



Gainesville Regional Utilities
Strategic Planning Department
301 SE 4th Avenue
Gainesville, FL 32601

FACSIMILE COVER SHEET

TO: Bruce Mitchell

FAX #: 850/921-9533

PHONE #: _____

FROM: ROB KLEMANS

FAX #: 352/334-3151

PHONE #: 352/393-1283

Number of pages sent: 8 (including this cover sheet)

Date sent: 11/5/04

COMMENTS:

cc'd: Trina }
Bruce } 11/5/04 RR

MAILING/BILLING ADDRESS: P. O. Box 147117, Sta. A-136
Gainesville, FL 32614-7117



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% O₂ (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

Mr. Bruce Mitchell
November 5, 2004
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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 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.

Mr. Bruce Mitchell
November 5, 2004
Page 3 of 3

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

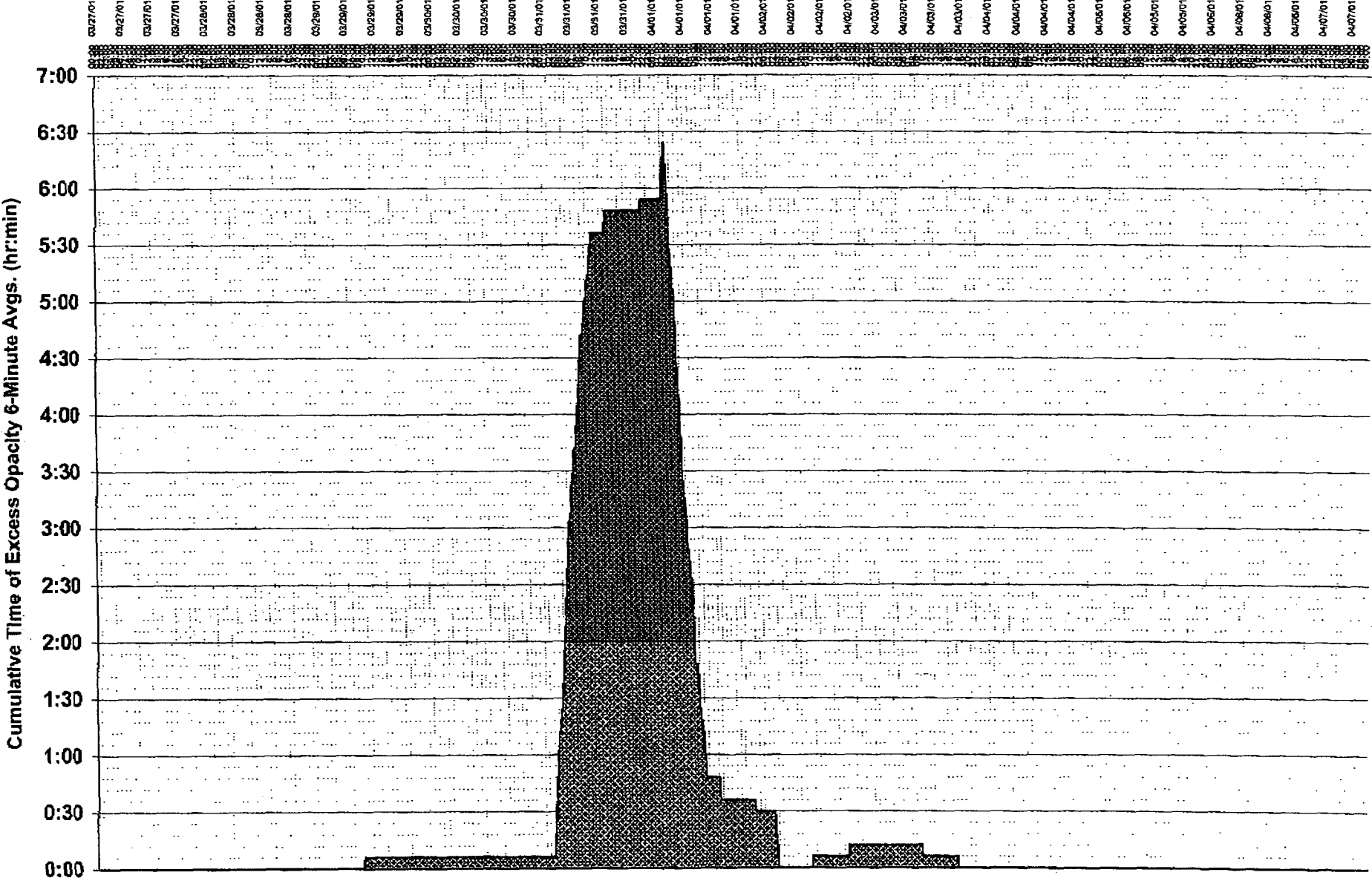
Attachments

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

DH2 2001-03 Opacity.xls

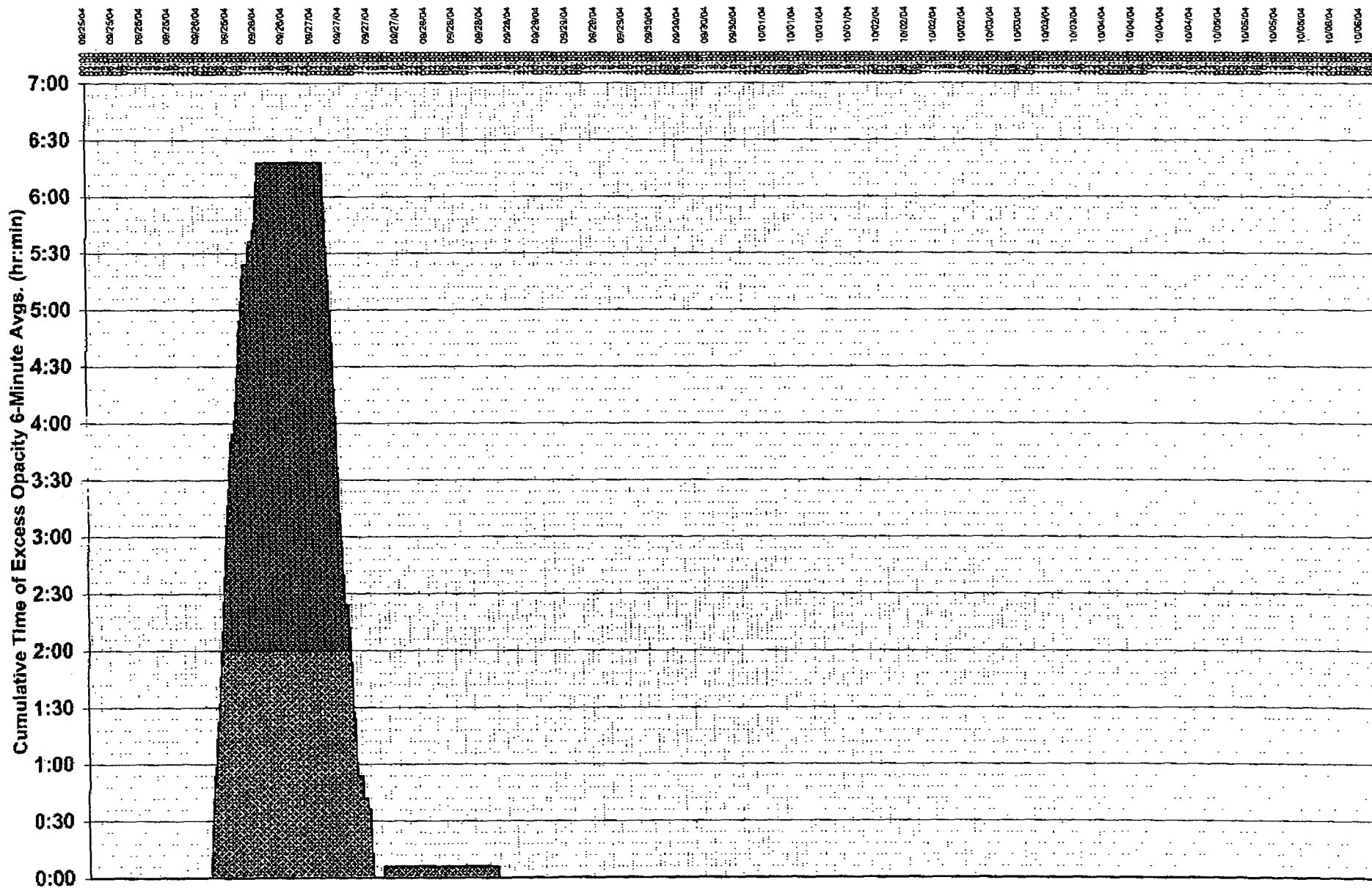
Rolling 24-Hour Area Chart

CEMS Time and Date



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

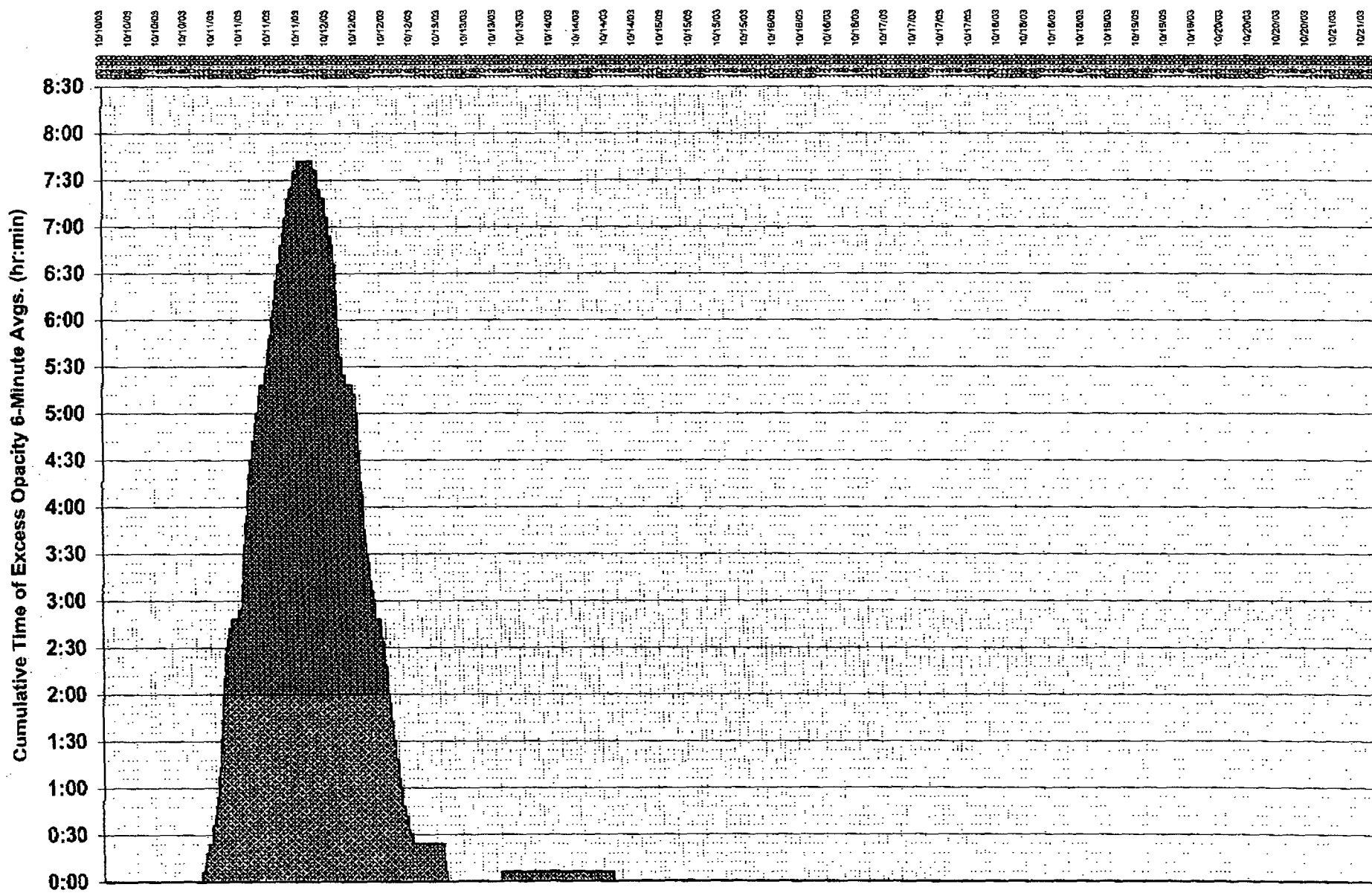
CEMS Time and Date



DH2 2003-10 Opacity.xls

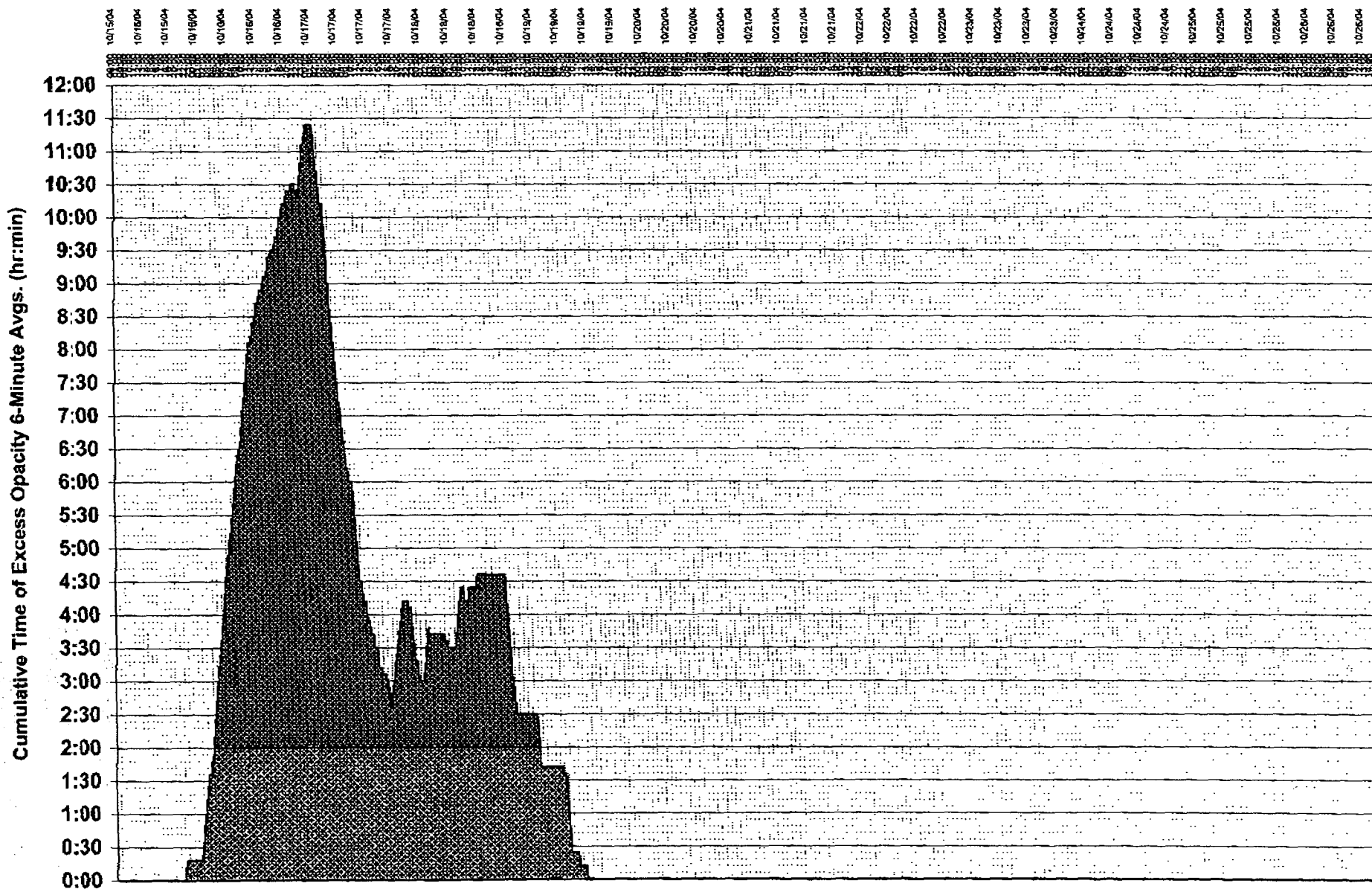
Rolling 24-Hour Area Chart

CEMS Time and Date



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

CEMS Time and Date





Gainesville Regional Utilities
Strategic Planning Department
301 SE 4th Avenue
Gainesville, FL 32601

FACSIMILE COVER SHEET

TO: Bruce Mitchell

FAX #: 850/921-9533

PHONE #: 850/413-9198

FROM: Yolanta Jonynas

FAX #: 352/334-3151

PHONE #: 352/393-1284

Number of pages sent: 3 (including this cover sheet)

Date sent: 10/13/04

COMMENTS:

MAILING/BILLING ADDRESS: P. O. Box 147117, Sta. A-136
Gainesville, FL 32614-7117



GAINESVILLE REGIONAL UTILITIES

STRATEGIC PLANNING

October 13, 2004

Mr. James Pennington, P.E.
Florida Dept. of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301

RE: Gainesville Regional Utilities
Deerhaven Generating Station
Draft Title V Operation Permit Renewal No. 0010006-003-AV
Draft Air Construction Permit No. 0010006-004-AC/PSD-FL-212(A)/PA 74-04
Proof of Publication of Public Notice

Dear Mr. Pennington:

Attached is proof of publication of the Public Notice of Intent To Issue An Air Construction Permit and Title V Air Operation Permit Renewal. The notice was published in the Legal Notices section of the Gainesville Sun on October 7, 2004.

Sincerely,

Yolanta E. Jonynas
Environmental Resource Coordinator

- xc: D. Beck
- R. Casserleigh
- R. Embry
- R. Klemans
- S. Manasco
- B. Mitchell, FDEP ~ Tall.
- J. Shaw
- CAA-Title V - DH

DHTVPubNotice.y54

26805

NO _____

**THE GAINESVILLE SUN
Published Daily and Sunday
GAINESVILLE, FLORIDA**

**STATE OF FLORIDA
COUNTY OF ALACHUA**

NAOMI WILLIAMS-JORDAN

Before the undersigned authority appeared.....
Classified Assistant Manager

Who on oath says that he/she is.....of THE GAINESVILLE SUN, a daily

newspaper published at Gainesville in Alachua County, Florida, that the attached copy of advertisement, being a
**PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND
A TITLE V AIR OPERATION PERMIT RENEWAL**

.....
DRAFT Title V Air Operation Permit Renewal, Project No.: 0010006-003-AV

In the matter of

in the.....Court, was published in said newspaper in the issues of
OCTOBER 7TH

..... 2004

Affidavit further says that the said THE GAINESVILLE SUN is a newspaper published at Gainesville, in said Alachua County, Florida, and that the said newspaper has heretofore been continuously published in said Alachua County, each day, and has been entered as second class mail matter at the post office in Gainesville, in Said Alachua County, Florida, for a period of one year next preceding the first publication of the attached copy Of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount for publication in the said newspaper.

Sworn to and subscribed before me this

..... day of Oct..... A.D., 2004
Cecile S. Feagle
(seal) Notary Public

Naomi Williams-Jordan



Cecile S. Feagle
MY COMMISSION # DD238598 EXPIRES
August 5, 2007
BONDED THRU TROY FAIN INSURANCE, INC.

September 27, 2004

Mr. Bruce Mitchell
Florida Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
Title V Section
2600 Blair Stone Road, MS 5505
Tallahassee, FL 32399-2400

RECEIVED

SEP 30 2004

BUREAU OF AIR REGULATION

RE: Gainesville Regional Utilities (GRU)
Deerhaven Generating Station
Title V Permit No. 0010006-002-AV (AND 003)

Dear Mr. Mitchell:

In followup to Ms. Jonynas' E-mail dated August 30, 2004, GRU is requesting that for Emission Unit ID. No. 006 (DHCT3) the Department change the method of demonstrating compliance with the NOx limits (ppmvd at 15% O2) from annual stack testing to the use of the Continuous Emission Monitoring System. GRU is also requesting that the lbs/hr and tons per year (TPY) limits for all pollutants in permit No. PSD-FL-212, Condition No. 6 be relegated into equivalents based on current permitting strategies employed on similar units. These pollutants include NOx, PM10, SO2 and H2SO4. GRU understands that this will require a revision of the Air Construction Permit and that FDEP will do a dual notice of the change along with the notice of the Title V permit renewal.

Please contact me at 352-393-1789 or Ms. Jonynas at 352-393-1284 if you have any further questions.

Sincerely,


Randy Casserleigh, Interim Assistant Manager Energy Supply
Designated Representative and Responsible Official

xc: D. Beck
Y. Jonynas
R. Klemans
S. Manasco
T. Rafter
J. Shaw
D. Thompson
CAA Title V - DH

Mitchell, Bruce

From: Clark, Vincent
Sent: Wednesday, September 29, 2004 8:34 AM
To: Mitchell, Bruce
Subject: GRU Deerhaven (AIRS 0010006) Compliance

Bruce,

Deerhaven is in compliance. We have no current enforcement issues with them. John Gay completed a Full Compliance Evaluation on 9/24/04, which is in ARMS. If you have any further questions please contact me.

Vincent Clark
Environmental Specialist
Air Compliance & Enforcement
FDEP-Northeast District
(904) 807-3239
Vincent.Clark@dep.state.fl.us

9/29/04

Dear Trina,

Good morning! Per your request, I received the following response from the NED office, specifically Vincent Carter, as to the compliance status of Gainesville Regional Utilities's Deerhaven Generating Station. I have placed a copy of the e-mail in the file.

Bruce

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

From: Clark, Vincent

Sent: Wednesday, September 29, 2004 8:34 AM

To: Mitchell, Bruce

Subject: GRU Deerhaven (AIRS 0010006) Compliance

Bruce,

Deerhaven is in compliance. We have no current enforcement issues with them. John Gay completed a Full Compliance Evaluation on 9/24/04, which is in ARMS. If you have any further questions please contact me.

Vincent Clark
Environmental Specialist
Air Compliance & Enforcement
FDEP-Northeast District
(904) 807-3239
Vincent.Clark@dep.state.fl.us

9/28/04

Dear Barbara,

Good morning! Please post the above referenced permitting project located at:

O:Bar/Title V/BRUCE/PERMITS/0010006.003.AV.Renewal.GRU.Deerhaven
0010006.003.AV.Renewal.APPENDIX.CAM
0010006.003.AV.Renewal.Table1-1
0010006.003.AV.Renewal.Table1-1A
0010006.003.AV.Renewal.Table2-1
0010006.003.AV.Renewal.Table2-1A
0010006d.003.AV.Renewal
0010006G.003.AV.Renewal
0010006H.003.AV.Renewal
0010006U.003.AV.Renewal
0010006.003.AV.Renewal.SOB
0010006.003AV.004AC.TEPD
0010006.004AC.letterAC.Draft
0010006i.003AV.Renewal.004AC.PSD.FL.212A

Many thanks! I've also done the Permit Summary page. Take care.

Bruce

Friday, Barbara

To: Kirts, Christopher; Oven, Hamilton; 'tdavis@ectinc.com'
Cc: Mitchell, Bruce
Subject: DRAFT Title V Permit Renewal #0010006-003-AV/0010006-004-AC - City of Gainesville - Deerhaven Generating Station

Find attached zip files for subject DRAFT 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

9/28/2004