

Florida Department of
Environmental Protection

Memorandum

TO: ~~Clair Fancy, Chief - Bureau of Air Regulation~~
THROUGH: Al Linero, Administrator - New Source Review Section
FROM: Jeff Koerner, New Source Review Section
DATE: September 26, 2001
SUBJECT: Draft Air Construction Permit No. 1230034-007-AC
Florida Gas Transmission Company
Taylor Compressor Station No. 15
Phase V Modifications

AAL for CHF 8/28
AAL 9/27

Attached for your review are the following items:

- Intent to Issue Permit and Public Notice Package;
- Technical Evaluation and Preliminary Determination;
- Draft Permit; and
- PE Certification

The draft permit authorizes construction of a new 7222 bhp gas turbine compressor engine (FGT No. 1508), the up-rating of an existing gas turbine compressor engine (FGT No. 1507) to 13,180 bhp, and a new emergency generator (FGT No. GEN03) to replace two existing emergency generators (GEN01 and GEN02). The new equipment will be installed at existing Compressor Station No. 15, which is located on Pisgah Road approximately 1 mile east of U.S. Highway 19 near Perry in Taylor County, Florida. The project is minor with respect to PSD based on a netting analysis that includes reduced NOx emissions for the existing gas turbine (FGT No. 1507). The Technical Evaluation and Preliminary Determination provides a detailed description of the project, rule applicability, and emission standards. The P.E. certification briefly summarizes proposed project. Day #90 is November 19, 2001. I recommend your approval of the attached Draft Permit for this project.

CHF/AAL/jfk

Attachments

Florida Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
New Source Review Section
2600 Blair Stone Road, MS #5505
Tallahassee, Florida, 32399-2400

P.E. CERTIFICATION STATEMENT

PERMITTEE

Florida Gas Transmission Company
1400 Smith Street
Houston, TX 77002

Draft Air Permit No. 1230034-007-AC
Taylor Compressor Station No. 15
Phase V Modifications

PROJECT DESCRIPTION

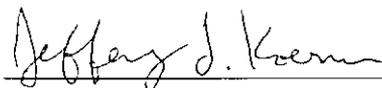
The existing facility operates as a compressor station in Taylor County for Florida Gas Transmission Company's natural gas pipeline. It consists of three 2000 bhp engines (installed in 1962), a 2000 bhp engine (installed in 1966), a 2000 bhp engine (installed in 1968), a 4000 bhp engine (installed in 1991), and a 12,600 bhp gas turbine (installed in 1994 and subject to PSD) and two small emergency generators. All units fire natural gas. The proposed project will add a Cooper Rolls Model 501-KC7 DLE gas turbine with a capacity of 7222 bhp as a new compressor engine and up-rate the existing gas turbine compressor engine to 13,180 bhp. In conjunction with the up-rating, the applicant proposes a lower NOx emissions standard. The project will also replace two existing emergency generators with a single Waukesha Model No. L36GL emergency generator with a capacity of 585 bhp. All new units fire natural gas exclusively.

Because potential emissions of at least one regulated pollutant exceed 250 tons per year, the existing facility is classified as a major source of air pollution with respect to Rule 62-212.400, F.A.C, the Prevention of Significant Deterioration (PSD) of Air Quality. Therefore, new projects are subject to a PSD applicability review. The project will result in the following potential emissions increases: 73 tons of carbon monoxide per year; 32 tons of nitrogen oxides per year; 2 tons of particulate matter per year; 7.6 tons of sulfur dioxide per year; and 1.5 ton of volatile organic compounds per year. The project is not subject to PSD preconstruction review because the emissions increases are less than the PSD significant emissions rates. Emissions from the emergency generator are less than 1 ton per year for each pollutant. In addition, total emissions of hazardous air pollutants (HAP) from the project are predicted to be less than 2 tons per year, which is much less than the HAP thresholds that would trigger a case-by case- MACT determination.

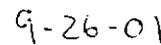
The gas turbines are subject to the New Source Performance Standards of Subpart GG in 40 CFR 60, adopted by reference in Rule 62-204.800, F.A.C. This regulation establishes standards for emissions of NOx and SO2 as well as testing and monitoring requirements. Based on the manufacturer's estimated performance and the emissions standards established in the permit, the gas turbine will readily comply with the NSPS requirements. The emergency generator is categorically exempt from air permitting requirements in accordance with Rule 62-210.300(3)(c)20, F.A.C.

The existing gas turbine (FGT No. 1507) was originally subject to PSD review in 1994. The Department made a BACT determination for NOx emissions. This determination specified an initial NOx limit of 42 ppmvd with provisions intended to reduce this limit (if possible) to 25 ppmvd, which the Department believed to represent BACT. The current Title V operation permit specifies a NOx limit of 42 ppmvd. In conjunction with the request to "up-rate" the gas turbine, the applicant also requests that the NOx emissions standard be reduced to 25 ppmvd. Because the original PSD permit made a BACT determination for NOx and contemplated this limit as achievable, the Department believes that the project does not trigger any additional PSD review nor is any new determination of BACT required. However, "25 ppmvd" will be identified in the permit as the BACT standard for this unit.

I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).



Jeffery F. Koerner, P.E.
Registration Number: 49441


(Date)

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To: **Mr. Danny Pribble**
 Name: **Vice President of Operations**
 Street: **Florida Gas Transmission Company**
 P.O. Box 1188
 City: **Houston, TX 77251**

PS Form 3800, July 1999 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 18, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Danny Pribble, Vice President of Operations
Florida Gas Transmission Company (FGTC)
P.O. Box 1188
Houston, TX 77251

Re: **Request for Additional Information**
Project No. 1230034-007-AC
Compressor Station No. 15 (Taylor County), Phase V Modification

Dear Mr. Pribble:

On July 3, 2001, the Department received your application for an air construction permit to increase the capacity of Compressor Station No. 15 located in Taylor County. The project is part of the overall Phase V Expansion Project aimed at boosting the capacity of FGTC's natural gas pipeline for Florida customers. The application is incomplete. In order to continue processing your application, the Department will need the additional information requested below. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. For compressor engine No. 1507 (gas turbine), please identify:
 - The date of the initial performance tests;
 - The date of commencement of commercial operation;
 - Any emissions factors used in this application that differ from the initial air construction permit application; and
 - Any emissions standards requested in this application that differ from the current Title V operation permit.
2. For the facility, were any existing emissions units modified or new emissions units added after 1995?

The Department will resume processing your application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the authorized representative or responsible official. You are reminded that Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days or provide a written request for an additional period of time to submit the information.

If you have any questions regarding this matter, please call me at 850/921-9536.

Sincerely,

Jeff Koerner, P.E.

New Source Review Section

AAL/jfk

cc: Mr. Jim Thompson, FGTC
Mr. Kevin McGlynn, McGlynn Consulting Co.
Mr. Duane Pierce, AQMs
Mr. Chris Kirts, NED Office

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