



Florida Gas Transmission Company

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

November 20, 2002

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BUREAU OF AIR REGULATION

CERTIFIED MAIL – RETURN RECEIPT

Mr. Clair H. Fancy, P.E.
Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Office Bldg.
2600 Blairstone
Tallahassee, FL 32399-2400

Reference: Facility: 01230034
Emission Unit No. 002
Compressor Station No. 15, Perry, Taylor County
Phase VI Expansion Project

Dear Mr. Fancy:

Subject: Request to Modify PM Emission Rate

Florida Gas Transmission Company (FGT) is requesting that an additional change be made as part of the recent application for a construction permit to increase horsepower of a Mars 100 compressor turbine at the above referenced facility as part of the Phase VI Expansion Project.

Estimates of particulate matter (PM) emissions for Engine No. 1506 (EU No. 002) have changed due to changes in emission factors provided by the U.S. Environmental Protection Agency (USEPA) since the original construction permit application for this engine was submitted. FGT is requesting that permitted PM emissions be revised to 1.68 lb/hr and 7.4 tpy based on the new USEPA emission factor of 0.04831 lb/MMBtu as given in the USEPA document AP-42, 5th Ed., July 2000, Table 3.2-1. The permitted heat rate for this engine is 34.85 MMBtu/hr.

PM Emissions Calculations

$0.04831 \text{ lb / MMBtu} * 34.85 \text{ MMBtu/hr} = 1.6836 \text{ lb/hr}$
 $1.68 \text{ lb/hr} * 8760 \text{ hr/yr} * 1 \text{ ton/2000 lb} = 7.4 \text{ tpy}$

FGT stresses that this does not represent any change in real emissions. This should only be considered a better estimate of the actual emissions than was originally used.

A Responsible Official signature page is enclosed.

If you have any questions or need additional information, please call me at (713) 646-7646 or Dr. Duane Pierce at (281) 373-5365.

Sincerely,

Marc Phillips

Marc Phillips
Director, Air Compliance

CC: Jim Thompson, Phase VI Tampa Office
Jake Krautsch, FGT
V. Duane Pierce, Ph.D., AQMcs, LLC
Compressor Station No. 15

J. Korman
C. Kirtz, NED

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: Richard Craig, Vice President, Southeast Operations
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Florida Gas Transmission Company Street Address: 1400 Smith Street City: Houston State: TX Zip Code: 77002
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (713) 646-6128 Fax:
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [], if so) or the responsible official (check here [X], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i> Signature: <u>Richard J. Craig</u> Date: <u>11-20-02</u>

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: Kevin McGlynn Registration Number: 50908
2. Professional Engineer Mailing Address: Organization/Firm: McGlynn Consulting Company Street Address: 1967 Commonwealth Lane City: Tallahassee State: FL Zip Code: 32303
3. Professional Engineer Telephone Numbers: Telephone: (850)380-5035 Fax: (850) 350-5001

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