M E M O R A N D U M

DATE: May 8, 2014

TO: Richard D. Garrity, Ph.D.

FROM: Lora Webb **THRU**: Diana M. Lee, P.E.
Sterlin K. Woodard, P.E

SUBJECT: Revised Operating Permit Renewal – Florida Gas Transmission Company Permit No. 0571279-004-AO

Attached is Revised Renewal Operating Permit No. 0571279-004-AO for the operation of Florida Gas Transmission Co. (FGT) Compressor Station No. 27, located at 10171 County Road 579, Thonotosassa, FL. The facility consists of two Cooper-Rolls Royce, Model No. 501-KC7DLE, natural gas fired turbine compressor engines. Each engine has a nominal rating of 7,200 brake horsepower (ISO) and a maximum heat input rate of 63 MMBtu/hr. The turbines are used to compress the natural gas in the natural gas pipeline operated by FGT in order to maintain a constant pressure for the transportation of the natural gas to customers throughout Florida.

The renewal operating permit was issued on February 12, 2014. On February 17, one comment on the permit was received from the facility by email. Listed below is each comment and a response to each in the order that the comment was received. The comment(s) will not be restated but are summarized. Where duplicative comments exist, the original response is referenced.

Comment No. 1: FGT only conducts NSPS testing as described in Specific Condition 9.D)ii)b) when a turbine exchange event has occurred. All other compliance testing (i.e. annual visible emissions and permit renewal testing) is conducted when the turbines are operating at 90-100% capacity or as practicable.

Response: After talking with the facility, it was clarified that Specific Condition Nos. 9.D)ii)b) and 17 require the facility to perform NOx and CO testing while operating at different rates. Specific Condition No. 9.D)ii)b) states "The 3-run performance test required by 40 CFR 60.8 must be performed within 5 percent at 30, 50, 75, and 90-to-100 percent of peak load or at four evenly-spaced load points in the normal operating range of the gas turbine, including the minimum point in the operating range and 90-to-100 percent of peak load, or at the highest achievable load point if 90-to-100 percent of peak load cannot be

physically achieved in practice".

However, Specific Condition No. 17 states "Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity of 13.13 MMBtu/hr for Turbine Nos. 3001 (EU 001) and 3002 (EU 002) and 15.76 MMBtu/hr for Turbine No. 3003 (EU 003)". Specific Condition No. 17 is changed as follows to clarify that testing in accordance with 40 CFR 60 Subpart GG is only required when a turbine exchange event occurs.

From:
17. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity of 63 MMBtu/hr. If it is impracticable to test at capacity, then the source may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the EPC. Failure to submit the input rates and actual operating conditions may invalidate the test. [Rules 62-4.070(3) and 62-297.310(2)(b), F.A.C.]

To:
17. Except as specified under Specific Condition No. 9.D) and 11.C), which are applicable to new turbine engines, testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity of 63 MMBtu/hr. If it is impracticable to test at capacity, then the source may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the EPC. Failure to submit the input rates and actual operating conditions may invalidate the test. [Rules 62-4.070(3) and 62-297.310(2)(b), F.A.C.]

Based on our review, we recommend that the above referenced permit be issued as drafted.

LAW: 0571279-004-AO

ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT ISSUANCE

CERTIFIED MAIL

David Shellhouse
Vice President, Southeast Operations
Florida Gas Transmission Company
2405 Lucien Way, Suite 200
Maitland, FL 32751

File No.: 0571279-004-AO
County: Hillsborough

Enclosed is Permit Number 0571279-004-AO for the operation of Compressor Station No. 27, which consists of two Cooper-Rolls Royce (Model No. 501-KC7DLE) natural gas fired turbine compressor engines, each with a nominal 7,200 bhp (ISO) rating, issued pursuant to Section 403.087, Florida Statutes. Please read this new permit thoroughly as there are changes from the previous permit.

The EPC will issue the final permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Section 120.569 and 120.57 F.S. before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

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 Legal Department of the EPC at 3629 Queen Palm Dr, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) 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 14 (fourteen) days of receipt of this permit. Under Section 120.60(3), however, any person who asked the EPC for notice of agency action may file a petition within 14 (fourteen) days of receipt of that notice.

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 of the F.A.C.

A petition that disputes the material facts on which the EPC'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 and the name, address, and telephone number of each petitioner's representative, if any, which shall be the address for service purposes during the course of the proceedings; and an explanation of how the petitioner's substantial interests will be affected by the EPC's determination;

(c) A statement of how and when the petitioner received notice of the EPC 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 EPC's proposed action;

(f) A statement of specific rules or statutes the petitioner contends requires reversal or modification of the EPC's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; and

(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the EPC to take with respect to the EPC's proposed action.

A petition that does not dispute the material facts upon which the EPC'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.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the EPC'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 EPC on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation under section 120.573, F.S. is not available in this proceeding.

This action is final and effective on the date filed with the Clerk of the EPC unless a petition is filed in accordance with above. Upon the timely filing of a petition, this order will not be effective until further order of the EPC.

Any person listed below may request to obtain additional information, a copy of the application (except for information entitled to confidential treatment pursuant to Section 403.111, F.S.), all relevant supporting materials, and all other materials available to the EPC that are relevant to the permit decision. Interested persons may contact Diana M. Lee, P.E., at the above address or call (813) 627-2600, for additional information.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statues, by filing a notice of appeal under rule 9.110 of the Florida rules of Appellate Procedure with the EPC's Legal Office at 3629 Queen Palm Dr, Tampa, Florida 33619 and 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 days after this order is filed with the clerk of the Department.

Executed in Tampa, Florida.

Sincerely,

_____

Richard D. Garrity, Ph.D.
Executive Director

RDG/LAW/law

cc: Florida Department of Environmental Protection, Southwest District (via e-mail)

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT ISSUANCE and all copies were before the close of business on _____ to the listed persons.

FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to Section 120.52(11), Florida Statutes, with the clerk, receipt of which is hereby acknowledged.

_____ _____
Clerk Date

PERMITTEE:
Florida Gas Transmission Company
2405 Lucien Way, Suite 200
Maitland, FL 32751

PERMIT/CERTIFICATION
Permit No: 0571279-004-AO
County: Hillsborough
Expiration Date: February 12, 2019
Project: Two Natural Gas Fired Turbine Compressor Engines

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-204, 62-210, 62-212, 62-296, 62-297, and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans and other documents, attached hereto or on file with the EPC and made a part of hereof and specifically described as follows:

This permit authorizes the operation of Compressor Station No. 27, which consists of two Cooper-Rolls Royce, Model No. 501-KC7DLE, natural gas fired turbine compressor engines. Each engine has a nominal rating of 7,200 brake horsepower (ISO) and a maximum heat input rate of 63 MMBtu/hr. The turbines are powered by natural gas supplied by the Florida Gas Transmission Company pipeline. The turbines are used to compress the natural gas in the pipeline in order to maintain a constant pressure for the transportation of the natural gas to customers throughout Florida. In addition, the turbine compressor engines are contained in an acoustical building in order to minimize the noise effects from the compressor engines.

Also onsite are miscellaneous support equipment. The facility has two 4,200 gallon storage tanks, which are used to store oily water and pipeline condensate, and one 495 HP Cummins natural gas fired emergency generator. The tanks and the emergency generator are exempt from permitting pursuant to Rules 62-210.300(3)(b) and 62-210.300(3)(a)35., F.A.C., respectively. However, the engine, which was manufactured in 1998, is subject to 40 CFR 63, Subparts A and ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

Emissions are minimized by limiting the type of fuel that can be combusted in the turbines to natural gas only and by limiting the sulfur and nitrogen content in the natural gas.

Location: 10171 CR 579, Thonotosassa, FL

UTM: 17-372.157 E 3102.414 N NEDS NO: 1279

Emission Unit No.: 001 – FGTC Engine 2701 - 7200 bhp Gas Turbine Compressor Engine
002 – FGTC Engine 2702 - 7200 bhp Gas Turbine Compressor Engine

References Permit No.: 0571279-001-AC

Replaces Permit No.: 0571279-003-AO

SPECIFIC CONDITIONS:

1. A part of this permit is the attached General Conditions. [Rule 62-4.160, F.A.C.]

2. All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. [Rule 62-4.070(7), F.A.C.]

3. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C., or any other requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]

4. Each gas turbine shall fire only natural gas with a maximum of 10 grains of sulfur per 100 cubic feet of natural gas. [40 CFR 60.334(h)(3)(i), Rules 62-210.200(PTE) and 62-4.070(3), F.A.C., and Permit No. 0571279-001-AC]

5. The gas turbines shall not discharge into the atmosphere the emissions of air pollutants, the density of which is equal to or greater than 10 % opacity. [Rule 62-4.070(3), F.A.C., and Permit No. 0571279-001-AC]

6. In order to ensure compliance with Specific Condition Nos. 4 and 5, the following restrictions and conditions shall apply: [Rule 62-4.070(3), F.A.C. and Permit No. 0571279-001-AC]

A) Fuel: Natural gas as supplied by the pipeline.
B) The maximum heat input to each gas turbine shall not exceed 63 MMBtu/hr while producing approximately 7,220 bhp (ISO) based on a compressor inlet air temperature of 59 ºF, 100% load, and a higher heating value 1,040 BTU/scf for natural gas. Heat input rates will vary depending upon gas turbine characteristics, load, and ambient conditions.
C) The operating hours are not restricted.
D) Except for startup and shutdown, operation of the turbines below 50% base load is prohibited.
E) The turbine units shall be kept in good repair and all leaks shall be minimized.

7. In order to limit the potential to emit, emissions from each gas turbine shall not exceed the following: [Rule 62-4.070(3), F.A.C., and Permit No. 0571279-001-AC]

Pollutant	Standards	lb/hr	TPY
VOC	Good combustion practices (factor:10 ppmvd @ 15% O_2	1.5	6.6
NOx	25.0 (Factor:10 ppmvd @ 15% O_2)	5.7	25
CO	50.0 ppmvd @ 15% O_2	7.0	30.7
SO_2	10 grains of sulfur per 100 scf of gas	1.7	3.8
PM	Good combustion practices Factor:(0.0066 lb/MMBtu)	0.4	1.8

SPECIFIC CONDITIONS:

8. The permittee shall not cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320, F.A.C.]

9. The stationary gas turbines shall comply with all the applicable regulations in 40 CFR 60, Subpart GG and the following: [Rule 62-204.800(8)(b)41, F.A.C.]

A) Standards: [40 CFR 60.332(a)(2), 40 CFR 60.332(c), 40 CFR 60.333(b), Rule 62-4.070(3), F.A.C., and Permit No. 0571279-001-AC]

i) The permittee shall not cause to be discharged into the atmosphere from any stationary gas turbine any gases which contain nitrogen oxides and sulfur dioxide in excess of the following:

$$STD = 0.0150\frac{(14.4)}{Y} + F$$

where:
STD = allowable ISO corrected (if required as given in 60.335(b)(1)) NOx emissions (percent by volume at 15 percent oxygen and on a dry basis).
Y = manufacturer's rated heat rate at manufacturer's rated peak load (kilojoules per watt hour), or actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt hour.
F = NOx emission allowance for fuel-bound nitrogen as defined by the table below.

F shall be defined according to the nitrogen content of the fuel as follows:

Fuel-bound nitrogen (% by weight)	F (NO_x% by volume)
$N \leq 0.015$	0
$0.015 < N \leq 0.1$	0.04(N)
$0.1 < N \leq 0.25$	0.004+0.0067(N-0.1)
$N > 0.25$	0.005

where:
N = the nitrogen content of the fuel (percent by weight). Manufacturers may develop custom fuel-bound nitrogen allowances for each gas turbine model they manufacture. These fuel-bound nitrogen allowances shall be substantiated with data and must be approved for use by the Administrator before the initial performance test required by 40 CFR 60 Appendix A. Notices of approval of custom fuel-bound nitrogen allowances will be published in the Federal Register.

ii) The permittee shall not burn in any stationary gas turbine any fuel which contains sulfur in excess of 0.8 percent by weight.

B) Monitoring of Operations: [40 CFR 60.334(c), 40 CFR 60.334(h)(3)(i), Rule 62-4.070(3), F.A.C., Permit No. 0571279-001-AC, and EPA determination dated October 21, 1998]

i) Each turbine shall use natural gas from a source delivering gas under a tariff specifying that the maximum sulfur content of the fuel shall not exceed 10 gr./100 scf.

ii) The requirement to monitor the nitrogen content of the pipeline natural gas is waived due to natural gas being the exclusive fuel and containing negligible amounts of nitrogen.

C) Excess emissions: [Rules 62-210.700(1) and (4) and 62-210.700(6), F.A.C. and Permit No. 0571279-001-AC]

i) Excess emissions resulting from startup, shutdown or malfunction shall be permitted providing best operational practices to minimize emissions are adhered to and the duration of the excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

ii) Excess emissions caused entirely or in part by poor maintenance, poor operation or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. Excess emissions from malfunctions shall be reported to the EPC. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

D) Test methods and procedures: [40 CFR 60.334 and 40 CFR 60.335]

i) The owner or operator shall conduct the performance tests required in 40 CFR 60 Subpart A using either EPA Method 20, ASTM D6522-00, or EPA Method 7E and either EPA Method 3 or 3A in 40 CFR 60 Appendix A, to determine NO_x and diluent concentration.

ii) The permittee shall determine compliance with the nitrogen oxides and sulfur dioxide standards in 9.A) and B) and shall meet the performance test requirements of 40 CFR 60.8 and as follows: [40 CFR60.335(b)]

a) For each run of the performance test, the mean nitrogen oxides emission concentration (NO_{Xo}) corrected to 15 percent O_2 shall be corrected to ISO standard conditions using the following equation:

$$NO_X = (NO_{XO})\,(P_r/P_O)^{0.5} e^{19(H_o\ --\ 0.00633)}\,(288°K/T_a)\ \ 1.53$$

where:
NO_X = emission rate of NO_X at 15 percent O_2 and ISO standard ambient conditions, ppm by volume.
NO_{XO} = observed NO_X concentration, ppm by volume at 15 percent O_2.
P_r = reference combustor inlet absolute pressure at 101.3 kilopascals ambient pressure, mm Hg.
P_o = observed combustor inlet absolute pressure at test, mm Hg.
H_o = observed humidity of ambient air, g H2O/g air.
e = transcendental constant, 2.718.
T_a = ambient temperature, °K.

b) The 3-run performance test required by 40 CFR 60 Appendix A must be performed within plus or minus 5 percent at 30, 50, 75, 90 to 100 percent of peak load or at four evenly spaced load points in the normal operating range of the gas turbine, including the minimum point in the range and 90 to 100 percent of peak load. Or the highest achievable load point if 90- to – 100 percent of the peak load cannot be physically achieved in practice. [40 CFR 60.335(a)(6)(2)]

c) Method 20, ASTM D6522-00, or EPA Method 7E and either EPA Method 3 or 3A shall be used to determine the nitrogen oxides, sulfur dioxide, and oxygen concentrations. The span shall be 300 ppm of nitrogen oxide and 21 percent oxygen. The NOx emissions shall be determined at 30, 50, 75 and 100 percent of the peak load or at four points in the normal operating range of the gas turbine, including the minimum point in the range and peak load.

d) The permittee is required to correct NOx emissions to ISO ambient atmospheric conditions for each required emissions performance test and compare to the NOx standard specified in 40 CFR 60.332 (Specific Condition No. 9.A)).

e) If the owner or operator elects to claim an emission allowance for fuel bound nitrogen as described in 40 CFR 60.332 (Specific Condition No. 9.A)), then concurrently with each reference method run, a representative sample of the fuel used shall be collected and analyzed, following the applicable procedures described in 40 CFR 60.335(b)(9) (below). These data shall be used to determine the maximum fuel nitrogen content for which the established water (or steam) to fuel ratio will be valid.

1. To determine the fuel bound nitrogen content of fuel being fired (if an emission allowance is claimed for fuel bound nitrogen), the owner or

operator may use equipment and procedures meeting the requirements of:

(a) For liquid fuels, ASTM D2597-94 (Reapproved 1999), D6366-99, D4629-02, D5762-02 (all of which are incorporated by reference, see 40 CFR 60.17); or
(b) For gaseous fuels, shall use analytical methods and procedures that are accurate to within 5 percent of the instrument range and are approved by the Administrator.

iv) The permittee may use the following procedure described as an alternative to the reference methods and procedures specified in 40 CFR 60.335(b) (Condition 9.D)ii)a) above):
Instead of using the equation in Specific Condition 9.D)ii)a), manufacturers may develop ambient condition correction factors to adjust the nitrogen oxides emission level measured by the performance test as provided in 40 CFR 60 Appendix A to ISO standard day conditions. These factors are developed for each gas turbine model they manufacture in terms of combustion inlet pressure, ambient air pressure, ambient air humidity, and ambient air temperature. They shall be substantiated with data and must be approved for use by the Administrator before the initial performance test required by 40 CFR 60 Appendix A. Notices of approval of custom ambient condition correction factors will be published in the Federal Register. [40 CFR 60.335(c) and 60.332(a)(4)]

10. [Reserved]

11. The permitee shall comply with the following notification and testing requirements for the replacements of the gas turbine components to facilitate prompt repair and return the unit to its original specifications: [Rule 62- 4.070(3), F.A.C. and FDEP determination dated July 1, 2005]

A) Components shall only be replaced with functionally equivalent “like-kind” equipment. Replacement components may consist of improved or newer equipment, but such components shall not change the operation or increase the capacity (heat input and power output rates) of the gas turbine. Replacement components that affect emissions shall be designed to achieve the emissions standards specified in all valid air permits and shall achieve these standards or better. After a component replacement, the gas turbine compressor engine remains subject to the standards of all valid air permits. [Rule 62-210.200(169), F.A.C.]

B) The permittee shall notify the Environmental Protection Commission within seven days after beginning any replacement of the gas generator component of the compressor engine. Within seven days of the first fire on a replacement gas generator, the permittee shall submit the following information to the Environmental Protection Commission: date of first fire and certification from the vendor that the replacement gas generator is a functionally equivalent “like

Kind" component. The vendor certification shall also identify the make, model number, maximum heat input rate (MMBtu/hr), power output (bhp) at ISO conditions, and that the permitted emission rate(s) are achieved with the replacement component. This notification may be made by letter, fax, or email. A copy of the information shall be kept on site at the compressor station.

C) Within 60 day of restarting the unit after a gas generator replacement, the permittee shall conduct a stack test in accordance with Specific Condition No. 9.D) to demonstrate compliance with the applicable emission standards. The permittee shall notify the Environmental Protection Commission in writing at least 15 days prior to conducting these tests. The permittee shall comply with all of the permit requirements for test notification, test methods, test procedures, and reporting. [Rule 62-4.130, 62-160(15), and 62-297.310(7)(b), F.A.C.]

D) After investigation and for good cause, the Department may require a special compliance test pursuant to Rule 62-297.310(7)(b), F.A.C.

12. If the permittee is temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the permittee shall immediately notify the EPC. Notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with Department rules. [Rule 62-4.130, F.A.C.]

13. Test for visible emissions from each turbine unit, once per federal fiscal year (October 1 – September 30) and submit two copies of the test data to the Air Management Division of the Environmental Protection Commission of Hillsborough County within 45 days of such testing. Testing procedures shall be consistent with the requirements of Rule 62-297.310, F.A.C. In addition to the test results, each report shall include the following: a report on any non-routine maintenance conducted on each unit, a vendor analysis of the fuel sulfur content and a general description of the activities and operation of this facility since the last test. [Rules 62-297.310(7)(a)3 and 62-297.310(7)(a)4, F.A.C.]

14. Test each gas turbine, in order to demonstrate compliance with the SO_2, CO and NOx standards, during the 12-month period prior to the renewal of this permit. CO and NOx emissions shall be tested concurrently at the permitted facility. SO_2 emissions shall be calculated based on fuel flow and vendor analysis of the fuel sulfur content. [Rule 62-297.310(7)(a)3, F.A.C.]

15. Compliance with the emission limitations of Specific Condition No. 5 shall be determined using EPA Method 9 contained in 40 CFR 60 Appendix A and adopted by reference in Rule 62-297, F.A.C. The EPA Method 9 test shall be at least 30 minutes in duration. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60 Appendix A. [Rule 62-297.310(4), F.A.C.]

SPECIFIC CONDITIONS:

16. When the Environmental Protection Commission of Hillsborough County (EPC) after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in Rules 62-204, 62-210, 62-212, 62-296, or 62-297, F.A.C., or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the EPC. [Rule 62-297.310(7)(b), F.A.C.]

17. Except as specified under Specific Condition No. 9.D) and 11.C), which are applicable to new turbine engines, testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity of 63 MMBtu/hr. If it is impracticable to test at capacity, then the source may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the EPC. Failure to submit the input rates and actual operating conditions may invalidate the test. [Rules 62-4.070(3) and 62-297.310(2)(b), F.A.C.]

18. The permittee shall notify the Air Compliance Section of the Environmental Protection Commission of Hillsborough County at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the contact person who will be responsible for coordinating and having such test conducted. [Rule 62-297.310(7)(a)9., F.A.C]

19. The permittee shall comply with the following requirements: [40 CFR 60.7, .11, and .12]

A) The permittee shall furnish the EPC written notification of any physical or operational change which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an application subpart or in 40 CFR 60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The EPC may request additional relevant information subsequent to this notice. [40 CFR 60.7(a)(4]

B) At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the EPC which may include but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [40 CFR 60.11(d)]

C) No owner or operator subject to the provisions of this part shall build, erect, install, or use any

article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere. [40 CFR 60.12]

D) The permittee shall comply with the following requirements: [40 CFR 60.7(f), Rule 62-4.160(14), F.A.C., and Permit No. 0571279-001-AC]

i) Record and maintain records for the heat input (MMBtu), power output (bhp), and hours of operation for each turbine.

ii) Record and maintain records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instruments).

iii) Maintain records required by i) and ii) above on-site for a period of three years. All records shall be made available for review by any federal, state, or local agency upon request.

20. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Rule 62-296.320, F.A.C. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, alterations, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. [Rule 62-296.320, F.A.C.]

21. The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200, F.A.C., Modification. The changes do not include normal maintenance, but may include, and are not limited to the following, and may also require prior authorization before implementation: [Rules 62-210.300, 62-4.060 and 62-4.070(3), F.A.C.]

A) Installation or addition of any equipment which is a source of air pollution.
B) The introduction of any new primary or backup fuel.

22. The permittee shall apply for a timely revision of this permit, if affected by the promulgation of federal NESHAP standards for this type of operation. [Rule 62-4.070(3), F.A.C.]

23. Submit to the Environmental Protection Commission of Hillsborough County each calendar year on or before April 1, completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility", for the preceding calendar year. [Rule 62-210.370(3)(c)., F.A.C.]

24. Prior to sixty days before the expiration of this operating permit, the permittee shall apply for a

renewal of the permit using the current version of the permit renewal application form. A renewal application shall be timely and sufficient. If the application is submitted prior to sixty days before the expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the EPC or, if there is court review of the final agency action, until a later date is required by Section 120.60, Florida Statutes. [Rule 62-4.090, F.A.C.]

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

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Richard D. Garrity, Ph.D.
Executive Director