

Check Sheet

Company Name: Florida Gas Transmission  
Permit Number: General  
PSD Number: \_\_\_\_\_  
Permit Engineer: \_\_\_\_\_

**Application:**

- Initial Application
  - Incompleteness Letters
  - Responses
  - Waiver of Department Action
  - Department Response
  - Other

**Cross References:**

- ~~AC 05 - 229322~~
- ~~AC 09 - 229441~~
- ~~AC 29 - 228821~~
- ~~AC 50 - 229440~~
- ~~AC 50 - 230129 PSDFC-203~~
- ~~AC 62 - 229319 PSDFC-202~~
- AC 04 - 189459
- AC 05 - 189665
- AC 05 - 229322
- AC 09 - 229441
- AC 29 - 228821
- AC 42 - 189459
- AC 48 - 189456
- AC 50 - 229440
- AC 56 - 189457
- AC 50 - 230129 PSDFC-203
- AC 57 - 188869
- AC 62 - 229319 PSDFC-202
- AC 62 - 189439
- AC 67 - 189220

**Intent:**

- Intent to Issue
- Notice of Intent to Issue
- Technical Evaluation
- BACT or LAER Determination
- Unsigned Permit
- Correspondence with:
  - EPA
  - Park Services
  - Other
- Proof of Publication
  - Petitions - (Related to extensions, hearings, etc.)
  - Waiver of Department Action
  - Other

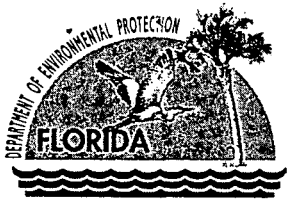
**Final**

**Determination:**

- Final Determination
- Signed Permit
- BACT or LAER Determination
- Other

**Post Permit Correspondence:**

- Extensions/Amendments/Modifications
- Other



# Department of Environmental Protection

Lawton Chiles  
Governor

Northwest District  
160 Governmental Center  
Pensacola, Florida 32501-5794

Virginia B. Wetherell  
Secretary

OCTOBER 31, 1995

Allan Weatherford, REM  
Division Environmental Specialist  
Florida Gas Transmission Company  
Post Office Box 945100  
Maitland, Florida 32794-5100

*Teresa - Are these changes consistent with AIC's? I'm sure they are - "I hope they are." al*

Dear Mr. Weatherford:

This is in response to your letter dated September 6, 1995 regarding the amending of the following operating permits for your transmission stations:

Source ID#	Station Name	Permit	City
10PEN57003701	12	AO57-191323	Munson
10PEN67000501-05	13	AO67-191328	Caryville
10TLH20002901	14	AO20-191330	Quincy

This letter amends the air permits listed above as follows:

- Specific Condition No. 16 and 17 (5% opacity limit) is deleted.
- Specific Condition No. 18 (NOx and CO test) is deleted.
- Specific Condition No. 20 is amended:

From: An annual operating report (DEP Form 17-1.202(6) attached) shall be submitted by March 1 of each year. The attached form shall be reproduced by the permittee and used for future annual submittals. Results of NOx and CO emissions testing will be combined with operating hours to calculate the annual emission.

To: An annual operating report for air pollutant emitting facility, (DEP Form 2-210.990(5) attached) shall be submitted by March 1 of each year. A copy of the form and instructions may be obtained from the Department of Environmental Protection, Northwest District Air

Resources Management Program, (904) 444-8364. [FAC Rule 62-210.370].

Please make the appropriate changes to the air operating permits listed above and attach a copy of this letter to them.

If you have any questions or comments, please contact Andy Allen of this office at (904) 444-8364.

Sincerely,



Ed K. Middleswart, P.E.  
Air Program Administrator  
Air Resources Management

EKM:asc

cc: DEP Division of Air Resources Management, Tallahassee

--ATTENTION MAIL ROOM--  
PLEASE ROUTE THIS  
DOCUMENT TO:  
John Brown (Permits) + Standards  
Name of Individual/Office  
MS 5505  
Mail Station Number

I N T E R O F F I C E M E M O R A N D U M

Date: 02-Nov-1995 02:28pm EST  
From: Rita Felton JAX  
FELTON\_R@A1@JAX1  
Dept: Northeast District Office  
Tel No: 904/448-4310 Ext. 237  
SUNCOM:

TO: Andy Allen PEN ( ALLEN\_A@A1@PNS1 )  
TO: Jim McDonald TPA ( MCDONALD\_J@A1@TPA1 )  
TO: John B. Turner ORL ( TURNER\_JB@A1@ORL1 )  
TO: Art Lyall FTM ( LYALL\_A@A1@FTM1 )  
TO: Teresa Heron TAL ( HERON\_T@A1@DER )

Subject: Florida Gas Transmission

Hello everyone,

Recently, I received, as I'm sure many of you also received, a request from Florida Gas Transmission concerning specific conditions in their permits. Basically, the request is to remove from the permits the specific conditions that have maximum allowable emissions limits that are based on emissions factors and not rule based.

Theses permits are operation permits that were a result of a consent order concerning the old compressor stations that were installed prior to EPA/NSPS requirements. Therefore, to my knowledge, a construction permit did not exists for these units and the changes are to be handled in the Districts.

I am of the belief that if it is not ruled based, then it should not be in the permit unless it was for toxic purposes, PSD, etc.

I am curious to know how you handled this situation. Since this company has several facilities throughout the state, I believe that we should be as consistent as possible.

Please let me know as soon as possible.

Thank you.

Rita

I N T E R O F F I C E   M E M O R A N D U M

**Date:** 03-Nov-1995 08:47am EST  
**From:** Andy Allen PEN  
ALLEN\_A@A1@PNS1  
**Dept:** Northwest District Offi  
**Tel No:** 904/444-8300  
**SUNCOM:**

**TO:** Rita Felton JAX ( FELTON\_R@A1@JAX1 )  
**CC:** Jim McDonald TPA ( MCDONALD\_J@A1@TPA1 )  
**CC:** John B. Turner ORL ( TURNER\_JB@A1@ORL1 )  
**CC:** Art Lyall FTM ( LYALL\_A@A1@FTM1 )  
**CC:** Teresa Heron TAL ( HERON\_T@A1@DER )

**Subject:** RE: Florida Gas Transmission

Rita,

We agree with you in the NWD, therefore, we amended their permit to delete the specific conditions per their request.

Andy

I N T E R O F F I C E M E M O R A N D U M

**Date:** 03-Nov-1995 09:23am EST  
**From:** Art Lyall FTM  
LYALL\_A@A1@FTM1  
**Dept:** South District Office  
**Tel No:** 941/332-6975  
**SUNCOM:**

**TO:** Rita Felton JAX ( FELTON\_R@A1@JAX1 )  
**CC:** Andy Allen PEN ( ALLEN\_A@A1@PNS1 )  
**CC:** Jim McDonald TPA ( MCDONALD\_J@A1@TPA1 )  
**CC:** John B. Turner ORL ( TURNER\_JB@A1@ORL1 )  
**CC:** Teresa Heron TAL ( HERON\_T@A1@DER )

**Subject:** RE: Florida Gas Transmission

We have no gas units (to my knowledge) in the South District. Any time we find emission limits in a permit, that is not a result of a construction permit condition, it is dropped. If we can not justify it by rule, or by applicant request, it should not be in the permit.

I have to check up on Highlands County, since I remember some facilities have permits to use natural gas or propane as fuels. If there is a pipeline there we should have permitted it.

[Jim McDonald: Do you remember any in Highlands County when it was in your district?]

Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1.  Addressee's Address
2.  Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:  
 Mr. V. Duane Pierce, AOS  
 Phase III Expansion Project  
 Ha. Gas Transmission  
 P O BOX 1188  
 Houston, TX 77251-1188

4a. Article Number  
 Z 392 979 004

4b. Service Type  
 Registered  Insured  
 Certified  COD  
 Express Mail  Return Receipt for Merchandise

7. Date of Delivery  
 JUN 26 1995

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)  
 Chris Pullman

PS Form 3811, December 1991 U.S. GPO: 1993-352-714

**DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service.

Z 392 979 004



**Receipt for Certified Mail**

No Insurance Coverage Provided  
 Do not use for International Mail  
 (See Reverse)

PS Form 3800, March 1993

Sent to V. Duane Pierce	
Street and No. Ha GAS	
P.O., State and ZIP Code Houston, TX	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date 14 6-21-95	
Rev. to Compressor Stations	



# Department of Environmental Protection

Lawton Chiles  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

June 20, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. V. Duane Pierce  
Air Quality Supervisor  
Phase III Expansion Project  
Florida Gas Transmission Company  
Post Office Box 1188  
Houston, Texas 77251-1188

Dear Mr. Pierce:

RE: Request for Air Construction Permit Revisions to  
FGT Compressor Stations:

AC57-188869	Station No. 12, Santa Rosa County
AC67-189220	Station No. 13, Washington County
AC62-189439	Station No. 15, Taylor County
AC62-229319	& PSD-FL-202, Station No. 15, Taylor County
AC04-189454	Station No. 16, Bradford County
AC42-189455	Station No. 17, Marion County
AC48-189456	Station No. 18, Orange County
AC05-189665	Station No. 19, Brevard County
AC05-229322	Station No. 19, Brevard County
AC56-189457	Station No. 20, St. Lucie County
AC56-230129	& PSD-FL-203, Station No. 20, St. Lucie County
AC50-229440	Station No. 21, Palm Beach County
AC09-229441	Station No. 26, Citrus County
AC29-228821	Station No. 30, Hillsborough County

The Department is in receipt of your letter dated May 3, 1995, requesting to use Method 19 (stoichiometric calculation using F-Factors) to calculate exhaust flow rate instead of using Method 1 through 4 (use of Pitot tube) and to add a paragraph to adjust the testing schedule of Phase III engines so that it coincides with the testing schedule of the Phase II engines. The Bureau has evaluated your requests and determines the following:

1. Pursuant to Rule 62-297.620, F.A.C., FGT needs to apply for an approval of an Alternate Sampling Procedure (ASP) in order to use Method 19 instead of Method 1- 4. However, if the proposed request only purpose is to provide a procedure for expressing measured NOx



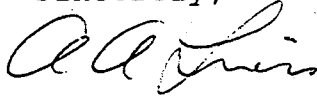
Mr. V. Duane Pierce  
June 20, 1995  
Page Two

concentrations as hourly mass emissions through the use of EPA Method 19; the requested amendment need to be reworded before the permits can be revised.

2. To approve the testing schedule of Phase III engines to coincide with the testing schedule of Phase II engines. Thereafter, annual determination of compliance will be performed as indicated in each operating permit.

If you have any questions on the Alternate Standard Procedure (ASP) requirements, please call Mr. Mike Harley at (904) 488-6140 or call Ms. Teresa Heron at (904) 488-1344 or write to me at the above address.

Sincerely,



A. A. Linero, P.E.  
Administrator  
New Source Review Section

AL/th/t

Enclosure: Mr. V. Duanne Pierce's letter of May 3, 1995

cc: Ed Middleswart, NWD  
Robert Leetch, NED  
Charles Collins, CD  
Isidore Goldman, SED  
Jerry Campbell, EPCHC  
Alan Weatherford, FGTC  
Barry Andrews, ENRS

Is your RETURN ADDRESS completed on the reverse side?

<b>SENDER:</b> • Complete items 1 and/or 2 for additional services. • Complete items 3, and 4a & b. • Print your name and address on the reverse of this form so that we can return this card to you. • Attach this form to the front of the mailpiece, or on the back if space does not permit. • Write "Return Receipt Requested" on the mailpiece below the article number. • The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
3. Article Addressed to: Mr. V. Duane Pierce, AQS Phase III Exp. Project H Gas Transmission Co. P. O. Box 1188 Houston, TX 77251-1188		4a. Article Number Z 311 902 902	
5. Signature (Addressee)		4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise	
6. Signature (Agent)		7. Date of Delivery JUN - 2 1995	
8. Addressee's Address (Only if requested and fee is paid)			

Thank you for using Return Receipt Service.

PS Form 3811, December 1991    \*U.S. GPO: 1993-352-714    DOMESTIC RETURN RECEIPT

Z 311 902 902



**Receipt for Certified Mail**  
 No Insurance Coverage Provided  
 Do not use for International Mail  
 (See Reverse)

PS Form 3800, March 1993

Sent to Duane Pierce	
Street and No. H Gas Trans	
P. O. State and ZIP Code Houston, TX	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	5-30-95



# Department of Environmental Protection

Lawton Chiles  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

May 30, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. V. Duane Pierce  
Air Quality Supervisor  
Phase III Expansion Project  
Florida Gas Transmission Company  
Post Office Box 1188  
Houston, Texas 77251-1188

Dear Mr. Pierce:

Re: Request for Extensions to Air Construction Permits  
AC 62-229319/PSD-FL-202-Taylor County  
AC 05-229322-Brevard County  
AC 56-230129/PSD-FL-203-St. Lucie County  
AC 50-229440-Palm Beach County  
AC 09-229441-Citrus County  
AC 29-228821-Hillsborough

The Department is in receipt of your letter dated April 20, requesting to extend the expiration date of the above mentioned permits. The Bureau has evaluated your request and agrees to extend the expiration date of the permits as follows:

Expiration Date:

From: July 30, 1995  
To: January 30, 1996

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. Petitioner

Mr. V. Duane Pierce  
May 30, 1995  
Page Two

shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information:

- (a) The name, address and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,
- (g) A statement of the relief sought by petitioner, stating precisely the action the petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the amendment request/application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this amendment in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

Mr. V. Duane Pierce  
May 30, 1995  
Page Three

A copy of this letter shall be filed with the referenced permits and become a part of the permits.

Sincerely,



Howard L. Rhodes, Director  
Division of Air Resources  
Management

HLR/th/t

Enclosure: Mr. V. Duane Pierce's letter of April 20, 1995

cc: Ed Middleswart, NWD  
Robert Leetch, NED  
Charles Collins, CD  
Isidore Goldman, SED  
Jerry Campbell, EPCHC  
Alan Weatherford, FGTC  
Barry Andrews, ENRS  
Jim Stormer, PBCHU



**Florida Gas Transmission Company**

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

RECEIVED

APR 26 1995

April 20, 1995

Mr. C. H. Fancy, P.E., Chief  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
2600 Blairstone Road  
Tallahassee, Florida 32399-2400

Bureau of  
Air Regulation

RE: Extension of Construction Permits

Air Permit No. AC 62-229319/PSD-FL-202  
FGT Compressor Station No. 15, Taylor County

Air Permit No. AC 05-229322  
FGT Compressor Station No. 19, Brevard County

Air Permit No. AC 56-230129/PSD-FL-203  
FGT Compressor Station No. 20, St. Lucie County

Air Permit No. AC 50-229440  
FGT Compressor Station No. 21, Palm Beach County

Air Permit No. AC 09-229441  
FGT Compressor Station No. 26, Citrus County

Air Permit No. AC 29-228821  
FGT Compressor Station No. 30, Hillsborough County

Dear Mr. Fancy:

Florida Gas Transmission Company (FGT) requests an extension for each of the above referenced air construction permits to a date 60 days after the due date for the Title V permit application for the facility. A non-Title V operating permit application for each of the facilities was submitted on 31 March 1995.

If you have any questions or need additional information, please call me at (713) 646-7323 or Mr. Allan Weatherford at (407) 875/5816.

Sincerely,

V. Duane Pierce, Ph.D.  
Air Quality Supervisor  
Phase III Expansion Project



3755  
2223

# Florida Gas Transmission Company

P. O. Box 945100 Maitland, Florida 32794-5100 (407) 875-5800

0102982

May 12, 1995

Ms. Clair Fancy  
Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Dear Ms. Fancy:

**RE: Florida Gas Transmission Company  
Air Permit Processing Fees for Extension Permits  
C/S's 15, 19, 20, 21, 26, and 30**

In response to your May 2 letter, attached is our check in the amount of \$300 (\$50 for each station) to cover the processing fee for permit extensions for the above-referenced compressor stations.

Please call me at 407-875-5816 if necessary.

Sincerely,

Allan Weatherford, R.E.M.  
Division Environmental Specialist

RECEIVED  
MAIL ROOM  
1995 MAY 16 PM 3:08

bc  
aw051295  
attach

- c Duane Pierce
- C/S 15 - Sonny Beets
- C/S 19 - Riley Jackson
- C/S 20 - Allan Vollmer
- C/S 21 - Alan France
- C/S 26 - David Gaines
- C/S 30 - Charlie Thompson

**BEST AVAILABLE COPY**

CHECK NO.  
0622504192

FLORIDA GAS TRANSMISSION COMPANY  
P.O. BOX 1188  
HOUSTON, TEXAS 77251-1188

DATE OF CHECK  
May 12, 1995

0102982



PAY EXACTLY Three Hundred Dollars & 00/100----- DOLLARS 300.00  
This check is VOID unless printed on BLUE background

PAY TO THE ORDER OF Florida Dept of Environmental Protection  
Twin Towers Office Bldg  
2600 Blair Stone Rd  
Tallahassee FL 32399-2400

*Alfred H. [Signature]*

NOT VALID OVER \$5,000 UNLESS COUNTERSIGNED

UNITED BANK OF GRAND JUNCTION



CHECK NO.

REMITTANCE STATEMENT

VOUCHER NO.	INVOICE DATE	INVOICE NUMBER	PURCHASE ORDER	AMOUNT		
				GROSS	DISCOUNT	NET
		Air Permit Extension Fees @ \$50 each (6 stations = \$300)				
		C/S 15 - Perry, FL				
		C/S 19 - Melbourne, FL				
		C/S 21 - West Palm Beach, FL				
		C/S 26 - LeCanto, FL				
		C/S 30 - Plant City, FL				
		C/S 20 - Ft. Pierce, FL				

DEPOSITED  
 MAY 16 1995  
 10:30 AM

Special Instructions





# Florida Gas Transmission Company

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

# RECEIVED

MAY 8 1995

May 3, 1995

Bureau of  
Air Regulation

Mr. C. H. Fancy, P.E., Chief  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
2600 Blairstone Road  
Tallahassee, Florida 32399-2400

RE: Request for Revision to Air Permits

Air Permit No. AC 57-188869  
FGT Compressor Station No. 12, Sante Rosa County

Air Permit No. AC 67-189220  
FGT Compressor Station No. 13, Washington County

Air Permit No. AC 20-189438  
FGT Compressor Station No. 14, Gadsen County

Air Permit No. AC 62-189439  
FGT Compressor Station No. 15, Taylor County

Air Permit No. AC 62-229319/PSD-FL-202  
FGT Compressor Station No. 15, Taylor County

Air Permit No. AC 04-189454  
FGT Compressor Station No. 16, Bradford County

Air Permit No. AC 42-189455  
FGT Compressor Station No. 17, Marion County

Air Permit No. AC 48-189456  
FGT Compressor Station No. 18, Orange County

Air Permit No. AC 05-189665  
FGT Compressor Station No. 19, Brevard County

Air Permit No. AC 05-229322  
FGT Compressor Station No. 19, Brevard County

Air Permit No. AC 56-189457  
FGT Compressor Station No. 20, St. Lucie County

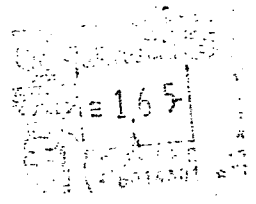
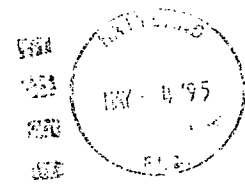
Air Permit No. AC 56-230129/PSD-FL-203  
FGT Compressor Station No. 20, St. Lucie County



**Florida Gas Transmission Company**  
An **ENRON/SONAT** Affiliate

P.O. Box 945100 Maitland, Florida 32794-5100

**CERTIFIED**  
P 880 802 538  
**MAIL**



5511

Mr. C.H. Fancy, P.E., Chief  
Bureau of Air Regulation  
Florida Dept. of Environmental Protection  
2600 Blairstone Road  
Tallahassee, FL 32399-2400

Air Permit No. AC 50-229440  
FGT Compressor Station No. 21, Palm Beach County

Air Permit No. AC 09-229441  
FGT Compressor Station No. 26, Citrus County

Air Permit No. AC 29-228821  
FGT Compressor Station No. 30, Hillsborough County

Dear Mr. Fancy:

Florida Gas Transmission Company (FGT) requests two revisions to the permits referenced above.

1. FGT requests that all of the permits be revised to allow the use of Method 19 (stoichiometric calculation using F-factors) to calculate exhaust flow rates instead of using Methods 1-4 (use of Pitot tube). Specifically, FGT proposes adding the following sentence to Specific Condition No. 8 of these permits.

**“Method 19 may be used in place of Methods 1, 2 and 3 or 3a to determine exhaust volumetric flow rates.”**

The reasons for this request are as follows:

- a. Method 19 is a USEPA method published in 40 CFR 60 Appendix A as an acceptable method for measuring exhaust flow rates.
- b. There are no regulations (e.g. NSPS or NESHAP) specifying that Methods 1-3 or 3A must be used on these sources or that Method 19 may not be used.
- c. The selection of Methods 1-4 to determine volumetric flow rate was an arbitrary decision by the permit engineer. Both approaches are applicable and acceptable.
- d. Method 19 is a simpler method to use compared to using Methods 1-4 and is therefore less prone to error.
- e. Method 19 can be expected to be a more accurate approach in some situations where marginal conditions may result in some flow disturbances that may affect the results using Methods 1-4.
- f. Method 19 is less expensive to use than Methods 1-4.
- g. Extensive data (60 tests) collected by FGT indicate that there are no significant differences between the two methods. The correlation between the pitot tube method and the Method 19 O<sub>2</sub> and CO<sub>2</sub> factors are extremely high with  $r = 0.9878$  and  $r = 0.9882$  respectively. In addition, the mean percent difference between the O<sub>2</sub> and CO<sub>2</sub> factors and the pitot tube method are only -1% and -2% respectively. See Attachment A.

2. FGT also requests that the annual testing of Phase III engines be scheduled to coincide with the testing of Phase II engines. FGT is willing to retest the Phase III engines a second time during 1995 in

order to adjust their testing schedule so that it coincides with the testing schedule of the Phase II engines. Specifically, FGT proposes that the following sentence be added to the Specific Condition No. 8.

**“The permittee may perform the first annual determination of compliance with the allowable emission limits at a date less than one year after the initial compliance determination. Annual determination of compliance will then be performed annually based on this earlier date.”**

This change would only apply to the Phase III permits listed below.

Air Permit No. AC 62-229319/PSD-FL-202  
FGT Compressor Station No. 15, Taylor County

Air Permit No. AC 05-229322  
FGT Compressor Station No. 19, Brevard County

Air Permit No. AC 56-230129/PSD-FL-203  
FGT Compressor Station No. 20, St. Lucie County

Air Permit No. AC 50-229440  
FGT Compressor Station No. 21, Palm Beach County

Air Permit No. AC 09-229441  
FGT Compressor Station No. 26, Citrus County

Air Permit No. AC 29-228821  
FGT Compressor Station No. 30, Hillsborough County

A check for \$250.00 has been attached for the application fee.

FGT appreciates your assistance in this matter. If you have any questions or need additional information, please call me at (713) 646-7323 or Mr. Allan Weatherford at (407) 875/5816.

Sincerely,



V. Duane Pierce, Ph.D.  
Air Quality Supervisor  
Phase III Expansion Project

Allan Weatherford  
P O Box 945100  
Maitland, FL  
32794-5100

BEST AVAILABLE COPY

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- Print
- return this card to the post office
- Attach this form to the front of the mailpiece, or otherwise, if the post office does not permit.
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Receive the  
an extra

Addressee's Address

Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:  
 Duane Pierce, Ph.D.  
 Air Quality Supervisor  
 Fla. Gas Trans. Co.  
 P.O. Box 1188  
 Houston, TX 77251-1188

4a. Article Number  
 Z 311 902 928

4b. Service Type  
 Registered  Insured  
 Certified  COD  
 Express Mail  Return Receipt for Merchandise

7. Date of Delivery  
 MAY 09 1995

5. Signature (Addressee)  
 6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3800

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Z 311 902 928



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 (See Reverse)

PS Form 3800, March 1993

Sent to	V. Duane Pierce
Street and No.	FIA. GAS
P.O. State and ZIP code	Houston, TX
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	5-4-95

\$50 fee



# Department of Environmental Protection

Lawton Chiles  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

May 2, 1995

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

V. Duane Pierce, Ph.D.  
Air Quality Supervisor  
Florida Gas Transmission Company  
P. O. Box 1188  
Houston, Texas 77251-1188

Dear Dr. Pierce:

The Bureau of Air Regulation received your April 20, 1995 request to extend permits issued to Florida Gas Transmission Company. Before we can begin processing your request, we will need a \$50 processing fee for each permit extension. If you have any questions, please call Patty Adams at (904)488-1344.

Sincerely,

for C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/pa

cc: Teresa Heron



# Florida Gas Transmission Company

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

RECEIVED

APR 26 1995

April 20, 1995

Mr. C. H. Fancy, P.E., Chief  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
2600 Blainstone Road  
Tallahassee, Florida 32399-2400

Bureau of  
Air Regulation

RE: Extension of Construction Permits

Air Permit No. AC 62-229319/PSD-FL-202  
FGT Compressor Station No. 15, Taylor County

Air Permit No. AC 05-229322  
FGT Compressor Station No. 19, Brevard County

Air Permit No. AC 56-230129/PSD-FL-203  
FGT Compressor Station No. 20, St. Lucie County

Air Permit No. AC 50-229440  
FGT Compressor Station No. 21, Palm Beach County

Air Permit No. AC 09-229441  
FGT Compressor Station No. 26, Citrus County

Air Permit No. AC 29-228821  
FGT Compressor Station No. 30, Hillsborough County

Dear Mr. Fancy:

Florida Gas Transmission Company (FGT) requests an extension for each of the above referenced air construction permits to a date 60 days after the due date for the Title V permit application for the facility. A non-Title V operating permit application for each of the facilities was submitted on 31 March 1995.

If you have any questions or need additional information, please call me at (713) 646-7323 or Mr. Allan Weatherford at (407) 875/5816.

Sincerely,

V. Duane Pierce, Ph.D.  
Air Quality Supervisor  
Phase III Expansion Project



**Florida Gas Transmission Company**

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

March 31, 1995

Mr. C. H. Fancy, P.E., Chief  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
2600 Blirstone Road  
Tallahassee, Florida 32399-2400

RECEIVED  
APR 05 1995  
Bureau of  
Air Regulation

RE: Operating Permit Applications

Air Permit No. AC 62-229319/PSD-FL-202  
FGT Compressor Station No. 15, Taylor County

Air Permit No. AC 05-229322  
FGT Compressor Station No. 19, Brevard County

Air Permit No. AC 56-230129/PSD-FL-203  
FGT Compressor Station No. 20, St. Lucie County

Air Permit No. AC 50-229440  
FGT Compressor Station No. 21, Palm Beach County

Air Permit No. AC 09-229441  
FGT Compressor Station No. 26, Citrus County

Air Permit No. AC 29-228821  
FGT Compressor Station No. 30, Hillsborough County

Dear Mr. Fancy:

Enclosed are copies of applications for air operating permits for the facilities constructed under the above referenced Air Construction Permits. Originals have been submitted to the appropriate District or local program offices.

We will be requesting an extension for our construction permits to a date 60 days past the due date for our Title V permit application. This will be done through the Department of Environmental Protection in Tallahassee since the Construction Permits were issued from that office.



If you have any questions or need further information, please call me at (713) 646-7323 or Mr. Allan Weatherford at (407) 875-5816.

Sincerely,



V. Duane Pierce, Ph.D.  
Air Quality Supervisor  
Phase III Expansion Project

cc: Allan Weatherford - FGT - w/o attachments

FGT Compressor Station No. 15 File - w/o attachments

FGT Compressor Station No. 19 File - w/o attachments

FGT Compressor Station No. 20 File - w/o attachments

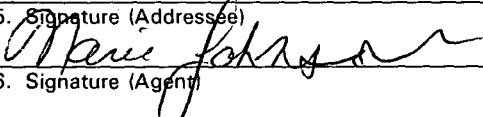
FGT Compressor Station No. 21 File - w/o attachments

FGT Compressor Station No. 26 File - w/o attachments

FGT Compressor Station No. 30 File - w/o attachments

FILE: TALOPAPP.doc

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<b>SENDER:</b> <ul style="list-style-type: none"> <li>Complete items 1 and/or 2 for additional services.</li> <li>Complete items 3, and 4a &amp; b.</li> <li>Print your name and address on the reverse of this form so that we can return this card to you.</li> <li>Attach this form to the front of the mailpiece, or on the back if space does not permit.</li> <li>Write "Return Receipt Requested" on the mailpiece below the article number.</li> <li>The Return Receipt will show to whom the article was delivered and the date delivered.</li> </ul>		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.
3. Article Addressed to: Mr. Allan Weatherford Compliance Environmentalist Florida Gas Transmission Company P. O. Box 945100 Maitland, Florida 32794-5100	4a. Article Number P 872562 486	
5. Signature (Addressee)  6. Signature (Agent)		4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
7. Date of Delivery		8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.

PS Form 3811, December 1991    ★U.S. GPO: 1992-323-402    **DOMESTIC RETURN RECEIPT**

P 872 562 486



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 No Insurance Coverage Provided  
 Do not use for International Mail  
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Sent to	
Mr. Allan Weatherford	
Street and No.	
P. O. Box 945100	
P.O., State and ZIP Code	
Maitland, Florida 32794-5100	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	
Mailed: 10/26/93	
Request for Permit Extension	
Mobile Field Compressor	

PS Form 3800, JUNE 1991



Lawton Chiles  
Governor

# Florida Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

October 19, 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Allan Weatherford  
Compliance Environmentalist  
Florida Gas Transmission Company  
P. O. Box 945100  
Maitland, Florida 32794-5100

Dear Mr. Weatherford:

RE: Request for Permit Exemption  
Mobile Field Compressor

The Department has reviewed your September 23, 1993, letter requesting that the Mobile Field Compressor, Waukesha Model 6-LRORB-13, be exempted from the air permit requirements of the Florida Department of Environmental Protection. This unit is used to lower the pressure at various locations on the gas transmission line. Our findings are:

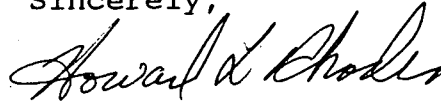
1. The compressor has a rated horsepower capacity of 351 hp to 439 hp (maximum).
2. Emission factors are 12 gr NO<sub>x</sub>/bhp-hr and 6 gr CO/bhp-hr.
3. Operating time is recorded at approximately 56 hours/year.

Based on the above findings, the Department will exempt this source from the air permitting requirements per F.A.C. Rule 17-4.040(1)(b) because any air pollutant emitted will not be in significant quantities to contribute to the air pollution problems within the state. This source will be limited to operate not more than 168 hours per year.

Mr. Allan Weatherford  
October 19, 1993  
Page Two

Any questions should be directed to Mr. Preston Lewis, Bureau of  
Air Regulation, at (904)488-1344.

Sincerely,



Howard L. Rhodes  
Director  
Division of Air Resources  
Management

HLR/TH/bjb

cc:



# Florida Gas Transmission Company

P. O. Box 945100 Maitland, Florida 32794-5100 (407) 875-5800

September 23, 1993

Certified Mail - Return Receipt  
Requested

**RECEIVED**

**SEP 27 1993**

Division of Air  
Resources Management

Mr. Clair Fancy, P. E.  
Chief, Bureau of Air Regulation  
Florida Department of Environmental  
Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Dear Mr. Fancy:

Re: Request for Permit Exemption

This letter is a follow up to your recent conversation with Barry Andrews, ENSR Consulting and Engineering, regarding the permitting requirements for a mobile field compressor operated by Florida Gas Transmission Company (FGTC).

The mobile field compressor, Waukesha Model 6-LRORB-13, is used to lower the pressure at various locations on the gas transmission line. The compressor has a rated horsepower of 351 hp, but is able to achieve a maximum of 439 hp. Over the last three years, the compressor has logged approximately 168 hours.

Given the small size of the mobile compressor (the rated horsepower of the compressor-engines at the compression stations range from 2400 hp to 4100 hp) and the limited operation, FGTC believes that the mobile field compressor is subject to exemption under Florida Administrative Code 17-4.040(1)(b).

Accordingly, FGTC requests that the Department provide confirmation that the mobile field compressor is, indeed, entitled to the permit exemption. Should the Department conclude that the compressor is not exempt, FGTC will make application for a permit as soon as possible.

Thank you for your assistance in this matter. Should you have any questions, please contact me at 407/875-5816.

Sincerely,

Allan Weatherford  
Compliance Environmentalist

AW0923a.swp

cc: Bernie Sandner                      Jame Dollar  
      Charlie Thompson                 ✓ Barry Andrews, ENSR