

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
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1. Article Addressed to: Mr. Danny Pribble Vice President of Operations Florida Gas Transmission Company P.O. Box 1188 Houston, TX 77251	C. Signature <u>X. D. Selva</u> <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee
2. Article Number (Copy from service label) 7099 3400 0000 1453 1750	D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No
PS Form 3811, July 1999	3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.
Domestic Return Receipt	4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

7099 3400 0000 1453 1750

Article Sent To:		Postmark Here
Mr. Danny Pribble		
Postage	\$	
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	
Name (Please Print Clearly) (to be completed by mailer) Mr. Danny Pribble		
Street, Apt. No., or PO Box No. P.O. Box 1188		
City, State, ZIP+4 Houston, Texas 77251		

PS Form 3800, July 1999 See Reverse for Instructions



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

July 2, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Danny Pribble, V.P. of Operations
Florida Gas Transmission Company
1400 Smith Street
Houston, TX 77002

Re: Draft Air Permit No. 1330005-002-AC
Washington County Compressor Station No. 13
Phase V Modifications

Dear Mr. Pribble:

On June 13, 2001, the Department received your application for an air construction permit to add new emissions units to Compressor Station No. 13 located approximately 8 miles south of Caryville on County Road 284 in Washington County, Florida. The proposed Phase V expansion at this station consists of two new electric-drive compressor turbines (FGT Unit Nos. 1307 and 1308), two new compressor buildings, a new gas-fired 800 bhp emergency generator, and additional fugitive emissions from component leaks. Based on a review of the application, the Department determines the following:

1. The two new electric-drive compressor turbines (FGT Unit Nos. 1307 and 1308) and compressor buildings do not require an air construction permit because they do not generate any air emissions.
2. The new gas-fired 800 bhp emergency generator is categorically exempt from the requirement to obtain an air construction permit in accordance with Rule 62-210.300(3)(a)20, F.A.C. (The application indicates the maximum operation would be less than 500 hours per year at a maximum fuel consumption rate of 0.00547 million cubic feet of natural gas per hour. This is equivalent to 2.735 million cubic feet of natural gas per year, which is less than the exemption threshold of 4.4 million cubic feet of natural gas per year.)
3. The additional fugitive emissions from component leaks (valves, flanges, pumps, connectors, etc.) are generically exempt from the requirement to obtain an air construction permit in accordance with Rule 62-210.300(3)(b)1, F.A.C. (Potential VOC emissions are predicted to be less than one-half ton per year, which is less than the exemption thresholds of 5.0 tons of VOC per year, 1000 pounds of any single HAP per year, and 2500 tons of total HAP per year.)

As stated above, each of the proposed emissions units are exempt by Department rule from the requirement to obtain an air construction permit. Therefore, no air construction permit is required for this project. For purposes of the Title V air operation permit for this facility, the proposed equipment is insignificant as defined by Rule 62-213.430(6), F.A.C. As such, you are required to notify the Title V permitting authority (Northwest District Office) with the following information:

- A brief description of the proposed equipment and potential emissions;
- A showing that the units are exempt from the requirement to obtain an air construction permit (attach this letter);

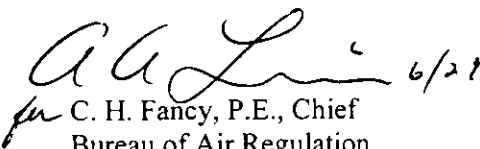
"More Protection, Less Process"

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- A showing show that the units are considered insignificant as defined by Rule 62-213.430(6), F.A.C.; and
- A statement that the units will be included in the application for the next Title V permit revision or renewal.

If you have any questions regarding this project, please contact Jeff Koerner at 850/921-9536.

Sincerely,


for C. H. Fancy, P.E., Chief
Bureau of Air Regulation

cc: Mr. Jim Thompson, FGT
Mr. Kevin McGlynn, McGlynn Consulting Co.
Mr. V. Duane Pierce, AQMcS
Ms. Sandra Veazey, NWD

CHF/AAI/jfk

Enclosures

e. The facility is not subject to any Standard of Performance for New Stationary Sources (NSPS) requirement adopted by reference in Rule 62-204.800, F.A.C.; and

f. The facility is not subject to any volatile organic compound Reasonably Available Control Technology (RACT) requirement of Chapter 62-296, F.A.C.

30. Petroleum lubrication systems.

31. Application of fungicide, herbicide, or pesticide.

32. Asbestos renovation and demolition activities.

33. Non-halogenated solvent storage and cleaning operations, provided the solvents contain none of the hazardous air pollutants listed at Rule 62-210.200, F.A.C.

34. Vehicle refueling operations and associated fuel storage.

35. Restaurants.

36. Burning of drugs seized by law enforcement agencies in boilers with a heat input of 250 million BTU per hour or more.

(b) Generic and Temporary Exemptions.

1. Generic Emissions Unit Exemption. An emissions unit or pollutant-emitting activity that is not entitled to a categorical exemption pursuant to Rule 62-210.300(3)(a), F.A.C., shall be exempt from the permitting requirements of this chapter, Chapter 62-212, F.A.C., and Chapter 62-4, F.A.C., if it meets all of the following criteria:

a. It would be subject to no unit-specific applicable requirement.

b. It would neither emit nor have the potential to emit:

(i) 500 pounds per year or more of lead and lead compounds expressed as lead;

(ii) 1,000 pounds per year or more of any hazardous air pollutant;

(iii) 2,500 pounds per year or more of total hazardous air pollutants; or

(iv) 5.0 tons per year or more of any other regulated pollutant.

c. Its emissions, in combination with the emissions of other units and activities at the facility, would not cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

d. In the case of a proposed new emissions unit at an existing facility, the emissions of such unit, in combination with the emissions of any other proposed new or modified units and activities at the facility, would not result in a modification subject to the preconstruction review requirements of Rule 62-204.800(10)(d)2., 62-212.400 or 62-212.500, F.A.C.

e. In the case of a proposed new pollutant-emitting activity, such activity would not constitute a modification of any existing non-exempt emissions unit at a non-Title V source or any existing non-insignificant emissions unit at a Title V source.

2. Generic Facility Exemption. A facility that is not entitled to a categorical exemption pursuant to Rule 62-210.300(3)(a), F.A.C., shall be exempt from the permitting requirements of this chapter, Chapter 62-212, F.A.C., Chapter 62-213,

Memorandum

Florida Department of Environmental Protection

TO: ~~Clair Fancy, Bureau of Air Regulation~~ *by [signature]*
THROUGH: Al Linero, New Source Review Section *[signature] 6/29*
FROM: Jeff Koerner, New Source Review Section
DATE: June 29, 2001
SUBJECT: Project No. 1330005-002-AC
Washington County Compressor Station No. 13
Phase V Modifications

The attached letter recognizes that the proposed emissions units are exempt from the requirement to obtain an air construction permit. The two new electric-drive compressor turbines do not generate any air emissions. The new gas-fired emergency generator is "categorically exempt" in accordance with Rule 62-210.300(3)(a)20, F.A.C. The additional fugitive emissions from component leaks are "generically exempt" in accordance with Rule 62-210.300(3)(b)1, F.A.C. For purposes of the Title V, the proposed equipment is insignificant as defined by Rule 62-213.430(6), F.A.C. The attached letter requires notification of the Northwest District Office and inclusion of the proposed equipment in the next application for a Title V permit revision or renewal. No references to administrative proceedings were included because these activities are "exempt by rule".

I recommend your approval of the attached letter.

AAL/jfk

Attachments