# FINAL DETERMINATION

## PERMITTEE

Deerhaven Generating Station
City of Gainesville, Gainesville Regional Utilities (GRU)
P.O. Box 147117, Station A132
Gainesville, Florida 32614-7117

## PERMITTING AUTHORITY

Florida Department of Environmental Protection (Department)
Division of Air Resource Management
Office of Permitting and Compliance
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400

## PROJECT

Final Permit No. 0010006-022-AV

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

The Title V air operation permit was processed using a parallel review.

## PUBLIC NOTICE

A Written Notice of Intent to Issue Air Permits to the City of Gainesville, Gainesville Regional Utilities (GRU) for the Deerhaven Generating Station located in Alachua County at 10001 NW 13th Street in Gainesville, Florida, was clerked on August 18, 2014. The applicant published the Public Notice in the Pasco Times edition of the Gainesville Sun in Alachua County, Florida on August 22, 2014. The draft/proposed Title V air operation permit was available for public inspection at the permitting authority's office in Tallahassee. The Department received the proof of publication on August 28, 2014.

No requests for an administrative hearing or requests for an extension of time in which to file a petition for an administrative hearing were received by the Agency Clerk in the Department's Office of General Counsel.

## COMMENTS

On August 18, 2014, the Department informed U.S. EPA Region 4 that the Title V air operation permit was being processed using a parallel review.

No comments on the permit were received from the public or U.S. EPA during the 30-day public comment period; however, comments were received from the Applicant. The comments were not considered significant enough to reissue the draft/proposed Title V air operation permit and require another Public Notice, therefore, the draft/proposed Title V air operation permit was changed. The comments are addressed below.

All changes are emphasized with yellow highlight in this document only. Additions to the permit are indicated below by double underline. Deletions from the permit are indicated below by ~~strike through~~.

Comments from the Applicant dated August 26, 2014, received via email on September 11, 2014

### Comments

1. GRU requests to have Condition **C.9.** read as follows:

   **C.9.** Excess Emissions Allowed. Excess emissions resulting from startup, shutdown, or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed ~~two hours~~120 minutes (noncontinuous) in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]

***Response*:** Review of the underlying Florida Rule 62-210.700(1), F.A.C. finds clarifications to be acceptable.

Clarifications are made to the permit as follows:

*Specific Condition III.C.9.:*

"**C.9.** Excess Emissions Allowed. Excess emissions resulting from startup, shutdown, or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours {120 minutes (non-continuous)} in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.; and, Applicant Request.]"

2. GRU did not request in the application to have all of the transfer points fully enclosed. Please replace Condition **D.1.** with the following language to clearly represent the intent of the request in the application.

**D.1.** Equipment: The "Transfer Pt. ID's" (transfer points) identified as CH-001 - CH-011 are either fully enclosed or fugitive emissions, therefore not subject to VE testing requirements.

***Response*:** The Department acknowledges that GRU did not request in the permit application to have all of the transfer points fully enclosed. A review of the request changes ("ADB6") had seemed to indicate that these transfer points were fully enclosed. There seems to have been some ambiguity. A further, detailed review of the diagram found in Attachment C-3 of the permit application clearly shows these transfer points identified as CH-001 - CH-011. The diagram shows that the transfer points identified as CH-006 - CH-009 are not fully enclosed. Therefore, the Department agrees that a correction is in order and needs to be done to the permit language.

The corrections are made to the permit as follows:

*Specific Condition III.D.1.:*

"**D.1.** Equipment. The "Transfer Pt. ID's" (transfer points) identified as CH-001 - CH-011 ~~shall be fully enclosed~~are either fully enclosed or fugitive emissions, therefore not subject to VE testing requirements. [Permit No. 0010006-021-AC; Rule 62-210.200(PTE), F.A.C.; and, Applicant Request.]"

Email from the Applicant on August 18, 2014

3. GRU submitted a Phase II NOx Compliance Plan (Renewal) on August 18, 2014.

***Response*:** The draft/proposed permit in Subsection IV.B. had contained the most recent Phase II NOx Compliance Plan on file with the Department. A minor correction can be made to reflect the submitted renewed Phase II NOx Compliance Plan. The NOx emission standard did not change in the renewal submitted.

The corrections are made to the permit as follows:

*Specific Condition IV.B.1.:*

"**B.1.** Acid Rain Part Application. The Phase II Acid Rain Part application submitted for this facility, as approved by the Department, is a part of this permit. The owners and operators of these Phase II acid rain units must comply with the standard requirements and special provisions set forth in the application(s) listed below:

a. Phase II NOx Compliance Plan, EPA Form 7610-28 (12-03), received on ~~[Month day , year (2014)]~~ August 18, 2014, and signed by the Designated Representative on ~~[August 11, 2009]~~ August 18, 2014, which is included at the end of this subsection.

[Chapter 62-213, F.A.C.; and, Rule 62-214.320, F.A.C.]"

The two page renewed Phase II NOx Compliance Plan replaces the previous one in the draft/proposed permit.

Also, the permitting note as it relates to acid rain just above Specific Condition III.A.1. is corrected as follows {Phase II NOx does not apply to Boiler No. 1}:

*"{Permitting note(s): This emissions unit is regulated under ~~Acid Rain, Phase II;~~ Rule 62-296.470, F.A.C., Clean Air Interstate Rule (CAIR); Rule 62-296.405(1), F.A.C., Fossil Fuel Steam Generators with More than 250 million Btu per Hour Heat Input. As required under the Acid Rain Program, the unit has continuous emission monitoring systems (CEMS) for measuring opacity, ~~nitrogen oxides,~~ and carbon dioxide. These monitors are used as indicators of compliance and periodic monitoring.}"*

**Administrative Permit Correction**

A comment was submitted on Specific Condition D.1. of the draft/proposed Title V air operation permit. Specific Condition D.1. of the draft/proposed Title V air operation permit was corrected as previously indicated above.

1. As part of this permitting action the Department makes the corresponding administrative permit correction to the underlying Permit No. 0010006-021-AC as follows:

"1. Equipment. The "Transfer Pt. ID's" (transfer points) identified as CH-001 - CH-011 ~~shall be fully enclosed~~are either fully enclosed or fugitive emissions, therefore not subject to VE testing requirements. [Permit No. 0010006-021-AC; Rule 62-210.200(PTE), F.A.C.; Applicant Request.]"

**CONCLUSION**

The final action of the Department is to issue the permit with the administrative corrections and/or clarifications as noted above.

Note: This permit became a final permit on 10/16/2014 (Day 55) by operation of law pursuant to Section 403.0872, F.S.