



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

- G14 -
GRU-SR Kelly

OCT 25 2001

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OCT 29 2001

BUREAU OF AIR REGULATION

4APT-ATMB

C.H. Fancy, P.E., Chief
Bureau of Air Regulation
Department of Environmental Protection
Division of Air Resources Management
Mail Station 5500
2600 Blair Stone Road
Tallahassee, Florida 32199-2400

Dear Mr. Fancy:

The purpose of this letter is to provide you with written comments regarding an initial performance testing deadline extension requested by Gainesville Regional Utilities (GRU) in a September 7, 2001, letter that was sent to both the U.S. Environmental Protection Agency (EPA) Region 4 and the Florida Department of Environmental Protection. This request is for Combined Cycle Unit No. 1 at the J.R. Kelly Generating Station in Gainesville, Florida, and this unit is subject to 40 C.F.R. Part 60, Subpart GG (Standards of Performance for Stationary Gas Turbines). Based upon the date that the maximum firing rate for No. 2 fuel oil in the unit was achieved, the deadline for completing an initial performance test for oil would have been May 18, 2001. Due to ongoing problems that the unit has experienced while firing oil, GRU has been unable to conduct an initial performance test for this fuel and requested an extension of the initial performance testing for oil firing in its September 7, 2001, letter. Although the New Source Performance Standards (NSPS) do not contain provisions for extending the performance testing deadlines specified in 40 C.F.R. §60.8(a), we recommend deferring any decision regarding whether to pursue enforcement for the missed testing deadline at GRU until the testing is actually completed.

Unit No. 1 can be fired with either natural gas or oil, and since the maximum firing rate for each of these fuels was achieved on different days, the deadlines for completing initial testing for these two fuels were different. In a May 1, 2001, letter addressed to you, Region 4 approved a previous GRU request for an extension of the testing deadlines for both fuels fired in Unit No. 1. An extension for testing during natural gas firing was granted because the removal of parts that had to be returned to the manufacturer for repairs prevented the unit from operating on the April 18, 2001, deadline for testing. An extension for oil firing was granted because the unit had been experiencing vibration problems while firing this fuel, and it was unlikely that these problems would be corrected by the May 18, 2001, deadline for testing while firing oil. Under

the terms of the extension approved in our May 1, 2001 letter, GRU was given up to 720 operating hours following the restart of Unit No. 1 to complete testing. In addition, the letter required that all testing for both fuels be completed no later than September 11, 2001. The date by which GRU completed testing during natural gas firing (June 15, 2001) was acceptable under the terms specified in our May 1, 2001, letter. GRU has been unable, however, to complete performance testing for oil since the cause of the vibration problems when this fuel is fired has not yet been identified and corrected. Because of the inability to complete testing during oil firing within the time frame specified in Region 4's previous letter, GRU's September 7, 2001, letter requested that the deadline for completing testing during oil firing be extended for an additional 720 operating hours after the use of this fuel resumes.

Although our May 1, 2001, letter indicated that an extension of the initial testing deadlines for natural gas and oil firing in Unit No. 1 would be acceptable, we recently became aware of the fact that 40 C.F.R. Part 60 does not contain any provisions which allow EPA to grant extensions of the NSPS testing deadlines specified in 40 C.F.R. §60.8(a). Initiating enforcement for missing one of these deadlines, however, may not be necessary or reasonable when the deadline is missed for reasons that are beyond the control of a source owner or operator. In such circumstances, using enforcement discretion as the basis for not pursuing an action would be acceptable provided that testing is completed expeditiously once the problems that prevented completion of testing by the applicable deadline are resolved.

Based upon the specific problems associated with Unit No. 1, we recommend deferring any decision regarding whether to pursue enforcement for missing the testing deadline for oil until after the testing is actually completed. Although decisions regarding what would constitute a reasonable amount of time for completing testing should be made on a case-by-case basis, Region 4 has typically considered a period of either 30 calendar days or 720 operating hours following the restart of a facility which could not operate on the initial deadline for testing to be reasonable. Our May 1, 2001, letter indicated that a 720 operating hour extension following the restart of Unit No. 1 would be acceptable. A final date of September 11, 2001, for completing testing was also specified in this letter due to the expectation that the vibration problems experienced during oil firing could be identified and corrected within this time frame. Because the manufacturer of Unit No. 1 has not been able to conclusively identify the cause of the vibration problems during oil firing yet, GRU was unable to complete testing for oil by the September 11, 2001, deadline specified in our May 1, 2001, letter.

If the testing is completed expeditiously once Unit No. 1 is capable of sustained operation on oil, deciding not to pursue enforcement for missing the testing deadline would be an acceptable option consistent with the enforcement discretion available to your agency. If testing is not completed expeditiously once oil can be fired in the unit on a sustained basis, deferring a decision regarding enforcement until after the initial performance testing is completed would not preclude you from citing GRU for a violation of the requirements in 40 C.F.R. §60.8(a) extending back to the original May 18, 2001, deadline for testing.

If you have any questions about the issues addressed in this letter, please contact Mr. David McNeal of the EPA Region 4 staff at (404) 562-9102.

Sincerely,

A handwritten signature in cursive script that reads "Douglas Neeley".

R. Douglas Neeley, Chief
Air Toxics and Monitoring Branch
Air, Pesticides and Toxics
Management Division

cc: Mr. Randy L. Casserleigh
Ms. Yolanta Jonynas



March 27, 2001

Mr. Scott Sheplak, Administrator
Title V Section
Florida Dept. of Environmental Protection
2600 Blair Stone Rd., MS 5505
Tallahassee, FL 32399-2400

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MAR 28 2001

BUREAU OF AIR REGULATION

RE: Gainesville Regional Utilities/Deerhaven Generating Station
Permit No. 0010006-001-AV

Dear Mr. Sheplak:

Gainesville Regional Utilities is requesting the revision of the Title V Permit and permit application for the above-referenced facility as follow:

Section II. Facility-wide Conditions.

2. Not federally enforceable. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall ~~not~~ cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.

[Rule 62-296.320(2), F.A.C.]

Rationale: Editorial correction.

Emission Unit ID No. 3 – Unit 1

A.12. Excess emissions resulting from malfunction *or fuel switching* shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

[Rule 62-210.700(1), F.A.C. *and Rule 62-210.700(5)*]

Rationale: On occasion temporary but unavoidable excess emissions may be experienced as a result of changing to an alternative method of operation (i.e., switching fuels) during which the boiler may have periods of combustion instability. These periods are generally infrequent and of short duration. For example, during calendar year 2000 there were five incidents with a total of seven six-minute periods of opacity greater than 20% that occurred during a fuel change. Opacity readings during this period ranged from 22% to 70% with the majority (5) of opacity readings being less than 30%.

Subsection B. – Emission Unit ID No. 005 – Unit 2

B.12. Excess Emission Reports.

(g) Excess emission and monitoring system performance (“MSP”) reports shall be submitted to the Administrator ~~for every calendar quarter~~ semiannually for each six-month period in the calendar year. All ~~quarterly~~ semiannual reports shall be postmarked by the 30th day following

the end of each ~~calendar quarter~~ *six-month period*. *Excess emission reports may be submitted on a quarterly basis at the permittee's discretion*. Each excess emission and MSP report shall include the information required in 40 CFR 60.7(c) [Specific Condition E.1.]. Periods of excess emissions and monitoring systems (MS) downtime that shall be reported are defined as follows: [40 CFR 60.45(g)]

Rationale: 40 CFR 60.45(g) was revised in 1999 to require semi-annual, rather than quarterly, reporting. However, GRU would like to reserve the right to continue submitting quarterly reports at its discretion.

Appendix U-1 – Unregulated Emission Units and/or Activities

GRU is hereby revising its original permit application and requesting that certain unregulated emission units/activities as indicated in Appendix U-1 (attached) be reclassified as insignificant emissions units/activities pursuant to Rule 62-213.430(6)(b).

Appendix I-1 – List of Insignificant Emissions Units and/or Activities

GRU is requesting the following revisions to Appendix I-1:

- Addition of a new activity: Transfer of Wet Fly Ash from Onsite Landfill to Trucks.

Rationale: In September 2000, recovery of ash from the onsite landfill for beneficial use offsite was initiated. The ash is wetted prior to/during the loading operations and trucks are covered prior to leaving the site. This activity resulted in de-minimis emissions during 2000 and while a greater amount of fly ash is expected to be recovered in 2001, this activity will still be insignificant.

- Addition of new units/activities from Appendix U-1 as indicated.

Rationale: These units/activities meet the criteria for insignificant units specified in Rule 62-213.430(6)(b).

- Revision of unit description from "Dozer Operations on Fly Ash Landfill" to "Equipment Operations on Fly Ash Landfill".

Rationale: Different types of equipment (e.g., backhoes, front-end loaders) not just dozers are used on the landfill.

- Addition of language to recognize the Generic Emissions Unit Exemption in Rule 62-210.300(3)(b)(1).

Rationale: GRU recently determined that activity number 18 (i.e., Surface coating operations utilizing 6.0 gallons per day or less, average monthly, of coatings containing greater than 5.0 percent VOCs, by volume) did not qualify for the Categorical Exemption under Rule 62.210.300(3)(a) but did qualify under Rule 62-210.300 (3)(b)(1), Generic Emissions Unit Exemption.

Please call Ms. Yolanta Jonynas at (352) 334-3400 Ext.1284 if you have any questions or need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Darrell R. DuBose", with a horizontal line extending to the right.

Darrell R. DuBose
Assistant General Manager Energy Supply,
Designated Representative/Responsible Official

xc: R. Casserleigh
Y. Jonynas
CAA Title V – DH

Appendix U-1. List of Unregulated Emissions Units and/or Activities.

City of Gainesville, GRU
Deerhaven Generating Station

FINAL Permit No.: 0010006-001-AV

Unregulated Emissions Units and/or Activities. An emissions unit which emits no “emissions-limited pollutant” and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

E.U. ID No.	Brief Description of Emissions Units and/or Activity
Xxx	Lime Silo
Xxx	Soda Ash Silo
Xxx	Brine Spray Dryer
Xxx	Loading of Dried Brine to Trucks
Xxx	Brine Trucks to Onsite Landfill, Full
Xxx	Brine Trucks to Onsite Landfill, Empty
Xxx	Unloading of Brine from Trucks to Onsite Landfill
Xxx	Brine Landfill
Xxx	Dozer Operations on Brine Landfill
Xxx	Pneumatic Transfer of Fly Ash from DH 2 to Fly Ash Silo
Xxx	Dry Transfer from Fly Ash Silo to Trucks (Vented to Baghouse)
Xxx	Dry Transfer from Fly Ash Silo to Trucks (Fugitives)
Xxx	Wet (Pug Mill) Transfer from Fly Ash Silo to Trucks (Fugitives)
Xxx	Fly Ash Trucks to Onsite Landfill, Full
Xxx	Fly Ash Trucks to Onsite Landfill, Empty
Xxx	Fly Ash Trucks to Offsite Disposal, Full
Xxx	Fly Ash Trucks to Offsite Disposal, Empty
Xxx	Transfer of Wet Fly Ash from Trucks to Onsite Landfill
Xxx	Dozer Operations on Fly Ash Landfill
Xxx	Fly Ash Landfill
Xxx	Groundwater Aerator
001	20 MW (nominal) Simple Cycle Combustion Turbine No. 1 (Draws fuel oil from the same tank as Combustion Turbine No. 3)
002	20 MW (nominal) Simple Cycle Combustion Turbine No. 2 (Draws fuel oil from the same tank as Combustion Turbine No. 3)

Appendix I-1. List of Insignificant Emissions Units and/or Activities.

City of Gainesville, GRU
Deerhaven Generating Station

FINAL Permit No.: 0010006-001-AV

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, or that meet the criteria specified in Rule 62-210.300(3)(b)(1), F.A.C., Generic Emissions Unit Exemption, are exempt from the permitting requirements of ~~Chapters~~ Rules 62-210, 212 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining the potential emissions of the facility containing such emissions units. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a) and (b)(1), F.A.C., shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if they are contained within a Title V source; however, such emissions units and activities shall be considered insignificant for Title V purposes provided they also meet the criteria of Rule 62-213.430(6)(b), F.A.C. No emissions unit shall be entitled to an exemption from permitting under Rule 62.210.300(3)(a) and (b)(1), F.A.C., if its emissions, in combination with the emissions of other units and activities at the facility, would cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

The below listed emissions units and/or activities are considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

Brief Description of Emissions Units and/or Activities:

1. Parts cleaning and degreasing stations
2. Storage tanks < 550 gallons
3. Distillate fuels (Nos. 1 or 2) and residual fuel oils (No. 4, 5 or 6) storage tanks > 550 gallons
4. Laboratory equipment used exclusively for chemical or physical analyses (including fume hoods and vents)
5. Fire and safety equipment
6. Turbine vapor extractor
7. Sand blasting and abrasive grit blasting
8. Equipment used for steam cleaning
9. Belt conveyors
10. Vehicle refueling operations
11. Vacuum pumps in laboratory operations
12. Equipment used exclusively for space heating, other than boilers
13. Evaporation of on-site generated boiler non-hazardous cleaning chemicals in Boiler Nos. 1 and 2 . This activity occurs once every three to five years or longer.
14. Brazing, soldering and welding.
15. One or more emergency generators which are not subject to the Acid Rain Program and have a total fuel consumption, in the aggregate, of 32,000 gallons per year or less of diesel fuel, 4,000 gallons per year or less of gasoline, and 4.4 million cubic feet per year or less of natural gas or propane, or an equivalent prorated amount if multiple fuels are used.

16. One or more heating units and general purpose internal combustion engines which are not subject to the Acid Rain Program and have a total fuel consumption, in the aggregate, of 32,000 gallons per year or less of diesel fuel, 4,000 gallons per year or less of gasoline, and 4.4 million cubic feet per year or less of natural gas or propane, or an equivalent prorated amount if multiple fuels are used.
17. Freshwater cooling towers.
18. Surface coating operations utilizing 6.0 gallons per day or less, average monthly, of coatings containing greater than 5.0 percent VOCs, by volume.
19. Surface coating operations utilizing only coatings containing 5.0 percent or less VOCs, by volume.
20. Degreasing units using heavier-than-air vapors exclusively, not subject to 40 CFR 63, Subpart T.
21. Railcar maintenance.
22. Application of fungicide, herbicide, or pesticide.
23. Petroleum lubrication systems.
24. Asbestos renovation and demolition activities.
25. Lime Silo
26. Soda Ash Silo
27. Brine Spray Dryer
28. Loading of Dried Brine to Trucks
29. Brine Trucks to Onsite Landfill, Full
30. Brine Trucks to Onsite Landfill, Empty
31. Unloading of Brine from Trucks to Onsite Landfill
32. Brine Landfill
33. Dozer Operations on Brine Landfill
34. Pneumatic Transfer of Fly Ash from DH-2 to Fly Ash Silo
35. Dry Transfer from Fly Ash Silo to Trucks (Vented to Baghouse)
36. Dry Transfer from Fly Ash Silo to Trucks (Fugitives)
37. Wet (Pug Mill) Transfer from Fly Ash Silo to Trucks (Fugitives)
38. Fly Ash Trucks to Onsite Landfill, Full
39. Fly Ash Trucks to Onsite Landfill, Empty
40. Fly Ash Trucks to Offsite Disposal, Full
41. Fly Ash Trucks to Offsite Disposal, Empty
42. Transfer of Wet Fly Ash from Trucks to Onsite Landfill
43. Dozer Equipment Operations on Fly Ash Landfill
44. Fly Ash Landfill
45. Transfer of Wet Fly Ash from Onsite Landfill to Trucks

{Note: Emissions units or activities which are added to a Title V source after issuance of this permit shall be incorporated into the permit at its next renewal, provided such emissions units or activities have been exempted from the requirement to obtain an air construction permit, and also qualify for exemption from permitting pursuant to Rule 62-213, F.A.C. [Rule 62-213.430(6)(a)]}