

Walker, Elizabeth (AIR)

From: DeVore, Susan
Sent: Thursday, April 23, 2009 2:03 PM
To: Walker, Elizabeth (AIR)
Subject: FW: Comments Station 12

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From: Wait, Charles [mailto:Charles.Wait@SUG.com]
Sent: Wednesday, February 18, 2009 4:32 PM
To: DeVore, Susan
Subject: Comments Station 12

Owner/Company Name: FLORIDA GAS TRANSMISSION COMPANY
Facility Name: COMPRESSOR STATION Number12
Project Number: 1130037-011-AC
Permit Status: DRAFT
Permit Activity: CONSTRUCTION
Processor: Susan DeVore

Susan,

FGT has a couple comments for your consideration on the draft permit.

Condition 8 "Initial Compliance Tests" of the permit states, "The initial NO_x performance tests shall be conducted at approximately four evenly spaced points between the minimum normal operating load and 100% of peak load. Each of the three low-load NO_x performance tests shall consist of three, 20-minute test runs. The peak load NO_x performance test shall consist of three, 1-hour test runs."

This draft permit language seems to be a holdover from NSPS Subpart GG. Subpart KKKK revises the test load points for the initial compliance test of natural gas fired turbine units. Section 60.4400 (b) states that "The performance test must be done at any load condition within plus or minus 25 percent of 100 percent of peak load. You may perform testing at the highest achievable load point, if at least 75 percent of peak load cannot be achieved in practice. You must conduct three separate test runs for each performance test. The minimum time per run is 20 minutes."

FGT proposes that the peak load definition be 90-100% of rated capacity to remain consistent with current agency policy. With this in mind FGT suggests the following be substituted into the condition, "The initial NO_x performance tests shall be conducted within 90-100% of rated capacity and shall consist of three 20-minute test runs."

Condition 9 "Annual Compliance Tests" requires an annual emissions test during the federal fiscal year. FGT suggests an additional phrase be added to the condition so that this permit condition reflects the requirements of Subpart KKKK. §60.4340 states for turbines not using water injection and relying on emission testing to demonstrate compliance with the standard, "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.” With regard to annual emissions testing, §60.4400 states “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).”

FGT respectfully suggested that the following revision be made to the draft permit language, “During each federal fiscal year (October 1 - September 30) But not exceeding 14 months from a previous test where NO_x emissions were greater than 75% of the NO_x emissions standard (40CFR 60.4400 (a)), the combustion turbine shall be tested to demonstrate compliance with the emission standards for CO, NO_x, and visible emissions.”

Thank you for your consideration

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