

Walker, Elizabeth (AIR)

From: DeVore, Susan
Sent: Thursday, April 23, 2009 2:05 PM
To: Walker, Elizabeth (AIR)
Subject: FW: FGTC Compressor Stations in FL

Susan DeVore, P.E.
Bureau of Air Regulation
New Source Review
Telephone (850) 921-8968

From: Wait, Charles [mailto:Charles.Wait@SUG.com]
Sent: Tuesday, April 14, 2009 9:26 AM
To: DeVore, Susan
Subject: RE: FGTC Compressor Stations in FL

Susan,

I think we should add the blue language to better reflect the federal requirement. FGT supports testing the turbine annually since that is the state rule and frankly it would confuse folks to not test a turbine annually. All FGT is attempting to do is to place the 14 month window into the permit in the event the unit's last test exceeded 75% of the NSPS standard. Without the reference to the 14 months FGT and in the event the unit's emissions was higher than 75%, FGT feels like operating personnel would not remember the federal requirement unless spelled out in the permit. However, if the DEP feels like the inclusion of the phrasing in blue countermands the annual test requirement, FGT proposes to remove the 14 month language altogether. As currently proposed, the 14 month window is more restrictive than both federal and state requirements.

Each subsequent compliance test shall be conducted no more than 14 calendar months following the previous performance test if the turbine's NOx emissions exceeded 75% of the NSPS Standard (18 ppm) on the previous performance test.

I hope this helps clarify our request.

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From: DeVore, Susan [mailto:Susan.DeVore@dep.state.fl.us]
Sent: Tuesday, April 14, 2009 7:12 AM
To: Wait, Charles
Subject: RE: FGTC Compressor Stations in FL

7. Initial Compliance Tests: Each combustion turbine shall be tested to demonstrate initial compliance with the emission standards for CO, NO_x, and visible emissions. The initial tests shall be conducted within 60 days after

achieving permitted capacity, but not later than 180 days after initial startup of the combustion turbine. Pursuant to Rule 62-310(2), F.A.C., permitted capacity is defined as 90% to 100% of the maximum operation rate (heat input rate) allowed by the permit. Pursuant to 40 CFR 60.4400, the performance tests must be done at any load condition within plus or minus 25% of peak load. The NO_x performance tests shall consist of three, 1-hour test runs. The CO performance tests shall be conducted concurrently with the NO_x performance tests at peak load. Actual SO₂ emissions shall be reported based on the current typical fuel sulfur content and actual natural gas firing rate for each test run. [Rules 62-4.070(3) and 62-297.310(7)(a)1, F.A.C.; and 40 CFR 60.8 and 40 CFR 60.4400]

8. **Annual Compliance Tests:** During each federal fiscal year (October 1 - September 30), each combustion turbine shall be tested to demonstrate compliance with the emission standards for CO, NO_x, and visible emissions. Each subsequent compliance test shall be conducted no more than 14 calendar months following the previous performance test. CO and NO_x emissions shall be tested concurrently at permitted capacity. Actual SO₂ emissions shall be reported based on the current typical fuel sulfur content and actual natural gas firing rate for each test run. [Rules 62-4.070(3) and 62-297.310(7)(a)4, F.A.C.; and 40 CFR 60.4400]

Annual testing is the state requirement. We added no more than 14 months per the federal rule. The federal rule relaxes it to every 2 years with adequate test results, but the state requires annual testing. Do the above conditions satisfy you knowing that? Thanks.

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From: Wait, Charles [mailto:Charles.Wait@SUG.com]

Sent: Monday, April 13, 2009 1:58 PM

To: DeVore, Susan

Subject: RE: FGTC Compressor Stations in FL

First, the following lays out the annual subsequent test requirement and the 14 month "not to exceed" requirement.

§60.4400 How do I conduct the initial and subsequent performance tests, regarding NO_x?

- (a) You must conduct an initial performance test, as required in §60.8. Subsequent NO_x performance tests shall be conducted on an annual basis (no more than 14 calendar months following the previous performance test).

EPA did all of us a favor by relaxing the requirement for non- water/steam injected sources in the following:

§60.4340 How do I demonstrate continuous compliance for NO_x if I do not use water or steam injection?

- (a) If you are not using water or steam injection to control NO_x emissions, you must perform annual performance tests in accordance with §60.4400 to demonstrate continuous compliance. If the NO_x emission result from the performance test is less than or equal to 75 percent of the NO_x emission limit for the turbine, you may reduce the frequency of subsequent performance tests to once every 2 years (no more than 26 calendar months following the previous performance test). If the results of any subsequent performance test exceed 75 percent of the NO_x emission limit for the turbine, you must resume annual performance tests.

EPA allow the relaxation of the requirement in the event that the initial and subsequent testing demonstrates NO_x emission less than 75% of the standard or 18 ppm. FGT fully expects the unit emission rates to be significantly less than 18ppm but are requesting the change to remain consistent with the NSPS.

Hope this helps

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From: DeVore, Susan [mailto:Susan.DeVore@dep.state.fl.us]
Sent: Monday, April 13, 2009 10:57 AM
To: Wait, Charles
Subject: FGTC Compressor Stations in FL

Charles,
I read the rule and didn't see the connection, what did you find when you came back to the office?
Susan

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