



March 27, 2001

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

RECEIVED

MAR 28 2001

BUREAU OF AIR REGULATION

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

Dear Mr. Sheplak:

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

Section II. Facility-wide Conditions.

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

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

Rationale: Editorial correction.

Emission Unit ID No. 3 – Unit 1

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

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

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

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

B.12. Excess Emission Reports.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,

A handwritten signature in black ink, appearing to read "Darrell R. DuBose". The signature is fluid and cursive, with a long horizontal stroke at the end.

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

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

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

City of Gainesville, GRU
Deerhaven Generating Station

FINAL Permit No.: 0010006-001-AV

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

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

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

City of Gainesville, GRU
Deerhaven Generating Station

FINAL Permit No.: 0010006-001-AV

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

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

Brief Description of Emissions Units and/or Activities:

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

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

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