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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

ATLANTA FEDERAL CENTER  
61 FORSYTH STREET, SW  
ATLANTA, GEORGIA 30303-8909

MAY 21 1998

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MAY 20 1998

BUREAU OF  
AIR REGULATION

4APT-ARB

Clair Fancy, P.E., Chief  
Bureau of Air Regulation  
Air Resources Management Division  
Florida Department of Environmental  
Protection  
Mail Station 5500  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

SUBJ: Alternative Monitoring Proposals for Unit No. 2 and  
Combustion Turbine (CT) No. 3 at Gainesville Regional  
Utilities' Deerhaven Station

Dear Mr. Fancy:

The purpose of this letter is to provide you with comments regarding three alternative monitoring procedures (AMPs) that Gainesville Regional Utilities (GRU) proposed in the enclosed letter that was sent to Region 4 on February 2, 1998. The referenced units are subject to continuous emission monitoring requirements under 40 C.F.R. Part 60, and we are providing our comments to you because the authority to implement Part 60 regulations in the State of Florida has been delegated to your agency. Each of the AMPs proposed by GRU are described in this letter and are followed by our comments.

The first AMP proposed by GRU is a custom fuel monitoring plan for measuring the sulfur content of the natural gas burned in CT No. 3. This unit is subject to 40 C.F.R. Part 60, Subpart GG (Standards of Performance for Stationary Gas Turbines), and the sulfur dioxide (SO<sub>2</sub>) emission limit for turbines subject to this regulation is promulgated at 40 C.F.R. §60.333. Since GRU does not have intermediate bulk storage for the natural gas burned in CT No. 3, 40 C.F.R. §60.334(b)(2) would require that the company monitor SO<sub>2</sub> emissions by analyzing samples of its fuel gas on a daily basis each day the unit operates. In its February 2 letter, GRU proposed two alternatives to this daily monitoring requirement.

The first of the sulfur monitoring alternatives proposed by GRU is to implement a custom fuel monitoring schedule in accordance with guidance that the U.S. Environmental Protection Agency (EPA) issued on April 14, 1987. This custom fuel monitoring approach is described in detail on the first page of

the enclosed letter from GRU, and it is a three-step process under which owners and operators of turbines subject to Subpart GG can reduce the frequency of sulfur analyses for natural gas from a daily to a semi-annual basis. Under this approach, the reduction in the sampling and analysis frequency must be justified by conducting periodic sampling that shows little variability in the sulfur content of the natural gas and that demonstrates consistent compliance with the applicable sulfur content limit. Because this basic custom fuel monitoring approach has been approved for many facilities since the April 14, 1987, guidance was originally issued by EPA, we would have no objections to use of the same custom fuel monitoring approach for CT No. 3.

The second sulfur monitoring alternative proposed by GRU is to provide the Florida Department of Environmental Protection (FDEP) with tariff sheets listing the criteria for sulfur content in the natural gas delivered to CT No. 3. One major difference between this proposal and the custom fuel monitoring procedures outlined in the guidance issued by EPA in 1987 is that, under the GRU proposal, no actual sampling and analysis of the gas burned in the turbine would be required. On at least one previous occasion, EPA has approved a custom fuel monitoring schedule that dropped the requirement to periodically measure the sulfur content of natural gas burned in a turbine that was subject to Subpart GG. A copy of this January 16, 1996, Region 5 determination is attached, and the basis for dropping the requirement to sample the gas burned in the turbine addressed by this determination is that SO<sub>2</sub> emissions from the turbine were being monitored in accordance with acid rain requirements in 40 C.F.R. Part 75.

After reviewing the determination issued by Region 5 in 1996, we have concluded that dropping the requirement to periodically measure the sulfur content of the natural gas burned in the CT No. 3 would be acceptable under the following conditions:

1. GRU must be in possession of an approved Phase II acid rain permit for CT No. 3.
2. An acid rain monitoring plan that has been certified by signature of the Designated Representative for GRU must be submitted, and the monitoring plan must list pipeline quality natural gas as the primary fuel for CT No. 3.
3. SO<sub>2</sub> emissions from CT No. 3 must be measured using monitoring systems that have been certified by EPA in

Since the Part 75 monitoring requirements do not, at the present time, require periodic sampling to determine the sulfur content of pipeline quality natural gas, we would not be opposed to approval of the sampling waiver requested by GRU if the above conditions are met. In order to ensure consistency between the monitoring performed for Subpart GG and for Part 75 in the future, however, we believe that it is important to make the sampling waiver contingent upon adherence to Part 75 monitoring requirements. If the Subpart GG sampling waiver were based upon the maintenance of tariff sheets alone, inconsistencies between the monitoring conducted for Part 60 and 75 purposes could arise in the future if the Part 75 provisions are ever revised or updated.

The second monitoring alternative proposed by GRU involves the method used to monitor nitrogen oxides (NO<sub>x</sub>) excess emission from CT No. 3. Under the provisions for 40 C.F.R. §60.334(c)(1), the operating parameters used to identify NO<sub>x</sub> excess emissions for Subpart GG turbines are water-to-fuel injection rates and fuel nitrogen content. As an alternative to monitoring NO<sub>x</sub> excess emissions with these parameters, GRU is proposing to use a NO<sub>x</sub> continuous emission monitoring system (CEMS) that has been certified for measuring NO<sub>x</sub> emissions under 40 C.F.R. Part 75. Based upon the enclosed determination issued by EPA on March 12, 1993, NO<sub>x</sub> CEMS can be used to monitor excess emissions from Subpart GG turbines if a number of conditions specified in the determination are met.

In its request for permission to use its certified NO<sub>x</sub> CEMS to conduct excess emission monitoring, GRU proposed an alternative to one of the approval conditions contained in the March 13, 1993, EPA guidance. According to the guidance, a NO<sub>x</sub> CEMS used to conduct excess emission monitoring for Subpart GG must be capable of correcting results to ISO standard day conditions (i.e., 288 degrees Kelvin, 60 percent relative humidity, and 101.3 kilopascals pressure). The basis for this requirement is that, under the provisions of 40 C.F.R. §60.335(c), NO<sub>x</sub> results from performance tests must be converted to ISO standard day conditions. According to its proposal, GRU would not convert results to ISO standard day conditions on a continuous basis. The company did, however, propose keeping records of the data needed to make this conversion, so that NO<sub>x</sub> results could be calculated on an ISO standard day condition basis anytime at the request of EPA or the Florida DEP.

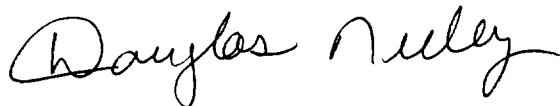
After reviewing the GRU proposal to calculate NO<sub>x</sub> results on an ISO standard day condition basis when requested, rather than continuously, we have concluded that this approach will be

acceptable. The basis for this conclusion is that, since the Prevention of Significant Deterioration (PSD) permit for CT No. 3 contains NO<sub>x</sub> limits that are more stringent than those in Subpart GG, compliance with Subpart GG for this unit would be a concern only in cases when the turbine is in violation of the NO<sub>x</sub> limits in its PSD permit. Therefore, converting NO<sub>x</sub> results to ISO standard day conditions when the CEMS indicates an exceedance of the applicable PSD limits, rather than converting results continuously, will provide adequate assurance of compliance with the NO<sub>x</sub> limit in Subpart GG.

The third request from GRU involves CEMS that were installed and certified on Unit No. 2 in accordance with 40 C.F.R. Part 75. In its February 2, 1998, letter, GRU asked for approval to use these CEMS to satisfy applicable monitoring requirements under 40 C.F.R. Part 60. As part of this request, GRU indicated that a report demonstrating that the monitoring systems on Unit 2 meet applicable Part 60 monitoring requirements had been submitted to the FDEP Northern District Office on March 14, 1995. Because the authority for implementing Part 60 requirements has been delegated to your agency, the FDEP should review the March 1995 report from GRU to determine whether the monitoring systems certified for use under Part 75 satisfy the applicable performance specifications under Part 60. If you identify issues during this review that require the attention of EPA, however, we can provide you with any additional assistance necessary.

If you have any questions regarding the determination provided in this letter, please call David McNeal of my staff at 404/562-9102.

Sincerely yours,



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

Enclosures

- (1) February 2, 1998, GRU request for approval of alternative monitoring procedures

- (2) January 16, 1996, Region 5 waiver of Subpart GG fuel monitoring requirement for CT subject to Part 75
- (3) March 12, 1993, Headquarter's guidance regarding the use of CEMS to monitor NO<sub>x</sub> excess emissions under Subpart GG

cc: Scott Sheplak  
Air Resources Management Division  
Florida Department of Environmental  
Protection  
Mail Station 5500  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Ms. Yolanta E. Jonynas  
Sr. Environmental Engineer  
Gainesville Regional Utilities  
P.O. Box 147117  
Station A136  
Gainesville, FL 32614-7117

cc: Mike Harley  
s/es



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AIR AND RADIATION TECHNOLOGY BRANCH  
EPA-REGION 4  
ATLANTA, GA

February 2, 1998

Mr. David McNeal  
U.S. Environmental Protection Agency, Region IV  
61 Forsyth St.  
Atlanta, GA 30303

RE: Deerhaven Generating Station  
Monitoring of Operations

Dear Mr. McNeal:

Pursuant to our January 30, 1998 telephone conversation, Gainesville Regional Utilities ("GRU") is requesting EPA approval of the following:

**CUSTOM FUEL MONITORING SCHEDULE**  
Deerhaven Combustion Turbine No. 3, 40 CFR 60, Subpart GG Unit

Pursuant to 40 CFR 60.334(b) GRU is requesting approval of one of the custom monitoring schedules set forth below. Custom Monitoring Schedule 1 is consistent with the guidance memorandum titled Authority for Approval of Custom Fuel Monitoring Schedules Under NSPS Subpart GG from J. Rasnic to the Regional Air Compliance Branch Offices dated April 14, 1987. Custom Monitoring Schedule 2 recognizes that the unit is supplied with pipeline natural gas under an approved tariff that places stringent criteria on the sulfur content of the natural gas in the pipeline. These criteria are significantly lower than the NSPS limits of 247 grains/100 scf. Therefore, this schedule provides reasonable assurances that the sulfur standard contained in 40 CFR 60.333(b) is being met while minimizing the administrative burden on GRU and the regulatory agencies.

Custom Monitoring Schedule 1. The sulfur and nitrogen content of the natural gas being fired in the combustion turbine shall be determined in accordance with this schedule.

1. Nitrogen monitoring: Monitoring is not required.
2. Sulfur monitoring:
  - a) Analysis for the sulfur content shall be conducted using one of the following ASTM reference methods or an approved alternative method: ASTM 1072-80, D3031-81, D4084-82, D3246-81, D4468-85, D5504-94 or the latest edition(s).
  - b) Effective the date of this custom schedule, sulfur monitoring shall be conducted twice monthly for six months. If this monitoring shows little variability in the fuel sulfur content and indicates consistent compliance with 40 CFR 60.333, then sulfur monitoring shall be conducted once per quarter for six quarters.
  - c) If after the monitoring required in paragraph (b) above, the sulfur content of the fuel shows little variability and indicates consistent compliance with 40 CFR 60.333, then sulfur monitoring shall be conducted twice a year during the first and third quarters of each calendar year.
  - d) Should any sulfur analysis as required in paragraphs (b) and (c) above indicate non-compliance with 40 CFR 60.333, the owner or operator shall notify the Florida Dept. of Environmental Protection of such excess emissions and this custom schedule shall be re-examined by the Environmental

Protection Agency. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.

3. Should there be a change in fuel supply (i.e., a substantial change in fuel quality), the owner or operator shall notify the Florida Dept. of Environmental Protection of such change for re-examination of this custom schedule. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.

Custom Monitoring Schedule 2: The owner or operator shall file and keep current with the Florida Department of Environmental Protection a tariff sheet which demonstrates the criteria for sulfur content (in terms of grains of sulfur per hundred cubic feet at standard conditions) of the natural gas delivered to the unit. A new tariff sheet shall be filed within 15 days of becoming effective if it contains different sulfur criteria.

#### ALTERNATIVE MONITORING SYSTEM FOR EXCESS NO<sub>x</sub> EMISSIONS Deerhaven Combustion Turbine No. 3, 40 CFR 60, Subpart GG Unit

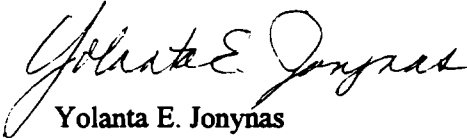
GRU is requesting EPA approval to use a certified NO<sub>x</sub> continuous emission monitoring system ("CEMS") in lieu of monitoring the ratio of water to fuel being fired in the turbine and the fuel-bound nitrogen as required pursuant to 40 CFR 60.334 for determining excess emissions. GRU will maintain the data necessary to correct the CEMS NO<sub>x</sub> emission rates to ISO conditions if so requested by the regulatory agencies.

#### USE OF A 40 CFR 75 CEMS TO MEET 40 CFR 60 MONITORING REQUIREMENTS Deerhaven Unit 2, 40 CFR 60, Subpart 60 Unit

GRU is requesting approval to use a continuous emission monitoring system installed, certified and operated pursuant to 40 CFR 75 to meet the 40 CFR 60 NSPS monitoring requirements. By letter dated March 14, 1995 GRU submitted to the Florida Dept. of Environmental Protection (Northeast District) a 40 CFR 60 Certification Testing Report demonstrating that the CEMS was in conformance with the applicable requirements of 40 CFR 60.

Please call me at (352) 334-3400 Ext. 1284 if you have any questions.

Sincerely,



Yolanta E. Jonynas  
Sr. Environmental Engineer

xc: T. Herron, FDEP-TALL.  
S. Sheplak, FDEP-TALL.  
CAA Title V

Control Number: 9600034

Category: NSPS

Region: Region 5

Date: 01/16/1996

Title: Custom Fuel Monitoring

Recipient: Wright, Amy

Author: Czerniak, George

Comments:

Abstract:

Q: Will EPA grant a request for a custom fuel monitoring schedule for (pipeline) natural gas fired turbines regulated by Subpart GG and Title IV (Acid Rain)?

A: Yes, this request is granted provided certain Acid Rain requirements are met.



Letter:

Amy Wright  
Dayton Power and Light Company  
O.H. Hutchings Station  
9200 Chautauqua Road  
Miamisburg, Ohio 45342

Dear Ms. Wright;

This is in response to your request for a custom fuel schedule, pursuant to the New Source Performance Standards (NSPS) Subpart GG, Section 60.334(b)(2), dated August 31, 1995. This request was originally sent to Donald Schregardus, Director, Ohio Environmental Protection Agency and later faxed to George Czerniak, United States Environmental Protection Agency (USEPA), Region 5, on September 9, 1995. In your request you proposed a custom fuel schedule under which no sampling of natural gas would be required for the combustion turbines installed, or to be installed under the Permit to Install application number 08-2507.

The three combustion turbines for which this custom schedule would apply are affected units under the "Acid Rain Program", Title IV of the Clean Air Act Amendments. Emissions from a Title IV effected unit are required to be monitored according to 40 CFR Part 75 "Continuous Emission Monitoring" for sulfur dioxide (SO<sub>2</sub>). Under Part 75, appendix D, a gas fired turbine that is using pipeline quality natural gas as it's primary fuel can use the default value of 0.0006 lb/mmBtu to account for the units SO<sub>2</sub> emissions. With this the USEPA has recognized that the sulfur content of pipeline quality natural gas is low enough to warrant the use of a default value for SO<sub>2</sub> emissions.

Therefore, the Regional office of the USEPA approves the custom fuel schedule of no fuel sampling for these three units provided the following requirements are met.

- Each unit has been issued and is in possession of an

approved Phase II Acid Rain Permit.

- Each unit has submitted a Monitoring Plan, certified by signature of the Designated Representative, that commits to using a primary fuel of pipeline supplied natural gas.
- Each unit is monitoring SO<sub>2</sub> emissions using methods consistent with the requirements of Part 75 and certified by the USEPA.

This custom schedule will only be valid when pipeline natural gas is used as a primary fuel. If the primary fuel for these units is changed to anything other than this, SO<sub>2</sub> emissions must be accounted for by using daily fuel sampling and analysis.

If you have any questions regarding this determination please contact Allan Batka of my staff at (312) 353-3716.

Sincerely yours,

George Czerniak, Chief  
Air Enforcement and Compliance Assurance Branch

Control Number: 9400024

Category: NSPS

Region: SSCD

Date: 03/12/1993

Title: NSPS Subpart GG, Alternative Method

Recipient: Karl Mangels

Author: Rasnic, John B.

Comments:

Abstract:

Can a gas turbine subject to NSPS subpart GG, and using both water injection and selective catalytic reduction to control NOx emissions use a CEMS.

Yes, the alternative of using a CEMS was approved.

Letter:

**MEMORANDUM**

**SUBJECT: Approval of the Use of NO<sub>x</sub> CEMS as an Alternative  
Method to the Water-fuel Ratio Monitoring under NSPS  
Subpart GG**

**FROM: John B. Rasnic, Director  
Stationary Source Compliance Division  
Office of Air Quality Planning and Standards**

**To: Karl Mangels, Chief  
New York Compliance Section  
Air Compliance Branch, Region II**

In response to your January 12, 1993, memorandum to Linda Lay, SSCD investigated the feasibility of our approval of your request. You asked SSCD to approve a request from East Syracuse Generating Company to allow the use of the NO<sub>x</sub> continuous emission monitoring system (CEMS) as an alternative monitoring method to the continuous water-fuel ratio monitoring method.

East Syracuse Generating Company is to commence development of a 100 MW natural gas-fired cogeneration combustion turbine facility in the village of East Syracuse, New York. The facility is allowed to use a limited amount of low sulfur distillate oil as a backup fuel. To control the emissions of NO<sub>x</sub> this turbine will use both water injection and selective catalytic reduction as required by the New York State Department of Environmental Conservation (NYSDEC). Since the NYSDEC permit conditions are more restrictive than the requirements of NSPS Subpart GG, East Syracuse is asking for a waiver from the following monitoring requirements:

1. Fuel sulfur monitoring
2. Fuel nitrogen monitoring

### 3. Continuous water-fuel ratio monitoring for Nox compliance.

You have already made determinations on the first two issues and asked SSCD to address only the third issue, use of NOx CEMS, that is required by the State permit, instead of the water-fuel ratio monitoring method.

SSCD determined that the use of a NOx CEMS can be allowed as an alternative monitoring method if the facility meets the following conditions:

- \* Each turbine meets the emission limitation (STD) determined according to 40 CFR Part 60.332. The "Y" value for the applicable equation and supporting documentation should be provided by the applicant and the limitation for NOx emissions from pipeline quality natural gas should be fixed by EPA assuming the "F" value equals 0. The emission limitation shall be expressed in ppmv, dry, corrected to 15 percent O<sub>2</sub>.
- \* Each NOx CEMS meets the applicable requirements of 40 CFR 560.13, Appendix B, and Appendix F for certifying, maintaining, operating and assuring quality of the system.
- \* Each NOx CEMS must be capable of calculating NOx emissions concentrations corrected to 15% O<sub>2</sub> an ISO conditions.
- \* Monitor data availability shall be no less than 95 percent on the quarterly basis.
- \* NOx CEMs should provide 4 data points for each hour and calculate a 1-hour average.
- \* Each owner or operator of a NOx CEMS shall submit an excess emissions (calculated according to the requirements of paragraph 60.13(h)) and monitoring systems performance report and/or a summary report form to the Administrator on a quarterly basis, if excess emissions are determined, or semiannually. The report shall be postmarked by the 30th day following the end of each reporting period. Written reports shall include information required in paragraphs 60.7 (c) and 60.7 (d).

This report shall also contain the content of nitrogen in fuel oil for each reporting period when oil is fired and a clearly calculated corresponding emission limitation (STD).

\* Recordkeeping requirements shall follow the requirements specified in 40 CFR 560.7.

In addition, to upgrade the EPA data, we recommend that the NO<sub>x</sub> CEMS be used to demonstrate compliance with the emission limitation on a continuous basis and that the quarterly report include the NO<sub>x</sub> mass emissions for the reported period as reported to the State.

If you have any questions, please call Zofia Kosim at 703-308-8733.

cc:

Air, Pesticides, and Toxics Management Division  
Directors  
Regions I and IV

Air and Waste Management Division Director  
Region II

Air, Radiation, and Toxics Division Director  
Region III

Air and Radiation Division Director  
Region V

Air, Pesticides, and Toxics Division Director  
Region VI

Air and Toxics Division Directors  
Regions VII, VIII, IX, and X



February 2, 1998

Mr. David McNeal  
U.S. Environmental Protection Agency, Region IV  
61 Forsyth St.  
Atlanta, GA 30303

RE: Deerhaven Generating Station  
Monitoring of Operations

Dear Mr. McNeal:

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  - b) Effective the date of this custom schedule, sulfur monitoring shall be conducted twice monthly for six months. If this monitoring shows little variability in the fuel sulfur content and indicates consistent compliance with 40 CFR 60.333, then sulfur monitoring shall be conducted once per quarter for six quarters.
  - c) If after the monitoring required in paragraph (b) above, the sulfur content of the fuel shows little variability and indicates consistent compliance with 40 CFR 60.333, then sulfur monitoring shall be conducted twice a year during the first and third quarters of each calendar year.
  - d) Should any sulfur analysis as required in paragraphs (b) and (c) above indicate non-compliance with 40 CFR 60.333, the owner or operator shall notify the Florida Dept. of Environmental Protection of such excess emissions and this custom schedule shall be re-examined by the Environmental

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Protection Agency. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.

3. Should there be a change in fuel supply (i.e., a substantial change in fuel quality), the owner or operator shall notify the Florida Dept. of Environmental Protection of such change for re-examination of this custom schedule. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.

Custom Monitoring Schedule 2: The owner or operator shall file and keep current with the Florida Department of Environmental Protection a tariff sheet which demonstrates the criteria for sulfur content (in terms of grains of sulfur per hundred cubic feet at standard conditions) of the natural gas delivered to the unit. A new tariff sheet shall be filed within 15 days of becoming effective if it contains different sulfur criteria.

#### ALTERNATIVE MONITORING SYSTEM FOR EXCESS NO<sub>x</sub> EMISSIONS Deerhaven Combustion Turbine No. 3, 40 CFR 60, Subpart GG Unit

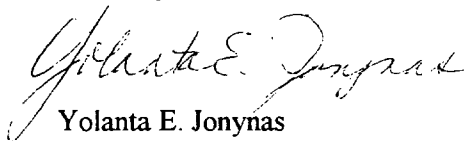
GRU is requesting EPA approval to use a certified NO<sub>x</sub> continuous emission monitoring system ("CEMS") in lieu of monitoring the ratio of water to fuel being fired in the turbine and the fuel-bound nitrogen as required pursuant to 40 CFR 60.334 for determining excess emissions. GRU will maintain the data necessary to correct the CEMS NO<sub>x</sub> emission rates to ISO conditions if so requested by the regulatory agencies.

#### USE OF A 40 CFR 75 CEMS TO MEET 40 CFR 60 MONITORING REQUIREMENTS Deerhaven Unit 2, 40 CFR 60, Subpart 60 Unit

GRU is requesting approval to use a continuous emission monitoring system installed, certified and operated pursuant to 40 CFR 75 to meet the 40 CFR 60 NSPS monitoring requirements. By letter dated March 14, 1995 GRU submitted to the Florida Dept. of Environmental Protection (Northeast District) a 40 CFR 60 Certification Testing Report demonstrating that the CEMS was in conformance with the applicable requirements of 40 CFR 60.

Please call me at (352) 334-3400 Ext. 1284 if you have any questions.

Sincerely,



Yolanta E. Jonynas  
Sr. Environmental Engineer

xc: T. Herron, FDEP-TALL.

2/4/98 S. Sheplak, FDEP-TALL. ✓  
CAA Title V





December 9, 1997

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**DEC 10 1997**

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AIR REGULATION**

Mr. Scott Sheplak, P.E.  
Bureau of Air Regulation  
Florida Dept. of Environmental Protection  
2600 Blair Stone Road, MS 5505  
Tallahassee, FL 32399-2400

RE: City of Gainesville  
Gainesville Regional Utilities (GRU)  
Deerhaven Generating Station  
Draft Title V Permit No. 0010006-001-AV

Dear Mr. Sheplak:

Enclosed are the following documents:

- Revised Facility Plot Plan (Document II.E.2.B.) reflecting the new railcar maintenance facility near the coal ash building. Minor maintenance activities (e.g., general repairs, brake installation and testing, bearing replacement) will be conducted at this facility. Air emissions, if any, will be negligible.
- GRU's comments on the Draft Title V Permit No. 0010006-001-AV. These are also being submitted electronically to Ms. Heron. Due to the nature and extent of the comments, the draft permit was downloaded from the Internet and modified. Suggested changes are made in the strike-through/underline format in red; GRU's comments/rationale are provided in blue.

Additionally, in Appendix TV-1, Title V Conditions (version dated 08/11/97), GRU requests that the Department designate the following TV-1 conditions as "not federally enforceable." The rules underlying these conditions are not contained in Florida's SIP and have no federally enforceable basis under the Clean Air Act.

TV-1 CONDITION	RULE TITLE	F.A.C. RULE NO.
1.	General Prohibition	62-4.030
3.	Standards for Issuing & Denying Permits	62-4.070(7)
4.	Modification of Permit Conditions	62-4.080
10.	Definition of "Immediately"	No regulatory basis for the definition.
12. (2), (4), (5), (6), (9), (11)	Permit Conditions	62-4.160
13.	Construction Permits	62-4.210
14.	Operation Permit for New Sources	62-4.220
17.	Asbestos	62-257
18. (intro), (1)	Permits Required	62-210.300
19.	Notification of Startup	62-210.300(5)
20.	Emission Unit Reclassification	62-210.300(6)
23.	Reports	62-210.370

Mr. Scott Sheplak  
Page 2  
December 9, 1997

GRU understands that the Department is conducting research on these conditions/rules and the question of federal enforceability. GRU requests that any changes resulting from the Department's research and future negotiations with FCG be reflected accordingly in the Title V permit.

GRU is hereby requesting that the Department issue and incorporate into the Title V permit an order extending the expiration date(s) of the existing air operating permits until the Title V permit becomes effective. This will clarify that the facility will continue to comply with the terms and conditions of the existing permits until such time that the Title V permit becomes effective.

GRU would also appreciate the Department forwarding to GRU any comments received from the public or other regulatory agencies pertaining to the draft permit.

If you have any questions, please call me at (352) 334-3400 Ext. 1284.

Sincerely,



Yolanta E. Jonynas  
Sr. Environmental Engineer

Encl.

xc: D. Beck  
R. Casserleigh  
T. Heron  
R. Manasco  
A. Morrison, HGSS  
CAA Title V

TVDHcomments