

# Memorandum

# Florida Department of Environmental Protection

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TO: Trina Vielhauer, Bureau of Air Regulation  
FROM: Jon Holtom, Title V Section *J.H.*  
DATE: August 26, 2008  
SUBJECT: Draft/Proposed Air Permit No. 0010006-008-AV  
Gainesville Regional Utilities, Deerhaven Generating Station  
Unit 2 Excess Emissions Clarification Project

Attached for your review are the following items:

- Written Notice of Intent to Issue Air Permit;
- Public Notice of Intent to Issue Air Permit;
- Statement of Basis;
- Draft/Proposed Permit; and
- P.E. Certification.

The Draft Permit makes minor changes to the Title V air operation permit for GRU's Deerhaven Generating Station, which is located in Alachua County, Florida. The Statement of Basis provides a summary of the project. The P.E. certification briefly summarizes the proposed project.

The application was received and deemed complete on July 21, 2008. Day 90 is October 19, 2008. There is currently an open enforcement case for this facility related to a self-reported exceedence of the State's excess emissions rule that is currently in the permit. I discussed this revision with Rick Banks, of the Northeast District Office, and he stated that he would not pursue the enforcement in light of this pending revision.

Only the pages of the permit that contain changes as a result of this revision have been included in the package. The transmittal letter states that these are the only pages that are included for review in this revision and that when the permit revision becomes final, these pages should replace the corresponding pages of the existing permit.

I recommend your approval of the attached Draft/Proposed 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

August 28, 2008

*Electronic Mail – Received Receipt Requested*

Robert E. Hunzinger, General Manager ([hunzingerre@gru.com](mailto:hunzingerre@gru.com))  
City of Gainesville, Gainesville Regional Utilities  
P.O. Box 147117 (A134)  
Gainesville, Florida 32614-7117

Re: Draft/Proposed Permit No. 0010006-008-AV  
Title V Air Operation Permit Revision  
Deerhaven Generating Station  
Unit 2 Excess Emissions Clarification

Dear Mr. Hunzinger:

On July 21, 2008, you submitted an application form requesting minor revisions to the Title V permit for the Deerhaven Generating Station to clarify which excess emissions rules apply to Unit 2. This facility is located in Alachua County at 10001 NW 13<sup>th</sup> Street, Gainesville, Florida. Enclosed are the following documents:

- The Draft/Proposed Title V Air Permit Revision, which only includes the cover page, the table of contents, the signature page and the two pages of the permit (pages 23 and 29) that required revisions based on the requested changes. When this permit revision becomes final, these pages will replace the corresponding pages of the existing Title V permit No. 0010006-003-AV.
- The Statement of Basis, which summarizes the facility, the equipment, the primary rule applicability, and any changes since the last Title V air operation permit renewal.
- The Written Notice of Intent to Issue Title V Air Operation 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/Proposed 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. The Public Notice of Intent to Issue Title V Air Permit must be published as soon as possible and the proof of publication must be provided to the Department within seven days of the date of publication.

If you have any questions, please contact the Project Engineer, Jonathan Holtom, P.E., by telephone at 850-921-9531 or by email at [jonathan.holtom@dep.state.fl.us](mailto:jonathan.holtom@dep.state.fl.us).

Sincerely,

Trina L. Vielhauer, Chief  
Bureau of Air Regulation

TLV/jh

Enclosures

**WRITTEN NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT REVISION**

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

City of Gainesville, Gainesville Regional Utilities  
P.O. Box 147117 (A134)  
Gainesville, Florida 32614-7117

Permit No. 0010006-008-AV  
Facility ID No. 0010006  
Deerhaven Generating Station  
Unit 2 Excess Emissions Clarification Project  
Alachua County, Florida

*Responsible official:*  
Robert E. Hunzinger, General Manager

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

**Project:** The applicant has submitted a complete and certified revision application form and has requested minor changes to the existing Title V air operation permit to clarify which excess emissions provisions apply to Unit 2. Details of the project are provided in the application and the enclosed Statement of Basis.

The existing facility consists of the following emissions units:

The facility consists of two steam boilers (Unit Nos. 1 and 2) and associated steam turbines; a simple cycle combustion turbine (CT No. 3) regulated under New Source Performance Standards (NSPS); 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. Also, included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities. Based on the Title V permit renewal application received July 2, 2004, this facility is a major source of hazardous air pollutants (HAP).

**Permitting Authority:** Applications for Title V air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-213 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/Proposed Permit, the Statement of Basis, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the Draft/Proposed Permit by visiting the following website: <http://www.dep.state.fl.us/air/eproducts/apds/default.asp> and entering the permit number shown above. 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, 62-213, 62-214, 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/Proposed 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.

## WRITTEN NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT REVISION

**Public Notice:** Pursuant to Sections 403.815 and 403.087, F.S. and Rules 62-110.106 and 62-210.350(3), 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 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 Draft Title V Permit for a period of 30 days from the date of publication of the Public Notice. Written comments must be received by the close of business (5:00 p.m.), on or before the end of this 30-day period by the Permitting Authority at the above address. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly (FAW). If a public meeting is requested within the 30-day comment period and conducted by the Permitting Authority, any oral and written comments received during the public meeting will also be considered by the Permitting Authority. If timely received written comments or comments received at a public meeting result in a significant change to the Draft Permit, the Permitting Authority shall issue a Revised Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection. For additional information, contact the Permitting Authority at the above address or phone number.

**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 indicate; (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

**WRITTEN NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT REVISION**

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.

**Mediation:** Mediation is not available in this proceeding.

**EPA Review:** EPA has agreed to treat the Draft/Proposed Title V air operation permit as a Proposed Title V air operation permit and to perform its 45-day review provided by the law and regulations concurrently with the public comment period. Although EPA's 45-day review period will be performed concurrently with the public comment period, the deadline for submitting a citizen petition to object to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended. The Final Title V air operation permit will be issued after the conclusion of the 45-day EPA review period so long as no adverse comments are received that result in a different decision or significant change of terms or conditions. The status regarding EPA's 45-day review of this project and the deadline for submitting a citizen petition can be found at the following website address: <http://www.epa.gov/region4/air/permits/Florida.htm>.

**Objections:** Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within sixty (60) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1); to object to the issuance of any Title V air operation permit. Any petition shall be based only on objections to the Permit that were raised with reasonable specificity during the thirty (30) day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding EPA review and objections, visit EPA's Region 4 web site at <http://www.epa.gov/region4/air/permits/Florida.htm>.

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief  
Bureau of Air Regulation

**WRITTEN NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT REVISION**

**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 Statement of Basis, and the Draft/Proposed Permit) was sent by electronic mail with received receipt requested before the close of business on 8/29/08 to the persons listed below.

- Mr. Robert E. Hunzinger, General Manager, GRU ([hunzingerre@gru.com](mailto:hunzingerre@gru.com))
- Mr. Robert Klemans, P.E., GRU ([klemansrw@gru.com](mailto:klemansrw@gru.com))
- Mr. Tomas W. Davis, P.E., ECT, Inc. ([tdavis@ectinc.com](mailto:tdavis@ectinc.com))
- Mr. Chris Kirts, P.E., Northeast District Office ([chris.kirts@dep.state.fl.us](mailto:chris.kirts@dep.state.fl.us))
- Ms. Katy Forney, US EPA Region 4 ([forney.kathleen@epa.gov](mailto:forney.kathleen@epa.gov))
- Ms. Barbara Friday, DEP BAR: [Barbara.Friday@dep.state.fl.us](mailto:Barbara.Friday@dep.state.fl.us) (for posting with U.S. EPA, Region 4)

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)      8/29/08 (Date)

## P.E. CERTIFICATION STATEMENT

### PERMITTEE

City of Gainesville, Gainesville Regional Utilities  
P.O. Box 147117 (A134)  
Gainesville, Florida 32614-7117

Permit No. 0010006-008-AV  
Facility ID No. 0010006  
Deerhaven Generating Station  
Unit 2 Excess Emissions Clarification Project  
Alachua County, Florida

*Responsible official:*  
Robert E. Hunzinger, General Manager

### PROJECT DESCRIPTION

This project is for a revision of Title V permit No. 0010006-003-AV for the above referenced facility. The applicant submitted a complete and certified revision application form and requested minor changes to the existing Title V air operation permit to clarify which excess emissions provisions apply to Unit 2. Emissions unit -005 (Unit 2) was originally permitted through the Power Plant Siting Certification process in 1974. This unit was not issued a prevention of significant deterioration (PSD) permit with a best available control technology determination (BACT). Instead, through the Power Plant Siting certification, it was subjected to 40 CFR 60 Subpart D, Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction Is Commenced After August 17, 1971. Because the emissions limits that apply to this unit are only from the federal rule, the state excess emissions provisions from Rule 62-210.700, F.A.C. do not apply and are being removed from the permit for Unit 2.

*I HEREBY CERTIFY that the air pollution control 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, geological, and meteorological features).*



*Jonathan K. Holtom*  
Jonathan K. Holtom, P.E.  
Registration Number: 0052664

*8/26/06*  
Date

## PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT REVISION

Florida Department of Environmental Protection  
Division of Air Resource Management, Bureau of Air Regulation  
Draft/Proposed Air Permit No. 0010006-008-AV  
Gainesville Regional Utilities, Deerhaven Generating Station  
Alachua County, Florida

**Applicant:** The applicant for this project is the City of Gainesville, Gainesville Regional Utilities. The applicant's authorized representative and mailing address is: Robert E. Hunzinger, General Manager, Gainesville Regional Utilities, P.O. Box 147117 (A134), Gainesville, Florida 32614-7117.

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

**Project:** The applicant has submitted a complete and certified revision application form and has requested minor changes to the existing Title V air operation permit to clarify which excess emissions provisions apply to Unit 2. Emissions unit -005 (Unit 2) was originally permitted through the Power Plant Siting Certification process in 1974. This unit was not issued a prevention of significant deterioration (PSD) permit with a best available control technology determination (BACT). Instead, through the Power Plant Siting certification, it was subjected to 40 CFR 60 Subpart D, Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction Is Commenced After August 17, 1971. Because the emissions limits that apply to this unit are only from the federal rule, the state excess emissions provisions from Rule 62-210.700, F.A.C. do not apply and are being removed from the permit for Unit 2.

The existing facility consists of the following emissions units:

The facility consists of two steam boilers (Unit Nos. 1 and 2) and associated steam turbines; a simple cycle combustion turbine (CT No. 3) regulated under New Source Performance Standards (NSPS); 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. Also, included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities. Based on the Title V permit renewal application received July 2, 2004, this facility is a major source of hazardous air pollutants (HAP).

**Permitting Authority:** Applications for Title V air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-213 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/Proposed Permit, the Statement of Basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the Draft/Proposed Permit by visiting the following website: <http://www.dep.state.fl.us/air/eproducts/apds/default.asp> and entering the permit number shown above. 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 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



## PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT REVISION

appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 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/Proposed 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 Draft Title V Permit for a period of 30 days from the date of publication of the Public Notice. Written comments must be received by the close of business (5:00 p.m.), on or before the end of this 30-day period by the Permitting Authority at the above address. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly (FAW). If a public meeting is requested within the 30-day comment period and conducted by the Permitting Authority, any oral and written comments received during the public meeting will also be considered by the Permitting Authority. If timely received written comments or comments received at a public meeting result in a significant change to the Draft Permit, the Permitting Authority shall issue a Revised Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection. For additional information, contact the Permitting Authority at the above address or phone number.

**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 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 indicate; (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 Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final

## **PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT REVISION**

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.

**EPA Review:** EPA has agreed to treat the Draft/Proposed Title V air operation permit as a Proposed Title V air operation permit and to perform its 45-day review provided by the law and regulations concurrently with the public comment period. Although EPA's 45-day review period will be performed concurrently with the public comment period, the deadline for submitting a citizen petition to object to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended. The Final Title V air operation permit will be issued after the conclusion of the 45-day EPA review period so long as no adverse comments are received that result in a different decision or significant change of terms or conditions. The status regarding EPA's 45-day review of this project and the deadline for submitting a citizen petition can be found at the following website address: <http://www.epa.gov/region4/air/permits/Florida.htm>.

**Objections:** Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within sixty (60) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Title V air operation permit. Any petition shall be based only on objections to the Permit that were raised with reasonable specificity during the thirty (30) day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding EPA review and objections, visit EPA's Region 4 web site at <http://www.epa.gov/region4/air/permits/Florida.htm>.

## STATEMENT OF BASIS

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### Title V Air Operation Permit Revision Permit No. 0010006-008-AV

#### APPLICANT

The applicant for this project is Gainesville Regional Utilities. The applicant's responsible official and mailing address are: Robert E. Hunzinger, General Manager, City of Gainesville, GRU, P.O. Box 147117(A134), Gainesville, Florida 32614-7117.

#### FACILITY DESCRIPTION

The applicant operates the Deerhaven Generating Station, which is located at 10001 NW 13<sup>th</sup> Street, Gainesville, Alachua County, Florida.

The facility consists of two steam boilers (Unit Nos. 1 and 2) and associated steam turbines; a simple cycle combustion turbine (CT No. 3) regulated under New Source Performance Standards (NSPS); 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. Also, included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities. Based on the Title V permit renewal application received July 2, 2004, this facility is a major source of hazardous air pollutants (HAP).

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

#### PROJECT DESCRIPTION

The purpose of this permitting project is to revise the existing Title V permit for the above referenced facility (permit No. 0010006-003-AV) to clarify the excess emissions limitations for Unit 2.

#### PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).

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

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility operates units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

CAIR: The facility is subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

Siting: Emissions units 005 and 006 were originally certified pursuant to the power plant Siting provisions of Chapter 62-17, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) applies to emissions unit 005 for the controlled emissions of particulate matter.

#### PROJECT REVIEW

Emissions unit -005 (Unit 2) was originally permitted through the Power Plant Siting Certification process in 1974. This unit was not issued a prevention of significant deterioration (PSD) permit with a best available control technology determination (BACT). Instead, through the Power Plant Siting certification, it was subjected to 40 CFR 60 Subpart D, Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction Is Commenced After August 17, 1971. Because the emissions limits that apply to this unit are only from the federal rule, the state excess emissions provisions from Rule 62-210.700, F.A.C. do not apply. It appears that the state's

## STATEMENT OF BASIS

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excess emissions provisions were erroneously placed into effect through the issuance of the original Title V permit. The Department believes that this was an error and agrees with the applicant's request to remove all references to Rule 62-210.700, F.A.C. from the Title V permit for Unit 2 in Section III, Subsections B. and D. This revision action does not affect any other emissions unit at the facility.

The following changes are being made to permit No. 0010006-003-AV (additions are represented by a double underline; deletions are represented by a ~~strikethrough~~):

### Section III, Subsection B.

**B.14.** This emissions unit is also subject to Specific Conditions **D.1.** and D.4. through **D.14.** contained in **Subsection D. NSPS Common Conditions.** Unit 2 is not subject to Specific Condition D.2. of Subsection D. NSPS Common Conditions.

### Section III, Subsection D.

The following Conditions apply to the emissions unit(s)/activities listed above except as noted below: Specific Conditions **D.1., D.4., D.5., D.6., D.7., D.9., D.10., D.12.** and **D.14.** *do not apply* to E.U. ID No. 007, Coal Handling and Storage Activities. Specific Conditions **D.2. and D.3.** do not apply to E.U. ID No. 005, 2,428 MMBtu/hr Steam Boiler – Unit 2.

In addition, pursuant to Rule 62-213.420(1)(a)2., F.A.C., the deadline for submittal of the Title V permit renewal has been changed to require the submission of the application 225 days prior to permit expiration. The new application due date is May 20, 2009.

The above changes are the only portions of the permit open to public comment.

### **CONCLUSION**

This project revises Title V air operation permit No. 0010006-003-AV, which was effective on January 1, 2005. This Title V air operation permit revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, 62-213 and 62-214, F.A.C. In accordance with the terms and conditions of this permit, the above named permittee is hereby authorized to operate the facility as shown on the application and approved drawings, plans, and other documents, on file with the permitting authority.

City of Gainesville  
Gainesville Regional Utilities  
Deerhaven Generating Station  
**Facility ID No.:** 0010006  
Alachua County

Title V Air Operation Permit Revision  
**Draft/Proposed Permit No.** 0010006-008-AV  
(1<sup>st</sup> Revision to Permit No. 0010006-003-AV)

Permitting Authority:

State of Florida  
Department of Environmental Protection  
Division of Air Resources Management  
Bureau of Air Regulation  
Title V Section  
Mail Station #5505  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400  
Telephone: 850/488-0114  
Fax: 850/921-9533

Compliance Authority:

Northeast District Office  
7825 Baymeadows Way, Suite 200B  
Jacksonville, FL 32256-7590  
Telephone: 904/807-3300  
Fax: 904/448-4363

Title V Air Operation Permit  
Draft/Proposed Permit Revision No. 0010006-008-AV

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# 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

**Permittee:**

City of Gainesville, GRU  
P.O. Box 147117 (A134)  
Gainesville, Florida 32614-7117

**Permit No.** 0010006-008-AV

**Facility ID No.** 0010006

**SIC No.:** 49; 4911

**Project:** Unit 2 Excess Emissions Clarification Project

This permit is for the revision of Title V air operation permit No. 0010006-003-AV for the City of Gainesville, Gainesville Regional Utilities (GRU), Deerhaven Generating Station. This facility is located at 10001 NW 13th Street, Gainesville, Alachua County; UTM Coordinates: Zone 17, 367.70 km East and 3292.60 km North; Latitude: 29° 45' 30" North and Longitude: 82° 23' 13" West.

This Title V air operation permit revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, 62-213 and 62-214, Florida Administrative Code (F.A.C.). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

The subject of this revision is to clarify that the applicable excess emissions provisions for emissions unit -005 (Unit 2) are those of the New Source Performance Standards contained in rule 40 CFR 60, Subpart A, and not those found in Rule 62-210.700, F.A.C. In addition, pursuant to Rule 62-213.420(1)(a)2., F.A.C., the deadline for submittal of the Title V permit renewal has been changed to require the submission of the application 225 days prior to permit expiration. Additions to the permit are shown in double underline format and deletions are shown in ~~strikethrough~~ format.

**Referenced Attachments made a part of this permit:**

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

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

APPENDIX TV-4, TITLE V CONDITIONS (version dated 02/12/2002)

APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/07/96)

TABLE 297.310-1, CALIBRATION SCHEDULE

FIGURE 1 - SUMMARY REPORT-GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE REPORT (version dated 7/96)

BACT Determination dated 04/11/95

Alternate Sampling Procedure: ASP Number 97-B-01

ORDER CORRECTING SCRIVENER'S ERROR: ASP Number 97-B-01

Phase II Acid Rain Application dated/signed 06/21/2004

Phase II NO<sub>x</sub> Compliance Plan dated/signed 06/25/2004

APPENDIX CAM

**Effective Date:** January 1, 2005

**Revision Effective Date:** (Day 55)

**Renewal Application Due Date:** ~~July 3~~ May 20, 2009

**Expiration Date:** December 31, 2009

---

Joseph Kahn, Director  
Division of Air Resource Management

JK/tlv/jh

[40 CFR 60.45(g)]

Pursuant to 40 CFR 60.13(h) [Specific Condition **E.5.(h)**], 1-hour averages of SO<sub>2</sub> and NO<sub>x</sub> shall be computed from four (4) or more data points equally spaced over each 1-hour period.

**Other NSPS Subpart D Conditions**

**B.13.** Pursuant to 40 CFR 60.41: Definitions. As used in this Subsection of the permit, the definitions in 40 CFR 60.41 apply, as well as additional definitions under Subpart A, 40 CFR 60.

**Common Conditions**

**B.14.** This emissions unit is also subject to Specific Conditions **D.1.** and D.4. through **D.14.** contained in **Subsection D. NSPS Common Conditions.** Unit 2 is not subject to Specific Condition D.2. of Subsection D. NSPS Common Conditions.

**B.15.** This emissions unit is also subject to Specific Conditions **E.1.** through **E.6.** contained in **Subsection E. NSPS General Conditions.**



**Subsection D. NSPS Common Conditions.**

<b>E.U. ID No.</b>	<b>Brief Description</b>
005	2,428 MMBtu/hr Steam Boiler - Unit 2
006	Combustion Turbine No. 3
007	Coal Handling and Storage Activities

The following Conditions apply to the emissions unit(s)/activities listed above except as noted below: Specific Conditions **D.1., D.4., D.5., D.6., D.7., D.9., D.10., D.12., and D.14.** *do not apply* to E.U. ID No. 007, Coal Handling and Storage Activities. Specific Conditions **D.2. and D.3.** do not apply to E.U. ID No. 005, 2,428 MMBtu/hr Steam Boiler – Unit 2.

**Essential Potential to Emit (PTE) Parameters**

**D.1. Hours of Operation.** The emission unit 005 (Unit 2) may operate continuously, i.e., 8,760 hours/year. The emission unit 006 (DHCT3) is allowed to operate up to 3900 hours per year, but not to exceed 2000 hours while firing distillate fuel oils (Nos. 1 or 2).  
[Rule 62-210.200(PTE), F.A.C.]

**Emission Limitations and Standards**

{Permitting note: Table 1-1A, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purpose only. This table does not supersede any of the terms or conditions of this permit.}

**Excess Emissions**

{Permitting note: The Excess Emissions Rule at Rule 62-210.700, F.A.C., cannot vary any requirement of an NSPS, NESHAP, or Acid Rain program provision.}

**D.2.** Excess emissions resulting from startup, shutdown, or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.  
[Rule 62-210.700(1), F.A.C.]

[Permitting Note. For excess NO<sub>x</sub> emissions for combustion turbine No. 3, please see Specific Condition **C.13.b.**]

**D.3.** Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.  
[Rule 62-210.700(4), F.A.C.]

**Monitoring of Operations**

**D.4. Determination of Process Variables.**

(a) **Required Equipment.** The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) **Accuracy of Equipment.** Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated

**Walker, Elizabeth (AIR)**

---

**From:** Walker, Elizabeth (AIR)  
**Sent:** Friday, August 29, 2008 5:46 PM  
**To:** 'hunzingerre@gru.com'  
**Cc:** 'klemansrw@gru.com'; 'tdavis@ectinc.com'; Kirts, Christopher;  
'Forney.Kathleen@epamail.epa.gov'; Friday, Barbara; 'Danois.Gracy@epamail.epa.gov';  
Holtom, Jonathan  
**Subject:** Noticed of DRAFT/PROPOSED PERMIT - DEERHAVEN GENERATING STATION;  
0010006-008-AV

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**Owner/Company Name:** CITY OF GAINESVILLE, GRU

**Facility Name:** DEERHAVEN GENERATING STATION

**Project Number:** 0010006-008-AV

**Permit Status:** DRAFT/PROPOSED

**Permit Activity:** PERMIT REVISION

**Facility County:** ALACHUA

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*Elizabeth Walker*

Bureau of Air Regulation

Division of Air Resource Management (DARM)

(850)921-9505

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**Walker, Elizabeth (AIR)**

---

**From:** Hunzinger, Robert E [HunzingerRE@gru.com]  
**To:** Walker, Elizabeth (AIR)  
**Sent:** Monday, September 01, 2008 11:21 AM  
**Subject:** Read: Noticed of DRAFT/PROPOSED PERMIT - DEERHAVEN GENERATING STATION;  
0010006-008-AV

Your message

To: [HunzingerRE@gru.com](mailto:HunzingerRE@gru.com)  
Subject:

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## Walker, Elizabeth (AIR)

---

**From:** Klemans, Robert W [KLEMANSRW@gru.com]  
**Sent:** Tuesday, September 02, 2008 8:06 AM  
**To:** Walker, Elizabeth (AIR)  
**Subject:** RE: Noticed of DRAFT/PROPOSED PERMIT - DEERHAVEN GENERATING STATION; 0010006-008-AV

**Robert W. Klemans, P.E.**  
Interim Environmental Resource Coordinator  
Gainesville Regional Utilities  
(352) 393-1283  
(352) 334-3151 (fax)  
[klemansrw@gru.com](mailto:klemansrw@gru.com)

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

**From:** Walker, Elizabeth (AIR) [mailto:Elizabeth.Walker@dep.state.fl.us]  
**Sent:** Friday, August 29, 2008 5:46 PM  
**To:** Hunzinger, Robert E  
**Cc:** Klemans, Robert W; tdavis@ectinc.com; Kirts, Christopher; Forney.Kathleen@epamail.epa.gov; Friday, Barbara; Danois.Gracy@epamail.epa.gov; Holtom, Jonathan  
**Subject:** Noticed of DRAFT/PROPOSED PERMIT - DEERHAVEN GENERATING STATION; 0010006-008-AV

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**Owner/Company Name:** CITY OF GAINESVILLE, GRU  
**Facility Name:** DEERHAVEN GENERATING STATION  
**Project Number:** 0010006-008-AV  
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If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation at (850)488-0114.

*Elizabeth Walker*

**Walker, Elizabeth (AIR)**

---

**From:** Tom Davis [tdavis@ectinc.com]  
**Sent:** Friday, August 29, 2008 5:56 PM  
**To:** Walker, Elizabeth (AIR)  
**Subject:** RE: Noticed of DRAFT/PROPOSED PERMIT - DEERHAVEN GENERATING STATION; 0010006-008-AV

---

**From:** Walker, Elizabeth (AIR) [mailto:Elizabeth.Walker@dep.state.fl.us]  
**Sent:** Friday, August 29, 2008 5:46 PM  
**To:** hunzingerre@gru.com  
**Cc:** klemansrw@gru.com; tdavis@ectinc.com; Kirts, Christopher; Forney.Kathleen@epamail.epa.gov; Friday, Barbara; Danois.Gracy@epamail.epa.gov; Holtom, Jonathan  
**Subject:** Noticed of DRAFT/PROPOSED PERMIT - DEERHAVEN GENERATING STATION; 0010006-008-AV

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*Elizabeth Walker*  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
(850)921-9505

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