STATEMENT OF BASIS

Florida Gas Transmission Company
Compressor Station No. 16
Facility ID No.: 0070012
Bradford County

Title V Air Operation Permit Revision
FINAL Permit Project No.: 0070012-010-AV
Revision to Title V Air Operation Permit No.: 0070012-007-AV

The initial Title V Air Operation Permit, No. 0070012-002-AV, was issued/effective on March 20, 1998. This Title V Air Operation Permit Revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

The subject of this permit revision is to incorporate the terms and conditions of the Air Construction Permit, No. 0070012-011-AC;to revise the Particulate Matter (PM/PM_{10}), and SO_2 emission limits for Emission Unit 003; for an increase in heat rate for EU003 (Engine 1607) from 62.1 MMBtu/hr to 68 MMBth/hr; to add language that would allow turbine replacement; to add the requirements of 40 CFR 60, Subpart GG and to delete Specific Condition C.19: Custom Fuel Monitoring Schedule.

This facility consist of:

EU 001: Five engines (No.s 1601, 1602, 1603, 1604 and 1605). Each are rated at 2,000 bhp and manufactured by Worthington, model SEHG-8. All engines are fired by natural gas **only**.

EU 002: One engine No. 1606 rated at 4,000 bhp and manufactured by Cooper-Bessemer, Model 8W-330-C2. This engine fired by natural gas and incorporates "lean burn" technology to minimize exhaust NO_x emissions. This emissions unit is regulated in accordance with F.A.C. Rule 62-212.400, Prevention of Significant Deterioration, which required a BACT determination approved May 8, 1991.

New PM emission limit and emission factor for EU002:

Pollutant	Emissions Rate		Emissions Factor
	lb/hr	tons/year	
Particulate Matter	1.68	7.36	0.04831 lbs/MMscf **NOTE (1)**
PM10	1.68	7.36	0.04831 lbs/MMscf **NOTE (1)**

NOTE (1) PM/PM_{10} emissions are minimized by good combustion design with the firing of natural gas as the exclusive fuel.
[Air Permit No. 0070012-008-AC]

EU 003: One engine No. 1607 rated at 7009 bhp fired by natural gas, installed as a compressor and manufactured by Cooper-Rolls Model 501-KC7-DLE.

New PM and SO2 emission for EU003:

Pollutant	Standards		Maximum Emissions		Rule Basis
	Limit	Units	Lb/hour	TPY	
PM [e]	Good combustion practices		0.45	2.0	Avoid Rule 62-212.400, F.A.C.
SO_2 [b]	10.0	Grains of sulfur per 100 SCF of natural gas	1.87	8.2	Avoid Rule 62-212.400, F.A.C. 40 CFR 60.332

[e] For both PM and VOC, the efficient combustion of clean fuels is indicated by compliance with opacity and CO standards. Equivalent maximum PM emissions were based on data in Table 3.1-2a in AP-42. Regulated VOC emissions were conservatively assumed to be 10% of the manufacturer's estimated emissions for total hydrocarbons. **No testing required.**

[b] The fuel sulfur specification is based on the maximum limit specified by Federal Emergency Regulatory Commission (FERC) and effectively limits the potential SO_2 emissions. Expected fuel sulfur levels are less than 1 grain per 100 SCF of natural gas from the pipeline.

NOTE (1) PM/PM_{10} emissions are minimized by good combustion design with the firing of natural gas as the exclusive fuel.

{Permitting Note: This standard supersedes the previously specified permit limits for PM (TSP and PM_{10}) in all prior Air Construction Permits and all prior Title V Permits concerning EU003, as well as the outdated referenced emission factor. This does not result in any increases in actual or potential emissions of PM. Also this standard supersedes the previously specified permit limits for SO_2 in all prior Air Construction Permits and all prior Title V Permits concerning EU003.}

[Air Construction Permit No. 0070012-011-AC]

CAM **does not** apply.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Based on the initial Title V Air Operation Permit application received June 18, 1996, this facility is not a major source of hazardous air pollutants (HAPs).