



Florida Gas Transmission Company

August 23, 2001

Capital Projects Field Office, 111 Kelsey Lane, Ste. A., Tampa, FL 33619
813.655.7441 / 800.381.1477

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Jeff Koerner, P.E.
New Source Review Section
Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Office Bldg.
2600 Blairstone
Tallahassee, FL 32399-2400

RECEIVED

AUG 27 2001

BUREAU OF AIR REGULATION

Reference: Request for Additional Information Dated July 18, 2001
Project No. 1230034-007-AC
Compressor Station No. 15 (Taylor County), Phase V Modification

Dear Mr. Koerner:

Subject: Response to Request for Additional Information

The following is being sent in response to the above referenced Request for Additional Information.

1. *For compressor engine no. 1507 (gas turbine), please identify:*

- *The date of the initial performance test;*

Response: The date of the initial performance test was March 17, 1995.

- *The date of commencement of commercial operation;*

Response: The date of commencement of commercial operation was October 14, 1994.

- *Any emission factors used in this application that differ from the initial air construction permit application, and;*

Response: The emission factors used in this application that differ from the initial air construction permit application are listed below. These differences are due to changes in vendor provided emission factors and fuel use for the proposed new turbine configuration versus the original configuration and to changes in AP-

42 emission factors. Additionally, HAP emissions were not estimated in the original application.

Table 1. Changes in Emission Factors

Pollutant	Original Emission Factor	Source	New Emission Factor	Source	Comments
NO _x	16.14 lb/hr	Vendor	10.4 lb/hr	Vendor	Change reflects new engine size and better NO _x control technology
CO	11.71 lb/hr	Vendor	12.23 lb/hr	Vendor	Change reflects new engine size and new NO _x control technology
VOC	0.67 lb/hr	Vendor	0.35 lb/hr	Vendor	Change reflects new engine size and new NO _x control technology
PM	5 lb/MMscf	AP-42 Table 1.4-1	0.0066 lb/MMBtu	AP-42, Table 3.1-2a, 04/00	PM emission changes due to revised AP-42 emission factors and change in fuel use
SO ₂	10 grains/100 scf	Vendor (fuel use)	10 grains/100 scf	Vendor (fuel use)	Emissions estimated by material balance and vendor provided fuel use
HAPS	None	NA	0.0217 g/bhp-hr	Gas Research Institute HapCalc 3 software	HAP factors were not available at time of original application

- *Any emissions standards requested in this application that differ from the current Title V operation permit.*

Response: The following emission standard changes have been requested:

Table 2. Changes in Requested Standards

Emission Unit	Pollutant	Current Title V Standard	Requested New Standard
1507	NO _x	16.14 lb/hr (42 ppmv)	5.7 lb/hr (25 ppmv)
1507	SO ₂	3.61 lb/hr	3.05 lb/hr

Note: That the NO_x emission rate on the current 1507 has been reduced to 25 ppmv (~9.61 lb/hr) but the permitted lb/hr and ton per year emission rates have not been changed.

2. *For the facility, were any existing emissions units modified or new emissions units added after 1995?*

Response: No new emission units were added. The original turbine 1507, a Mars 90 T-12000S (12,600 bhp), was replaced by a Mars 90 T-13000S (12,600 bhp) in December 1997. The original turbine had NO_x emissions of 42 ppmv and the replacement unit had NO_x emissions of 25 ppmv. This first Mars 90 T-13000S replacement unit was replaced with an identical second unit in March 1998 due to bearing problems in the first. NO_x emissions of the second replacement unit were the same as the first replacement unit.

FGTC believes that the above responses do not constitute material changes to the application; therefore, a new certification statement by the authorized responsible official has not been included.

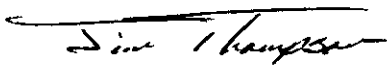
Additional Request: Ms. Hui Liang of the DEP Northeast District has indicated to Mr. Jake Krautsch that FGT should request that the particulate matter (PM) limits for the turbines be

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dropped from the permit. FGT, therefore, requests that PM emission limits not be included in the permit for these turbines.

If you have any questions or need additional information, please call me at (800) 381-1477 or Dr. Duane Pierce at (281) 373-5365.

Sincerely,



Jim Thompson
Project Manager, Environmental

CC: James Alexander, Phase V, w/o attachments
Dan Pribble, w/o attachments
Jim Thompson, Phase V
Jake Krautsch, FGT
V. Duane Pierce, Ph.D., AQMcs, LLC
Larry Parrish, Compressor Station No. 15