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Mr. A. A. Linero, P.E.
Administrator
New Source Review Section
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

SUBJECT: Custom Fuel Monitoring Schedule for Combustion Turbines
located at Florida Gas Transmission Company - #29228821
Compressor Stations 15, 26 and 30 -0570438-002-AC

Dear Mr. Linero: PSD-202 0170035-001-AC #09229441
#62229319

Thank you for your letter of September 11, 1998, regarding Florida Gas Transmission Company's request for approval of a custom fuel monitoring schedule proposed for combustion turbines operated by the company at the above referenced compressor stations. The natural gas fired turbines are subject to 40 C.F.R. Part 60, Subpart GG - Standards of Performance for Stationary Gas Turbines. Region 4 has concluded that the use of the proposed custom fuel monitoring schedule is acceptable because it is consistent with guidance that the U.S. Environmental Protection Agency (EPA) previously issued regarding such schedules. The approved custom fuel monitoring schedule is outlined in the following paragraph.

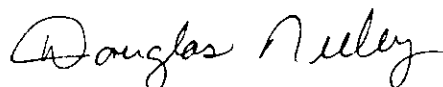
According to 40 C.F.R. 60.334(b)(2), owners and operators of stationary gas turbines subject to Subpart GG are required to monitor fuel nitrogen and sulfur content on a daily basis if a company does not have intermediate bulk storage for its fuel. 40 C.F.R. 60.334(b)(2) also contains provisions allowing owners and operators of turbines that do not have intermediate bulk storage for their fuel to request approval of custom fuel monitoring schedules that require less frequent monitoring of fuel nitrogen and sulfur content. In a memorandum dated August 14, 1987, the EPA Compliance Monitoring Branch provided guidance regarding

acceptable custom fuel monitoring provisions for natural gas fired turbines, and this memorandum also gave EPA regional offices the authority to approve custom fuel monitoring schedules for Subpart GG turbines.

Under the EPA guidance issued in 1987, the requirement to monitor the nitrogen content of pipeline quality natural gas was waived entirely since the Agency determined that this type of fuel does not contain any fuel-bound nitrogen that can cause NOx emissions. As an alternative to daily sulfur monitoring, the 1987 policy describes a three-stage process under which owners and operators of natural gas fired turbines can obtain approval to conduct sampling on a semiannual basis. In the first step of this process, the sulfur content of the fuel must be monitored twice a month for at least six months. If the results of this bimonthly monitoring verify compliance with the applicable sulfur limit and indicate little variability in the sulfur content of the fuel, the fuel sampling and analysis frequency can be reduced from a bimonthly to a quarterly basis. If six quarters of fuel monitoring data verify compliance with the applicable sulfur standard and indicate little variability in the sulfur content of the fuel, the sampling and analysis frequency can be reduced to a semiannual basis. Since the custom fuel monitoring approach Florida Gas Transmission Company included with their requests is identical to that outlined in the 1987 custom fuel monitoring guidance issued by EPA, Region 4 has no objections to approval of the proposed alternative for Compressor Stations 15, 26 and 30.

If you have any questions about the determination provided in this letter, please contact Mr. David McNeal of my staff at 404-562-9102.

Sincerely,



R. Douglas Neeley, Chief
Air and Radiation Technology
Branch
Air, Pesticides and Toxics
Management Division

cc: J. Heron

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B. Andrews, ENSR

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PS Form 3800, April 1995