

Florida Department of
Environmental Protection

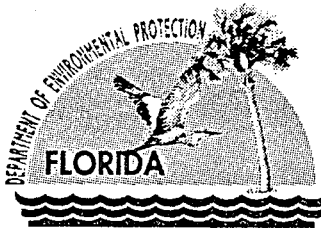
Memorandum

TO: Joseph Kahn, Division of Air Resources Management
THRU: Trina Vielhauer, Bureau of Air Regulation *TV*
Al Linero, New Source Review Section *AL*
FROM: Jeff Koerner, New Source Review Section *JK*
DATE: July 25, 2003
SUBJECT: Extension of Permit Expiration Date
Air Permit No. 1230034-009-AC
Florida Gas Transmission Company
Station No. 15, Taylor County, Engine 1508

Attached for your approval and signature is a modification that extends the permit expiration date for the above referenced project. Florida Gas Transmission Company (FGTC) requests a 6-month extension of air construction Permit No. 1230034-009-AC for Engine 1508 at existing Station No. 15 located near Perry in Taylor County, Florida. The engine is a Rolls Royce Model No. 01-KC7-DLE gas turbine. This specific engine is experiencing problems related to the automatic control system and is unable to operate at low loads. It successfully demonstrated initial compliance with the permit standards on January 7, 2003 while operating at full load. It has operated approximately 820 hours – all at full load. On July 24, 2003, FGTC notified the Department that the manufacturer inspected the engine during the week of June 29th and determined that the engine must be replaced with an identical unit. FGTC had also requested an extension of the 180 days to perform low load testing as required by NSPS Subpart GG. However, this will not be necessary because the engine is being replaced and the testing requirement will restart.

The attached extension will allow FTGC to replace the current Rolls Royce Model No. 01-KC7-DLE gas turbine with and identical unit, conduct all required initial tests, and submit a complete application for a Title V air operation permit. Day 74 is October 5, 2003. I recommend your approval and signature.

Attachments



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

July 25, 2003

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Richard Craig, V.P. of Southeast Operations
Florida Gas Transmission Company
1400 Smith Street
Houston, TX 77002

Re: Extension of Air Construction Permit Expiration Date
Taylor Compressor Station No. 15 – Engine 1508
Air Permit No. 1230034-009-AC, Extension

Dear Mr. Craig:

On June 30, 2003, Florida Gas Transmission Company (FGTC) requested a 6-month extension of air construction Permit No. 1230034-009-AC for existing Station No. 15 located near Perry in Taylor County, Florida. Engine 1508 is a Rolls Royce Model No. 01-KC7-DLE gas turbine. This specific engine is experiencing problems related to the automatic control system and is unable to operate at low loads. It successfully demonstrated initial compliance with the permit standards on January 7, 2003 while operating at full load. It has operated approximately 820 hours – all at full load. On July 24, 2003, FGTC notified the Department that the manufacturer inspected the engine during the week of June 29th and determined that the engine must be replaced with an identical unit. FGTC had also requested an extension of the 180 days to perform low load testing as required by NSPS Subpart GG. However, this will not be necessary because the engine is being replaced and the testing requirement will restart.

The Department approves the request to replace the current Rolls Royce Model No. 01-KC7-DLE gas turbine with and identical unit. The permit is hereby extended from **December 31, 2003 to July 1, 2004** to replace the engine, conduct all required initial tests, and submit a complete application for a Title V air operation permit. A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permitting decision is issued pursuant to Chapter 403, Florida Statutes.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3), F.S., must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency

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determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

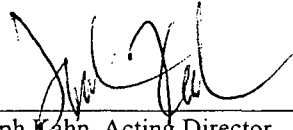
The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

This permitting decision is final and effective on the date filed with the clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this action will not be effective until further order of the Department.

Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty (30) days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



Joseph Kahn, Acting Director
Division of Air Resources Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this order was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 8/5/03 to the persons listed:

- Mr. Richard Craig, FGTC*
- Mr. Jacob Krautsch, FGTC
- Mr. Jim Burrow, FGTC
- Mr. Kevin McGlynn, McGlynn Consulting Co.
- Mr. V. Duane Pierce, AQMcS
- Mr. Chris Kirts, NED

Clerk Stamp

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

Victoria Gibson (Clerk) August 5, 2003 (Date)



Florida Gas Transmission Company

1967 Commonwealth Lane, Tallahassee, FL 32303, (850) 350-5000, Fax Downstairs (850) 350-5001

July 23, 2003

UPS Overnight – 1Z F62 059 22 1003 306 4

Jeff Koerner
Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Office Bldg.
2600 Blairstone
Tallahassee, FL 32399-2400

RECEIVED

JUL 24 2003

BUREAU OF AIR REGULATION

Reference: Facility: 1230034
Permit No. 1230034-007-AC
Compressor Station No. 15, Perry, Taylor County

Dear Mr. Koerner:

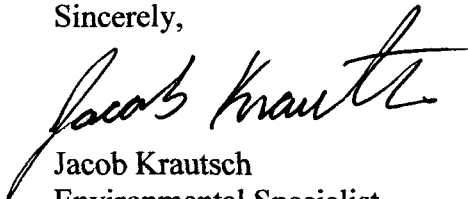
Subject: Replacement of Turbine 1508's Gas Generator

Florida Gas Transmission Company must replace the Rolls Model 501 KC-7's (Engine 1508) gas generator. The existing turbine currently has problems with the control system and the unit cannot be operated at low loads. Rolls Royce sent a team to the facility on the week of June 29, 2003 to try to resolve the problem and it was determined that the gas generator must be replaced. The replacement will be the same model as the original and all emissions and other engine parameters will remain the same. The replacement will remain in place as the permanent installation.

The turbine that was initially installed has operated 820 hours through June of 2003.

If you have any questions or need additional information, please call me at (850) 350-5042.

Sincerely,



Jacob Krautsch
Environmental Specialist

CC: Compressor Station 15
Allan Weatherford
FGT Files
Envision Env. 3.1.20



Florida Gas Transmission Company

July 7, 2003

Capital Projects Field Office, 111 Kelsey Lane, Ste. A., Tampa, FL 33619
813.655.7441 / 800.381.1477

Air Compliance Section
Northeast District
Florida Department of Environmental Protection
7825 Baymeadows Way, Suite B-200
Jacksonville, Florida 32256-7590
Phone (904) 448-4300
Fax (904) 448-4319

RECEIVED
JUL 09 2003
BUREAU OF AIR REGULATION

Reference: Permit No. 1230034-007-AC
Emissions Unit ID No. 004, Engine No. 1508
Compressor Station No. 15, Taylor County

Dear Air Compliance Section:

Subject: Emissions Test Postponement

The initial emissions test that was scheduled for Emission Unit 004 (Engine No. 1508) at the above referenced facility for July 7, 2003, must be postponed due to continuing problems with the Rolls Royce Model 501 KC-7. Rolls Royce has inspected the turbine and has agreed that a major repair or replacement is necessary. Your Office was notified of the postponement on July 3, 2003, by telephone by Cubix Corporation.

The emissions test will be rescheduled approximately 60 days from now. The specific date cannot be determined until the exact solution to the problem has been determined. FGT will make notification as soon as a date for testing the replaced or repaired unit is determined. FGT has requested the Tallahassee Office for an extension of the construction permit and the testing deadline.

If you have any questions or need additional information, please call me at (800) 381-1477 or Dr. Duane Pierce at (281) 373-5365.

Sincerely,

Jim Thompson
Project Manager, Environmental

Florida Gas Transmission Company

Permit No. 1230034-007-AC

July 7, 2003

CC: Mr. Jeff Koerner, P.E., New Source Review Section, Bureau of Air Regulation, Florida
Department of Environmental Protection, Twin Towers Office Bldg., 2600 Blairstone
Road, Tallahassee, FL 32399-2400
Frank Diemont
Jake Krautsch - FGT
V. Duane Pierce, AQMcs, LLC
C/S 15 File



June 27, 2003

Florida Gas Transmission Company

*Capital Projects Field Office, 111 Kelsey Lane, Ste. A., Tampa, FL 33619
813.655.7441 / 800.381.1477*

Mr. Jeff Koerner, P.E.
New Source Review Section
Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Office Bldg.
2600 Blairstone Road
Tallahassee, FL 32399-2400

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JUN 30 2003

BUREAU OF AIR REGULATION

Reference: Permit No. 1230034-007-AC
Compressor Station No. 15, Taylor County

Dear Mr. Koerner:

Subject: Extension of Construction Permit Expiration

Due to continuing problems with the Rolls Royce Model 501 KC-7 (Engine 1508), it will not be possible for Florida Gas Transmission Company (FGT) to complete the modifications to this facility, perform the required initial emissions compliance test and apply for a Title V operating permit at least 120 days before the expiration date of the above referenced Construction Permit.

The current problems are associated with the control system and the unit cannot be operated at low loads. This prevents FGT from conducting a complete emissions test as required by 40 CFR 60 Subpart GG. Rolls Royce has agreed to send a team to the facility on the week of June 29 to try and resolve this problem.

The unit is currently being operated at full load only. An emissions test was conducted on 7 January 2003 at full load. The test demonstrated compliance with the permitted emission limits. A test report was sent to the DEP Northeast District Office on 20 February 2003.

FGT requests a 180 day extension for the referenced construction permit in order to complete the construction, perform the required Subpart GG emissions test and to submit an application for the Title V operating permit.

FGT also requests an extension to the 180 day performance test requirement of 40 CFR 60.8(a) in order for FGT to make the changes needed to complete the installation so that testing at lower loads can be completed as required by 40 CFR 60.335.

If you have any questions or need additional information, please call me at (800) 381-1477 or Dr. Duane Pierce at (281) 373-5365.

Sincerely,

Jim Thompson
Project Manager, Environmental

CC: Jake Krautsch
Duane Pierce

- item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Richard Craig
 V.P. of Southeast Operations
 Florida Gas Transmission Company
 1400 Smith Street
 Houston, TX 77002

7 570000007 101033
 C. Signature: *[Handwritten Signature]*
 Agent
 Addressee

D. Is delivery address different from item 1?
 If YES, enter delivery address below: Yes
 No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

2. 7001 0320 0001 3692 5443

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

U.S. Postal Service
CERTIFIED MAIL RECEIPT
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OFFICIAL USE

7001 0320 0001 3692 5443

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

Sent To
 Richard Craig
 Street, Apt. No.
 or P.O. No. Smith St.
 City, State, ZIP+4
 Houston, TX 77002

PS Form 3800, January 2001

See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1 Article Addressed to:

Mr. Richard Craig
 V.P. of Southeast Operations
 Florida Gas Transmission Company
 1400 Smith Street
 Houston, TX 77002

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) *T. Broadway* B. Date of Delivery *8/8/93*

C. Signature *[Signature]* Agent
 Addressee

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

2 7001 0320 0001 3692 5443

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

OFFICIAL USE

5443 2692 3692 0001 0320 7001

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

Sent To
 Richard Craig
 Street, Apt. No.,
 or P.O. No. Smith St.
 City, State, ZIP+4
 Houston, TX 77002



- Sender: Please print your name, address, and ZIP+4 in this box •

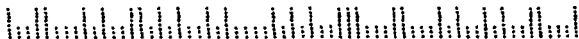
Dept. of Environmental Protection
 Division of Air Resources Mgt.
 Bureau of Air Regulation, NSR
 2600 Blair Stone Rd., MS 5505
 Tallahassee, FL 32399-2400

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AUG 12 2003

BUREAU OF AIR REGULATION

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- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "*Restricted Delivery*".
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