



# Florida Gas Transmission Company

A Southern Union/El Paso Affiliate

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January 22, 2009

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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BUREAU OF AIR REGULATION

Ms. Susan C. DeVore, P.E.  
New Source Review Section  
Division of Air Resource Management  
Florida Department of Environmental Protection  
2600 Blair Stone Road, MS 5500  
Tallahassee, FL 32399-2400  
850-922-6979

Reference: Request for Additional Information Dated December 19, 2008  
Project No. 1230034-018-AC  
Compressor Station No. 15 (Taylor County), Phase VIII Modifications

Dear Ms. DeVore:

**Subject: Response to Request for Additional Information**

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

- 1. For each existing and proposed emergency generator, please provide the identification number, horsepower rating, fuel type, and hourly fuel consumption rate of each unit in million standard cubic feet of natural gas, or gallons of gasoline or gallons of diesel fuel.*

**Response:** FGT understands this request is for the department's assessment of a possible exemption for the installation of the proposed emergency generator at the station. FGT did not perform this analysis in its application due to the recent promulgation of the RICE NSPS (40 CFR 60, Subpart JJJJ). The proposed emergency generator will be manufactured and purchased after January 1, 2009, the effective date of the regulation for emergency use engines. Therefore, FGT is required by FAC to prepare a construction permit application due to the NSPS applicability. The requested information is provided below in Table 1.

**Table 1. Existing and Proposed Emergency Generators**

<b>Engine</b>	<b>Manufacturer/Model</b>	<b>Category</b>	<b>Rating (bhp)</b>	<b>Fuel Type</b>	<b>Fuel Rate (MMscf/hr)</b>
GEN03	Waukesha /L36GL	4 stroke rich	880	Natural Gas	0.005470
GEN04	Generac Model/SG150	4 stroke rich	223	Natural Gas	0.002395

2. *You state that engines in compliance with 40 CFR 60 Subpart JJJJ are considered to be in compliance with 40 CFR 63 Subpart ZZZZ. For these particular units and expected hours of operation please identify the applicable requirements of 40 CFR 60 Subpart JJJJ and 40 CFR 63 Subpart ZZZZ.*

**Response:** This proposed engine will be required to meet the requirements of Subpart JJJJ. Specifically,

- 60.4233(f)(4) and 60.4233(e) - Emissions are limited to the equivalent of
  - 2.0 gm/hp-hr NO<sub>x</sub>
  - 4.0 gm/hp-hr CO, and
  - 1.0 gm/hp-hr VOC
- 60.4243(b)(2)(i), 60.4243(c) –Operator must follow a written maintenance plan
- 60.4243(d) – Maintenance checks and readiness testing are limited to 100 hours per year.
- Initial performance testing must be completed within 60 days of achieving maximum production rate

With respect to, These engines will meet the requirements of the Subpart ZZZZ. 40 CFR 63.6590(c) states that units meet the requirements of this NESHAPS by meeting the requirements of NSPS 40 CFR 60 Subpart JJJJ.

A detailed list of requirements for 40 CFR 60 Subpart JJJJ is provided below in Table 2.

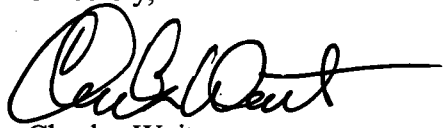
**Table 2. Applicability of 40 CFR 60 Subpart JJJJ**

<b>Applicability of New Source Performance Standards Subpart JJJJ</b>					
<b>Emission Standards</b>					
<b>Manufacturer</b>	<b>Model</b>	<b>Engine Type</b>	<b>Maximum Engine Power</b>	<b>Fuel</b>	
Generac	150SG	Emergency	223 bhp	Natural Gas	
<b>NSPS Regulation</b>	<b>Type Requirement</b>	<b>Pollutant</b>	<b>Maximum Engine Power</b>	<b>NSPS Emission Limits</b>	<b>Equipment Emissions</b>
Subpart JJJJ Table 1	Emission Standard	NO <sub>x</sub>	130 hp and greater	2.0 g/hp-hr	1.80 g/hp-hr
Subpart JJJJ Table 1	Emission Standard	CO	130 hp and greater	4.0 g/hp-hr	3.55 g/hp-hr
Subpart JJJJ Table 1	Emission Standard	VOC	130 hp and greater	1.0 g/hp-hr	0.29 g/hp-hr
<b>Additional Requirements Applicable to All Engines</b>					
<b>NSPS Regulation</b>	<b>Type Requirement</b>	<b>Requirement</b>			
§ 60.7	General Notification and Recordkeeping	<ol style="list-style-type: none"> <li>1) A notification of the date construction is commenced postmarked no later than 30 days after such date.</li> <li>2) A notification of the actual date of initial startup of a postmarked within 15 days after such date.</li> <li>3) Notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted. The notice shall be postmarked 60 days or as soon as practicable before the change is commenced.</li> <li>4) Maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.</li> <li>5) Maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other</li> </ol>			

<b>Applicability of New Source Performance Standards Subpart JJJ</b>		
		information required by this part recorded in a permanent form suitable for inspection. The file shall be retained for at least two years following the date of such measurements, maintenance, reports, and records.
§ 60.8	General Performance Testing	<ol style="list-style-type: none"> <li>1) Perform an initial performance test within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility</li> <li>2) Provide the Administrator at least 30 days prior notice of any performance test.</li> <li>3) Provide, or cause to be provided, performance testing facilities.</li> </ol>
§ 60.4237	Monitoring	Units built on or after January 1, 2011, and do not meet the standards applicable to non-emergency engines, the owner or operator must install a non-resettable hour meter
§ 60.4243(b)(2)(i)	Recordkeeping	Must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition,
§ 60.4245(a) and (d)	Recordkeeping	Must maintain records of all notifications submitted to comply with the subpart, all documentation supporting any notification, maintenance conducted on the engine and documentation that the engine meets the emission standards.
§ 60.4243(b)(2)(i)	Testing	Must conduct an initial performance test to demonstrate compliance.

If you have any questions or need additional information, please call me at (713) 989-7459.

Sincerely,



Charles Wait  
 Principal Engineer

CC: David Shellhouse w/o attachments  
 Kevin McGlynn, P.E.  
 Duane Pierce, AQMcS, LLC  
 Compressor Station No. 15