

Florida Department of
Environmental Protection

Memorandum

TO: Trina Vielhauer, Bureau of Air Regulation
THROUGH: Jeff Koerner, Air Permitting North Section *JK*
FROM: Syed Arif, Air Permitting North Section *Syed Arif*
DATE: June 26, 2007
SUBJECT: Draft Air Permit No. 0010006-005-AC
Gainesville Regional Utilities (GRU), Deerhaven Generating Station (DGS)
Installation of Air Quality Control Systems (AQCS)

This project is subject to minor source preconstruction review. Attached for your review are the following items:

- Written Notice of Intent to Issue Air Permit;
- Public Notice of Intent to Issue Air Permit;
- Technical Evaluation and Preliminary Determination;
- Draft Permit; and
- P.E. Certification.

The Draft Permit authorizes GRU to retrofit DGS Unit No. 2 with AQCS in order to comply with the requirements of EPA's Clean Air Interstate Rule. The proposed work will be conducted at DGS Unit 2, which is located in Alachua County, Florida. The Technical Evaluation and Preliminary Determination provide a detailed description of the project and the rationale for issuance. The P.E. certification briefly summarizes the proposed project. I recommend your approval of the attached Draft Permit.

Attachments



Florida Department of
Environmental Protection
Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

P.E. Certification Statement

Permittee:

Gainesville Regional Utilities (GRU)
Deerhaven Generating Station (DGS)

DEP File No. 0010006-005-AC

Project type: The applicant, GRU, submitted an application to the Department for the installation of air quality control systems (AQCS) on DGS Unit 2 in order to comply with the requirements of EPA's Clean Air Interstate Rule and the Clean Air Mercury Rule. The AQCS includes the following: selective catalytic reduction (SCR) system to decrease nitrogen oxides (NO_x) emissions, circulating dry scrubber (CDS) to reduce sulfur dioxide (SO₂) emissions and a baghouse system to reduce particulate matter (PM) emissions.

While the addition of SCR will substantially decrease emissions of NO_x, there is the potential for collateral increases in emissions of sulfuric acid mist (SAM) and PM. The potential increase of SAM emissions is a result of the oxidation of SO₂ to sulfur trioxide (SO₃) that is emitted as SAM after the CDS system. SAM emissions will also increase as a result of the proposed higher sulfur coals. Potential increases in SAM emissions will be minimized through the injection of alkaline reagent (lime) to react with SO₃ prior to the baghouse. The reactants, primarily particulate calcium compounds, will be collected in the fabric filter. The potential increase in PM from the reaction of lime and SO₃ will be collected in the CDS system and the fabric filter. There will be no emissions increase over the PSD significant emission rates from the installation of SCR and CDS.

Concurrent with the AQCS project, the Unit 2 steam turbine may be refurbished by replacing the high- and intermediate-pressure rotor along with the associated stationary elements. The steam turbine refurbishment will increase the efficiency of the steam turbine. There will be no changes to the existing electrical generator (i.e., no expansion in steam generating capability) and no increase in maximum heat input to the boiler or steam flow capability of the turbine.

Unit 2 is currently fired with low sulfur (0.8 weight percent sulfur) eastern bituminous coal. Following installation and operation of the AQCS, Unit 2 will be capable of firing a variety of eastern bituminous coal blend, including medium sulfur coal (up to 2.5 weight percent sulfur). Overall, the project will decrease emissions due to the installation of AQCS systems, but the cold startup SO₂ emissions for Unit 2 will increase due to the firing of higher sulfur coal.

An air quality impact analysis was not required. No increase in ambient impacts due to the proposed permit modification is expected. Emissions from the facility will not significantly contribute to or cause a violation of any state or federal ambient air quality standards.

The applicant's authorized representative and mailing address is: Mr. George K. Allen, Assistant General Manager – Energy Supply, GRU, Post Office Box 147117 (A132), Gainesville, Florida 32614-7117.

I HEREBY CERTIFY that the engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, meteorological and geological features).

Syed Arif 6/28/07 *SA*
Syed Arif, P.E. Date
Registration Number: 51861

Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Phone (850) 488-0114
Fax (850) 922-6979



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

June 28, 2007

ELECTRONIC MAIL – RECEIVED RECEIPT REQUESTED

Mr. George K. Allen, Assistant General Manager/Energy Supply
City of Gainesville, GRU
Post Office Box 147117 (A132)
Gainesville, Florida 32614-7117

Re: Air Construction Permit No. 0010006-005-AC
Gainesville Regional Utilities, Deerhaven Generating Station (DGS)
Installation of Air Quality Control Systems

Dear Mr. Allen:

On February 23, 2007, you submitted an application requesting to retrofit DGS Unit No. 2 with air quality control systems in order to comply with the requirements of EPA's Clean Air Interstate Rule. This facility is located in Alachua County at 10001 NW 13th Street, Gainesville, Florida. Enclosed are the following documents:

- The Technical Evaluation and Preliminary Determination summarizes the Permitting Authority's technical review of the application and provides the rationale for making the preliminary determination to issue a Draft Permit.
- The proposed Draft Permit includes the specific conditions that regulate the emissions units covered by the proposed project.
- The Written Notice of Intent to Issue Air Permit provides important information regarding: the Permitting Authority's intent to issue an air permit for the proposed project; the requirements for publishing a Public Notice of the Permitting Authority's intent to issue an air permit; the procedures for submitting comments on the Draft Permit; the process for filing a petition for an administrative hearing; and the availability of mediation.
- The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project.

If you have any questions, please contact the Project Engineer, Syed Arif, at 850-921-9528.

Sincerely,

Trina Vielhauer, Chief
Bureau of Air Regulation

Enclosures

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

*In the Matter of an
Application for Air Permit by:*

Gainesville Regional Utilities
Post Office Box 147117 (A132)
Gainesville, Florida 32614-7117

Air Permit No. 0010006-005-AC
Facility ID No. 0010006
Deerhaven Generating Station
Installation of Air Quality Control
Systems
Alachua County, Florida

Authorized Representative:
Mr. George K. Allen

Facility Location: Gainesville Regional Utilities operates Deerhaven Generating Station, which is located at 10001 NW 13th Street, Gainesville, Alachua County, Florida.

Project: The applicant proposes to retrofit Deerhaven Generating Station Unit 2 with air quality control systems. Details of the project are provided in the application and the enclosed Technical Evaluation and Preliminary Determination.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be postmarked by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting 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 with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, 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 Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall 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 (in a proceeding initiated by another party) 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.

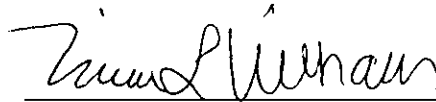
A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; 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 when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the 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 Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

Mediation: Mediation is not available in this proceeding.

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief
Bureau of Air Regulation

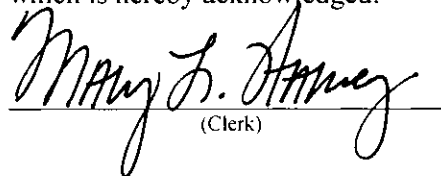
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit package (including the Public Notice, the Technical Evaluation and Preliminary Determination, and the Draft Permit) was sent by electronic mail with received receipt requested before the close of business on 6/29/07 to the persons listed below.

- George K. Allen, GRU (allengk@gru.com)
- Yolanta E. Jonynas, GRU (jonynasve@gru.com)
- Jim Little, EPA (little.james@epa.gov)
- Kathleen Forney, EPA (forney.kathleen@epa.gov)
- D. Morse, NPS (dee_morse@nps.gov)
- Chris Kirts, DEP-NED (christopher.kirts@dep.state.fl.us)
- Tom W. Davis, P.E., ECT, Inc. (tdavis@ectinc.com)
- Michael Halpin, OSC (michael.halpin@dep.state.fl.us)

Clerk Stamp

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



(Clerk)

6/29/07
(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection
Division of Air Resource Management, Bureau of Air Regulation
Draft Air Permit No. 0010006-005-AC
Gainesville Regional Utilities, Deerhaven Generating Station
Alachua County, Florida

Applicant: The applicant for this project is Gainesville Regional Utilities. The applicant's authorized representative and mailing address is: Mr. George K. Allen, Assistant General Manager – Energy Supply, Gainesville Regional Utilities, Post Office Box 147117 (A132), Gainesville, Florida 32614-7117.

Facility Location: Gainesville Regional Utilities, operates the existing Deerhaven Generating Station, which is located in Alachua County at 1001 NW 13th Street in Gainesville, Florida.

Project: The applicant proposes to install air quality control systems (AQCS) on Unit 2 in order to comply with the requirements of EPA's Clean Air Interstate Rule and Clean Air Mercury Rule. The AQCS includes the following: selective catalytic reduction system to decrease nitrogen oxides (NO_x) emissions, circulating dry scrubber to reduce sulfur dioxide (SO₂) emissions and a baghouse system to reduce particulate matter (PM) emissions.

While the addition of selective catalytic reduction system will substantially decrease emissions of NO_x, there is the potential for collateral increases in emissions of sulfuric acid mist (SAM) and PM. The potential increase of SAM emissions is a result of the oxidation of SO₂ to sulfur trioxide (SO₃) that is emitted as SAM after the circulating dry scrubber system. SAM emissions will also increase as a result of the proposed higher sulfur coals. Potential increases in SAM emissions will be minimized through the injection of alkaline reagent (lime) to react with SO₃ prior to the baghouse. The reactants, primarily particulate calcium compounds, will be collected in the fabric filter. The potential increase in PM from the reaction of lime and SO₃ will be collected in the circulating dry scrubber system and the fabric filter. There will be no emissions increase over the PSD significant emission rates from the installation of the AQCS.

Concurrent with the AQCS project, the Unit 2 steam turbine may be refurbished by replacing the high and intermediate pressure rotor along with the associated stationary elements. The steam turbine refurbishment will increase the efficiency of the steam turbine. There will be no changes to the existing electrical generator (i.e., no expansion in steam generating capability) and no increase in maximum heat input to the boiler or steam flow capability of the turbine.

Unit 2 is currently fired with low sulfur (0.8 weight percent sulfur) eastern bituminous coal. Following installation and operation of the AQCS, Unit 2 will be capable of firing a variety of eastern bituminous coal blend, including medium sulfur coal (up to 2.5 weight percent sulfur). SO₂ emissions due to cold and warm startup will increase under worst-case condition by 25 tons per event due to non-availability of AQCS initially when firing higher sulfur coal. On an annual basis, SO₂ emissions will decrease by 7,139 tons per year.

The project is expected to reduce emissions of SO₂, NO_x, PM and SAM as well as hydrogen fluoride and mercury. The estimated reduction for NO_x is 3,262 tons per year. Because the project will not result in a significant increase in emissions, an air quality impact analysis was not required.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

(Public Notice to be Published in the Newspaper)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site:

<http://www.dep.state.fl.us/air/eproducts/apds/default.asp>.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be postmarked by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting 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 with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall 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 (in a proceeding initiated by another party) 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 Permitting Authority'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 rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon

(Public Notice to be Published in the Newspaper)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

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 Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available for this proceeding.

TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION

City of Gainesville
Gainesville Regional Utilities

Deerhaven Generating Station
Unit 2, Installation of Air Quality Control Systems
Alachua County, Florida

DEP File Number
0010006-005-AC

Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation

June 26, 2007

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

1. APPLICATION INFORMATION

APPLICANT

City of Gainesville
Gainesville Regional Utilities (GRU)
P.O. Box 147117 (A132)
Gainesville, Florida 32614-7117

Authorized Representative: Mr. George K. Allen, Assistant General Manager – Energy Supply

FACILITY LOCATION

The applicant's facility, Deerhaven Generating Station (DGS) is located at 10001 NW 13th Street, Gainesville, Alachua County, Florida. UTM coordinates of the site are: Zone 17, 367.70 km E and 3292.60 km N. This location is approximately 80 km from the nearest Class I area, the Okefenokee Wilderness Area.

The facility consists of two steam boilers (Units No. 1 and 2) and associated steam turbines, a simple cycle combustion turbine (CT No. 3), two unregulated simple cycle combustion turbines (CT Nos. 1 and 2), a recirculating cooling water system, storage and handling facilities for coal, brine salt, fly ash and bottom ash, fuel oil storage tanks, water treatment facilities, a railcar maintenance facility and ancillary support equipment.

Emission control equipment presently installed on Unit 2 consists of a hot-side electrostatic precipitator for control of particulate matter.

The standard industrial classification (SIC) code for the power plant is Major Group No. 49, Industry Group No. 4911.

REGULATORY CLASSIFICATION

Because potential emissions of at least one regulated pollutant exceed 100 tons per year, the existing facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.). Regulated pollutants include pollutants such as carbon monoxide (CO), nitrogen oxides (NO_x), particulate matter (PM/PM₁₀), sulfur dioxide (SO₂), and volatile organic compounds (VOC).

The existing facility is major source of hazardous air pollutants (HAP).

The facility operates emissions units subject to the acid rain provisions of the Clean Air Act.

The facility is considered a "fossil fuel fired steam electric plant of more than 250 million BTU per hour of heat input". This facility is one of the 28 source categories with the lower applicability threshold of 100 tons per year with respect to the Rule 62-210.200, F.A.C. Potential emissions of at least one regulated pollutant exceed 100 tons per year. Therefore, the facility is classified as a Prevention of Significant Deterioration (PSD)-major source.

Unit 2 and CT No. 3 were certified pursuant to Electrical Power Plant Siting in accordance with Chapter 62-17, F.A.C. and Chapter 403, Part II, Florida Statutes (F.S.).

MODIFICATION REQUEST

GRU submitted an application for a minor source air construction permit to retrofit DGS Unit 2 with air quality control systems (AQCS) as one means of complying with the requirements of EPA's Clean

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Air Interstate Rule (CAIR) and the Clean Air Mercury Rule (CAMR) as implemented by the Department in Rules 62-296.470 and 62-296.480, F.A.C., respectively. The AQCS planned for DGS Unit 2 includes the following:

- Selective catalytic reduction (SCR) system to reduce NO_x emissions.
- A circulating dry scrubber (CDS) to reduce SO₂ emissions.
- Baghouse (fabric filter) to reduce PM emissions. The baghouse is an integral part of the CDS.
- Ancillary support equipment including new material (urea, lime and CDS by-product) handling and storage.

These emission control systems will also have the co-benefit of controlling mercury (Hg), hydrogen chloride (HCl), hydrogen fluoride (HF) and sulfuric acid mist (SAM) emissions. Provisions have been made in the design of the AQCS for activated carbon injection in the future if needed for additional Hg control. The primary purpose of the project is to limit emissions of SO₂, NO_x and Hg to assist with CAIR and CAMR. While the addition of SCR will substantially decrease emissions of NO_x, there is the potential for collateral increases in emissions of SAM and particulate matter (PM). The potential increase of SAM emissions is a result of the oxidation of SO₂ to sulfur trioxide (SO₃) that is emitted as SAM after the CDS system. SAM emissions will also increase as a result of the proposed higher sulfur coals. Potential increases in SAM emissions will be minimized through the injection of alkaline reagent (lime) to react with SO₃ prior to the baghouse. The reactants, primarily particulate calcium compounds, will be collected in the fabric filter. The potential increase in PM from the reaction of lime and SO₃ will be collected in the CDS system and the fabric filter. There will be no emissions increase over the PSD significant emission rates from the installation of SCR and CDS.

Concurrent with the AQCS project, the Unit 2 steam turbine may be refurbished by replacing the high- and intermediate-pressure rotor along with the associated stationary elements. The steam turbine refurbishment will increase the efficiency of the steam turbine in order to recover power lost due to the parasitic load associated with the operation of the new AQCS. DGS Unit 2 is currently fired with low sulfur eastern bituminous coal. There will be no changes to the existing electrical generator (i.e., no expansion in steam generating capability) and no increase in maximum heat input to the boiler or steam flow capability of the turbine.

Following installation and operation of the AQCS, Unit 2 will be capable of firing a variety of eastern bituminous coal blend, including medium sulfur coal (up to 2.5 percent sulfur), and still comply with the New Source Performance Standards (NSPS) Subpart D of 40 CFR 60.

REVIEWING AND PROCESS SCHEDULE

02-23-2007: Date of Receipt of Application
03-12-2007: Department of Environmental Protection's (DEP's) 1st Completeness Request
03-30-2007: Applicant's response to DEP's 1st Completeness Request
04-23-2007: DEP's 2nd Completeness Request
05-15-2007: Applicant's response to DEP's 2nd Completeness Request
06-14-2007: DEP's 3rd Completeness Request
06-22-2007: Applicant's response to DEP's 3rd Completeness Request. Application complete

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

AQCS DESCRIPTION

Selective Catalytic Reactor

SCR is a process that uses catalyst to promote the conversion of NO_x to nitrogen and water in the flue gas. The conversion occurs between the boiler economizer and the air heaters in a specially designed ductwork section called the SCR Reactor, which contains the catalyst. Ammonia vapor mixed with dilution air is injected into the flue gas upstream of the catalyst and is thoroughly mixed with the flue gas prior to the catalyst. As the flue gas passes over the catalyst, the nitrogen monoxide and nitrogen dioxide combine with the ammonia to form nitrogen and water.

Unit 2 will have two SCR reactors. The SCR system will tie into the ductwork at the outlet of the existing hot-side electrostatic precipitator which is expected to remain in-service after installation of the AQCS. Ammonia mixer plates and patented Delta Wing mixers will be located within the inlet duct to the two SCR reactors. The SCR outlet duct will connect to the existing air heaters.

The SCR system is designed so that flue gas flows through it whenever the Unit 2 is operating i.e., there are no bypasses. The SCR system contains instrumentation to measure flue gas pressures, temperatures and NO_x concentrations at various locations in the ductwork and reactors. NO_x control is initiated when the temperature at the outlet of the reactor reaches the minimum short-term operating temperature of 613°F and ammonia flow is started through the injection nozzles.

Unit 2 flue gas will flow through the three layers (two active and one future layer) of honeycomb catalyst. This SCR design provides sufficient space with margin to accommodate plate or honeycomb type catalyst and meet the performance requirements without using the spare catalyst level. The catalyst handling system will consist of a catalyst-rotating device, catalyst module lift device (supplied by the catalyst vendor), electric and manual hoists, and a catalyst cart and rail system. Provisions have been made in the catalyst design for removable test samples of catalyst material that can be used to monitor and predict catalyst activity during the catalyst life. The design life of the catalyst is 24,000 hours.

Gaseous arsenic is one of the predominant catalyst deactivation mechanisms in coal-fired SCR applications. Introducing calcium oxide (CaO) to the fuel reduces the gaseous arsenic in the flue gas and decreases its harmful effect on the catalyst. For the DGS Unit 2 SCR system, an addition rate of 0.51 weight percent CaO is expected to reduce the concentration of arsenic in the flue gas to within acceptable limits, subsequently ensuring the catalyst for a minimum 24,000 hours of operation. This optional CaO addition may be provided from lime or limestone.

A permanent sampling grid will be provided above and below the catalyst layers as well as between layers. These grids will allow sampling of the gas stream from outside the SCR while the unit is operating. A moveable NO_x probe will be provided in each SCR reactor inlet and outlet. A sampling/NO_x analyzer system will be connected to each probe to measure the inlet and outlet NO_x and provide a process control signal for the ammonia injection system.

A urea-based ammonia system will be provided to supply ammonia for the SCR catalyst to remove NO_x. The system is sized to produce ammonia for two SCRs at full load. The urea to ammonia system will use urea that is dissolved into water and the solution will be injected into heated in-line hydrolysers at a controlled rate and under conditions to provide the required amount of ammonia. The process will produce a gaseous mixture of ammonia, carbon dioxide and water vapor, which will be mixed into the flue gas stream.

The Unit 2 SCR control system is designed to achieve a target outlet NO_x emission rate of 0.07 pounds per million British thermal units (lb/MMBtu) with an ammonia slip concentration of no more than 5.0

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

parts per million at 3% oxygen (O₂). The target SCR controlled NO_x emission is ten times lower than the current NSPS Subpart D limit of 0.7 lb/MMBtu.

Circulating Dry SO₂ Scrubber

CDS will be installed down stream of the existing Unit 2 induced draft (ID) fans. This flue gas desulfurization (FGD) system will remove the acidic constituents of the flue gas, primarily SO₂ and SO₃ and to a lesser extent carbon dioxide (CO₂), HCl and HF, by reaction with hydrated lime. The system includes the CDS vessel, adsorbent preparation and injection, water injection, product recycle injection and a flue gas recycle system. To assure a high level of SO₂ removal, a portion of the solid products exiting the CDS vessel (i.e., primarily reaction products such as calcium sulfite (CaSO₃), calcium sulfate (CaSO₄), calcium carbonate (CaCO₃), calcium chloride (CaCl₂), calcium fluoride (CaF₂) and inerts) will be separated from the flue gas in the baghouse and recycled back into the CDS to maintain the fluidized bed, while the excess material will be pneumatically transported out of the system to a storage silo. The amount of solids recycled is dependent upon the differential pressure within the CDS and the volumetric flue gas flow rate.

In order to ensure that the CDS is constantly fluidized, a portion of the flue gas stream downstream of the two booster fans will be recirculated to the inlet duct of the CDS during boiler operation at reduced loads. The amount of flue gas recirculated is accomplished through the positions of the two recirculation dampers.

The CDS is designed so that flue gas flows through it whenever Unit 2 is operating (i.e., there are no bypasses). It contains instrumentation to measure flue gas pressures, temperatures and SO₂ concentrations at various locations in the ductwork.

Unit 2 flue gas will first pass through a group of venturi nozzles. The venturi nozzles serve to accelerate the flue gas just prior to the injection of high-pressure water, recycled solids, and adsorbent (i.e., lime). The reactor acts as a fluidized bed, assuring maximum contact between the pollutants in the flue gas and the adsorbent solids. The reactor is characterized by high turbulences and optimal chemical and physical heat and mass transfer rates. Water is added to bring the flue gas closer to the saturation temperature where the SO₂ absorption is most effective. The high dust load leaving the reactor is captured in the baghouse (fabric filter).

SO₂ will be measured at the inlet and outlet of the CDS reactor. These measurements will be used to vary the quantity of fresh lime that is introduced into the reactor. The final residue of the CDS process is a moist product which may be landfilled or potentially re-utilized.

Hydrated lime, Ca(OH)₂, is the adsorbent used in the CDS process. Lime will be delivered to the DGS via truck or rail and subsequently hydrated to increase its reactivity before injection in the CDS. Within the hydrator, the lime is mixed with water and agitated until the hydration reaction is complete. The quantity of fresh lime that is introduced into the CDS is controlled by inlet and outlet SO₂ concentrations.

SAM emissions can also be controlled by injecting lime into the CDS reactor without water injection and with no ash recirculating provided the baghouse is in-service. SAM emissions will be neutralized by lime in the CDS reactor and will be collected as particulate calcium compounds by the downstream fabric filter. To evaluate potential changes in SAM emissions, GRU proposes to conduct both baseline (prior to installation of the AQCS) and post-AQCS stack testing. Baseline stack testing would be conducted using compliance coal while the post-AQCS testing will evaluate both compliance and higher sulfur coals, alternate lime injection locations, and various boiler/AQCS operating configurations. The tests will serve to document the impact of lime injection on reducing SAM emissions, and to develop correlations between lime injection rates and SAM emission rates.

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The DGS Unit 2 CDS control system is designed to achieve a target outlet SO₂ emission rate of 0.12 lb/MMBtu. The target CDS controlled SO₂ emission is ten times lower than the current NSPS Subpart D limit of 1.2 lb/MMBtu.

Baghouse

For particulate removal, one pulse-jet baghouse containing ten (10) compartments will be installed between the outlet of the CDS and inlet of the booster fans at DGS Unit 2. The fabric filter is designed so that flue gas flows through it whenever the DGS Unit 2 is operating (i.e., there are no bypasses).

Particulate contained in the raw flue gas as well as reaction products from the CDS are captured in the pulsejet fabric filter. The pulsejet fabric filter is multi-compartmented, consisting of two parallel trains with centrally located inlet and outlet plenums. Each parallel train of compartments is served by an air slide utilizing heated air. The air slide conveys a significant portion of the collected particulate back to the CDS to maintain a high solids environment and improve overall reagent utilization. The balance of the collected particulate goes to surge bins (one per air slide) from which it is pneumatically conveyed to a common ash silo equipped with redundant pug mills. The ash can then be loaded into trucks.

Each compartment will contain one cylindrical bag bundle with 984 filter bags per bundle. This equates to a total of 9,840 bags installed, with an additional 2 percent included as startup spares. The filter bags for this project will be fabricated from heavy weight 18 oz/yd nominal weight polyphenyl sulfide (PPS), self supported with fused seam. The design air-to-cloth ratio is 4:1 or less with one compartment off-line for maintenance.

The pulsejet fabric filter utilizes bags fabricated from felted PPS fabric that is appropriate for this application. During operation the incoming particulate laden flue gas passes from outside of each bag creating a filter cake. With the passage of time, this cake thickens and tends to increase pressure drop. An automatic cleaning system is utilized to dislodge this filter cake, thus maintaining the desired overall pressure drop. The motive force for cleaning is pressurized air that is introduced at the top of the bags, just above the tubesheet. This flow of pressurized air travels counter to the normal flow of flue gas, thus dislodging the accumulated filter cake and assisting its downward drop into the collecting hoppers below. Redundant low-pressure positive displacement blowers provide the pressurized air.

Two 50 percent booster fans are provided for the DGS Unit 2 AQCS. The fans serve two functions. They provide the additional motive force to overcome the additional pressure drop imposed on the system by the addition of the SCRs, the CDS, and the baghouse. They also allow the CDS to operate at reduced Unit 2 loads by recycling a portion of flue gas from the baghouse outlet to the CDS vessel inlet, thereby keeping the solids bed in the vessel fluidized. The discharge of the booster fans ties into the ductwork upstream of the stack.

The DGS Unit 2 fabric filter control system is designed to achieve a target outlet filterable PM emission rate of 0.015 lb/MMBtu. The target fabric filter controlled PM emission is 6.7 times lower than the current NSPS Subpart D limit of 0.1 lb/MMBtu.

Urea, Lime and CDS By-Product Handling and Storage

Reagents associated with the DGS Unit 2 AQCS include urea for the SCR NO_x control system and lime for the SO₂ CDS control system. Solid materials generated by the DGS Unit 2 AQCS consist of the reaction products (primarily calcium sulfate, calcium sulfite, unreacted lime and inerts) from the SO₂ CDS control system. A discussion of the handling and storage of the AQCS reagents and by-product are provided in the following sections.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Urea

Granular or prilled urea will be delivered by truck and transferred pneumatically directly to the urea to ammonia dissolver tank where the urea is dissolved in water. The urea/water solution will then be injected into a heated in-line reactor at controlled rates to produce the appropriate amounts of gaseous ammonia and water vapor. The gaseous ammonia and water vapor stream will then be injected into the SCR control system. Accordingly, there will be no emissions associated with the unloading and processing of urea.

Lime

The lime unloading and storage system includes equipment for the pneumatic unloading of pebble lime from railcars or trucks, transport to a storage silo, and transport from the storage silo into two lime day bins.

Lime will be received in 100 ton railcars that have bottom hopper outlets. Lime may also be received in 25 ton maximum capacity trucks that have self-unloading blower systems. A roofed enclosure with partial walls parallel to the track for wind and rain protection is provided to protect the unloading operation from weather exposure.

For railcar unloading, unloading pans are provided that are clamped to each of three hopper outlet flanges, and a vacuum conveying system removes lime from the railcar hopper, one hopper section at a time, into a filter receiver. From the filter receiver, lime is fed through an airlock, into an airlock hopper, which discharges through another airlock into a positive pressure pneumatic conveyor. The vacuum and pressure conveying systems each have two blowers, one blower is spare.

The vacuum conveyor system is also designed to unload two positive pressure pneumatic trucks by having the truck discharge line connect to the vacuum conveyor line. The unloading building also provides for one or two self-unloading pressure differential trucks to unload. Two independent conveying pipes and hoses are provided so both trucks can unload at the same time.

The positive pressure lime conveyor discharges into the lime storage silo. The silo has a vibrating bin outlet, to assure continuous flow from the silo and has a bin vent to exhaust filtered air from the silo. From the vibrating bin discharger, lime discharges through a diverter gate to either of two airlock hoppers. Each hopper feeds an independent positive pressure conveyor that transports lime into either of two lime day bins. Two blowers are provided; one acts as a spare.

The positive pressure conveyor discharges lime into either of two day bins, selected by a diverter in the convey line. Both day bins are provided with a bin vent filter. Two conveying pipes with hoses to connect to self-unloading pressure differential trucks are also provided to use as emergency sources of lime for the day bins.

Pebble lime from the day bins is conveyed to hydrators equipped with scrubbers where it is wetted to approximately 1 to 2 percent moisture. Hydrated lime is then conveyed by a positive pressure pneumatic conveyor into the hydrated lime silo. A bin vent filter is provided for the silo to vent filtered conveying air from the silo. Hydrated lime discharges from the silo through an airlock, and then into a feeder hopper, which discharges through another airlock into the conveying line. A positive pressure conveyor transports hydrated lime to the turbo reactor. The conveyor has two blowers with one acting as a spare.

PM emission sources associated with the lime handling and storage system consist of: (1) railcar unloading filter receiver, (2) lime storage silo, (3) two lime day bin silos, (4) two lime hydrator scrubbers, and (5) hydrated lime storage silo. The railcar unloading filter receiver and each of the storage silos will be equipped with bin vent fabric filters designed to achieve an outlet PM concentration of 0.01 grains per dry standard cubic foot (gr/dscf).

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

CDS Byproduct

A portion of the CDS byproducts will be collected by the CDS fabric filter and pneumatically transferred to a CDS byproduct storage silo which will be equipped with a bin vent fabric filter designed to achieve an outlet PM concentration of 0.01 gr/dscf.

CDS byproduct will then be transferred into two pin mixers where it will be mixed with water prior to being loaded into trucks. There are no significant PM emissions associated with the wet pin mixer operation.

Calcium Oxide Addition System for Fuel Conditioning

Calcium oxide in the form of lime or limestone may be added to the coal conveying system, as needed, to condition the fuel and enhance the life of the SCR catalyst.

2. PROJECT EMISSIONS

The existing DGS is located in an attainment area and is classified as a *major facility*. A modification to an existing major facility located in an attainment area which has a net emissions increase equal to or exceeding the significant emission rates listed in Rule 62-210.200(277), F.A.C., will be subject to PSD review.

For changes to existing emission units, such as the Unit 2 AQCS, the determination of a net emission increase is based on a comparison of actual-to-projected actual emission rates. A significant emissions increase of a PSD pollutant will occur if the difference between the *baseline actual emissions* and *projected actual emissions* equals or exceeds the significant emissions rate for that pollutant. As defined by Rule 62-210.200(36), F.A.C., baseline actual emissions for an existing electric utility steam generating unit means the average rate, in tons per year, at which the unit actually emitted the pollutant during any consecutive 24-month period selected by the owner or operator within the 5-year period immediately preceding the date a complete permit application is received by the Department. Baseline actual emissions include fugitive emissions, to the extent quantifiable, as well as emissions associated with startups and shutdowns.

Projected actual emissions, as defined by Rule 62-210.200(248), F.A.C., means the maximum annual rate, in tons per year, at which an existing emissions unit is projected to emit a PSD pollutant in any one of the 5 years following the date the unit resumes regular operation after the project, or in any one of the 10 years following that date, if the project involves increasing the emissions unit's design capacity or its potential to emit that PSD pollutant and full utilization of the unit would result in a significant emissions increase or a significant net emissions increase at the major stationary source. Emissions that the unit could have accommodated during the 24-month baseline period and that are unrelated to the modification are excluded. As noted previously, there will be no changes to the existing Unit 2 electrical steam generator and no increase in maximum heat input to the boiler or steam flow capability of the turbine. Since Unit 2 is a base load unit, there will also be no change in Unit 2 utilization (i.e., capacity factor) due to the AQCS project. Accordingly, the applicable period for determining projected actual emissions for the Unit 2 AQCS project is the 5 years following installation of the additional emission controls.

The Unit 2 AQCS project will result in substantial reductions in actual emissions of NO_x, SO₂, PM/PM₁₀, HF and SAM. The Department has reasonable assurance that PM/PM₁₀ emissions will not increase due to the existing electrostatic precipitator as well as additional particulate control with the baghouse system. No changes are planned to the Unit 2 combustion process. Accordingly, no change in actual emissions of combustion related pollutants (i.e., CO and VOC) will result due to the AQCS

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

project. Baseline actual emissions, projected actual emissions and net change in emissions are listed in the following tables:

TABLE 1 – PAST ACTUAL EMISSIONS & 2-YEAR AVERAGES

Year	SO ₂ (tons/yr)	NO _x (tons/yr)	PM (tons/yr)	PM ₁₀ (tons/yr)	H ₂ SO ₄ (tons/yr)	HF (tons/yr)	Hg (tons/yr)
2002	7,147.4	3,315.9	270.6	181.3	83.3	27.0	0.051
2003	7,678.8	3,666.3	308.3	206.5	83.0	29.0	0.044
2004	6,951.7	3,322.8	116.9	78.3	80.3	25.3	0.038
2005	8,042.9	3,932.5	96.9	64.9	103.3	33.0	0.025
2006	8,119.3	3,691.9	151.0	101.2	93.5	29.9	0.045
02-03 Average	N/A	N/A	289.4	193.9	N/A	N/A	N/A
05-06 Average	8,081.1	3,812.2	N/A	N/A	98.4	31.4	0.035

TABLE 2 – PROJECTED ACTUAL EMISSIONS

	SO ₂ (tons/yr)	NO _x (tons/yr)	PM (tons/yr)	PM ₁₀ (tons/yr)	H ₂ SO ₄ (tons/yr)	HF (tons/yr)	Hg (tons/yr)
Projected Emissions	942.6	549.9	117.8	108.4	30.7	3.1	0.0070
AQCS Material Handling	N/A	N/A	6.0	6.0	N/A	N/A	N/A
AQCS By-Product Truck Traffic	N/A	N/A	Neg.	Neg.	N/A	N/A	N/A
Totals	942.6	549.9	123.8	114.4	30.7	3.1	0.0070

TABLE 3 – ESTIMATED NET CHANGE IN ACTUAL EMISSIONS

	SO ₂ (tons/yr)	NO _x (tons/yr)	PM (tons/yr)	PM ₁₀ (tons/yr)	H ₂ SO ₄ (tons/yr)	HF (tons/yr)	Hg (tons/yr)
Net Change	-7,138.5	-3,262.3	-165.6	-79.5	-67.7	-28.3	-0.028

3. STARTUP, SHUTDOWN, AND MALFUNCTION EMISSIONS

Unit 2 is subject to the SO₂, NO_x and PM standards in 40 CFR 60, Subpart D. According to 40 CFR 60.8(c), operations during periods of startup, shutdown, and malfunction do not constitute representative conditions for performance testing, and emissions in excess of an applicable standard during such periods are not considered to be violations unless otherwise specified in the standard. Since Subpart D does not contain language indicating that the emissions standards apply at all times, emissions in excess of the Subpart D emissions standards during startup, shutdown, and malfunction periods are not considered violations pursuant to 40 CFR 60.8(c).

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Since the facility is proposing to use higher sulfur coals, startup emissions will be higher compared to startup emissions presently. The Department considered requiring the facility to use lower sulfur coal for startup, but storage pile space constraints, segregation of different grades of coal, logistical handling issues for multiple types of coal negated that approach.

Even though the emission limits in Subpart D does not apply during startup, shutdown, and malfunction, the reporting provisions in 40 CFR 60.7(c) requires owners and operators to report emissions in excess of the standards, including startup, shutdown and malfunction. In addition, 40 CFR 60.11(d) requires that owners and operators maintain and operate affected facilities in a manner to minimize emissions at all times. Because of this requirement, excess emission reports are reviewed in order to determine whether source owners and operators have taken adequate steps to minimize emissions during startup, shutdown, and malfunction.

4. RULE APPLICABILITY

Prevention of Significant Deterioration

New Source Review under PSD regulations is not applicable to the proposed project as the net increase in emissions due to this modification is less than the PSD significant emission rates listed in Rule 62-210.200, F.A.C. The net increase in emissions is determined based on the difference between the projected future actual emissions and the baseline actual emissions.

Federal and State Emission Standards

The proposed project is subject to the applicable provisions of Chapter 403, F.S., Chapters 62-4, 62-210, 62-212 and 62-296, F.A.C. The facility is located in an area designated attainment or maintenance for all criteria pollutants in accordance with F.A.C. Rule 62-204.340, F.A.C. The project is subject to the monitoring, record keeping and reporting requirements of Rule 62-212.300(1)(e), F.A.C. The draft permit authorizes the construction of the AQCS for Unit 2 and establishes specific monitoring conditions to determine whether the project resulted in significant net emissions increases.

The emission units are regulated under Acid Rain, Phase II and Phase I; NSPS – 40 CFR 60 Subpart D, Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After August 17, 1971, adopted and incorporated by reference in Rule 62.204-800, F.A.C.

5. AIR QUALITY ANALYSIS

According to the application and our review, the proposed project does not require an air quality analysis because there will be no net significant emissions increases.

6. CONCLUSION

Based on the foregoing technical evaluation of the application and information submitted by GRU, the Department has made a preliminary determination that the proposed project will comply with all applicable federal and state air pollution regulations.

DRAFT PERMIT

PERMITTEE

City of Gainesville
Gainesville Regional Utilities (GRU)
Post Office Box 147117 (A132)
Gainesville, Florida 32614-7117

Authorized Representative:

Mr. George K. Allen, Assistant General Manager
Energy Supply

Permit No.:	0010006-005-AC
Facility ID No.:	0010006
Project:	Installation of Air Quality Control Systems
Expires:	September 30, 2009

PROJECT AND LOCATION.

This permit authorizes the installation of selective catalytic reduction (SCR), circulating dry scrubber (CDS) and baghouse systems on existing Unit 2 at the Deerhaven Generating Station. The Deerhaven Generating Station is an existing electrical generating plant (SIC No. 4911) located at 10001 NW 13th Street in Gainesville, Alachua County, Florida. The UTM coordinates are: Zone 17; 365.7 km E; 3292.6 km N.

STATEMENT OF BASIS

The applicant elects to install the SCR, CDS and baghouse systems to provide full flexibility in implementing the federal cap and trade program under the Clean Air Interstate Rule (CAIR). Because CAIR affords a regulated facility the flexibility to evaluate market conditions to determine whether it will install controls, operate existing controls, or purchase allowances generated by other plants, the Department does not require the installation of SCR nor its operation. However, installation and operation of additional lime injection system is required to reduce sulfuric acid mist (SAM). This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.) and Title 40, Part 60 of the Code of Federal Regulations (CFR). The above named permittee is authorized to modify the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

CONTENTS

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Unit Specific Conditions
- Appendix GC. Construction Permit General Conditions

Executed in Tallahassee, Florida

(DRAFT)

Joseph Kahn, Director
Division of Air Resource Management

(Date)

SECTION 1. GENERAL INFORMATION (DRAFT)

FACILITY DESCRIPTION

The City of Gainesville, GRU operates an existing electrical generating plant at the Deerhaven Generating Station (DGS). This plant consists of two steam boilers (Unit Nos. 1 and 2) and associated steam turbines; a simple cycle combustion turbine (CT No. 3); two unregulated simple cycle combustion turbines (CT Nos. 1 and 2); a recirculating cooling water system; storage and handling facilities for coal; brine salt; fly ash and bottom ash; fuel oil storage tanks; water treatment facilities; a railcar maintenance facility and ancillary equipments. Boiler No. 2 has a nominal nameplate rating of 251 megawatts (MW), electric. Emission control equipment currently installed on Boiler No. 2 consists of a hot-side electrostatic precipitator for control of particulate matter.

PROJECT DESCRIPTION

This permit authorizes the installation of Air Quality Control Systems (AQCS) on DGS Unit 2 which includes the SCR, CDS and baghouse systems. The permittee elects to install these controls as part of its plan to comply with the Clean Air Interstate Rule (Rule 62-296.470(CAIR), F.A.C.) and the Clean Air Mercury Rule (Rule 62-296.480(CAMR), F.A.C.). Because CAIR affords a regulated facility the flexibility to evaluate market conditions to determine whether it will install controls, operate existing controls, or purchase allowances generated by other plants, the Department does not require the installation of this equipment nor its operation.

Installation of the SCR system will result in collateral increases in emissions of SAM and particulate matter (PM/PM₁₀). The potential increase of SAM emissions is a result of the oxidation of sulfur dioxide (SO₂) to sulfur trioxide (SO₃) that is emitted as SAM after the CDS system. The permit requires the injection of lime in the CDS to reduce SAM emissions. The lime reacts with SO₃ to form particulate calcium compounds, which will be collected in the downstream fabric filter (FF). With the lime injection in the CDS, there will be no PSD-significant emissions increases of SAM due to the installation of SCR systems on Unit 2.

The Unit 2 steam turbine may be refurbished by replacing the high- and intermediate- pressure rotor along with the associated stationary elements. Unit 2 is currently fired with low sulfur eastern bituminous coal. Following installation and operation of the new controls, Unit 2 will be capable of firing a variety of eastern bituminous coal blend, including medium sulfur coal (up to 2.5 weight percent sulfur), and still comply with the New Source Performance Standards in 40 CFR 60, Subpart D. There will be no changes to the existing electrical generator (i.e., no expansion in steam generating capability) and no increase in maximum heat input to the boiler or steam flow capability of the turbine.

REGULATORY CLASSIFICATION

Title III: The existing facility is a major source of hazardous air pollutants (HAPs).

Title IV: The existing facility operates units subject to the acid rain provisions of the Clean Air Act.

Title V: The existing facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

PSD: The existing facility is a major stationary in accordance with Rule 62-212.400, F.A.C.

NSPS: The existing facility operates units subject to the New Source Performance Standards of 40 CFR 60.

RELEVANT DOCUMENTS

The permit request and additional information received to make it complete are not a part of this permit; however, the information is listed in the technical evaluation which is issued concurrently with this permit.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting Authority: All documents related to applications for permits regarding construction and operation shall be submitted to the Bureau of Air Regulation of the Florida Department of Environmental Protection (DEP) at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. Copies of all such documents shall also be sent to the Department's Northeast District Office.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to Northeast District Office.
3. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403 of the Florida Statutes (F.S.); Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.); and Title 40, Part 60 of the Code of Federal Regulations (CFR), adopted by reference in Rule 62-204.800, F.A.C. The terms used in this permit have specific meanings as defined in the applicable chapters of the Florida Administrative Code. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
4. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
5. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
6. Title V Permit: This permit authorizes modification of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]
7. Source Obligation: At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by increasing its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction has not yet commenced on the source or modification. [Rule 62-212.400(12)(c), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

The specific conditions listed in this section apply to the following emission units:

EMISSION UNIT NO.	EMISSION UNIT DESCRIPTION
005	Steam Boiler - Unit 2

Unit 2 is a fossil fuel-fired steam generator with a nominal nameplate rating of 251 MW. Authorized fuels include pulverized coal, natural gas and/or distillate fuel oils (Nos. 1 or 2) with emissions exhausted through a 350 foot stack. The maximum heat input to Unit 2 is 2,428 MMBtu/hour. Unit 2 is a dry bottom, wall-fired boiler with a hot-side electrostatic precipitator to control particulate matter. Unit 2 began commercial operation in 1981. Opacity, nitrogen oxides (NO_x) and SO₂ emissions are continuously monitored.

PREVIOUS APPLICABLE REQUIREMENTS

1. **Permit Determination:** This permit authorizes the installation of SCR, CDS and baghouse systems for Unit 2. Unless otherwise specified, these conditions are in addition to all existing applicable permit conditions and regulatory requirements. The facility remains subject to all of the requirements specified in the current Title V Operation Permit (No. 0010006-003-AV). [Rule 62-4.070(3), F.A.C.]

AUTHORIZED WORK

2. **SCR System:** The permittee is authorized to construct, tune, operate and maintain a new SCR system for Unit 2 to reduce emissions of nitrogen oxides (NO_x) as described in the application. In general, the SCR system will include the following equipment: ammonia storage; ammonia flow control unit; ammonia injection grid; three layers (two active and one future layer) of honeycomb catalyst; an SCR reactor chamber; and other ancillary equipment. [Application; Rules 62-296.470(CAIR) and 62-210.200(PTE), F.A.C.]
3. **CDS System:** The permittee is authorized to install a new CDS system for Unit 2 to reduce emissions of SO₂ and SO₃. The new system will be installed downstream of the existing Unit 2 induced draft fan. The system includes the CDS vessel, adsorbent preparation and injection, water injection; product recycle injection and a flue gas recycle system. The system contains instrumentation to measure flue gas pressures, temperatures and SO₂ concentrations at various locations in the ductwork. SO₂ will be measured at the inlet and outlet of the CDS reactor. [Application; Rules 62-296.470(CAIR) and 62-210.200(PTE), F.A.C.]
4. **Baghouse System:** The permittee is authorized to install one pulse-jet baghouse containing ten compartments. The baghouse will be installed between the outlet of the CDS and inlet of the booster fans. Design Information: Each compartment will contain one cylindrical bag bundle with 984 filter bags per bundle. A total of 9,840 bags will be installed, with an additional 2 percent included as startup spares. The filter bags are fabricated from heavy weight 18 oz/yd nominal weight polyphenyl sulfide fabric. The design air-to-cloth ratio is 4:1. An automatic cleaning system is utilized to dislodge the filter cake. [Application; Rules 62-296.470(CAIR) and 62-210.200(PTE), F.A.C.]
5. **Circumvention:** No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly. Operation of the SCR is not required by this permit. As necessary, the permittee shall operate the lime injection system for SAM emissions control to ensure the project does not result in a PSD-significant emissions increase (7 tons/year) of sulfuric acid mist emissions above baseline actual emissions (98 tons/year). [Rules 62-210.650 and 62-212.400(12), F.A.C.]

PERFORMANCE REQUIREMENTS

6. **Annual SAM Emissions Projections:** For this project, the permittee projected that actual annual emissions due to the project would not exceed the baseline actual emissions of SAM (98 tons/year). The permittee

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

shall demonstrate this by compiling and submitting the reports required by this permit. [Application; and Rules 62-212.300 and 62-210.370, F.A.C.]

7. Lime Injection for SAM Emissions Control: On an annual basis, the permittee must demonstrate that SAM emissions as a result of this project do not exceed 98 tons per year. The permittee shall install and operate the lime injection system at a frequency and injection rate for SAM control to satisfy this requirement. An automated control system will be used to adjust the lime flow rate for the given set of operating conditions based on the most recent correlation curves based on performance testing. [Rules 62-4.070(3) and 62-212.300(1)(e), F.A.C.]
8. Ammonia Slip: Ammonia slip measured at the stack downstream of all emission control systems shall not exceed 5 parts per million by volume (ppmv). Annual testing of ammonia shall be conducted and corrective measures taken if measured values exceed 2 ppmv. [Design; and Rule 62-4.070(3), F.A.C.]

EMISSIONS PERFORMANCE TESTING

9. Baseline Performance Tests – Lime Injection for SAM Emissions Control: The permittee shall conduct baseline performance tests at permitted capacity to evaluate potential changes in SAM emissions. Baseline performance tests shall be conducted using current coal (0.8 weight percent sulfur). Three baseline performance tests shall be conducted. The first baseline performance test shall be conducted prior to installation of AQCS with no lime injection. The second baseline performance test shall be conducted prior to installation of AQCS with lime injection into the boiler. The third baseline performance test shall be done within 45 days of completing AQCS construction with lime injection into the CDS reactor. The permittee shall submit a test notification to the appropriate authorities at least 15 days prior to each test and shall submit a test report summarizing the emission tests and results within 45 days of the completion of the each performance test.
[Rules 62-4.070(3) and 62-212.300(1)(e), F.A.C.]
10. Post- AQCS Construction Performance Tests – Lime Injection for SAM Emissions Control: The permittee shall conduct post-AQCS performance tests to evaluate potential changes in SAM emissions. Post- AQCS construction tests shall evaluate both current and higher sulfur (up to 2.5 weight percent) coals, alternate lime injection locations, and various boiler/AQCS operating configurations. Within 120 days of completing construction of Unit 2 AQCS systems, the permittee shall conduct a series of performance tests on Unit 2 to determine the SAM emissions rate under a variety of operating scenarios that documents the impact of lime injection on reducing SAM emissions and results in the development of correlation curves based on injection rates, operating conditions and emissions.
 - a. For each set of operating conditions being evaluated, the permittee shall conduct at least a 1-hour test run to determine SAM emissions. At least nine such test runs shall be conducted to evaluate the effect of SAM emissions on such parameters as the SO₂ emission rate prior to the SCR catalyst (and CDS system), the unit load, the flue gas flow rate, the ammonia injection rate and the current catalyst oxidation rate.
 - b. Tests shall be conducted under a variety of fuel blends and load rates that are representative of the actual operating conditions intended for Unit 2. Sufficient tests shall be conducted to establish the SAM emissions rates for the following scenarios: SCR reactor in service without lime injection in the CDS, and SCR reactor in service under varying operating conditions and levels of lime injection in the CDS.
 - c. At least 15 days prior to initiating the performance tests, the permittee shall submit a test notification, preliminary test schedule and test protocol to the Bureau of Air Regulation and the Compliance Authority.

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

- d. Within 45 days following the last test run conducted, the permittee shall provide a report summarizing the emissions tests and results. All SAM emissions test data shall be provided with this report.
- e. Within 45 days following the submittal of the emissions test report and no later than 90 days following the last test run conducted, the permittee shall submit a project report summarizing the following: identify each set of operating conditions evaluated, identify each operating parameter evaluated, identify the relative influence of each operating parameter, describe how the adjustment to the lime injection rate be made based on the selected parameters, and provide details for calculating and estimating the SAM emissions rate based on the level of lime injection and operating conditions. The test results shall be used to adjust the lime injection system and estimate SAM emissions.

[Rules 62-4.070(3) and 62-212.300(1)(e), F.A.C.]

- 11. **Annual Tests – Lime Injection for SAM Emissions Control:** During each federal fiscal year, the permittee shall conduct performance tests to determine the SAM emission rates and adjust the lime injection correlation curves as necessary. At least six representative 1-hour test runs shall be conducted on Unit 2. Within 45 days following the last test run conducted, the permittee shall provide a report summarizing the emissions tests conducted, the results of the tests, the catalyst oxidation rate, and the updated series of related lime injection correlation curves. [Rules 62-4.070(3) and 62-212.300(1)(e), F.A.C.]
- 12. **Test Notification:** The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. [Rule 62-297.310(7)(a)9, F.A.C.]
- 13. **Test Methods:** Required tests shall be performed in accordance with the following reference methods:

EPA Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
8	Determination of Sulfuric Acid Mist Emissions
19	Determination of Sulfur Dioxide Removal Efficiency and Particulate Matter, Sulfur Dioxide, and Nitrogen Oxides Emission Rates (Optional F-factor method may be used to determine flow rate and gas analysis to calculate mass emissions in lieu of Methods 1-4.)

Compliance with the ammonia slip limit shall be determined annually using EPA conditional test method (CTM-027), EPA method 320, or other methods approved by the Department. [Rules 62-204.800 and 62-297.100, F.A.C.; 40 CFR 60, Appendix A]

STARTUP, SHUTDOWN, AND MALFUNCTION EMISSIONS

- 14. **Startup, Shutdown and Malfunction:** Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test nor shall emissions in excess of the level of the applicable emission limit during periods of startup, shutdown, and malfunction be considered a violation of the applicable emission limit unless otherwise specified in the applicable standard. [Rule 40 CFR 60.8(c)]
- 15. **Emissions:** The permittee at all times, including periods of startup, shutdown, and malfunction shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the facility. [Rule 40 CFR 60.11(d)]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

NOTIFICATIONS, RECORDS AND REPORTS

16. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Rule 62-297.310, F.A.C. For each sulfuric acid mist test run, the report shall also indicate the lime injection rate for SAM emissions control, unit load, and unit heat input rate. [Rule 62-297.310(8), F.A.C.]
17. Operational Data: The permittee shall continuously monitor and record the lime injection rate for SAM emissions control. [Rule 62-4.070(3), F.A.C.]
18. Annual SAM Emissions Reports: In accordance with Rule 62-212.300(1)(e), F.A.C., the permittee shall comply with the following monitoring, reporting and recordkeeping provisions:
- The permittee shall monitor the SAM emissions using the most reliable information available. On a calendar year basis, the permittee shall calculate and maintain a record of the annual emissions (tons per year) for a period of 5 years after completing construction on unit's control system. Emissions shall be computed in accordance with Rule 62-210.370, F.A.C.
 - Within 60 days after each calendar year following completion of construction, the permittee shall report to the Compliance Authority the annual emissions for the unit for the preceding calendar year. The report shall contain the following:
 - Name, address and telephone number of the owner or operator of the major stationary source;
 - Annual emissions as calculated pursuant to subparagraph 62-212.300(1)(e)1., F.A.C.;
 - If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and
 - Any other information that the owner or operator wishes to include in the report.
 - The information required to be documented and maintained shall be submitted to the Compliance Authority, where it will be available for review to the general public.

[Rule 62-212.300(1)(e), F.A.C.]

19. SAM Emissions Computation and Reporting: The permittee shall compute SAM emissions in accordance with the following requirements.
- For each year of reporting required, emissions shall be computed based on the controlled and uncontrolled emissions factors determined during the required annual emissions test. The owner or operator shall not compute emissions by converting an emission factor to pounds per hour and then multiplying by hours of operation, unless the owner or operator demonstrates that such computation is the most accurate method available.
 - With appropriate supporting test data, multiple emission factors may be used as necessary to account for variations in emission rate associated with variations in the emissions unit's operating rate or operating conditions during the period over which emissions are computed.
 - The permittee shall compute emissions by multiplying the appropriate controlled or uncontrolled emission factor by the annual heat input rate for the period over which the emissions are computed. The uncontrolled emissions factor shall be used if the minimum lime injection rate established for the latest test is not met.
 - The permittee shall retain a copy of all records used to compute emissions pursuant to this rule for a period of five years from the date on which such emissions information is submitted to the Department or Compliance Authority for any regulatory purpose.

[Rule 62-210.370, F.A.C.]

APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to sections 403.161, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), F.S. the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a. Have access to and copy any records that must be kept under the conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.Reasonable time may depend on the nature of the concern being investigated.
8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - a. a description of and cause of non-compliance; and
 - b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by sections 403.73 and 403.111, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of civil Procedure and appropriate evidentiary rules.
10. The permittee agrees to comply with changes in Department rules and F.S. after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - () Determination of Best Available Control Technology (BACT)
 - () Determination of Prevention of Significant Deterioration (PSD)
 - () Compliance with New Source Performance Standards (NSPS)
14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the dates analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law, which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

Friday, Barbara

From: Harvey, Mary
Sent: Tuesday, July 10, 2007 8:51 AM
To: Adams, Patty
Subject: FW: City of Gainesville. GRU - Facility #0010006-005-AC-DRAFT

-----Original Message-----

From: Dee_Morse@nps.gov [mailto:Dee_Morse@nps.gov]
Sent: Monday, July 09, 2007 6:11 PM
To: Harvey, Mary
Subject: City of Gainesville. GRU - Facility #0010006-005-AC-DRAFT

Return Receipt

Your City of Gainesville. GRU - Facility #0010006-005-AC-DRAFT
document:

was Dee Morse/DENVER/NPS
received
by:

at: 07/09/2007 04:11:17 PM

Friday, Barbara

From: Harvey, Mary
Sent: Monday, July 09, 2007 10:19 AM
To: Adams, Patty
Subject: FW: City of Gainesville. GRU - Facility #0010006-005-AC-DRAFT

From: Jonynas, Yolanta E [<mailto:JONYNASYE@gru.com>]
Sent: Monday, July 09, 2007 8:16 AM
To: Harvey, Mary
Subject: Read: City of Gainesville. GRU - Facility #0010006-005-AC-DRAFT

Your message

To: JONYNASYE@gru.com
Subject:

was read on 7/9/2007 8:16 AM.

Friday, Barbara

From: Harvey, Mary
Sent: Thursday, July 05, 2007 9:39 AM
To: Adams, Patty
Subject: FW: FW: City of Gainesville. GRU - Facility #0010006-005-AC-DRAFT

From: Allen, George K (Chip) [<mailto:ALLENGK@gru.com>]
Sent: Tuesday, July 03, 2007 4:28 PM
To: Harvey, Mary
Subject: Read: FW: City of Gainesville. GRU - Facility #0010006-005-AC-DRAFT

Your message

To: ALLENGK@gru.com
Subject:

was read on 7/3/2007 4:28 PM.

Friday, Barbara

From: Harvey, Mary
Sent: Monday, July 02, 2007 3:40 PM
To: Adams, Patty; Arif, Syed
Subject: FW: City of Gainesville. GRU - Facility #0010006-005-AC-DRAFT

From: Allen, George K (Chip) [<mailto:ALLENGK@gru.com>]
Sent: Monday, July 02, 2007 3:05 PM
To: Harvey, Mary
Subject: Read: City of Gainesville. GRU - Facility #0010006-005-AC-DRAFT

Your message

To: ALLENGK@gru.com
Subject:

was read on 7/2/2007 3:05 PM.

Friday, Barbara

From: Harvey, Mary
Sent: Monday, July 02, 2007 9:23 AM
To: Adams, Patty; Arif, Syed
Subject: FW: City of Gainesville. GRU - Facility #0010006-005-AC-DRAFT

From: Halpin, Mike
Sent: Friday, June 29, 2007 4:43 PM
To: Harvey, Mary
Subject: Read: FW: City of Gainesville. GRU - Facility #0010006-005-AC-DRAFT

Your message

To: Halpin, Mike
Cc: Arif, Syed
Subject: FW: City of Gainesville. GRU - Facility #0010006-005-AC-DRAFT
Sent: 6/29/2007 4:13 PM

was read on 6/29/2007 4:43 PM.

Friday, Barbara

From: Harvey, Mary
Sent: Monday, July 02, 2007 9:23 AM
To: Adams, Patty; Arif, Syed
Subject: FW: City of Gainesville. GRU - Facility #0010006-005-AC-DRAFT

From: Tom Davis [mailto:tdavis@ectinc.com]
Sent: Friday, June 29, 2007 7:25 PM
To: Harvey, Mary
Subject: RE: City of Gainesville. GRU - Facility #0010006-005-AC-DRAFT

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Friday, June 29, 2007 4:09 PM
To: George K. Allen, GRU; Yolanta E. Jonynas, GRU; Jim Little, EPA; Kathleen Forney, EPA; D. Morse, NPS; Kirts, Christopher; Tom W. Davis, P.E., ECT, Inc.; Michael Halpin, OSC
Cc: Arif, Syed; Adams, Patty; Gibson, Victoria
Subject: City of Gainesville. GRU - Facility #0010006-005-AC-DRAFT

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Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

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Thank you,

DEP, Bureau of Air Regulation

7/25/2007

Friday, Barbara

From: Harvey, Mary
Sent: Monday, July 02, 2007 9:21 AM
To: Adams, Patty; Arif, Syed
Subject: FW: City of Gainesville. GRU - Facility #0010006-005-AC-DRAFT

-----Original Message-----

From: Forney.Kathleen@epamail.epa.gov [mailto:Forney.Kathleen@epamail.epa.gov]
Sent: Monday, July 02, 2007 8:07 AM
To: Harvey, Mary
Subject: Re: City of Gainesville. GRU - Facility #0010006-005-AC-DRAFT

We got this... Thanks

Katy R. Forney
Air Permits Section
EPA - Region 4
61 Forsyth St., SW
Atlanta, GA 30024

Phone: 404-562-9130
Fax: 404-562-9019

"Harvey, Mary"
<Mary.Harvey@dep
.state.fl.us>

06/29/2007 04:08
PM

To
"George K. Allen, GRU"
<allengk@gru.com>, "Yolanta E.
Jonynas, GRU"
<jonynasye@gru.com>, James
Little/R4/USEPA/US@EPA, Kathleen
Forney/R4/USEPA/US@EPA, "D.
Morse, NPS" <dee_morse@nps.gov>,
"Kirts, Christopher"
<Christopher.Kirts@dep.state.fl.u
s>, "Tom W. Davis, P.E., ECT,
Inc." <tdavis@ectinc.com>,
"Michael Halpin, OSC"
<michael.halpin@dep.state.fl.us>

To

cc

"Arif, Syed"
<Syed.Arif@dep.state.fl.us>,
"Adams, Patty"
<Patty.Adams@dep.state.fl.us>,
"Gibson, Victoria"
<Victoria.Gibson@dep.state.fl.us>

Subject

City of Gainesville. GRU -
Facility #0010006-005-AC-DRAFT

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Thank you,
DEP, Bureau of Air Regulation

***** ATTACHMENT NOT DELIVERED *****

This Email message contained an attachment named
0010006.005.AC.D_pdf.zip
which may be a computer program. This attached computer program could contain a computer virus which could cause harm to EPA's computers, network, and data. The attachment has been deleted.

This was done to limit the distribution of computer viruses introduced into the EPA network. EPA is deleting all computer program attachments sent from the Internet into the agency via Email.

If the message sender is known and the attachment was legitimate, you should contact the sender and request that they rename the file name extension and resend the Email with the renamed attachment. After receiving the revised Email, containing the renamed attachment, you can rename the file extension to its correct name.

For further information, please contact the EPA Call Center at
(866) 411-4EPA (4372). The TDD number is (866) 489-4900.

***** ATTACHMENT NOT DELIVERED *****

Friday, Barbara

From: Harvey, Mary
Sent: Friday, June 29, 2007 4:09 PM
To: 'George K. Allen, GRU'; 'Yolanta E. Jonyas, GRU'; 'Jim Little, EPA'; 'Kathleen Forney, EPA'; 'D. Morse, NPS'; Kirts, Christopher; 'Tom W. Davis, P.E., ECT, Inc.'; 'Michael Halpin, OSC'
Cc: Arif, Syed; Adams, Patty; Gibson, Victoria
Subject: City of Gainesville. GRU - Facility #0010006-005-AC-DRAFT
Attachments: 0010006.005.AC.D_pdf.zip

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

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<http://www.adobe.com/products/acrobat/readstep.html>.

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Thank you,

DEP, Bureau of Air Regulation

Friday, Barbara

From: Harvey, Mary
Sent: Friday, June 29, 2007 4:11 PM
To: 'Kathleen Forney, EPA'; 'Jim Little, EPA'
Cc: Arif, Syed; Adams, Patty
Subject: FW: City of Gainesville. GRU - Facility #0010006-005-AC-DRAFT
Attachments: grugc - Facility #0010006-005-AC-Draft.PDF; gruint - Facility #0010006-005-AC-Draft.PDF; grupermit - Facility #0010006-005-AC-Draft.PDF; grupn - Facility #0010006-005-AC-Draft.PDF; grutepd - Facility #0010006-005-AC-Draft.PDF; Signed Documents - GRU - Facility #0010006-005-AC-DRAFT.pdf

From: Harvey, Mary
Sent: Friday, June 29, 2007 4:09 PM
To: 'George K. Allen, GRU'; 'Yolanta E. Jonynas, GRU'; 'Jim Little, EPA'; 'Kathleen Forney, EPA'; 'D. Morse, NPS'; Kirts, Christopher; 'Tom W. Davis, P.E., ECT, Inc.'; 'Michael Halpin, OSC'
Cc: Arif, Syed; Adams, Patty; Gibson, Victoria
Subject: City of Gainesville. GRU - Facility #0010006-005-AC-DRAFT

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Thank you,

DEP, Bureau of Air Regulation

7/25/2007

Friday, Barbara

From: Harvey, Mary
Sent: Thursday, June 21, 2007 4:11 PM
To: Adams, Patty
Subject: FW: FW: Ltr.- City of Gainesville, GRU - Mr. George Allen

From: Bates, Timothy C [<mailto:BatesTC@gru.com>]
Sent: Thursday, June 21, 2007 2:11 PM
To: Harvey, Mary
Subject: Read: FW: Ltr.- City of Gainesville, GRU - Mr. George Allen

Your message

To: BatesTC@gru.com
Subject:

was read on 6/21/2007 2:11 PM.

Friday, Barbara

From: Harvey, Mary
Sent: Wednesday, June 20, 2007 9:44 AM
To: Adams, Patty
Subject: FW: Ltr.- City of Gainesville, GRU - Mr. George Allen

From: Taylor, P. Joan [mailto:TAYLORPJ@gru.com] **On Behalf Of** Allen, George K (Chip)
Sent: Wednesday, June 20, 2007 9:08 AM
To: Harvey, Mary
Subject: RE: Ltr.- City of Gainesville, GRU - Mr. George Allen

per your request, here is our "reply" verifying receipt.

*P. Joan Taylor, Executive Assistant Sr.
Gainesville Regional Utilities
Energy Supply
P.O. Box 147117 A132
Gainesville, Fl 32614-7117
352-393-1710*

"Go Florida Gators"

-----Original Message-----

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Thursday, June 14, 2007 1:58 PM
To: Allen, George K (Chip); Jim Little, EPA; D. Morse, NPS; Kirts, Christopher; Yolanta E. Jonynas, GRU; Tom W. Davis, P.E., ECT, Inc.; Michael Halpin, OSC
Cc: Arif, Syed; Adams, Patty; Gibson, Victoria
Subject: Ltr.- City of Gainesville, GRU - Mr. George Allen

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

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The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site:

Friday, Barbara

From: Harvey, Mary
Sent: Tuesday, June 19, 2007 12:42 PM
To: Adams, Patty
Subject: FW: Ltr.- City of Gainesville, GRU - Mr. George Allen

-----Original Message-----

From: Dee_Morse@nps.gov [mailto:Dee_Morse@nps.gov]
Sent: Tuesday, June 19, 2007 12:26 PM
To: Harvey, Mary
Subject: Ltr.- City of Gainesville, GRU - Mr. George Allen

Return Receipt

Your Ltr.- City of Gainesville, GRU - Mr. George Allen
document:

was Dee Morse/DENVER/NPS
received
by:

at: 06/19/2007 10:26:20 AM

<http://www.adobe.com/products/acrobat/readstep.html>.

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Thank you,

DEP, Bureau of Air Regulation

Friday, Barbara

From: Harvey, Mary
Sent: Friday, June 15, 2007 9:33 AM
To: Adams, Patty
Subject: RE: Ltr.- City of Gainesville, GRU - Mr. George Allen

Patty read this message before I email Kathleen at EPA. Do you think this is to stiff.

Mary

Kathy - I will forward your emails to the permitting engineers and they can make that decision.

Thanks,
Mary

-----Original Message-----

From: Forney.Kathleen@epamail.epa.gov [mailto:Forney.Kathleen@epamail.epa.gov]
Sent: Thursday, June 14, 2007 4:10 PM
To: Harvey, Mary
Cc: Little.James@epamail.epa.gov; Adams, Patty
Subject: Fw: Ltr.- City of Gainesville, GRU - Mr. George Allen

Hey Mary,

We received this message. I know you send all the permits to me now, but can you also add me to any emails that have any kind of permitting coorespondance (especially the one that you would like a reply notice back on).

Thanks
Katy

Katy R. Forney
Air Permits Section
EPA - Region 4
61 Forsyth St., SW
Atlanta, GA 30024

Phone: 404-562-9130
Fax: 404-562-9019

----- Forwarded by Kathleen Forney/R4/USEPA/US on 06/14/2007 04:06 PM -----

----- Forwarded by James Little/R4/USEPA/US on 06/14/2007 04:06 PM -----

"Harvey, Mary"
<Mary.Harvey@dep
.state.fl.us>

06/14/2007 01:58
PM

To
<allengk@gru.com>, James
Little/R4/USEPA/US@EPA, "D.
Morse, NPS" <dee_morse@nps.gov>,
"Kirts, Christopher"
<Christopher.Kirts@dep.state.fl.u
s>, "Yolanta E. Jonynas, GRU"
<jonynase@gru.com>, "Tom W.

Davis, P.E., ECT, Inc."
<tdavis@ectinc.com>, "Michael
Halpin, OSC"
<michael.halpin@dep.state.fl.us>
CC
"Arif, Syed"
<Syed.Arif@dep.state.fl.us>,
"Adams, Patty"
<Patty.Adams@dep.state.fl.us>,
"Gibson, Victoria"
<Victoria.Gibson@dep.state.fl.us>
Subject
Ltr.- City of Gainesville, GRU -
Mr. George Allen

Dear Sir/Madam:

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Thank you,
DEP, Bureau of Air Regulation

(See attached file: Letter-George K. Allen - DEP #0010006-005-AC.pdf)

Friday, Barbara

From: Harvey, Mary
Sent: Thursday, June 14, 2007 1:58 PM
To: 'allengk@gru.com'; 'Jim Little, EPA'; 'D. Morse, NPS'; Kirts, Christopher; 'Yolanta E. Jonynas, GRU'; 'Tom W. Davis, P.E., ECT, Inc.'; 'Michael Halpin, OSC'
Cc: Arif, Syed; Adams, Patty; Gibson, Victoria
Subject: Ltr.- City of Gainesville, GRU - Mr. George Allen
Attachments: Letter-George K. Allen - DEP #0010006-005-AC.pdf

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Thank you,

DEP, Bureau of Air Regulation

Friday, Barbara

From: Harvey, Mary
Sent: Thursday, June 14, 2007 2:00 PM
To: Halpin, Mike
Cc: Adams, Patty; Arif, Syed
Subject: FW: Ltr.- City of Gainesville, GRU - Mr. George Allen
Attachments: Letter-George K. Allen - DEP #0010006-005-AC.pdf

From: Harvey, Mary
Sent: Thursday, June 14, 2007 1:58 PM
To: 'allengk@gru.com'; 'Jim Little, EPA'; 'D. Morse, NPS'; Kirts, Christopher; 'Yolanta E. Jonynas, GRU'; 'Tom W. Davis, P.E., ECT, Inc.'; 'Michael Halpin, OSC'
Cc: Arif, Syed; Adams, Patty; Gibson, Victoria
Subject: Ltr.- City of Gainesville, GRU - Mr. George Allen

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Thank you,

DEP, Bureau of Air Regulation

6/25/2007

Friday, Barbara

From: Harvey, Mary
Sent: Thursday, June 14, 2007 2:13 PM
To: Adams, Patty; Arif, Syed
Subject: FW: Ltr.- City of Gainesville, GRU - Mr. George Allen

From: Halpin, Mike
Sent: Thursday, June 14, 2007 2:12 PM
To: Harvey, Mary
Subject: Read: FW: Ltr.- City of Gainesville, GRU - Mr. George Allen

Your message

To: Halpin, Mike
Cc: Adams, Patty; Arif, Syed
Subject: FW: Ltr.- City of Gainesville, GRU - Mr. George Allen
Sent: 6/14/2007 2:00 PM

was read on 6/14/2007 2:12 PM.

Friday, Barbara

From: Harvey, Mary
Sent: Thursday, June 14, 2007 2:14 PM
To: Adams, Patty; Arif, Syed
Subject: FW: Ltr.- City of Gainesville, GRU - Mr. George Allen

From: Tom Davis [mailto:tdavis@ectinc.com]
Sent: Thursday, June 14, 2007 2:08 PM
To: Harvey, Mary
Subject: RE: Ltr.- City of Gainesville, GRU - Mr. George Allen

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Thursday, June 14, 2007 1:58 PM
To: allengk@gru.com; Jim Little, EPA; D. Morse, NPS; Kirts, Christopher; Yolanta E. Jonynas, GRU; Tom W. Davis, P.E., ECT, Inc.; Michael Halpin, OSC
Cc: Arif, Syed; Adams, Patty; Gibson, Victoria
Subject: Ltr.- City of Gainesville, GRU - Mr. George Allen

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6/25/2007

Friday, Barbara

From: Harvey, Mary
Sent: Thursday, June 14, 2007 2:14 PM
To: Adams, Patty; Arif, Syed
Subject: FW: Ltr.- City of Gainesville, GRU - Mr. George Allen

From: Kirts, Christopher
Sent: Thursday, June 14, 2007 2:13 PM
To: Harvey, Mary
Subject: Read: Ltr.- City of Gainesville, GRU - Mr. George Allen

Your message

To: 'allengk@gru.com'; 'Jim Little, EPA'; 'D. Morse, NPS'; Kirts, Christopher; 'Yolanta E. Jonynas, GRU'; 'Tom W. Davis, P.E., ECT, Inc.'; 'Michael Halpin, OSC'
Cc: Arif, Syed; Adams, Patty; Gibson, Victoria
Subject: Ltr.- City of Gainesville, GRU - Mr. George Allen
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was read on 6/14/2007 2:13 PM.