



Florida Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

December 9, 1993

Mr. Allan Weatherford
Compliance Environmentalist
Florida Gas Transmission Company
P.O. Box 94500
Maitland, Florida 32794-5100

Dear Mr. Weatherford:

RE: Request for Amendments and Extensions to Air Construction
Permits AC 57-188869, AC 67-189220, AC 20-189438,
AC 62-189439, AC 04-189454, AC 42-189455, AC 48-189456,
AC 05-189655, and AC 56-189457
Phase II - Florida Gas Transmission Company

The Department is in receipt of Mr. Barry Andrew's letter dated December 3, 1993, on behalf of your company, requesting to amend the above permits to use EPA Method 3A instead of EPA Method 3 for Gas Analysis. The Department has reviewed this request and has determined to amend the above mentioned permits as requested.

Specific Condition No. 8 of the above mentioned permits will be amended as follows:

SPECIFIC CONDITION NO. 8

FROM:

8. Compliance with the NO_x, SO₂, CO, VE, and VOC standards shall be determined by the following reference methods as described in 40 CFR 60, Appendix A (July 1, 1988) and adopted by reference in F.A.C. Rule 17-2.700.

- Method 1. Sample and Velocity Traverses
- Method 2. Volumetric Flow Rate
- Method 3. Gas Analysis
- Method 7E. Determination of Nitrogen Oxides Emissions from Stationary Sources
- Method 9. Determination of the Opacity of the Emissions from Stationary Sources
- Method 10. Determination of the Carbon Monoxide Emission from Stationary Sources
- Method 25. Determination of Total Gaseous Nonmethane Organic Emissions as Carbon

Mr. Allan Weatherford
December 9, 1993
Page Two

TO:

8. Compliance with the NO_x, SO₂, CO, VE, and VOC standards shall be determined by the following reference methods as described in 40 CFR 60, Appendix A (July 1, 1992) and adopted by reference in F.A.C. Rule 17-2.700.

- Method 1. Sample and Velocity Traverses
- Method 2. Volumetric Flow Rate
- Method 3A. Gas Analysis
- Method 7E. Determination of Nitrogen Oxides Emissions from Stationary Sources
- Method 9. Determination of the Opacity of the Emissions from Stationary Sources
- Method 10. Determination of the Carbon Monoxide Emission from Stationary Sources
- Method 25A. Determination of Total Gaseous Organic Concentrations Using a Flame Ionization Analyses

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. 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 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, Florida Statutes.

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;

Mr. Allan Weatherford
December 9, 1993
Page Three

(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;

(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 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, F.A.C.

This letter must be attached to the above mentioned permits and shall become a part of each permit.

Sincerely,



Howard Rhodes
Director
Division of Air Resources
Management

Attachment to be Incorporated

Mr. Barry Andrew's letter of December 3, 1993.

cc: E. Middleswart, NWD
Robert Leetch, NED
Charles Collins, CD
Isidore Goldman, SED
Duane Pierce, FGTC
Barry Andrews, ENSR

Mr. Allan Weatherford
December 9, 1993
Page Four

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this AMENDMENT and all copies were mailed by certified mail before the close of business on 12/21/93 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to
§120.52(11), Florida Statutes,
with the designated Department
Clerk, receipt of which is hereby
acknowledged.

Barbara J. Boutwell
Clerk

12/21/93
Date



ENSR Consulting
and Engineering
2809 West Mall Drive
Florence, AL 35630
(205) 767-1210
FAX (205) 767-1211

December 3, 1993

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

RECEIVED

DEC - 6 1993

Division of Air
Resources Management

Dear Clair:

**RE: Request for Amendments to Permits
Florida Gas Transmission Company**

Station 12 - Permit No. AC57-188869
Munson, Santa Rosa County, Florida

Station 13 - Permit No. AC67-189220
Caryville, Washington county, Florida

Station 14 - Permit No. AC20-189438
Quincy, Gadsden County, Florida

Station 15 - Permit No. AC62-189439
Perry, Taylor County, Florida

Station 16 - Permit No. AC04-189454
Brooker, Bradford County, Florida

Station 17 - Permit No. AC42-189455
Salt Springs, Marion County, Florida

Station 18 - Permit No. AC48-189456
Orlando, Orange County, Florida

Station 19 - Permit No. AC05-189665
Melbourne, Brevard County, Florida

Station 20 - Permit No. AC56-189457
Ft. Pierce, St. Lucie County, Florida



December 3, 1993
Mr. Clair Fancy
Page 2

This letter is in response to our recent conversation regarding a previous request by Florida Gas Transmission Company (FGTC) to amend the above permits to include Method 3A instead of Method 3.

On June 29, 1993, FGTC requested that the permits for the compressor engines referenced in this letter be amended to adjust the horsepower ratings and heat input rates. On September 9, 1993 (letter attached), FGTC further requested that specific condition 8 in each of the permits be amended to replace Method 3 with 3A, and that the SO₂ emission limits be clarified to base SO₂ emissions on the fuels sulfur content.

On September 17, 1993 the Division of Air Resources Management (DARM) responded to FGTC's request with a letter amending the permits. Included were the amendments for horsepower ratings, heat input, restrictions, and clarification of sulfur as the basis for SO₂ emissions.

It has recently come to FGTC's attention through the process of obtaining operating permits from the district offices that the request to replace Method 3 with Method 3A was not included in DARM's response. Until now it was assumed that the request had been included in the September 17, 1993 letter of amendment.

Accordingly, FGTC requests that DARM evaluate the request for the amendment to the testing method. This should not require an alternate sampling procedure since there is no regulatory requirement for determining the oxygen and carbon dioxide concentrations from compressor station engines.

Your expedited response to this request is appreciated since it relates to the issuance of our operating permits. Should you need additional information or have any questions please contact Mr. Alan Weatherford with FGTC at (407) 875-5816.

Sincerely,

A handwritten signature in cursive script that reads "Barry Andrews".

Barry D. Andrews, P.E.
Manager, Air Quality Services

cc : Alan Weatherford

Enclosure



Florida Gas Transmission Company

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

June 29, 1993

VIA FEDERAL EXPRESS
(overnight delivery)

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

Dear Mr. Fancy:

**RE: Request for Amendments and Extensions to Air
Construction Permits**

Permit No. AC57-188869
Florida Gas Transmission Company, Station 12
Munson, Santa Rosa County, Florida

Permit No. AC67-189220
Florida Gas Transmission Company, Station 13
Caryville, Washington County, Florida

Permit No. AC20-189438
Florida Gas Transmission Company, Station 14
Quincy, Gadsden County, Florida

Permit No. AC62-189439
Florida Gas Transmission Company, Station 15
Perry, Taylor County, Florida

Permit No. AC04-189454
Florida Gas Transmission Company, Station 16
Brooker, Bradford County, Florida

Permit No. AC42-189455
Florida Gas Transmission Company, Station 17
Salt Springs, Marion County, Florida

Permit No. AC48-189456
Florida Gas Transmission Company, Station 18
Orlando, Orange County, Florida

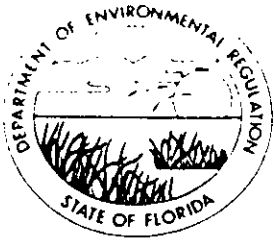
Permit No. AC05-189665
Florida Gas Transmission Company, Station 19
Melbourne, Brevard County, Florida

Permit No. AC56-189457
Florida Gas Transmission Company, Station 20
Ft. Pierce, St. Lucie County, Florida

On May 27, 1993, Florida Gas Transmission Company (FGT) submitted Certificates of Completion of Construction to the appropriate district offices to obtain operating permits for

RECEIVED
MAIL ROOM
JUN 30 11:10:10

← This file contains all the attachments related to this correspondence.



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

February 12, 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Weatherford:

Re: Permits AC57-188869, AC67-189220, AC20-189438, AC62-189439,
AC04-189454, AC42-189455, AC48-189456, AC05-189665 and
AC56-189457; Permit Amendment Request

The Department is in receipt of your letter dated January 18, 1993, requesting an amendment of the specific condition regarding test method for measuring VOC emissions for each one of the above referenced permits. The Department has reviewed your request and has determined to change Specific Condition No. 10 for each one of the permits as follows:

Specific Condition No. 10:

FROM: Initial compliance with the volatile organic compound emission (VOC) limits will be demonstrated by EPA Method 25, thereafter, compliance with the VOC emission limits will be assumed, provided the CO allowable emission rate is achieved.

TO: Initial compliance with the volatile organic compound emission (VOC) limits will be demonstrated by EPA Method 25A, thereafter, compliance with the VOC emission limits will be assumed, provided the CO allowable emission rate is achieved.

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. 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 permit applicant and the parties listed below must be filed within

Mr. Alan Weatherford
Florida Gas Transmission Company
Page 2

14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. Petitioner 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, Florida Statutes.

The Petition shall contain the following information:

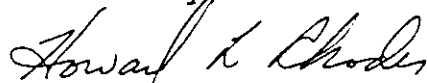
- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) 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 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 intent. Persons whose substantial interests will be affected by any decision of the Department with regard to the 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 intent 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, F.A.C.

Mr. Alan Weatherford
Florida Gas Transmission Company
Page 3

A copy of this letter shall be attached to the above mentioned permit and shall become a part of that permit.

Sincerely,



Howard L. Rhodes
Director
Division of Air Resources
Management

HLR/TH/plm

Attachment to be Incorporated:

Mr. Alan Weatherford's letter of December 7, 1992

cc: Ed Middleswart, NWD
Charles Collins, CD
Isidore Goldman, SED
Andy Kutyna, NED



Florida Gas Transmission Company

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

Certified Mail

December 7 , 1992

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

Dear Mr. Fancy:

RE: Request for Modification to Permits

Permit No. AC57-188869
Florida Gas Transmission Company, Station 12
Munson, Santa Rosa County, Florida

Permit No. AC67-189220
Florida Gas Transmission Company, Station 13
Caryville, Washington County, Florida

Permit No. AC20-189438
Florida Gas Transmission Company, Station 14
Quincy, Gadsden County, Florida

Permit No. AC62-189439
Florida Gas Transmission Company, Station 15
Perry, Taylor County, Florida

Permit No. AC04-189454
Florida Gas Transmission Company, Station 16
Brooker, Bradford County, Florida

Permit No. AC42-189455
Florida Gas Transmission Company, Station 17
Salt Springs, Marion County, Florida

Permit No. AC48-189456
Florida Gas Transmission Company, Station 18
Orlando, Orange County, Florida

Permit No. Ac05-189665
Florida Gas Transmission Company, Station 19
Melbourne, Brevard County, Florida

Permit No. AC56-189457
Florida Gas Transmission Company, Station 20
Ft. Pierce, St. Lucie County, Florida

RECEIVED

DEC 17 1992

An **ENRON/SONAT** Affiliate

Division of Air
Resources Management

Mr. Clair Fancy
Page 2 of 2
December 7, 1992

Florida Gas Transmission Company (FGT) requests that the permits referenced above be modified as follows:

Modify Specific Condition 10 which currently reads

"Initial compliance with the volatile organic compound (VOC) emissions limits will be demonstrated by EPA Method 25, thereafter, compliance with the VOC emission limits will be assumed, provided the CO allowable emission rate is achieved."

so that it reads

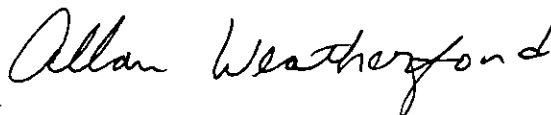
"Initial compliance with the volatile organic compound (VOC) emissions limits will be demonstrated by EPA Method 25A, thereafter, compliance with the VOC emission limits will be assumed, provided the CO allowable emission rate is achieved."

FGT has supplied your office with evidence supporting our contention that the use of Method 25 to measure VOC emissions in compressor engines is questionable. We believe the evidence supports the use of Method 25A. Mr. Barry Andrews, ENSR Consulting & Engineering, has spoken to you about this on FGT's behalf.

Since no specific test method is listed for our source (i.e. NSPS or 17-2.700), we ask that this change be made through a simple permit modification.

Please call me at 407-875-5816 if you have any questions.

Sincerely,

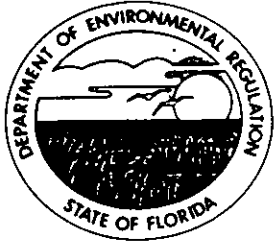


Allan Weatherford
Compliance Environmentalist

bc
aw1207cf

cc: Chuck Truby
Raymond Young
Fred Griffin
Barry Andrews, ENSR

J. Nelson
A. Williams



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

May 15, 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Allan Weatherford
Compliance Environmentalist
Florida Gas Transmission Company
P.O. Box 945100
Maitland, Florida 32399-2400

Dear Mr. Weatherford:

Re: Construction Permits Nos. AC 57-188869, AC 67-189220,
AC 20-189438, AC 62-189439, AC 04-189454, AC 42-189455,
AC 48-189456, AC 05-189665, and AC 56-189457

The Department is in receipt of your letter dated April 29, 1992, requesting the extension of the expiration dates of the above referenced permits. This request is acceptable. The expiration dates of these construction permits will be changed as follows:

FROM: June 30, 1992
TO: June 30, 1993

This letter must be attached to the above mentioned permits and shall become a part of each permit.

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. 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 permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. Petitioner 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, Florida Statutes.


Mr. Allan Weatherford
Page 2 of 2

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 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 intent. Persons whose substantial interests will be affected by any decision of the Department with regard to the 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 intent 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, F.A.C.

Sincerely,


for STEVE SMALLWOOD, P.E.
Director
Division of Air Resources Mgmt.

SS/TH/plm

Attachment to be Incorporated:

Mr. Weatherford's letter of April 29, 1992

cc: Ed Middleswart Andy Kutyna
Charles Collins Isidore Goldman



Florida Gas Transmission Company

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

Federal Express

April 29, 1992

RECEIVED
SER - MAIL ROOM
1992 APR 30 AM 10:49

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

Dear Mr. Fancy:

**RE: Request for Extensions of Construction Permits
Phase II Air Permits**

Permit No. AC57-188869
Florida Gas Transmission Company, Station 12
Munson, Santa Rosa County, Florida

Permit No. AC67-189220
Florida Gas Transmission Company, Station 13
Caryville, Washington County, Florida

Permit No. AC20-189438
Florida Gas Transmission Company, Station 14
Quincy, Gadsden County, Florida

Permit No. AC62-189439
Florida Gas Transmission Company, Station 15
Perry, Taylor County, Florida

Permit No. AC04-189454
Florida Gas Transmission Company, Station 16
Brooker, Bradford County, Florida

Permit No. AC42-189455
Florida Gas Transmission Company, Station 17
Salt Springs, Marion County, Florida

Permit No. AC48-189456
Florida Gas Transmission Company, Station 18
Orlando, Orange County, Florida

Permit No. AC05-189665
Florida Gas Transmission Company, Station 19
Melbourne, Brevard County, Florida

Permit No. AC56-189457
Florida Gas Transmission Company, Station 20
Ft. Pierce, St. Lucie County, Florida

Mr. Clair Fancy
Page 2 of 2
April 29, 1992

On behalf of Florida Gas Transmission Company, I respectfully request extensions of the construction permits referenced above. The permits are due to expire on June 30, 1992 and FGT needs more time to evaluate the operation and performance of the engines.

Emissions tests were done on the engines in March 1992. The test reports will be submitted to DER within the next two weeks. Preliminary results indicate that all emission limits were met.

FGT requests the expiration dates be extended to June 30, 1993. This 12-month extension will allow FGT the necessary time to thoroughly evaluate the operation of the new engines and to determine if additions or revisions to the permits are needed.

In anticipation of your approval, I've enclosed a check for \$450 to cover the permit extension fee for each of the nine stations.

Sincerely,



Allan Weatherford
Compliance Environmentalist

bc
aw0429cf

cc: Chuck Truby
Raymond Young
Fred Griffin
Bill Osborne
Glenn Sellars
Levon Carroll
Bob Beckham
Don Sterba
Duwood Mulford
Buddy Morris
James Dollar
Jim Read
Les Shadd
Leroy Coker
Wayne Daniels
Riley Jackson
Donnie Owings
Joe Kolb
Tom Gardiner, ENSR
S. Heron