TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION

Florida Municipal Power Agency
Treasure Coast Energy Center
PSD Permit Revision

Saint Lucie County

DEP File No. 1110121-006-AC (PSD-FL-353C)

Florida Department of Environmental Protection
Division of Air Resource Management
Office of Permitting and Compliance
Power Plant Group

July 17, 2012

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

1. GENERAL PROJECT INFORMATION

Applicant Name and Address

Florida Municipal Power Agency (FMPA)
Treasure Coast Energy Center
4545 Energy Lane
Fort Pierce, Florida 34981

Authorized Representative:
Mr. Edward S. Leongomez, Plant Manager

Processing Schedule

May 17, 2012: Air construction permit revision application was received and deemed complete.

Facility Description and Location

This facility is a nominal 300 megawatt (MW) gas-fired combined cycle electrical power plant. The plant includes one 170 MW combustion turbine generator, one heat recovery steam generator (HRSG), a 130 MW steam turbine generator, a 930,000 gallon fuel oil storage tank, a mechanical draft cooling tower, and auxiliary equipment. The facility is located southwest of the City of Fort Pierce, East of Highway 95, in St. Lucie County.

Major Regulatory Categories

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 Prevention of Significant Deterioration (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.

Proposed Project

Applicable Regulations.

This air construction permit revision modifies select specific conditions of permit Nos. 1110121-001-AC (PSD-FL-353) and 1110121-004-AC (PSD-FL-353B) for the combined cycle unit as described below.

Excess Emissions Allowed.

The applicant requested a change to the "excess emissions allowed" time limit due to oil-to-gas and gas-to-oil fuel switching from one to two hours each, respectively, in a 24-hour block. This change is acceptable and is consistent with recent Department air construction permits for the effective operation of similar combined cycle equipment.

Major Tuning Session Lead Time.

The applicant requested a revision to the major tuning session specific condition by changing the advanced notice of a major tuning session to the Department from 14 days to one hour. The one hour

lead time is not acceptable, however, a change to one working (business) day is, and is consistent with recent Department policy. This change is acceptable and the permit has been revised.

State Implementation Plan (SIP) Reporting Frequency.

The applicant requested changing the reporting frequency of excess emissions related to the BACT limits from quarterly to semiannually. This change is acceptable and the permit has been revised.

2. REGULATIONS THAT APPLY TO THE PROJECT

State Regulations

This project is subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The Florida Statutes authorize the Department of Environmental Protection to establish rules and regulations regarding air quality as part of the Florida Administrative Code (F.A.C.). This project is subject to the applicable rules and regulations defined in the following Chapters of the Florida Administrative Code. These include: 62-4 (Permitting Requirements); 62-204 (Ambient Air Quality Requirements, PSD Increments, and Federal Regulations Adopted by Reference); 62-210 (Permits Required, Public Notice, Reports, Stack Height Policy, Circumvention, Excess Emissions, and Forms); 62-212 (Preconstruction Review, PSD Review and BACT); 62-296 (Emission Limiting Standards); and 62-297 (Test Methods and Procedures, Continuous Monitoring Specifications, and Alternate Sampling Procedures).

3. PSD APPLICABILITY FOR PROJECT AND CONCLUSION

This project will result in no increase in allowable emissions limits or heat input. Most of the changes are clarifications to the original air construction permit. Based on this determination, the project constitutes a non-major modification with respect to the Department's rules and requires a construction permit revision to implement.