



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Labadie
Lt. Governor

Michael A. Smith
Secretary

October 30, 2009

Electronically Sent – Received Receipt Requested

Mr. John W. Stanton, Assistant General Manager
Energy Supply
City of Gainesville, Gainesville Regional Utilities
Post Office Box 147117 (A132)
Gainesville, Florida 32614-7117

Re: Project No. 0010006-011-AC
Affected Permit No. 0010006-005-AC
Gainesville Regional Utilities (GRU), Deerhaven Generating Station
Installation of Air Quality Control Systems on Unit 2
Authorization to Delay Sulfuric Acid Mist Testing for Extended Shakedown

Dear Mr. Stanton:

On October 1, 2009, Mr. Robert W. Klemans, Supervising Utilities Engineer at GRU, notified the Department by electronic mail of problems with the new circulating dry scrubber (CDS) being installed on Unit 2. During shakedown of the new CDS system, it was discovered that the venturi nozzles that inject air through the bottom of the unit are not sufficient to maintain the fluidized adsorbent bed above the venturi nozzles. Mr. Klemans provided the Department with a video that clearly showed this problem. Without a fully fluidized bed, the scrubber system will not function to its full potential. This is likely due to a minor error in scaling up the original equipment to a CDS unit of this size. The design vendor, Turbosorp, has completed a redesign of the venturi nozzles and plans to install the replacements after the first of the year.¹

On October 29 and 30, 2009, Mr. Klemans contacted the Department by phone and e-mail and requested authorization to defer sulfuric acid mist (SAM) performance testing due to the extended shakedown. In particular, Mr. Klemans cited Condition 10.b (Post-AQCS Construction Performance Tests - Hydrated Lime Injection for SAM Emissions Control) in Section 3 of Permit No. 0010006-005-AC, which states "Testing shall be conducted no later than 180 days after the first flue gas flow through the entire AQCS." The purpose of the performance test is to establish operating conditions that reflect specific control of SAM emissions. The purpose of this condition is to ensure that performance testing occurs after shakedown of the installed control equipment. However, due to the documented problems with the CDS system and the extended shakedown, the Department authorizes the following:

- Testing shall be conducted within 90 days after completing installation of the redesigned venturi nozzles and restarting Unit 2.

¹ The Mt. Tom Plant in Holyoke, Massachusetts is also installing a similar Turbosorp CDS system on a 146 megawatt coal-fired unit. The redesigned venturi nozzles were incorporated into the original installation. The unit is scheduled to commence operation in early November. If data collected from the Mt. Tom unit shows that the problem has been corrected, then the redesigned nozzles will then be installed on Deerhaven Unit 2.

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- Prior to installing the redesigned venturi nozzles, best operational practices shall be used to minimize SAM emissions, which include operating the hydrated lime injection system in accordance with the equipment vendor's recommendations for controlling SAM emissions.
- Copies of any preliminary emissions tests (summaries) conducted on the control system shall be submitted to the Bureau of Air Regulation and the Department's Northeast District Office. This includes any available data on SAM emissions at the inlet/outlet of the SCR reactor, the CDS system and the baghouse.
- Unit 2 shall continue to burn compliance coal (approximately up to 0.8% sulfur by weight) until the shakedown is complete and the CDS system is properly functioning.
- The operator shall notify the Department's Northeast District Office of: the initial date that the redesigned venturi nozzles will be installed; the date that installation of the redesigned venturi nozzles is complete; and the preliminary schedule for conducting the required SAM tests.

Nothing in this action waves any federal requirements of the applicable New Source Performance Standards (NSPS) for this unit.

The Department will consider the above-noted action final unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, of the Florida Statutes (F.S.). Mediation under Section 120.573, F.S., will not be available for this proposed action.

A person whose substantial interests are affected by the proposed decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Department's Office of General Counsel, MS #35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this notice. Petitions filed by any other person must be filed within 14 days of receipt of this proposed action. A petitioner must 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, F.A.C.

A petition that disputes the material facts on which the Department'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; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed 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, as well as the rules and statutes which entitle the petitioner to relief; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority'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, F.A.C.

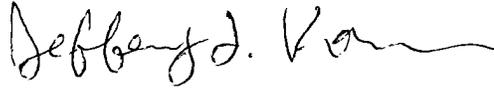
Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the

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application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Any party to this order has the right to seek judicial review of it under Section 120.68, F.S., by the filing of a Notice of Appeal, under Rule 9.110 of the Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station #35, 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 of Appeal must be filed within thirty days from the date this notice is filed with the Clerk of the permitting authority.

Executed in Tallahassee, Florida.



POF
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Trina L. Vielhauer, Chief
Bureau of Air Regulation

TLV/jfk

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this authorization was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on 10/30/09 to the persons listed below.

Mr. John W. Stanton, GRU: stantonjw@gru.com

Ms. Melissa Jones, GRU: jonesmc@gru.com

Mr. Robert W. Klemans, GRU: klemansrw@gru.com

Mr. Christopher Kirts, DEP Northeast District Office: christopher.kirts@dep.state.fl.us

Ms. Victoria Gibson, DEP BAR Reading File: victoria.gibson@dep.state.fl.us

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.



(Clerk)

10/30/09
(Date)