FINAL DETERMINATION

PERMITTEE

Orlando Utilities Commission
Reliable Plaza
100 West Anderson Street
Orlando, Florida 32801

PERMITTING AUTHORITY

Florida Department of Environmental Protection (Department)
Division of Air Resource Management
Bureau of Air Regulation, Title V Section
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400

PROJECT

Permit No. 0090008-005-AV
Indian River Plant

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

NOTICE AND PUBLICATION

The Department distributed an Intent to Issue a Title V Air Operation Permit Renewal package on October 30, 2009. The applicant published the Public Notice of Intent to Issue a Title V Air Operation Permit Renewal in the Florida Today on November 24, 2009. The Department received the proof of publication on December 1, 2009. The intent package included a draft/proposed permit document.

COMMENTS

Applicant Comments

Four comments were received from the applicant concerning the draft/proposed Title V air operation permit in an e-mail memorandum dated December 23, 2009. The comments follow with the corresponding Departmental response.

Comment 1: Reference: Specific Condition **C.7**. These combustion turbines do not have COMS, this condition seems to be an artifact of the old operation permit that included both the combustion turbines and the steam units that where [*sic*] sold by OUC to Reliant Energy. OUC proposes this condition is no longer applicable.

Response 1: Research of Department files reveals that this specific condition was included in the facility's Title V Air Operation Permit Revision No. 0090008-002-AV, issued on January 31, 2001, as part of a section with the heading "Common Conditions". Since it appears that the condition was intended to apply to the combustion turbines, this change is not adopted in the final permit.

Comment 2: Reference: Specific Condition **C.10.** This condition adds SO_2 to the annual testing requirements. Conditions A9, and B12 ("Fuel Sulfur Content. To comply with the sulfur emission limits, the sulfur content of the as-fired fuels shall not exceed 0.3 percent, by weight.") both suggest the compliance method for the units SO_2 limits is fuel sulfur content monitoring. OUC proposes the annual compliance test for SO_2 is not necessary.

Response 2: The Department agrees since SO_2 annual testing was not required by either the facility's initial Title V permit or the most recent Title V renewal permit. Specific Condition **C.10.** is changed as noted below (~~strikethrough~~ indicates deleted text):

C.10. Annual Compliance Tests Required. During each federal fiscal year (October 1st to September 30th), all four combustion turbines shall be tested to demonstrate compliance with the emissions standards for visible emissions~~, sulfur dioxide~~ and nitrogen oxides. In addition, combustion turbines C and D shall also be tested for carbon monoxide annually. [Rule 62-297.310(7), F.A.C.; and, Permit Nos. PSD-FL-130 and PSD-FL-173]

Comment 3: Reference: Specific Condition **C.11.** The previous permit (0090008-002-AV) condition **C.44.**, allowed an exemption of testing for units that ran less than 400 hours, pursuant to rule 62-210.300(2)(a)3.a, b, c or d. OUC proposes this condition is still applicable, and is consistent with the FDEP internal discussion documents (attached to this email) that conclude the exemption should apply to all pollutants on both natural gas and fuel oil. Also, to be consistent with comment #2, SO_2 testing requirement should be deleted.

Response 3: The Department concurs with the first part of this recommendation since it is consistent with the facility's most recent Title V permit and Departmental rules, but does not concur with the second part since SO_2 testing was required in the facility's initial and most recent Title V permit. Specific Condition **C.11.** is changed as noted below (double underline indicates addition of text).

C.11. Compliance Tests Prior To Renewal. Compliance tests shall be performed for visible emissions, sulfur dioxide and nitrogen oxides for combustion turbines A and B once every 5 years. Compliance tests shall be performed for visible emissions, particulate matter, carbon monoxide, sulfur dioxide, nitrogen oxides, volatile organic compounds and SAM for combustion turbines C and D once every 5 years. The tests shall occur prior to obtaining a renewed operating permit to demonstrate compliance with the emission limits in Specific Conditions **A.7. – A.8.** and **B.8. – B.10.** The Department shall not require submission of compliance test results for any emissions unit that, during the year prior to renewal: a) did not operate; or b) in the case of a fuel burning emissions unit, burned liquid and/or solid fuel for a total of no more than 400 hours. [Rules 62-210.300(2)(a) and 62-297.310(7)(a), F.A.C.]

Comment 4: Reference: Specific Condition **C.12.** This condition references PSD-Fl-130 and PSD-Fl-173. As such, OUC proposes this condition should apply to all pollutants for CTA and B, and not be limited to NO_x testing. This would be consistent with 62-210.300(2)(a)3.a, b, c or d. and is consistent with the FDEP internal discussion documents (attached to this email) that conclude the exemption should apply to all pollutants on both natural gas and fuel oil. The last sentence of this condition is also non-applicable as OUC is not claiming a fuel bound nitrogen limit exemption.

Response 4: The Department partially disagrees with the first part of this recommendation since Specific Condition **C.12.** only refers to NO_x testing. The Department concurs with the last part of the recommendation since this requirement is from NSPS Subpart GG and is thus already included in the Appendices Section. Including the requirement again is a redundancy. Specific Condition **C.12.** is changed as noted below (~~strikethrough~~ indicates deleted text, double underline indicates added text).

C.12. NO_x Compliance. Annual NO_x compliance tests shall be performed with natural gas. Annual NO_x compliance tests shall be performed with fuel oil if it is used for more than 170 hours per unit for combustion turbines A and B in the preceding 12 month period, and for more than 400 hours per unit for combustion turbines C and D in the preceding 12 month period. Testing of emissions shall be conducted at 90-100% of the manufacturer's rated heat input based on the average ambient air temperature during the test. ~~To compute the nitrogen oxides emissions, OUC shall use analytical methods and procedures that are accurate to within ±5 percent and are approved by the Department to determine the nitrogen content of the fuel being fired.~~ [~~40 CFR 60.335; and,~~ Permit Nos. PSD-FL-130 and PSD-FL-173]

Other Comments

No comments on the draft/proposed Title V air operation permit were received from the public or the EPA Region 4 Office.

CONCLUSION

The final action of the Department is to issue the final Title V air operation permit with the minor administrative changes indicated above.