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GAINESVILLE REGIONAL UTILITIES

STRATEGIC PLANNING

BY FACSIMILE AND US MAIL
(850) 921-9533

November 5, 2004

Mr. Bruce Mitchell
Division of Air Resources Management
Title V Section
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Gainesville Regional Utilities
Deerhaven Generating Station
Title V Permit No. 0010006-003-AV

Dear Mr. Mitchell:

The purpose of this letter is to provide comments to the Department on the above referenced draft Title V permit. Specific comments are detailed below.

1.) Specific Condition C.13.c NO_X CEMS for Continuous Compliance needs to be amended to include an averaging time of 4 hours pursuant to EPA (40CFR60, Subpart GG states that Method 20 takes 4 hours). Also, excess emissions due to startup, shutdown, fuel switching, malfunction, and load change should not be included in the calculation of the rolling four hour average to determine compliance. The modified condition language is shown below.

> *C.13.c NO_X CEMS for Continuous Compliance The NO_x CEMS shall be used for continuous compliance.* ***Calculation of the NO_X concentration for purposes of determining compliance with the BACT limits of 15/42 ppmvd @ 15% O_2 (natural gas/No. 2 fuel oil) will be based on a rolling 4 hour average excluding periods of startup, shutdown, fuel switching, malfunction, and load change.***
> *[PSD-FL-212 and PA 74-04; 0010006-004-AC/PSD-FL-212(A); and, e-mail received 08/30/04 from Yolanta E. Jonynas]*

2.) During preliminary discussions with Jonathan Holtom with respect to the CAM Plan for Unit #2, Jonathan had stated that he would eliminate the one six-minute period above 18% opacity as a indicator range for investigatory action. It is GRU's position that the other indicator range, a rolling hourly average of the six-minute average opacities over 13%, provides a reasonable level of safety with respect to the particulate limit of 0.1 lb/MMBtu. Since the Method 5

compliance test for particulates is the average of three one-hour runs, which equates to 30 six-minute periods, requiring some sort of action when only one six-minute period exceeds 18% is obviously overly protective. Therefore GRU requests that the CAM Plan be modified to eliminate this 18% indicator level. Amended language is provided below.

> *An excursion is defined as any one hour average measured stack opacity greater than 13% **~~or greater than 18% opacity for one six minute reading~~**, excluding those events defined as startup/shutdown and malfunctions. An excursion will trigger an evaluation of the operation of the boiler and ESP. Corrective action will be taken as necessary.*

3.) During the shutdown of Unit #2, excess emissions of opacity are unavoidable due to safety related and operational issues. Specifically, the precipitator must be de-energized until the boiler, the ductwork leading up to the precipitator, and the precipitator itself are purged of combustibles to avoid a fire in these pieces of equipment. However, after this purging is complete, the precipitator is re-energized. Operationally, as the hot components of the boiler and related ductwork cool, the gas that is passing through the precipitator is also cooling. As a result, the precipitator is operating in a temperature regime that is does not allow it to perform at its design efficiency, which results in excess opacities.

A review of the last four shutdowns for annual maintenance reveals that the maximum time of excess opacities in any 24 hour period ranges from 6 hours and 18 minutes in 2002 to 11 hours and 24 minutes in 2004. Please find attached graphical representations of the last four shutdowns for annual maintenance (2001, 2002, 2003, and 2004). Therefore, GRU requests that Specific Condition D.2. be modified to allow for 12 hours of excess opacities during shutdown of Unit #2. Amended language is provided below.

> ***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* ***except for Unit #2 where excess emissions of opacity shall not to exceed 12 hours in any 24 hour period only during shutdown of the unit*** *unless specifically authorized by the Department for longer duration.*

If you have any questions about these comments, please contact me at (352) 393-1283 or by e-mail at klemansrw@gru.com.

Sincerely

Robert W. Klemans, P.E.
Engineer IV

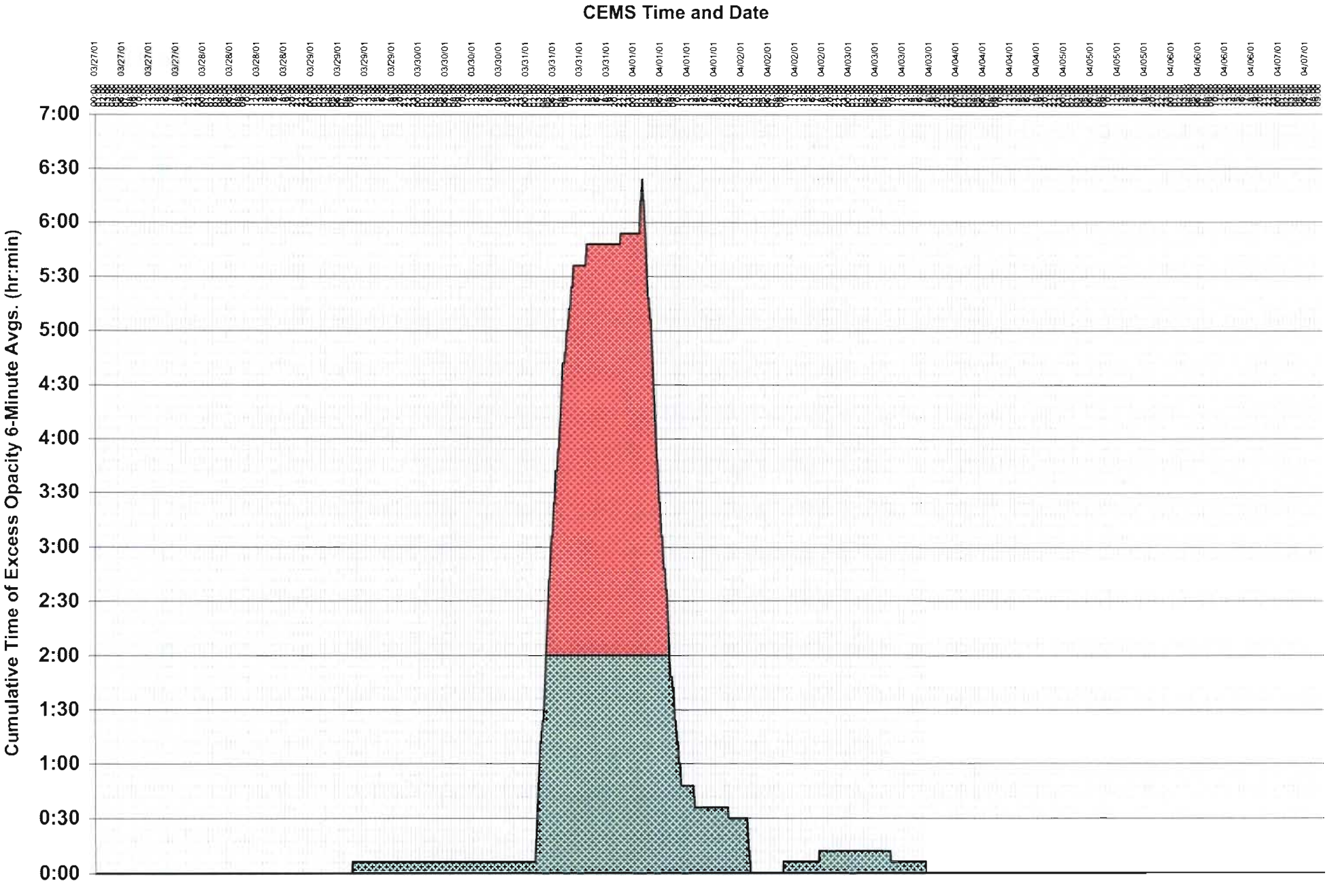
RWK

Attachments

cc: R. Casserleigh
H. Lannon
T. Rafter
D. Beck
Y. Jonynas
R. Embry
A. Morrison (HG&S)

W:\U0070\Klemans\WINWORD\LETTERS\Ltr to B Mitchell trans comments on DH TV permit.doc

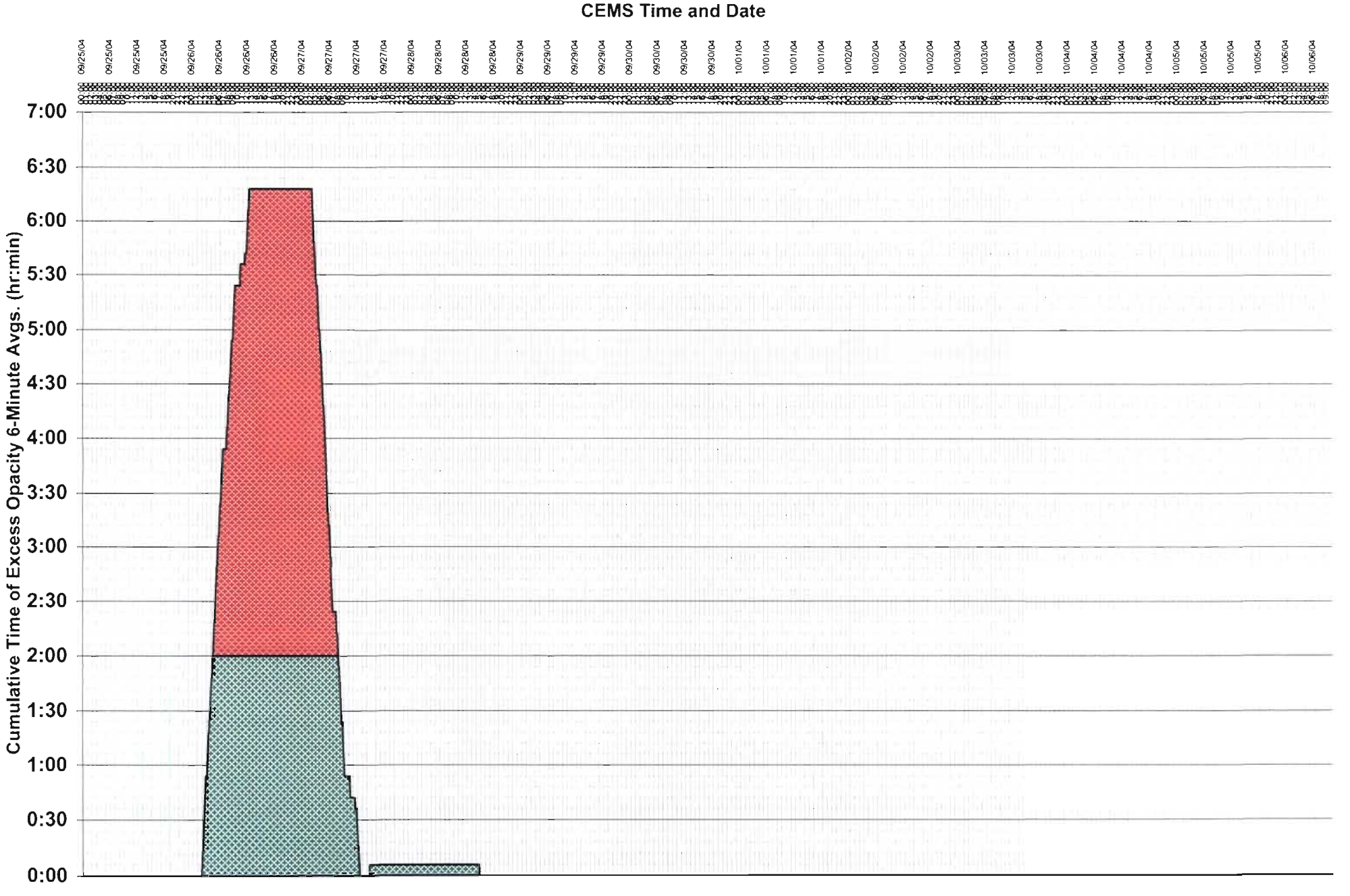
DH2 2001-03 Opacity.xls
Rolling 24-Hour Area Chart



RWK

11/05/2004

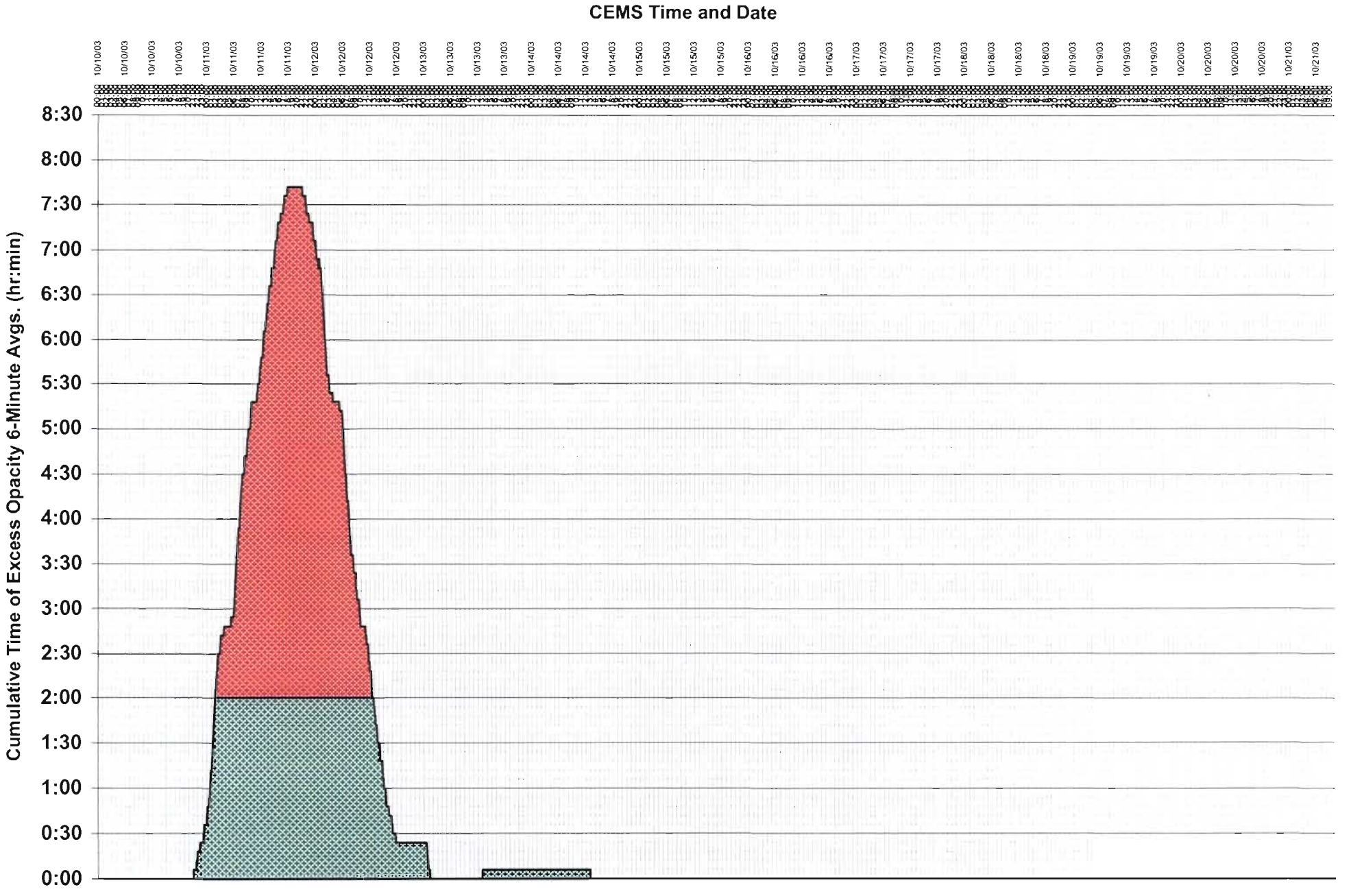
DH2 2002-10 Opacity.xls
Rolling 24-Hour Area Chart



RWK

11/05/2004

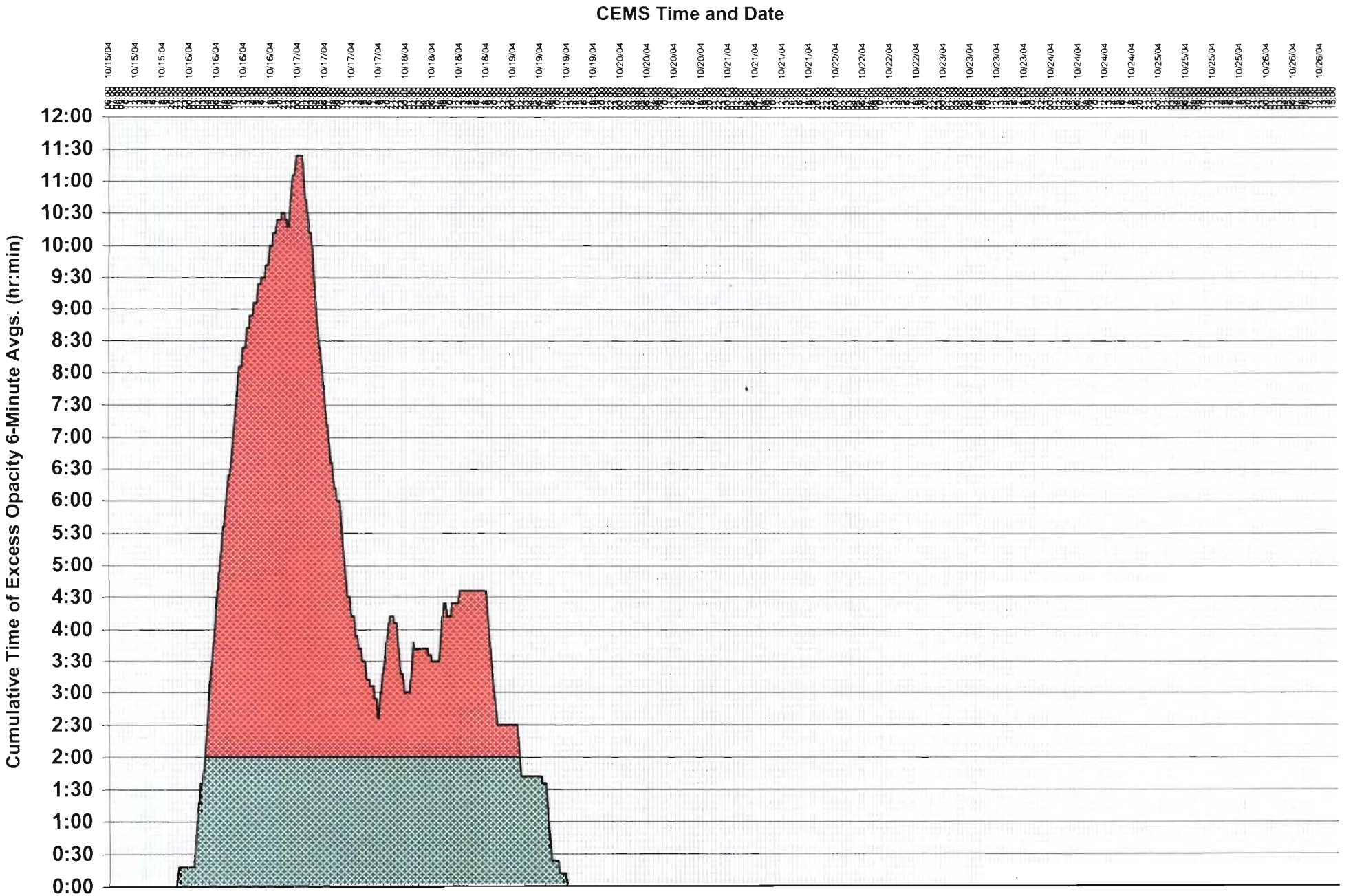
DH2 2003-10 Opacity.xls
Rolling 24-Hour Area Chart



RWK

11/05/2004

DH2 2004-10 Opacity.xls
Rolling 24-Hour Area Chart



RWK

11/05/2004

Friday, Barbara

To: Kirts, Christopher; 'tdavis@ectinc.com'

Cc: Mitchell, Bruce

Subject: PROPOSED Title V Permit Renewal No. 0010006-003-AV - Gainesville Regional Utilities - Deerhaven Generating Station

Find attached the zip file for subject PROPOSED Title V Permit Renewal for your information and files.

If I may be of further assistance, please feel free to contact me.

Barbara J. Friday
Planner II
Bureau of Air Regulation
(850)921-9524
Barbara.Friday@dep.state.fl.us

Friday, Barbara

From: Mitchell, Bruce

Sent: Monday, November 08, 2004 2:44 PM

To: Friday, Barbara

Cc: Pennington, Jim; Vielhauer, Trina

Subject: Posting of the PROPOSED T-5 Permit Renewal package: Gainesville Regional Utilities' Deerhaven Generating Station: 0010006-004-AV.

11/8/04

Dear Barbara,

Please post the above referenced T-5 Permit renewal package located and named:

o:Bar/Title V/BRUCE/PERMITS/0010006.003.AV.Renewal.GRU.Deerhaven

0010006.003.AV.Renewal.APPENDIX CAM
0010006.003.AV.Renewal.PD
0010006.003.AV.Renewal.SOB
0010006G.003.AV.Renewal
0010006H.003.AV.004.AC
0010006p.003.AV.Renewal
0010006U.003.AV.Renewal
0010006.003.AV.Renewal.Table 1-1
0010006.003.AV.Renewal.Table 1-1A
0010006.003.AV.Renewal.Table 2-1
0010006.003.AV.Renewal.Table 2-1A

Many thanks.

Bruce