TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Florida Power & Light Company
19050 SR 62
Parrish, FL 34219

Port Manatee Oil Storage Facility

Facility ID No. 0810024

PROJECT

Project No. 0810024-011-AC
Application for Minor Air Construction Permit
Project Name: Replacement Heater

COUNTY

Manatee, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Southwest District Office
Temple Terrace, Florida 33637-7600

August 9, 2011

Prepared by Nancy E. Knight

GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

I. Project Description:

A. Applicant:

Mr. Paul Plotkin, Plant General Manager
Florida Power & Light Company
19050 SR 62
Parrish, FL 34219

B. Professional Engineer:

Edward Preast, P.E.
Florida Power and Light Company
700 Universe
Juno Beach, FL 33408

C. Project Location:

Port Manatee
Palmetto, FL

D. Project Summary:

For replacement of the existing Volcanic fuel oil heater (EU 001) with a Volcanic 1002S thermal liquid heater (EU 004), as further described in the permit.

E. Application Information:

Application Received on: July 19, 2011
Additional Information Received on: August 5, 2011
Application Complete: August 5, 2011

II. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

Subject to:	Y/N	Comments
Rule 62-210.300, F.A.C. - Project Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements, F.A.C.	Y	Not exempt from general permitting requirements
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	facility is not a PSD major source
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	the heater (EU 004) is subject to the general VE standard
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	the heater (EU 004) is a source of VOCs and could be a source of odors
Rule 62-296.400, F.A.C. - Stationary Source Emission Standards	N	there is no applicable source category
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	Manatee County is not an air quality maintenance area for ozone
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	there is no applicable source category
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	Y	the heater (EU 004) is subject to 40 CFR 60, Subpart Dc
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS – 40 CFR 61)	N	there is no applicable source category

Subject to:	Y/N	Comments
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS – 40 CFR 63)	N	there is no applicable source category
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	N	facility is a synthetic non-Title V source
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	N	no testing is required for the heater (EU 004)

III. Summary of Emissions

Pollutant	EU No. and brief description	Potential Emissions (TPY) [1,2]	Allowable Emissions (TPY)
PM	003 – GTS Energy fuel oil heater	0.81	
	004 – Volcanic thermal liquid heater	0.63	
	Total	1.44	
PM10	003 – GTS Energy fuel oil heater	0.81	
	004 – Volcanic thermal liquid heater	0.63	
	Total	1.44	
VOC	003 – GTS Energy fuel oil heater	0.52	
	004 – Volcanic thermal liquid heater	0.35	
	Total	0.87	
NOx	003 – GTS Energy fuel oil heater	8.05	
	004 – Volcanic thermal liquid heater	9.11	
	Total	17.16	
SO2	003 – GTS Energy fuel oil heater	28.58	
	004 – Volcanic thermal liquid heater	31.59	
	Total	60.17	60.17
CO	003 – GTS Energy fuel oil heater	4.60	
	004 – Volcanic thermal liquid heater	2.50	
	Total	7.10	
VE	003– GTS Energy fuel oil heater		20%
	004– Volcanic thermal liquid heater		20%

[1] Emission values for EU 003 are from the Technical Evaluation dated October 4, 2007, for Construction Permit 0810024-008-AC.

[2] Emission values for EU 004 are from manufacturer data for No. 2 fuel oil for all pollutants except VOCs. Emission values for VOCs are from manufacturer data for natural gas since that emission factor was higher than the one for No. 2 fuel oil.

IV. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

V. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection Air Resource Management, Southwest District 13051 North Telecom Parkway, Temple Terrace, Florida 33637-7600.

Pursuant to Section 403.087, Florida Statutes and Section 62-4.070, Florida Administrative Code, the Department hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).