



May 24, 2012

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DIVISION OF AIR
RESOURCE MANAGEMENT

Mr. Jeff Koerner, P.E., Administrator
Office of Permitting and Compliance
Florida Department of Environmental Protection
Division of Air Resource Management
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Module No
AB090

**Re: Gainesville Regional Utilities
Deerhaven Generating Station
Request for Unit 2 Annual Sulfur Dioxide Emission Cap**

Dear Mr. Koerner:

Project No: 0010006-016-AC

The City of Gainesville, Gainesville Regional Utilities (GRU) requests an air construction permit specifying a sulfur dioxide (SO₂) annual emission cap of 5,500 tons per year for our Deerhaven Generating Station (DGS) Unit 2 located at 100001 Northwest 13th Street in Gainesville, Alachua County. The reason for this request is to ensure the Unit 2 will not be subject to the Reasonable Progress (RP) requirements of the Regional Haze Rule.

The 1977 Clean Air Act Amendments established a national goal of "preventing future, and remedying existing, visibility impairment" in 156 national parks and wilderness areas referred to as "mandatory Class I Federal areas." In response to this congressional mandate, EPA issued a rule addressing regional haze on July 1, 1999. The Regional Haze Rule set a long-term ultimate goal of returning visibility in the Class I areas to "natural conditions" by the year 2064.

The Regional Haze Plan for Florida Class I Areas (RH Plan) prepared by the Florida Department of Environmental Protection (FDEP) indicates that RP for Florida emission sources will be confined to sulfur dioxide (SO₂) emissions since reductions in emissions of this pollutant will provide the greatest benefit to visibility improvement. The FDEP RH Plan also identifies the specific Florida emission units that are required to prepare a four-factor RP technology analysis. The selection of Florida emission units subject to RP review was based on the ratio of 2002 SO₂ annual emissions (Q in tons) and distance (D in kilometers) from a Class I area. If the Q/D ratio is 50 or greater, the emission source was considered to have a significant impact on visibility impairment and therefore subject to a four-factor RF technology assessment. Based on this methodology, DGS Unit 2 is subject to RP review.

Following discussions with Mr. Tom Rogers and based on prior Department permitting decisions, GRU understands that Florida emission units otherwise subject to RP review can be exempted from this review by requesting an enforceable SO₂ emission limit such

that the Q/D ratio will be less than 50. The requested DGS Unit 2 SO₂ emission cap of 5,500 tons per year meets this requirement as indicated in the following table:

Parameter	Units	Value
Distance to Chassahowitzka NWR	km	113.6
Distance to Okefenokee NWR	km	112.2
Requested Unit 2 SO ₂ Emission Cap	tons/yr	5,500
Emission Rate / Distance (Q/D) Chassahowitzka NWR	ton/yr/km	48.4
Emission Rate / Distance (Q/D) Okefenokee NWR	ton/yr/km	49.0
FDEP Applicability Threshold	ton/yr/km	50

Based on the above, GRU requests a FDEP determination that the requested SO₂ emission cap of 5,500 tons per year satisfies the Regional Haze Rule RP requirements for DGS Unit 2 and that a four-factor RP BART analysis is therefore not required.

Four copies of the administrative and signature pages of the Department's *Application for Air Permit - Long Form* (DEP Form No. 62-210.900(1), Effective 3/11/2010) are attached.

If you have any questions, please do not hesitate to contact me by phone at (352) 393-1283, by e-mail at klemansrw@gru.com or at the address at the bottom of the first page.

Sincerely,



Robert W. Klemans, P.E.
Supervising Utility Engineer

RWK

cc: R. Hunzinger
J. Stanton
M. Jones
C. Brew
R. Embry
B. Hoang

file: A 4.2



Department of Environmental Protection RECEIVED

Division of Air Resource Management APPLICATION FOR AIR PERMIT - LONG FORM

MAY 25 2012

DIVISION OF AIR
RESOURCE MANAGEMENT

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit:

- For any required purpose at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air operation permit;
- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment new source review, or maximum achievable control technology (MACT);
- To assume a restriction on the potential emissions of one or more pollutants to escape a requirement such as PSD review, nonattainment new source review, MACT, or Title V; or
- To establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial, revised, or renewal Title V air operation permit.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: City of Gainesville, GRU	
2. Site Name: Deerhaven Generating Station	
3. Facility Identification Number: 0010006	
4. Facility Location... Street Address or Other Locator: 10001 NW 13th Street City: Gainesville County: Alachua Zip Code: 32653	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Application Contact

1. Application Contact Name: Robert W. Klemans, P.E., Supervising Utility Engineer	
2. Application Contact Mailing Address... Organization/Firm: City of Gainesville, GRU Street Address: P.O. Box 147117 (A136) City: Gainesville State: FL Zip Code: 32614-7117	
3. Application Contact Telephone Numbers... Telephone: (352) 393-1283 ext. Fax: (352) 334-3151	
4. Application Contact Email Address: klemansrw@gru.com	

Application Processing Information (DEP Use)

1. Date of Receipt of Application: 5-25-12	3. PSD Number (if applicable):
2. Project Number(s): 0010006-016-AC	4. Siting Number (if applicable):

APPLICATION INFORMATION

Purpose of Application

This application for air permit is being submitted to obtain: (Check one)

Air Construction Permit

- Air construction permit.
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

Air Operation Permit

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

Application is a request for a sulfur dioxide (SO₂) emission cap for Deerhaven Generating Station Unit 2 to ensure that Unit 2 will be exempt from the Reasonable Progress (RP) requirements of the Regional Haze Rule.

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Processing Fee
005	2,700 MMBtu/hr Steam Boiler No. 2	N/A	N/A

Application Processing Fee

Check one: Attached - Amount: \$ _____ Not Applicable

The Deerhaven Generating Station has been issued a Title V air operation permit. Application processing fee not required pursuant to Rule 62-4.050(4)(a)2., F.A.C.

APPLICATION INFORMATION

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name : John W. Stanton, Assistant General Manager – Energy Supply
2. Owner/Authorized Representative Mailing Address... Organization/Firm: City of Gainesville, GRU Street Address: P.O. Box 147117 (A132) City: Gainesville State: FL Zip Code: 32614-7117
3. Owner/Authorized Representative Telephone Numbers... Telephone: (352) 393-1789 ext. Fax: (352) 334-2786
4. Owner/Authorized Representative Email Address: stantonjw@gru.com
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.</i>  _____ Signature 5-23-12 _____ Date

APPLICATION INFORMATION


Application Responsible Official Certification **NOT APPLICABLE**

Complete if applying for an initial, revised, or renewal Title V air operation permit or concurrent processing of an air construction permit and revised or renewal Title V air operation permit. If there are multiple responsible officials, the “application responsible official” need not be the “primary responsible official.”

1. Application Responsible Official Name:
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source or CAIR source.
3. Application Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
4. Application Responsible Official Telephone Numbers... Telephone: () ext. Fax: ()
5. Application Responsible Official E-mail Address:
6. Application Responsible Official Certification: <i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i> _____ Signature _____ Date

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: Thomas W. Davis Registration Number: 36777
2. Professional Engineer Mailing Address... Organization/Firm: Environmental Consulting & Technology, Inc. Street Address: 3701 Northwest 98th Street City: Gainesville State: Florida Zip Code: 32606-5004
3. Professional Engineer Telephone Numbers... Telephone: (352) 248 - 3351 ext. Fax: (352) 332 - 6722
4. Professional Engineer Email Address: tdavis@ectinc.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/> , if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input checked="" type="checkbox"/> , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/> , if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/> , if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i>  Signature No 36777 (Seal) STATE OF FLORIDA PROFESSIONAL ENGINEER Date <u>5/24/12</u>

* Attach any exception to certification statement.