



**Florida
Power**
CORPORATION



Environmental Services Department

FAX COVER SHEET

727/826-4216

DATE: 10/1/97

TO: Charles Logan

FAX# (904) 922-1979

COMPANY: FOEP

FROM: Scott

PHONE # (813) 966-5158

FAX# _____

NUMBER OF PAGES TRANSMITTED 7

Please call number listed above for any transmission problems.

COMMENTS:



Please review my notes on
your responses to the UF Cogen Comments.
Let's try to arrange a conference call
for tomorrow (10/2) @ 10 AM.
Scott

PROPOSED PERMIT DETERMINATION

PROPOSED Permit No.: 0550003-001-AV

Page 1 of 3

I. Public Notice.

An "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" to Florida Power Corporation for the University of Florida Cogeneration Plant on Mowry Road at Building 82, University of Florida, Gainesville, Alachua County was clerked on June 25, 1997. The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was published in The Gainesville Sun on July 24, 1997. The DRAFT Title V Air Operation Permit was available for public inspection at the Northeast District Branch Office in Gainesville and the permitting authority's office in Tallahassee. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was received on August 13, 1997.

II. Public Comment(s).

Comments were received and the DRAFT Title V Operation Permit was changed. The comments were not considered significant enough to reissue the DRAFT Title V Permit and require another Public Notice. Comments were received from one respondent during the 30 (thirty) day public comment period. Listed below is each comment letter in the chronological order of receipt and a response to each comment in the order that the comment was received. The comment(s) will not be restated. Where duplicative comments exist, the original response is referenced.]

A. Letter from Mr. Scott H. Osbourn dated August 8, 1997, and received on August 13, 1997.

Section I. Facility Information

1. Condition 5. Page 3 of 30:

ok As a result of this comment, reference to the fuel consumption of 32,000 gallons/year for the unregulated emergency generator in Appendix U-1 will be deleted.

2. Condition 6. Page 3 of 30:

ok As a result of this comment, Appendix E-1 reference in this condition will be revised to read as follows;

- Lube Oil Vent changed to Lube Oil Vents
- Fuel Oil Storage Tanks change to 2-193,200 gallon No. 2 Fuel Oil Storage Tanks
- Vehicles will be deleted since emissions from this source are addressed in condition 8 of this section.
- The term Exempted changed to Exempt insignificant?

Proposed Permit Determination
 Florida Power Corporation
 University of Florida Cogeneration Plant, Facility ID No. 0010001
 Page 2 of 3

ok **3. Condition 7, Page 3 of 30:**

The bracheted term, [Not Federally Enforceable], has been deleted since this condition is part of our SIP.

ok **4. Condition 8, Page 4 of 30:**

As a result of this comment, this condition is changed;

FROM -

8. Not federally enforceable. Reasonable precautions should be taken to prevent emissions of unconfined particulate matter at this facility include the following:

- Maintenance of paved areas as needed,
- Regular mowing of grass and care of vegetation, and
- Limiting access to plant property by unnecessary vehicles.

[Rule 62-296.320(4)(c)2., F.A.C.; and, proposed by applicant in the initial Title V permit application received June 14, 1996]

ok ✓ TO -

8. Not federally enforceable. Reasonable precautions should be taken to prevent emissions of unconfined particulate matter at this facility. Steps presently taken at the facility to minimize particulate emissions are as follows:

- ◆ Maintenance of paved areas as needed,
- ◆ Regular mowing of grass and care of vegetation,
- ◆ Limiting access to plant property by unnecessary vehicles, and
- ◆ Additional or alternative activities may be utilized to minimize unconfined particulate emissions.

[Rule 62-296.320(4)(c)2., F.A.C.; and, proposed by applicant in the initial Title V permit application received June 14, 1996.]

5. Condition 11, Page 4 of 30:

As a result of your comment, this condition will become condition No. 12 and the following conditions will be renumbered. The following condition will become condition No. 11:

11. In the construction permit the permittee was given the option of installing, in the initial construction, adequate modules and other provisions necessary for future installation of state-of-the-art catalytic abatement or equivalent CO and NO_x control systems. The permittee decided to not make provisions for future installation of advanced catalytic control. Therefore, if test results from the turbine and duct burner show that it is unlikely that NO_x limits can be met, a revised BACT determination for NO_x shall also be considered. The Department may revise the BACT determination to require installation of such technology if so indicated by the revised BACT cost/benefit analysis. If permittee applies for a permit action that will increase capacity and/or emissions, the retrofit costs associated with not making

Proposed Permit Determination
Florida Power Corporation
University of Florida Cogeneration Plant, Facility ID No. 0010001
Page 2 of 3

BACT cost/benefit analysis

provisions for such technology initially shall not be considered by the Department in the ~~retrofit cost analysis~~ required for the future expansion.
[Rule 62-212.400(2)(g). F.A.C.; and, AC 01-204652/PSD-FL-181(A)]

ok

6. Condition 12, Page 4 of 30:

This condition will not be deleted. Permits for boilers 1, 2, & 3 are still active and this condition will permanently surrender them.

✓ **7. Condition 13, Page 4 of 30:**

As a result of your comment, the condition will be reworded to include verbiage stating that relevant data shall be kept for five years. *What about the rest of the wording?*

ok

8. Condition A.1, Page 5 of 30:

The turbine generator has a name plate rating of 43 MW and will not be deleted.

9. Condition A.3, Page 5 of 30:

As requested the "at all times" will be deleted from this condition. *Rule citation?*

** needs to be changed*

10. Condition A.5, Page 6 of 30:

Headings on the table in this condition will not be changed. "Allowables" will not be changed to "emission limits", "standards" will not be changed to "basis", and "No. 2 Fuel Oil will not be changed to "Oil". "@ 15% O₂" will be added to the standards for CO. The "Fuel Oil" in the VE standard will be changed to "No. 2 Fuel Oil".

o/k

11. Condition A.6, Page 6 of 30:

The construction permit stated that clean fuels would be burned to control particulates. The condition will not be changed. *Eliminate "low sulfur"*

** revise*

12. Condition A.7, Page 6 of 30:

This condition sites Rule 62-210.700(1), F.A.C. No change will be made.

13. Condition A.11, Page 7 of 30:

Until a rule concerning "compliance assurance monitoring" is adopted it should not be sited. Condition A.11 sites 40 CFR 60.334(a) and is, therefore, applicable. No change will be made.

14. Condition A.14, Page 8 of 30:

The permittee is responsible for making sure the most recently adopted ASTM us being used to provide data concerning permit compliance to the Department. The methods you recommended are presently referenced in the permit with the exception of D 1072-90(94), which is incorrect. The latest version is

Ken?

Proposed Permit Determination
 Florida Power Corporation
 University of Florida Cogeneration Plant, Facility ID No. 0010001
 Page 3 of

referenced in the permit and is D 1072-90(94)E-1. This method was first adopted in 1980, technically revised in 90, re-approved in 94, and has has one edit since 94. Therefore, "or latest edition(s)" will be added to the last sentence of A.14.b.1, Page 8 of 30.

need to change
15. Conditions A.18, Page 10 of 30:

This condition is only for demonstrating compliance with NSPS Subpart GG requirements and not for demonstrating compliance with the emissions allowables of this permit. No change will be made.

which is only required during initial compliance.

Ken
16. Condition A.19, Page 10 of 30:

The ASTM's referenced in this condition are referenced in 40 CFR 60.335(d). If a more recent ASTM has been adopted the permittee is responsible for using that ASTM. The previous sentence will be added to this condition.

ok
17. Condition A.20, Page 10 of 30:

This condition states, as per 40 CFR 6.335(e), who is authorized to perform fuel analysis. No change will be made.

ok
18. Condition A.22, Page 11 of 30:

The reference to 110 % is changed to 105 %.

ok
19. Condition A.24, Page 13 of 30:

Sections b, c, and e of this condition will be deleted. Section d will become b.

ok
20. Condition A. 27, Page 15 of 30:

The first line of this condition states that "the applicant shall submit.....as follows:". It is obvious what should be done with "only the summary report". No change will be made.

not responsive
21. Condition A.30, Page 16 of 30:

The phrase "and monitoring emissions pursuant to Facility Condition 13" will be inserted after the reference to 40 CFR 60.7(c) in the first line. Reference to fuel bound nitrogen in part a. will be deleted. The language you proposed as part a. will be inserted as part b. Part b. presently in the permit will become part c. The 0.05 % sulfur content will be corrected to 0.5 %, which was established by the referenced ~~BACT~~ *BSD permit*.

22. Subsection B. description, Page 17 of 31.

The duct burner is an integral part of the Combustion Turbine System, which is an acid rain unit, and both exhaust through a common stack. No change will be made.

not right, but how important is this issue?

Proposed Permit Determination
Florida Power Corporation
University of Florida Cogeneration Plant, Facility ID No. 0010001
Page 3 of

ok 23. Condition B.1, Page 17 of 31:
The maximum heat input of 187.3 MMBtu/hr will be changed to 188.0 MMBtu/hr.

24. Condition B.4, Page 18 of 31:
Refer to comment 10. No changes will be made. *needs to be revised*

25. Condition B.6, Page 18 of 31:
The condition is supported by 40 CFR 60.43b(g). The condition will not be deleted.

26. Condition B.7, Page 18 of 31:
The condition is applicable and will not be deleted. *discuss with Ken*

27. Condition B.10, Page 19 of 31:
Other than recording fuel fired, which is covered in B.12, A.11 is not applicable. No change will be made.

28. Conditions B.11, Page 19 of 31:
Since common conditions exist for different emissions units at the facility, this condition is applicable and will not be deleted. *should be deleted* *this one is important to change*

needs to be revised 29. Conditions B.13, Page 19 of 30:
CEMs is not applicable but this condition is. The condition will not be deleted.

30. Subsection C Description, Page 21 of 31:
The mmBtu/hr will be changed to MMBtu/hr. — *69.9 to 69.6*

31. Condition C.1, Page 21 of 31:
This comment cannot be addressed since there is no second sentence in C.1. *should have been C.3*

ok 32. Condition C.4, Page 22 of 31:
Specific condition 3. of the AC states that the boilers may be used a necessary for backup. This condition will not be changed.

ok 33. Condition C.5, Page 22 of 31:
Rule 62-296.406(1) provides two opacity options and the option selected must be stated in the operating permit. C.5 states the selected option. No change will be made.

Proposed Permit Determination
 Florida Power Corporation
 University of Florida Cogeneration Plant, Facility ID No. 0010001
 Page 3 of

34. Condition C.12, Page 23 of 31:

ok Your comment was excellent and the following verbiage will be added as condition C.13;

C.13. To only demonstrate compliance with the facility NO_x limit of 194.3 tons per year, a cumulative record of the fuel burned in boilers No.4 and No.5 shall be maintained. A cumulative record of the NO_x from each boiler, based on AP 42 emission factors, shall be maintained with the fuel consumption record. The NO_x emissions calculations shall be included in each operating report.
 [AC 01-204652/PSD-FL-181] *annual*

35. Condition C.13, Page 23 of 31:

- For multiple-valued opacity standards, by Rule 62-297.401, f.A.C., DEP Method 9 must be used. No change will be made. *is this correct?*

36. Condition C.15, Page 24 of 31:

ok This condition reflects the conditions accepted by the applicant in the construction permit and established by BACT. No change to condition C.15 will be made.

37. Condition C.16, Page 24 of 31:

As a result of the comment on C.15, condition C.16 will be changed to read as follows:

C.16. The fuel sulfur content, ^{50'}percent by weight, of the No. 2 fuel oil shall be evaluated using the most recently adopted ASTM(s).
 [Rules 62-213.440, 62-296.406(3), and 62-297.440, F.A.C.]

Responses to comments for D.1, D.2, D.3

Table 1-1

Table 2-1