Title V Air Operation Permit Renewal
Permit No. 0010001-023-AV

APPLICANT

The applicant for this project is Duke Energy Florida, LLC. The applicant's responsible official and mailing address are: Mr. Steven Marchigiano, Station Manager, Duke Energy Florida, LLC, University of Florida Cogeneration Plant, 1928 Mowry Road, Building 82, Gainesville, Florida 32611-2078.

FACILITY DESCRIPTION

The applicant operates the existing University of Florida (UF) Cogeneration (Cogen) Plant, which is located in Alachua County at 1928 Mowry Road, Building 82, Gainesville, Florida.

The UF Cogen Plant consists of one nominal 48 megawatt General Electric LM6000-PC-ESPRINT Combustion Turbine (CT) with one Heat Recovery Steam Generator (HRSG) and Duct Burner (DB) system comprising a combined cycle unit. In addition, there are three Backup Steam Boilers. The CT uses spray inter-cooling (SPRINT) to maximize power generation and reduce the need for supplemental firing of the DB system to meet steam and power requirements. Emissions from the CT and DB system are vented through the HRSG stack. Emissions of nitrogen oxides are controlled with steam injection and compliance is demonstrated by data collected from a continuous emissions monitoring system.

Each backup steam boiler has a separate exhaust stack and is used only as a backup source of steam when the combined cycle system is not available or to provide supplemental steam during periods of high steam demand. Boiler No. 7 is a backup to Boiler Nos. 5 and 6.

This facility also includes miscellaneous unregulated/insignificant emissions units and/or activities.

REGULATED EMISSIONS UNIT IDENTIFICATION NUMBERS AND DESCRIPTIONS

EU ID No.	Emission Unit Description
003	Steam Boiler No. 5
005	Heat Recovery Steam Generator Duct Burner
007	Combustion Turbine
008	Steam Boiler No. 6
009	Emergency Generator Diesel Engine
010	Steam Boiler No. 7

APPLICABLE REGULATIONS

Based on the Title V air operation permit revision application received on April 2, 2018, this facility is not a major source of hazardous air pollutants (HAP). The existing facility is a prevention of significant deterioration (PSD) major source of air pollutants in accordance with Rule 62-212.400, F.A.C. A summary of applicable regulations is shown in the following table:

Regulation	EU No(s).
Federal Rule Citations	
40 CFR 60, Subpart A, NSPS General Provisions	005, 007, 008, 010
40 CFR 60, Subpart Db	005
40 CFR 60, Subpart Dc	008, 010
40 CFR 60, Subpart GG	005, 007
40 CFR 63, Subpart JJJJJJ	003, 008

Regulation	EU No(s).
40 CFR 63, Subpart ZZZZ	009
40 CFR 72: Acid Rain Program Permit Regulations	005, 007
40 CFR 75: Acid Rain Monitoring Provisions	005, 007
40 CFR 77: Acid Rain Program Excess Emissions	005, 007
40 CFR 78: Acid Rain Program Appeal Procedures	005, 007
State Rule Citations	
Rule 62-204.800, F.A.C.: Federal Regulations Adopted by Reference	003, 005, 007, 008, 009, 010
Rule 62-212.400, F.A.C.: PSD	005, 007
Rule 62-213.413, F.A.C.: Fast-Track Revisions of Acid Rain Parts	005, 007
Chapter 62-214, F.A.C.: Sources Subject to the Federal Acid Rain Program	005, 007
Rule 62-296.406, F.A.C., Fossil Fuel Stem Generators with More Than 250 Million British Thermal Units per Hour (MMBtu/Hour) Heat Input	003, 005, 008, 010

PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V permit for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Renewal Title V Air Operation Permit No. 00100001-016-AV effective: January 1, 2015
Revised Title V Air Operation Permit No. 00100001-019-AV effective: May 12, 2016
Revised Title V Air Operation Permit No. 00100001-021-AV effective: July 17, 2018
Application for a Title V Air Operation Permit Renewal received: May 16, 2019
Additional Information Request dated: June 26, 2019
Additional Information Response received: September 13, 2019

PRIMARY REGULATORY REQUIREMENTS

Standard Industrial Classification (SIC) Code: 4911 – Electrical Generation.

North American Industry Classification System (NAICS): 221112 – Electric Power Generation, Fossil Fuel.

HAP: The facility **is not** identified as a major source of HAP.

Title IV: The facility operates units subject to the acid rain provisions of the Clean Air Act.

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is a PSD-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility operates units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility operates units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the units at the facility. The control equipment for NOx emissions is steam injection. All emission units are monitored using NOx CEMS.

GHG: The facility is identified as a major source of greenhouse gas (GHG) pollutants.

PROJECT REVIEW

Changes to the permit made as part of this revision are shown in ~~strike through~~ format for deletions and in double underline format for additions. For ease of identification, all changes have also been highlighted in yellow within the permit document.

The following revisions were made to the Title V air operating permit follows:

1. Changes throughout the Title V air operation permit that do not alter the intent or underlying language of any permit conditions include:
   - The renewal permit is based on the Department's updated formats for a Title V air operation permit.
   - Updated the permit rule citations and identified acronyms.
   - Updated facility and emissions unit descriptions.

Section II. Facility-Wide Conditions

2. Air Construction Permit No. 001001-022-AC revised Condition **FW9**. (Facility-Wide Annual NOx Emission Cap) and Condition **FW10**. (Annual Facility-Wide NOx Emissions Report). The Title V air operation permit combined the conditions to Condition **FW10** (Facility-Wide Annual NO_X Emissions Cap) for clarity, see the Technical Evaluation and Preliminary Determination (TEPD) for details.
3. Removed Condition **FW11** (Modifications) since it is applicable to prior air construction permits.
4. Removed Condition **FW12** (Recordkeeping and Reporting), per applicant request, to be combined with Condition **FW10** (Facility-Wide Annual NO_X Emissions Cap).
5. Air Construction Permit No. 001001-022-AC removed Condition **FW13** (Fuel Consumption Rates Monthly Monitoring) since the limit for the natural gas to be fired in the HRSG DB was removed, see TEPD for details.

Section III. Subsection A.
Emissions Units 003 (No. 5 Steam Boiler), 008 (No. 6 Steam Boiler) and 010 (No. 7 Steam Boiler)

6. Revised Condition **A.3.** (Methods of Operation – Fuels) for clarity and to meet the new Title V format. The changes are provided below.

A.3. Methods of Operation - Fuels. The fuels that are allowed to be burned in these units are:

a. Steam Boiler No. 5.

(1) Natural gas with a maximum fuel sulfur content of 2 grins of sulfur per 100 standard cubic feet (gr S/100 scf), annual average based on vendor data.

(2) No. 2 distillate fuel oil, secondary, with a maximum sulfur content of 0.5%, by weight.

~~*Fuel Oil*~~

~~i. EU No. 003 (No. 5 Boiler): No. 2 distillate fuel oil with a maximum sulfur content of 0.5% by weight~~

~~ii. EU No. 008 (No. 6 Boiler): No. 2 distillate fuel oil with a maximum sulfur content of 0.1% by weight~~

a. ~~Natural gas with a maximum sulfur content of 2 grains of sulfur per 100 scf of natural gas (annual average based on vendor data).~~

b. *Steam Boiler No. 6.*

(1) Natural Gas with a maximum fuel sulfur content of 2 gr S/100 scf, annual average based on vendor data.

(2) Fuel Oil, secondary.

(a) No. 2 distillate fuel oil, with a maximum sulfur content of 0.1%, by weight.

(b) Fuel oil may only be fired based on the number of hours determined in Condition **14**.

c. *Steam Boiler No. 7.* Natural gas with a maximum fuel sulfur content of 2 gr S/100 scf, annual average based on vendor data.

c. ~~Boilers Nos. 5 and 6 are exempt from the requirements of NESHAP, Subpart JJJJJJ as long as fuel oil firing is limited to 48 hours per calendar year per boiler for periodic testing.~~

d. ~~Fuel oil firing is not limited during periods of gas curtailment or gas supply interruptions.~~

e. ~~Boiler No. 7 is authorized to fire only natural gas. Per 40 CFR §63.11195(e), Boiler No. 7 meets the definition of a "gas-fired boiler" and is exempt from Subpart JJJJJJ requirements (see **Specific Condition A.13**).~~

~~*{Permitting Note: Because the UF Cogen site is supplied by a single natural gas pipeline examples of periods of gas interruptions include, pressure testing of the gas supply pipeline, maintenance and repair of gas valves and gas leak repair. If a back-up boiler exceeds the fuel oil firing limitations and no longer meets the definition of "gas fired boiler" contained in 40 CFR Part 63 Subpart JJJJJJ, the boiler shall comply with all the requirements of the subpart with in the deadlines delineated in this subpart.}*~~

[Rules 62-204.800(8)(b), 62-212.400(AVOID PSD) and 62-296.406(2) & (3)(BACT), F.A.C., F.A.C., 40 CFR 60.42c(d); and Permit Nos. 0010001-018-AC. and 0010001-020-AC ~~Rules 62-212.400(12), F.A.C. and 62-213.410, F.A.C., and Permit Nos. 0010001-011-AC/PSD-FL-181B and 0010001-014-AC/PSD-FL-181C; 0010001-015-AC, Specific Condition 2; and 0010001-020-AC, Specific Conditions 3.A.5 and 3.A.8.~~]

7. Revised Condition **A.5** (Hours of Operation), previous Condition **A.4**, to remove reference to the CT, HRSG DB, NO_X emissions cap and to clarify that the boilers have no restrictions on the hours of operation. The condition was revised as follows:

   A.5. Hours of Operation. These backup boilers may be operated continuously without restriction.~~The boilers may be operated as necessary for backup to the CT and DB, as long as total NO_x emissions from the five emission units (EU Nos. 003, 005, 007, 008 and 010) at the facility, excluding EU 009, do not exceed 185.3 TPY for any calendar year (see Facility-wide Condition **FW9**.). Emission factors pursuant to Facility-wide Condition **FW10** shall be applied to the fuel consumed by Boilers Nos. 5, 6 and 7 to determine compliance with the facility cap. See Facility-Wide Condition **FW9.**~~ [Rule 62-4.070(3), F.A.C.;~~s 62-212.400(12), F.A.C. and 62-213.410, F.A.C.,~~ and Permit Nos. ~~0010001-011-AC/PSD-FL-181B, 0010001-014-AC/PSD-FL-181C~~0010001-018-AC and 0010001-020-AC~~, Specific Condition 3.A.9~~]

8. Condition **A.5**.(Gas Curtailment, Operation of No. 6 Boiler) was moved to Condition **A.19** (Operation of Steam Boiler No. 6) under Test Methods and Procedures and the equation was referenced under Condition **A.3** (Methods of Operations – Fuels) in the Title V permit. Air Construction Permit No. 001001-022-AC revised the condition by removing reference to gas curtailment, see TEPD for details.

9. Air Construction Permit No. 001001-022-AC revised Condition **A.4.** (Restricted Operation of New Backup Boiler No. 7), previously Condition **A.6**, authorizing Boiler No. 7 to operate concurrently with Boiler Nos. 5 and 6 during transition period, see TEPD for details.

10. Revised Condition **A.6** (Visible Emissions) by combining previous Conditions **A.7**. (Visible Emissions Standards – Backup Steam Boilers) and **A.8.** (Visible Emissions – Soot Blowing and Load Change).

11. Combined and separated previous Conditions **A.9** (PM) and **A.10** (SO_2) based on the applicability of the boiler for clarity. Condition **A.8** (PM and SO_2 Emissions) is applicable to the Boiler No. 5, Condition **A.9** (PM and SO_2 Emissions) is applicable to the Boiler No. 6 and Condition **A.11** (PM and SO_2 Emissions) is applicable to the Boiler No. 7.

12. Previous Condition **A.11** (NO_X) was renamed and moved to Condition **A.7** (NO_X Emissions Cap).

13. Previous Condition **A.12** (Emission Standards – Backup Steam Boiler No. 6) the table was separated into individual conditions. In addition, Air Construction Permit No. 001001-022-AC revised the table to remove the NSPS Subpart Dc SO_2 limit for fuel oil since the facility is demonstrating compliance with the alternative fuel oil sulfur limit of 0.5%.

14. Relocated previous Condition **A.13** (NESHAP Subpart JJJJJJ Applicability for Boilers) to Condition **A.28** under other requirements since the boilers are not subject to these federal regulations.

15. Revised Condition **A.15.** (Test Methods), previously Condition **A.17**, by updating the test methods per applicant request.

16. Revised Condition **A.17** (Annual Compliance Tests) previously Condition **A.19**., to clarify "Steam Boiler Nos. 5 and 6 are required to do an annual visible emissions test when firing fuel oil if the boilers fire fuel oil for more than 400 hours/year". The condition is revised as follows:

A.17. Annual Compliance Tests. During each calendar year (January 1st to December 31st), Steam Boiler Nos. 5 and 6 shall be tested:

a. Steam Boiler Nos. 5 and 6 shall be tested to demonstrate compliance with the opacity limits in Condition **A.6.** when firing fuel oil. ~~in which fuel oil usage exceeds 400 hours for Boiler No. 5 or No. 6 (003 or 008), that boiler shall be tested to demonstrate compliance with the emissions standards for VE.~~ The annual emissions tests are not required if the boiler(s) do not fire fuel oil for more than 400 hours during the calendar year, other than during startup. If the boiler(s) fires fuel oil for more than 400 hours during the calendar year, other than during startup, an emissions test shall be completed no later than 60 days after the boiler(s) exceeds the 400 hours, or by the end of the calendar, whichever is later.

b. Steam Boiler No. 7 is only authorized to burn natural gas and is not required to conduct an annual visible emissions test.
~~Compliance with the liquid fuel sulfur limit shall be demonstrated through fuel sampling as specified in Specific Condition **A.6.** and the submission of an annual report detailing the results of the samples from the previous year. Annual VE compliance tests are not required for Boiler No. 7 since this boiler only fires natural gas.~~ [~~Permit Nos. 0010001-018-AC and 1010001-020-AC, Specific Condition 3.A.11; Rules 62-213.440 and 62-297.310(8)(a)5.e, F.A.C.~~ Rule 62-297.310(8) & (8)(a)5.e, F.A.C.; and Permit Nos. 0010001-018-AC and 0010001-020-AC]

17. Revised Condition **A.18.** (Compliance Tests Prior to Renewal), previously Condition **A.20**, for clarity. The condition is revised as follows:

A.18. Compliance Tests Prior to Renewal. Except as provided in subparagraph 62-297.310(8)(b)3., F.A.C. (see condition **TR7.b.(3)** in Appendix TR – Facility-wide Testing Requirements), in addition to the annual compliance tests specified above, compliance tests shall also be performed on Steam Boiler No. 6 for NO_X prior to obtaining a renewed operation permit to demonstrate compliance with the emission limits in Specific Condition **A.10**, and to re-establish the boiler's NO_X emission factors used to comply with the NO_X emissions cap in Condition **FW10**. The emissions tests shall not be required for each fuel-specific limit, natural gas or fuel oil, provided that for the previous 5-year period, the fuel was not burned for more than 400 hours, other than during startup, during each calendar year included in the five-year period. The first time the boiler burns natural gas or fuel oil for more than 400 hours during any calendar year, an emissions test for that fuel must be completed within 60 days, or by the end of that calendar year, whichever is later. ~~Compliance tests shall be performed for **VE** for natural gas operation prior to obtaining a renewed operating permit for Boiler No. 5 and No. 6 to demonstrate compliance with the emission limits in Specific Conditions **A.7.**, **A.8.** and **A.12**. VE testing on fuel oil is not required for Title V renewal. Boiler No. 6 shall be tested to demonstrate compliance with the natural gas NO_X standard in Specific Condition **Error! Reference source not found.**, and re-establish the boiler's NO_X natural gas emission factor, prior to each renewal of the facility's Title V operation permit. VE compliance tests prior to permit renewal are not required for Boiler No. 7 since this boiler only fires natural gas. Boiler No. 6 shall be tested to demonstrate compliance with the NO_X standard for oil, and re-establish the boiler's NO_X fuel oil emission factor, prior to renewal of the facility's Title V operation permit if the boiler was operated on oil for more than 400 hours in any individual year since the previous Title V permit renewal. Compliance with the liquid fuel sulfur limit contained in Specific Condition **a.** shall be demonstrated through fuel sampling as specified in Specific Condition **A.23** and the submission of an~~

~~annual report detailing the results of the samples from the previous year.~~ [~~Permit Nos. 0010001-018-AC and 0010001-020-AC, Specific Condition 3.A.11~~; Rules 62-210.300(2)(a), ~~62-213.440~~ and 62-297.310(8)(b).3.d, F.A.C.; and Permit No. 0010001-018-AC]

~~*{Permitting note: The permittee may petition the Department to remove the requirement for NO_x testing if testing shows that actual NO_x emissions are less than the standard in Specific Condition Error! Reference ource not found.. However, the Department is under no obligation to change this testing requirement.}*~~

18. Removed Condition **A.21.** (Visible Emissions) and **A.22** (NO_X) because these conditions are in duplicate form. The applicable test methods are in Condition **A15** (Test Methods). In addition, a portion of Condition **A.22.** (NO_X) was combined with Condition **A.18.** (Compliance Tests Prior to Renewal), previously Condition **A.20.**

19. Revised Condition **A.20** (Fuel Sulfur Content) previously Condition **A.23.** (SO_2 – Sulfur Content) to clarify the applicable requirements of NSPS Subpart Dc. The condition is as follows:

A.20. ~~Sulfur Dioxide – Sulfur Content~~ Fuel Sulfur Content. ~~The permittee shall demonstrate compliance with the liquid fuel sulfur limit by the vendor providing a fuel analysis upon each fuel delivery. The fuel sulfur content percent by weight, for liquid fuels shall be evaluated using either: ASTMD2622-92, ASTMD2494-90, both D4057-88 and ASTMD129-91, ASTMD1552 or equivalent method, or the latest edition(s). Current applicable alternative methods that are approved ASTM methods are adopted in Rule 62-297.440(1), F.A.C.~~[Rules ~~62-213.440, F.A.C., 62-296.406(3), F.A.C. are also acceptable 62-297.440, F.A.C., BACT~~

a. *Vendor Specifications.* The permittee may demonstrate compliance with the liquid fuel sulfur limit by the vendor providing a fuel analysis, tariff or fuel specification sheets, upon each fuel delivery.

b. *Sampling and Analysis*. If fuel sampling and analysis is used to demonstrate compliance with the fuel sulfur limits for natural gas and fuel oil, the permittee shall use the fuel analysis methods in Condition **A.15**. For fuel oil sampling, the sampling of the oil shall be immediately after the fuel tank is filled. If a partially empty fuel tank is refilled, a new sample and analysis of the fuel in the tank is required upon filling. Results shall be used as the daily value when calculating the 30-day rolling average until the next shipment is received.

62-204.800(8)(b), F.A.C.; 40 CFR 60.44c(g) and 60.46c(d)(2); and Permit Nos. 0010001-018-AC and 0010001-020-AC].

20. Revised Condition **A.22** (Fuel Sulfur Records), previously Condition **A.23** (Recordkeeping and Reporting Requirements), to clarify the applicable recordkeeping requirements.

A.22. Fuel Sulfur Records. ~~The permittee shall maintain the required fuel use records and include the total NO_x emission calculation in each annual operating report.~~

a. *Vendor Specification Sheets*. If fuel supplier certification, tariff or fuel specification sheets, is used to demonstrate compliance with the fuel sulfur limits for natural gas and No. 2 distillate fuel oil, the permittee shall maintain records of the fuel supplier certification. In addition to records of fuel supplier certifications, the report shall include a certified statement signed by the permittee that the records of fuel supplier certifications submitted represent all of the fuel oil combusted during the reporting period. For natural gas, such information may be provided by the natural gas pipeline vendor.

b. *Fuel Sampling*. Records of fuel sampling and analysis performed in Condition **A.21.b** shall be kept on site for 5-years and made available to the Department if requested.

[Rules 62-4.160(15) & 62-204.800(8)(b), F.A.C.; and 40 CFR 60.42c(h) and 60.48c(f); and Permit Nos. 0010001-018-AC and 0010001-020-AC]

21. Added Condition **A.23** (Fuel Consumption Rates – Monthly Records) requiring the fuel to be monitored for the boilers as stated in Permit Nos. 0010001-018-AC and 0010001-020-AC.

22. Removed previous Condition **A.24**. (Annual VE Test Waiver – Boilers No. 5 and No. 6) since it was in duplicate form.

23. Added Condition **A.24**. (Stack Test Reports), to reference the requirements, information and procedure for submittal of stack test reports as stated in Permit No. 0010001-018-AC.

24. Added Condition **A.25**. (Excess Emissions Records and Reports), to meet the requirements of 40 CFR 60.7(d) and 40 CFR 60.48c(c)1 necessary for notification and recordkeeping of the compliance test methods.

Section III. Subsection B. Emission Units 005 (HRSG DB) and 007 (CT)

25. Moved previous Condition **B.1** (Combined Cycle Combustion Turbine System) to Condition **B.20** (Periodic Tests – CT System) under Test Methods and Procedures since the CT requires testing and applicable compliance requirements for switching out like kind equipment.

26. Moved previous Condition **B.2** (Federal Rule Requirements) to Condition **B.30** under Other Requirements.

27. Air Construction Permit No. 001001-022-AC revised Condition **B.1.** (Design Capacity), previously Condition **B.3.** (Permitted Capacity) to change the CT to design capacity and clarify the HRSG DB was already changed to design capacity, see TEPD for details.

28. Air Construction Permit No. 0010001-022-AC revised Condition **B.3** (Methods of Operation – Fuels), previous Condition **B.5** by removing the HRSG DB natural gas fuel rate of 519.5 million cubic feet per year, see TEPD for details.

29. Revised Condition **B.8** (Emissions Standards – Combined Cycle Combustion Turbine with Duct Burner) by separating the pollutants into individual conditions, which includes **B.6** (CO Emissions), and combining with Condition **B.7** (NO_X Emissions), previous Condition **B.10**, Condition **B.8** (SO_2), previous Condition **B.12**, Condition **B.9** (PM), previous Condition **B.11** (PM), and Condition **B.10.** (Visible Emissions), previous Condition **B.9**, for clarity and moving the compliance requirements for NO_X emissions to Condition **B.22** (NO_X Emissions – Compliance Requirements) under Testing Requirements and Procedures.

30. Air Construction Permit No. 0010001-022-AC revised Condition **B.14** (Monitoring of Operations – CT and HRSG DB) by combined previous Conditions **B.16** (Fuel Consumption Monitoring of Operations) and **B.17** (Fuel Consumption Rates Monthly Monitoring) see TEPD for details.

31. Added Condition **B.15.** (Fuel Flow Monitoring) as required by NSPS Subpart GG (40 CFR 60.334) and 40 CFR Part 75 Appendix D.

32. Renamed Condition **B.17.** (Continuous Operations Monitoring Systems – CT), previously Condition **B.18** (Continuous Operations Monitoring Systems) for clarity.

33. Air Construction Permit No. 001001-022-AC revised Condition **B.16.** (NOx CEMS), previous Condition **B.19**. (Continuous NOx Emission Monitoring System) by renaming the condition's and to clarify the NO_X CEMS is to meet the applicable requirements of 40 CFR 75, see TEPD for details.

34. Air Construction Permit No. 001001-022-AC revised previous Condition **B.20** (Use of NO_X CEMS for CT and Duct Burner Compliance), see TEPD for details. This condition was moved to Condition **B.23** (NO_X Emissions – Compliance Requirements) and combined with previous Condition **B.8** (Emissions Standards – Combined Cycle Combustion Turbine with Duct Burner).

35. Revised Condition **B.19.** (Annual Compliance Tests), previously Condition **B.23.** for clarity. The condition is revised as follows.

    B.19. Annual Compliance Tests. During each calendar year (January 1st to December 31st), the combined cycle combustion turbine system shall be tested to demonstrate compliance with the CO ~~standards~~ in Condition **B.6**. Due to safety considerations, stack testing while firing the HRSG duct burner when there is no demand for steam would require dumping excess steam, which presents a safety issue given the existing configuration. Therefore, annual CO compliance tests may be conducted with or without the HRSG DB in operation ~~with the duct burner on or off~~, as dictated by the system demand. Continuous compliance with the NO_X standards in Condition **B.7.** will be demonstrated with certified CEMS data ~~*(Permitting Note: A safety evaluation of the steam vent system indicated that it did not meet the code and was deemed*~~

~~*unsafe*}~~ [Rules 62-4.070(3) and 62-297.310(7) & (8), F.A.C.; and Permit No. 0010001-018-AC.~~Permit No. 0010001-011-AC/PSD-FL-181B; 0010001-015-AC~~]

36. Added Condition **B.21** (Special Compliance Tests) as shown in Permit No. 0010001-018-AC and pursuant to Rule 62-297.310(8), F.A.C.
37. Removed Condition **B.24** (Compliance Tests Prior to Renewal) since no testing is not required prior to renewal.
38. Added Condition **B.26** (Fuel Sulfur Content Records) pursuant to NSPS Subpart GG of 40 CFR 60.
39. Revised Condition **B.27.** (Excess Emissions Report) to incorporate the definition of malfunction as provided in Rule 62-210.200(155), F.A.C. for clarification purposes.
40. Removed previous Conditions **B.25.** (Visible Emissions), **B.26** (CO), **B.27.** (SO_2), **B.28** (SO_2 Annual Test Waiver), and **B.29** (NO_X) since they are in duplicate form and the test methods previously provided are in Condition **B.21**.
41. Revised Condition **B.28** (Excess Emissions Report – CEMS), previous Condition **B.33** (Semi-Annual Reports) to meet the applicable requirements of NSPS Subpart GG of 40 CFR 60 and Rule 62-210.700, F.A.C.
42. Removed Condition **B.34** (Notification of Excess Emissions During Startup, Shutdown, and Documented Unavoidable Malfunctions) since it was in duplicate form.

CONCLUSION

This project renews Title V air operation permit No. 0010001-016-AV, which was effective on May 12, 2014. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210, and 62-213, F.A.C.