

Florida Department of
Environmental Protection

Memorandum

To: Trina Vielhauer, Bureau of Air Regulation
Through: Jeff Koerner, New Source Review Section *JK*
From: Heidi Coggins, New Source Review Section *HC*
Date: February 15, 2011
Subject: Draft Minor Source Air Construction Permit
Project No. 0010006-014-AC
Gainesville Regional Utilities, Deerhaven Generating Station, Unit 2
Low NOx Burner Project

Attached for your review is a draft minor air construction permit package for the existing Deerhaven Generating Station, which is located in Alachua County at 10001 NW 13th Street in Gainesville, Florida. Briefly, the draft permits authorizes the replacement of the existing Unit 2 coal burners with a low NOx burners (LNB) system and a modified over-fire air (OFA) system. The attached Technical Evaluation and Preliminary Determination provide a detailed description of the project and the rationale for permit issuance. The project is considered a new source review reform project. Day 90 of the permitting time clock is May 3, 2011. I recommend your approval of the attached draft permit package.

Attachments

TLV/jfk/hmc

P.E. CERTIFICATION STATEMENT

PERMITTEE

City of Gainesville, Gainesville Regional Utilities (GRU)
P.O. Box 147117 (A136)
Gainesville, Florida 32614-7117

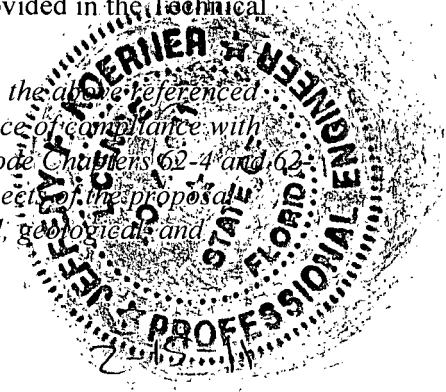
Draft Permit No. 0010006-014-AC
Deerhaven Generating Station, Unit 2
Low-NOx Burner Project
Alachua County, Florida

PROJECT DESCRIPTION

GRU operates an existing electrical generating plant at its Deerhaven Generating Station, which located in Alachua County at 10001 NW 13th Street in Gainesville, Florida. The facility proposes to replace the existing Unit 2 coal burners with a low-NOx burners (LNB) system and a modified over-fire air (OFA) system. The goal of the proposed project is to reduce operating costs related to ammonia injection for the recently installed selective catalytic reduction (SCR) system, which controls emissions of nitrogen oxides (NOx). Based on Computational Fluid Dynamics (CFD) modeling, the burner vendor predicts no concurrent increase in carbon monoxide (CO) emissions. The project is not expected to result in an increase in the maximum heat input rate nor emissions.

This project is subject to the general preconstruction review requirements in Rule 62-212.300, Florida Administrative Code (F.A.C.) and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality. The Department's full review of the project and rationale for issuing the draft permit is provided in the Technical Evaluation and Preliminary Determination.

I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify any other aspects of the proposal (including, but not limited to, the electrical, civil, mechanical, structural, hydrological, geological, and meteorological features).



Jeffery F. Koerner

Jeffery F. Koerner, P.E.
Registration Number 49441

(Date)



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard, Jr.
Secretary

February 16, 2011

Sent by Electronic Mail – Received Receipt Requested

Mr. John W. Stanton, Assistant General Manager of Energy Supply
City of Gainesville, Gainesville Regional Utilities
Post Office Box 147117 (A 132)
Gainesville, Florida 32614-7117

Re: Project No. 0010006-014-AC
Gainesville Regional Utilities, Deerhaven Generating Station
Low-NOx Burner Project for Unit 2

Dear Mr. Stanton:

On January 13th, you submitted an application requesting the replacement of the existing Unit 2 coal burners with a low-NOx burner system and a modified over-fire air system. The existing facility is located in Alachua County at 10001 NW 13th Street in Gainesville, Florida. Enclosed are the following documents: the Written Notice of Intent to Issue Air Permit; the Public Notice of Intent to Issue Air Permit; the Technical Evaluation and Preliminary Determination; and the Draft Permit with Appendices. The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. If you have any questions, please contact the project engineer, Heidi Coggins, at 850/717-9084.

Sincerely,

Trina Vielhauer, Chief
Bureau of Air Regulation

TLV

Enclosures

TLV/jfk/hmc

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

*In the Matter of an
Application for Air Permit by:*

City of Gainesville, Gainesville Regional Utilities
Post Office Box 147117 (A132)
Gainesville, Florida 32614-7117

Project No. 0010006-014-AC
Minor Air Construction Permit
Deerhaven Generating Station
Low-NOx Burners for Unit 2
Alachua County, Florida

Authorized Representative:

Mr. John W. Stanton, Assistant General Manager
Energy Supply

Facility Location: Gainesville Regional Utilities operates the existing Deerhaven Generating Station, which is located in Alachua County at 10001 NW 13th Street in Gainesville, Florida.

Project: The applicant proposes the replacement of the existing Unit 2 coal burner with a low-NOx burners system and a modified over-fire system. Details of the project are provided in the application and the enclosed Technical Evaluation and Preliminary Determination.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/717-9000.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.


A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

Executed in Tallahassee, Florida.

FOR


Trina Vielhauer, Chief
Bureau of Air Regulation

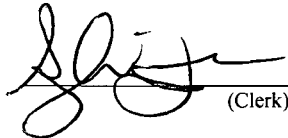
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit package (including the Written Notice of Intent to Issue Air Permit, the Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination and the Draft Permit with Appendices) was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on 2/16/11 to the persons listed below.

- Mr. John W. Stanton, GRU (stantonjw@gru.com)
- Ms. Melissa Jones, GRU (jonesmc@gru.com)
- Mr. Robert W. Klemans, GRU (klemansrw@gru.com)
- Ms. Ruth Martin, GRU (martinrc@gru.com)
- Mr. Christopher Kirts, DEP NE District (christopher.kirts@dep.state.fl.us)
- Mr. Mike Halpin, DEP Siting Office (mike.halpin@dep.state.fl.us)
- Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)
- Ms. Heather Abrams, EPA Region 4 (abrams.heather@epa.gov)
- Ms. Vickie Gibson, DEP BAR Reading File (victoria.gibson@dep.state.fl.us)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.


(Clerk)

2/16/11
(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection
Division of Air Resource Management, Bureau of Air Regulation
Draft Air Construction Permit
Project No. 0010006-014-AC
City of Gainesville, Gainesville Regional Utilities (GRU)
Deerhaven Generating Station
Alachua County, Florida

Applicant: The applicant for this project is Gainesville Regional Utilities. The applicant's authorized representative and mailing address is: Mr. John W. Stanton, Assistant General Manager, Energy Supply, Post Office Box 147117 (A132), Gainesville, Florida 32614-7117.

Facility Location: Gainesville Regional Utilities operates the existing Deerhaven Generating Station, which is located in Alachua County at 10001 NW 13th Street in Gainesville, Florida.

Project: Deerhaven Unit 2 is an existing 251 megawatt coal-fired steam electrical generating unit, which includes the following control equipment: selective catalytic reduction (SCR) to reduce nitrogen oxides (NOx) emissions; a circulating dry scrubber to reduce sulfur dioxide emissions; and a baghouse to reduce particulate matter emissions. On January 13th, the applicant requested authorization to replace the existing Unit 2 coal burners with a state-of-the-art low-NOx burner system and a modified over-fire air system. The goal of the project is to reduce the urea consumption associated with the SCR system and the related costs. The proposed project will not change the unit capacity and is not expected to increase emissions.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Bureau of Air Regulation in the Department of Environmental Protection's Division of Air Resource Management. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/717-9000.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the physical address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S.). Interested persons may contact the Permitting Authority's project engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site by entering draft permit number:
<http://www.dep.state.fl.us/air/emission/apds/default.asp>.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air construction permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of this Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the

(Public Notice to be Published in the Newspaper)

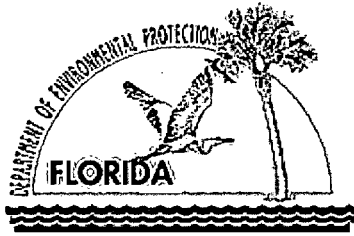
Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available for this proceeding.



**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

APPLICANT

City of Gainesville, Gainesville Regional Utilities
Post Office Box 147117 (A132)
Gainesville, Florida 32614-7117

Deerhaven Generating Station
Facility ID No. 0010006

PROJECT

Project No. 0010006-014-AC
Application for Minor Source Air Construction Permit
Low-NOx Burner Replacement for Unit 2

COUNTY

Alachua County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation
New Source Review Section
2600 Blair Stone Road, MS#5505
Tallahassee, Florida 32399-2400

February 16, 2011

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

1. GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

Facility Description and Location

Gainesville Regional Utilities (GRU) operates the existing Deerhaven Generating Station, which is an existing electrical generating plant categorized under Standard Industrial Classification Code No. 4911. The existing facility is located in Alachua County at 10001 NW 13th Street in Gainesville, Florida. The UTM coordinates of the existing facility are Zone 17, 365.7 km East, and 3292.6 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

Unit 2 is an existing 251 megawatt (MW, nominal) fossil fuel fired steam boiler. Unit 2 is authorized to fire coal, natural gas or distillate fuel oil (Nos. 1 or 2) with emissions exhausted through a 350 foot stack with a exit diameter of 18.5 feet. The actual volumetric flow rate is approximately 766,500 actual cubic feet per minute. Particulate matter emissions are controlled by a baghouse. Sulfur dioxide emissions are controlled by a circulating dry scrubber. Emissions of nitrogen oxides are controlled by a selective catalytic reduction (SCR) system. There is some ancillary support equipment for handling and storage.

Facility Regulatory Categories

- The facility is a major source of hazardous air pollutants (HAP).
- The facility operates units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.
- Units 1 and 2 are subject to the Clean Air Interstate Rule (CAIR).
- Unit 2 is subject to New Source Performance Standards (NSPS) in Subpart D of Title 40, Part 60 of the Code of Federal Regulations. The project will not affect the NSPS requirements.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Project Description

On January 19th, 2011, the Department received an application requesting the replacement of the existing Unit 2 coal burners with a low-NOx burner system and a modified over-fire air (OFA) system. The low-NOx burner project consists of an 18 Opti-Flow fuel injectors, secondary air nozzles, windbox compartment modifications, igniters, burner panels, over-fire air modifications, auxiliary air port modifications and coal piping. The emissions of nitrogen oxides (NOx) and carbon monoxide (CO) can be controlled by adjusting the low-NOx burners, enlarged auxiliary air ports and by modifying the over-fire air system which will allow tuning the entire combustion system. GRU had computational fluid dynamics (CFD) modeling performed to predict the performance of the new Siemens combustion system. The burner vendor expects NOx emissions to be 22% to 30% less than the existing uncontrolled NOx levels (0.45 lb/MMBtu), which will be approximately 0.32 to 0.35 lb/MMBtu. The same modeling indicates that CO emissions from the boiler furnace will remain the same or will be less.

Processing Schedule

01/13/2011 Received the application for a minor source air pollution construction permit.
01/31/2011 Requested additional information.
02/02/2011 Received additional information; application complete.

2. PSD APPLICABILITY

General PSD Applicability

For areas currently in attainment with the state and federal AAQS or areas otherwise designated as unclassifiable, the Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, F.A.C. Under preconstruction review, the Department first must determine if a project is subject to the PSD requirements ("PSD applicability review") and, if so, must conduct a PSD preconstruction review. A PSD applicability review is required for projects at new and existing major stationary sources. In addition, proposed projects at existing minor sources are subject to a PSD applicability review to determine whether potential emissions *from the proposed project itself* will exceed the PSD major stationary source thresholds. A facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit:

- 5 tons per year or more of lead;
- 250 tons per year or more of any regulated air pollutant; or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the following 28 PSD-major facility categories: fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, coal cleaning plants (with thermal dryers), Kraft pulp mills, portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants, primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants, fossil fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants and charcoal production plants.

Once it is determined that a project is subject to PSD preconstruction review, the project emissions are compared to the "significant emission rates" defined in Rule 62-210.200, F.A.C. for the following pollutants: CO; NO_x; sulfur dioxide (SO₂); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM₁₀); volatile organic compounds (VOC); lead (Pb); fluorides (F); sulfuric acid mist (SAM); hydrogen sulfide (H₂S); total reduced sulfur (TRS), including H₂S; reduced sulfur compounds, including H₂S; municipal

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

waste combustor organics measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans; municipal waste combustor metals measured as particulate matter; municipal waste combustor acid gases measured as SO₂ and hydrogen chloride (HCl); municipal solid waste landfills emissions measured as non-methane organic compounds (NMOC); and mercury (Hg). In addition, significant emissions rate also means any emissions rate or any net emissions increase associated with a major stationary source or major modification which would construct within 10 kilometers of a Class I area and have an impact on such area equal to or greater than 1 µg/m³, 24-hour average.

If the potential emission exceeds the defined significant emissions rate of a PSD pollutant, the project is considered “significant” for the pollutant and the applicant must employ the Best Available Control Technology (BACT) to minimize the emissions and evaluate the air quality impacts. Although a facility or project may be *major* with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several “significant” regulated pollutants.

PSD Applicability for Project

The low-NOx burner project will reduce the operational cost of the recently installed SCR control system by reducing the amount of ammonia consumption used to control NOx emissions. There will be no increase in the maximum heat input rate to the boiler. The low-NOx burner project is not expected to result in any increase in particulate matter, sulfur dioxide or volatile organic compounds. The project is intended to reduce NOx emissions before control by the existing SCR system to conserve ammonia consumption. Low-NOx burners can result in increased CO emissions. The application indicated baseline emission rates of 0.0143 lb CO/MMBtu and 0.475 lb NOx/MMBtu and projected actual emissions of 0.0143 lb CO/MMBtu and 0.10 lb NOx/MMBtu. Data from an existing process monitor in the boiler furnace was used to develop the baseline CO emissions. Acid Rain Data from the Clean Air Market website was used to develop baseline NOx emissions. The applicant provided the following table summarizing annual CO and NOx emissions and PSD applicability.

Table A: Applicant’s Annual Emission Summary and PSD Applicability

Year	Heat Input (MMBtu/yr)	Projected Annual Emissions		Baseline Actual Emissions		Net Change in Emissions	
		CO (TPY)	NOx (TPY)	CO (TPY)	NOx (TPY)	CO (TPY)	NOx (TPY)
2011	13,698,489	97.9	684.9	100.0	3,799.2	-2.0	-3,114.3
2012	15,071,369	107.8	753.6	100.0	3,799.2	7.8	-3,045.6
2013	15,649,883	111.9	782.5	100.0	3,799.2	11.9	-3,016.7
2014	7,198,402	51.5	359.9	100.0	3,799.2	-48.5	-3,439.3
2015	7,099,003	50.8	355.0	100.0	3,799.2	-49.2	-3444.2

Notes:

- a) CEMS data from the Acid Rain Program was used to obtain baseline actual emissions for NOx.
- b) CO process monitoring data was used to obtain baseline actual emissions.
- c) The projected actual emissions are predicted to be lower in 2014 and 2015 because the applicant believes Unit 2 will operate less once the proposed 100 MW biomass-fired power plant (adjacent to the Deerhaven Generating Station) begins commercial operation in 2014.

As shown in the above table, the applicant expect that no increases in emissions of NOx and CO from the project.

The following table summarizes the Department’s estimate of actual annual emissions using baseline actual emissions values determined from data obtained on the Clean Air Market website. The baseline heat input rate was based on the average annual emissions data of the highest value of the two consecutive years (2009-2010).

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

The projected actual annual emissions are based on the same emissions factors (since no change is expected) and the highest annual heat input rate predicted by the applicant.

Table B: Department's Annual Emission Summary and PSD Applicability

Pollutants	Annual Actual Emissions, Tons/Year				Subject to PSD review?
	Baseline Actual Emissions ^a	Projected Actual Emissions ^b	Emissions Increase ^c	PSD Significant Emission Rate	
CO ₂	107	112	5	100	No
NO _x	471	493	22	40	No

Notes:

- a) *Baseline*: The Department used 2010 heat input rate data (14,963,089 MMBtu/year) from the Acid Rain Program since the SCR system commenced operation in April of 2009. For the baseline actual emissions, the Department used the following emissions factors: 0.0143 lb CO₂/MMBtu (process CO monitoring data) and 475 tons NO_x/year (Acid Rain data, equivalent to 0.063 lb NO_x/MMBtu).
- b) *Projected*: The Department used the applicant's 2013 heat input rate data (15,649,883 MMBtu/year), which was the highest projected rate for the five years following completion of the project. For the projected actual emissions, the Department used the following emissions factors: 0.0143 lb CO₂/MMBtu (process CO monitoring data) and 0.063 lb NO_x/MMBtu (Acid Rain data). These factors were used since the vendor indicates CO emissions will not increase and the applicant states that the SCR system will be operated such that NO_x emissions will remain unchanged.
- c) The Department notes that the estimated emissions increases (5 tons CO/year and 22 tons NO_x/year) could be deducted because Unit 2 could have accommodated these emissions, which were solely due to predicted demand growth (annual heat input rate).

The proposed project is not expected to exceed the PSD significant emission rates for any PSD pollutant; therefore, the project is not subject to PSD preconstruction review.

3. DEPARTMENT REVIEW

Low-NO_x burners may create: (1) a reduced oxygen level in the combustion zone to limit fuel NO_x formation; (2) a reduced flame temperature that limits thermal NO_x formation; and/or (3) a reduced residence time at peak temperature which also limits thermal NO_x formation. Over-fire air is a technique in which a percentage of the total combustion air is diverted from the burners and injected through ports above the top burner level. Over-fire air reduces NO_x emissions by: (1) suppressing thermal NO_x by partially delaying and extending the combustion process resulting in less intense combustion and cooler flame temperatures; and (2) suppressing fuel NO_x formation by reducing the concentration of air in the combustion zone where volatile fuel nitrogen is evolved. Low-NO_x burners with over-fire systems are capable of reducing nitrogen oxide emissions by as much as 60% from uncontrolled levels.¹

In accordance with Permit No. 0010006-005-AC, GRU added a SCR system for Unit 2, which commenced operation in April of 2009 to reduce NO_x emissions. The applicant conducted a review of current operational costs (e.g., ammonia) versus the annualized costs of a new low-NO_x burner system with reduced operational costs (e.g., ammonia). Despite the predicted reduction in operation of Unit 2 by 2014, the applicant indicates the low-NO_x burner system and modified over-fire air system will be cost effective for the plant.

¹ "External Combustion Sources"; AP-42, Emissions Factor Reference Document; EPA; February 02, 2011; <http://www.epa.gov/ttn/chief/ap42/ch01/final/c01s01.pdf>

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

As previously discussed, the installation and operation of low-NOx burners is not expected to result in PSD-significant emissions increases. Unit 2 is subject to the Acid Rain Program and is equipped with CEMS for monitoring NOx emissions. Unit 2 has a CO process monitor that is no longer used; however, the applicant agrees to repair and re-calibrate this device to monitor CO emissions. Therefore, the only two pollutants that could be impacted will be continuously monitored. In accordance with Rule 62-210.370(2)(d)(3), F.A.C, CO and NOx emissions must be reported for five years after completing the project, with the first reporting year being the first full calendar year after completing construction.

The applicant indicates that there will be no increase in the maximum heat input rate to the boiler. Current Title V Permit No. 0010006-010-AV specifies a maximum heat input rate of 2428 MMBtu/hour. The previous Title V permit included a permitting note indicating that the maximum heat input rate was identified for purposes of conducting emissions compliance tests. During the last renewal of the Title V permit, the permitting note was removed. The Department requested GRU to identify the current maximum heat input rate based on a 4-hour average of the CEMS data provided to the EPA Acid Rain Database. GRU concluded that the current maximum heat input rate is 2700 MMBtu/hour based on a 4-hour average of the EPA Acid Rain data. The Department verified maximum heat input rates of 2699 MMBtu/hour (1-hour average) and 2680 MMBtu/hour (4-hour average) using available data from the EPA Acid Rain Database in June of 2007.

Although this appears to be an 11% increase in the maximum heat input rate, this difference results from methods used to estimate the heat input rates. The current permitted rate (2428 MMBtu/hour) was based on the original vendor's estimate of the maximum coal firing rate and the approximate fuel heating value of coal. The maximum 4-hour average based on EPA Acid Rain data is predicted from the measured hourly stack flow rates and an F-Factor for coal. To ensure that this burner replacement project will not increase the capacity of Unit 2, the draft permit will recognize the maximum heat input rate as 2700 MMBtu/hour based on a 4-hour block average of the EPA Acid Rain CEMS data.

4. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Heidi Coggins is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

DRAFT PERMIT

PERMITTEE

City of Gainesville, Gainesville Regional Utilities (GRU)
Post Office Box 147117 (A 132)
Gainesville, Florida 32614-7117

Air Permit No. 0010006-014-AC
Permit Expires: ~~March 14, 2012~~
Minor Air Construction Permit

Authorized Representative:

Mr. John W. Stanton, Assistant General Manager
Energy Supply

Deerhaven Generating Station
Low-NOx Burners for Unit 2

PROJECT

This is the final air construction permit, which authorizes the replacement of the existing Unit 2 coal burners with a low-NOx burner system and a modified over-fire air system. The proposed work will be conducted at the existing Deerhaven Generating Station, which is an electrical generating plant categorized under Standard Industrial Classification Code No. 4911. The existing facility is located in Alachua County at 10001 NW 13th Street in Gainesville, Florida. The UTM coordinates of the existing facility are Zone 17, 365.7 km East, and 3292.6 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit. As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida

(DRAFT)

Trina Vielhauer, Acting Director
Division of Air Resource Management

(Date)

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit with Appendices) was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on (DRAFT) to the persons listed below.

- Mr. John W. Stanton, GRU (stantonjw@gru.com)
- Mr. Robert W. Klemans, GRU (klemansrw@gru.com)
- Mr. Christopher Kirts, DEP NE District (christopher.kirts@dep.state.fl.us)
- Mr. Mike Halpin, DEP Siting Office (mike.halpin@dep.state.fl.us)
- Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)
- Ms. Ana M. Oquendo, EPA Region 4 (oquendo.ana@epa.gov)
- Ms. Vickie Gibson, DEP BAR Reading File (victoria.gibson@dep.state.fl.us)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

(DRAFT)

_____ (Clerk)

_____ (Date)

SECTION 1. GENERAL INFORMATION (DRAFT)

FACILITY DESCRIPTION

The existing facility consists of the following emissions units.

Facility ID No. 0010006	
ID No.	Emission Unit Description
<i>Regulated Emissions Units</i>	
003	Unit 1(75 megawatt (MW))
005	Unit 2 (251 MW)
006	Combustion Turbine No 3 (74 MW)
007	Coal Handling and Storage Activities
<i>Unregulated Emissions Units and Activities</i>	
001	Combustion Turbine No. 1 (20 MW)
002	Combustion Turbine No. 2 (20 MW)
008	Fly ash and bottom ash, soda ash, salt brine, urea, and lime storage and handling, and water and wastewater treatment systems
009	Stationary Reciprocating Internal Combustion Engine (1,100 hp)

PROPOSED PROJECT

This permit authorizes replacement of the existing Unit 2 coal burners with a low-NOx burner (LNB) system and modified over-fire air system. The LNB project consists of 18 Opti-Flow fuel injectors, secondary air nozzles, windbox compartment modifications, igniters, burner panels, over-fire air modifications, auxiliary air port modifications and coal piping.

This project will modify the following emissions unit.

Facility ID No. 0010006	
ID No.	Emission Unit Description
005	Unit 2 (251 MW)

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility operates units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.
- Units 1 and 2 are subject to the Clean Air Interstate Rule (CAIR).
- Unit 2 is subject to New Source Performance Standards (NSPS) of Subpart D in Title 40, Part 60 of the Code of Federal Regulations.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting Authority: The permitting authority for this project is the Bureau of Air Regulation, Division of Air Resource Management, Florida Department of Environmental Protection (Department). The Bureau of Air Regulation's mailing address is 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Air Resource Section of the Department's Northeast District Office at 7825 Baymeadows Way, Suite 200 B, Jacksonville, Florida 32256-7590.
3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); and Appendix D (Common Testing Requirements).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Source Obligation:
 - (a) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.
 - (b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.[Rule 62-212.400(12), F.A.C.]
8. Application for Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V air operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213.420, F.A.C.]

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

9. Actual Emissions Reporting: This permit is based on an analysis that compared baseline actual emissions with projected actual emissions and avoided the requirements of subsection 62-212.400(4) through (12), F.A.C. for emissions of carbon monoxide and nitrogen oxides. Therefore, pursuant to Rule 62-212.300(1)(e), F.A.C., the permittee is subject to the following monitoring, reporting and recordkeeping provisions.
- a. The permittee shall monitor the emissions of any PSD pollutant that the Department identifies could increase as a result of the construction or modification and that is emitted by any emissions unit that could be affected; and, using the most reliable information available, calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 5 years following resumption of regular operations after the change. Emissions shall be computed in accordance with the provisions in Rule 62-210.370, F.A.C., which are provided in Appendix C of this permit.
 - b. The permittee shall report to the Department within 60 days after the end of each calendar year during the 5-year period setting out the unit's annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:
 - 1) The name, address and telephone number of the owner or operator of the major stationary source;
 - 2) The annual emissions calculations pursuant to the provisions of 62-210.370, F.A.C., which are provided in Appendix C of this permit;
 - 3) If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and
 - 4) Any other information that the owner or operator wishes to include in the report.
 - c. The information required to be documented and maintained pursuant to subparagraphs 62-212.300(1)(e)1 and 2, F.A.C., shall be submitted to the Department, which shall make it available for review to the general public.

For this project, the permit requires the annual reporting of actual carbon monoxide and nitrogen oxides emissions for Deerhaven Unit 2.

[Application 0010006-014-AC; and Rules 62-212.300(1)(e) and 62-210.370, F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. EU 005

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
005	Unit 2 is a 251 MW fossil fuel fired steam boiler and is capable of burning coal, natural gas or distillate fuel oil (Nos. 1 or 2) with emissions exhausted through a 350 foot stack with an exit diameter of 18.5 feet. The actual volumetric flow rate is 766,500 actual cubic feet per minute. The exit temperature is 352° F. Particulate matter emissions are controlled by a baghouse. Sulfur dioxide (SO ₂) emissions are controlled by using a circulating dry scrubber. Nitrogen oxides (NO _x) emissions are controlled by a selective catalytic reduction. There are continuous emissions monitoring systems (CEMS) for SO ₂ and NO _x emissions and a continuous opacity monitoring system (COMS) for stack opacity.

EQUIPMENT

1. **LNB Project:** The permittee is authorized to replace the existing Unit 2 coal burners with a LNB system and modified over-fire air system. The LNB project consists of 18 Opti-Flow fuel injectors, secondary air nozzles, windbox compartment modifications, igniters, burner panels, over-fire air modifications, auxiliary air port modifications and coal piping. *{Permitting Note: The burner vendor expects a 22% to 30% reduction in nitrogen oxides emissions from the boiler furnace prior to the SCR system.}* [Application No. 0010006-014-AC]

PERFORMANCE RESTRICTIONS

2. **Permitted Capacity:** The maximum heat input rate to this unit is 2700 MMBtu per hour based on a 4-hour block average as determined by data collected from the Acid Rain monitoring system. On a calendar year basis, no more than ten, 4-hour block averages shall be greater than the specified maximum heat input rate. *{Permitting Note: The purpose of this specification is to define the maximum expected equipment capacity and thereby the potential to emit. The equipment may be physically capable of infrequent, but brief episodes that exceed the maximum capacity during periods of high demand.}* [Rule 62-210.200(PTE), F.A.C.]

TESTING REQUIREMENTS

3. **Initial Compliance Tests:** Unit 2 shall be tested to demonstrate initial compliance with the emissions standards for particulate matter specified in the Title V air operation permit. The initial tests shall be conducted within 60 days after completing construction on the LNB project and achieving permitted capacity, but not later than 180 days after initial operation of the unit. The results of this test may be used for purposes of demonstrating annual compliance with the standard for particulate matter. [Rules 62-4.070(3) and 62-297.310(7)(a)1, F.A.C.]
4. **Test Requirements:** The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(7)(a)9, F.A.C.]
5. **Test Methods:** Required tests shall be performed in accordance with the following reference methods.

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
5 or 17	Method for Determining Particulate Matter Emissions

The above methods are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rules 62-204.800 and 62-297.100, F.A.C.; and Appendix A of 40 CFR 60]

MONITORING REQUIREMENTS6. Emissions Monitoring:

- a. *CO Process Monitor*: The permittee shall refurbish and recalibrate the existing CO process monitoring system to measure and record carbon monoxide emissions from the boiler furnace. CO emissions measured by the process monitoring system shall be used in the annual report to determine whether the LNB project caused a PSD-significant increase in emissions (100 tons/year or more).
- b. *NOx CEMS*: NOx emissions measured by the existing Acid Rain CEMS shall be used in the annual report to determine whether the LNB project caused a PSD-significant increase in emissions (40 tons/year or more).

[Rule 62-4.070(3), F.A.C.]

RECORDS AND REPORTS

7. Stack Test Report: The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Compliance Authority on the results of each such test. For each required stack test, the permittee shall submit a written report that summarizes the results with 45 days of completing such test. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report shall provide the following information:
 - a. The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.
 - b. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.
 - c. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information.
 - (1) The type, location, and designation of the emissions unit tested.
 - (2) The facility at which the emissions unit is located.
 - (3) The owner or operator of the emissions unit.
 - (4) The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
 - (5) The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
 - (6) The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
 - (7) A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
 - (8) The date, starting time and duration of each sampling run.
 - (9) The test procedures used, including any alternative procedures authorized pursuant to Rule 62-

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. EU 005

297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.

- (10) The number of points sampled and configuration and location of the sampling plane.
- (11) For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
- (12) The type, manufacturer and configuration of the sampling equipment used.
- (13) Data related to the required calibration of the test equipment.
- (14) Data on the identification, processing and weights of all filters used.
- (15) Data on the types and amounts of any chemical solutions used.
- (16) Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
- (17) The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
- (18) All measured and calculated data required to be determined by each applicable test procedure for each run.
- (19) The detailed calculations for one run that relate the collected data to the calculated emission rate.
- (20) The applicable emission standard and the resulting maximum allowable emission rate for the emissions unit plus the test result in the same form and unit of measure.
- (21) A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

In addition to the above, the permittee shall submit records of the following for each test run: SO₂ emissions (CEMS); NO_x emissions (CEMS); CO emissions (process monitor); stack opacity (COMS); and heat input rate (Acid Rain CEMS).

[Rule 62-297.310(8), F.A.C.]

SECTION 4. APPENDICES (DRAFT)

Contents

Appendix A. Citation Formats and Glossary of Common Terms

Appendix B. General Conditions

Appendix C. Common Conditions

Appendix D. Common Testing Requirements

Citation Formats and Glossary of Common Terms

CITATION FORMATS

The following illustrate the formats used in the permit to identify applicable requirements from permits and regulations.

Old Permit Numbers

Example: Permit No. AC50-123456 or Permit No. AO50-123456

Where: “AC” identifies the permit as an Air Construction Permit
“AO” identifies the permit as an Air Operation Permit
“123456” identifies the specific permit project number

New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: “099” represents the specific county ID number in which the project is located
“2222” represents the specific facility ID number for that county
“001” identifies the specific permit project number
“AC” identifies the permit as an air construction permit
“AF” identifies the permit as a minor source federally enforceable state operation permit
“AO” identifies the permit as a minor source air operation permit
“AV” identifies the permit as a major Title V air operation permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: “PSD” means issued pursuant to the preconstruction review requirements of the Prevention of Significant Deterioration of Air Quality
“FL” means that the permit was issued by the State of Florida
“317” identifies the specific permit project number

Florida Administrative Code (F.A.C.)

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

GLOSSARY OF COMMON TERMS

° F: degrees Fahrenheit

µg: microgram

AAQS: Ambient Air Quality Standard

acf: actual cubic feet

acfm: actual cubic feet per minute

ARMS: Air Resource Management System
(Department’s database)

BACT: best available control technology

bhp: brake horsepower

Btu: British thermal units

CAM: compliance assurance monitoring

CEMS: continuous emissions monitoring system

cfm: cubic feet per minute

CFR: Code of Federal Regulations

SECTION 4. APPENDIX A (DRAFT)

Citation Formats and Glossary of Common Terms

CAA: Clean Air Act
CMS: continuous monitoring system
CO: carbon monoxide
CO₂: carbon dioxide
COMS: continuous opacity monitoring system
DARM: Division of Air Resource Management
DEP: Department of Environmental Protection
Department: Department of Environmental Protection
dscf: dry standard cubic feet
dscfm: dry standard cubic feet per minute
EPA: Environmental Protection Agency
ESP: electrostatic precipitator (control system for reducing particulate matter)
EU: emissions unit
F: fluoride
F.A.C.: Florida Administrative Code
F.A.W.: Florida Administrative Weekly
F.D.: forced draft
F.S.: Florida Statutes
FGD: flue gas desulfurization
FGR: flue gas recirculation
ft²: square feet
ft³: cubic feet
gpm: gallons per minute
gr: grains
HAP: hazardous air pollutant
Hg: mercury
I.D.: induced draft
ID: identification
kPa: kilopascals
lb: pound
MACT: maximum achievable technology
MMBtu: million British thermal units
MSDS: material safety data sheets
MW: megawatt
NESHAP: National Emissions Standards for Hazardous Air Pollutants
NO_x: nitrogen oxides
NSPS: New Source Performance Standards
O&M: operation and maintenance
O₂: oxygen
Pb: lead
PM: particulate matter
PM₁₀: particulate matter with a mean aerodynamic diameter of 10 microns or less
ppm: parts per million
ppmv: parts per million by volume
ppmvd: parts per million by volume, dry basis
QA: quality assurance
QC: quality control
PSD: prevention of significant deterioration
psi: pounds per square inch
PTE: potential to emit
RACT: reasonably available control technology
RATA: relative accuracy test audit
RBLC: EPA's RACT/BACT/LAER Clearinghouse
SAM: sulfuric acid mist
scf: standard cubic feet
scfm: standard cubic feet per minute
SIC: standard industrial classification code
SIP: State Implementation Plan
SNCR: selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides)
SO₂: sulfur dioxide
TPD: tons/day
TPH: tons per hour
TPY: tons per year
TRS: total reduced sulfur
UTM: Universal Transverse Mercator coordinate system
VE: visible emissions
VOC: volatile organic compounds

SECTION 4. APPENDIX B (DRAFT)

General Conditions

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in subsections 403.987(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
 - a. Have access to and copy any records that must be kept under conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules. Reasonable time may depend on the nature of the concern being investigated.
8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - a. A description of and cause of noncompliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time then noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.
9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

SECTION 4. APPENDIX B (DRAFT)

General Conditions

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.
11. This permit is transferable only upon Department approval in accordance with Rules 62-120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - a. Determination of Best Available Control Technology (not applicable);
 - b. Determination of Prevention of Significant Deterioration (not applicable); and
 - c. Compliance with New Source Performance Standards (not applicable).
14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - (a) The date, exact place, and time of sampling or measurements;
 - (b) The person responsible for performing the sampling or measurements;
 - (c) The dates analyses were performed;
 - (d) The person responsible for performing the analyses;
 - (e) The analytical techniques or methods used;
 - (f) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SECTION 4. APPENDIX C (DRAFT)

Common Conditions

Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.

EMISSIONS AND CONTROLS

1. Unconfined Particulate Emissions: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

RECORDS AND REPORTS

2. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least 5 years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rule 62-213.440(1)(b)2, F.A.C.]
3. Emissions Computation and Reporting
 - a. Computation of Emissions. For any of the purposes set forth in subsection 62-210.370(1), F.A.C., the owner or operator of a facility shall compute emissions in accordance with the requirements set forth in this subsection.
 - (1) Basic Approach. The owner or operator shall employ, on a pollutant-specific basis, the most accurate of the approaches set forth below to compute the emissions of a pollutant from an emissions unit; provided, however, that nothing in this rule shall be construed to require installation and operation of any continuous emissions monitoring system (CEMS), continuous parameter monitoring system (CPMS), or predictive emissions monitoring system (PEMS) not otherwise required by rule or permit, nor shall anything in this rule be construed to require performance of any stack testing not otherwise required by rule or permit.
 - (a) If the emissions unit is equipped with a CEMS meeting the requirements of paragraph 62-210.370(2)(b), F.A.C., the owner or operator shall use such CEMS to compute the emissions of the pollutant, unless the owner or operator demonstrates to the department that an alternative approach is more accurate because the CEMS represents still-emerging technology.
 - (b) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., but emissions of the pollutant can be computed pursuant to the mass balance methodology of paragraph 62-210.370(2)(c), F.A.C., the owner or operator shall use such methodology, unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
 - (c) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., and emissions cannot be computed pursuant to the mass balance methodology, the owner or operator shall use an emission factor meeting the requirements of paragraph 62-210.370(2)(d), F.A.C., unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
 - (2) Continuous Emissions Monitoring System (CEMS).
 - (a) An owner or operator may use a CEMS to compute emissions of a pollutant for purposes of this rule provided:
 - 1) The CEMS complies with the applicable certification and quality assurance requirements of 40 CFR Part 60, Appendices B and F, or, for an acid rain unit, the certification and quality assurance requirements of 40 CFR Part 75, all adopted by reference at Rule 62-204.800, F.A.C.; or
 - 2) The owner or operator demonstrates that the CEMS otherwise represents the most accurate means of computing emissions for purposes of this rule.
 - (b) Stack gas volumetric flow rates used with the CEMS to compute emissions shall be obtained by the most accurate of the following methods as demonstrated by the owner or operator:
 - 1) A calibrated flow meter that records data on a continuous basis, if available; or
 - 2) The average flow rate of all valid stack tests conducted during a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.

SECTION 4. APPENDIX C (DRAFT)

Common Conditions

- (c) The owner or operator may use CEMS data in combination with an appropriate factor, heat input data, and any other necessary parameters to compute emissions if such method is demonstrated by the owner or operator to be more accurate than using a stack gas volumetric flow rate as set forth at subparagraph 62-210.370(2)(b)2., F.A.C., above.
- (3) Emission Factors.
- a. An owner or operator may use an emission factor to compute emissions of a pollutant for purposes of this rule provided the emission factor is based on site-specific data such as stack test data, where available, unless the owner or operator demonstrates to the department that an alternative emission factor is more accurate. An owner or operator using site-specific data to derive an emission factor, or set of factors, shall meet the following requirements.
- 1) If stack test data are used, the emission factor shall be based on the average emissions per unit of input, output, or gas volume, whichever is appropriate, of all valid stack tests conducted during at least a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
 - 2) Multiple emission factors shall be used as necessary to account for variations in emission rate associated with variations in the emissions unit's operating rate or operating conditions during the period over which emissions are computed.
 - 3) The owner or operator shall compute emissions by multiplying the appropriate emission factor by the appropriate input, output or gas volume value for the period over which the emissions are computed. The owner or operator shall not compute emissions by converting an emission factor to pounds per hour and then multiplying by hours of operation, unless the owner or operator demonstrates that such computation is the most accurate method available.
- b. If site-specific data are not available to derive an emission factor, the owner or operator may use a published emission factor directly applicable to the process for which emissions are computed. If no directly-applicable emission factor is available, the owner or operator may use a factor based on a similar, but different, process.
- (4) Accounting for Emissions During Periods of Missing Data from CEMS, PEMS, or CPMS. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of missing data from CEMS, PEMS, or CPMS using other site-specific data to generate a reasonable estimate of such emissions.
- (5) Accounting for Emissions During Periods of Startup and Shutdown. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of startup and shutdown of the emissions unit.
- (6) Fugitive Emissions. In computing the emissions of a pollutant from a facility or emissions unit, the owner or operator shall account for the fugitive emissions of the pollutant, to the extent quantifiable, associated with such facility or emissions unit.
- (7) Recordkeeping. The owner or operator shall retain a copy of all records used to compute emissions pursuant to this rule for a period of five years from the date on which such emissions information is submitted to the department for any regulatory purpose.

[Rule 62-210.370(2), F.A.C.]

SECTION 4. APPENDIX D (DRAFT)

Common Testing Requirements

Unless otherwise specified in the permit, the following testing requirements apply to all emissions units that require testing.

COMPLIANCE TESTING REQUIREMENTS

1. Required Number of Test Runs: For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five-day period allowed for the test, the Secretary or his or her designee may accept the results of two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(1), F.A.C.]
2. Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. [Rule 62 297.310(2), F.A.C.]
3. Calculation of Emission Rate: For each emissions performance test, the indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]
4. Applicable Test Procedures:
 - a. Required Sampling Time.
 - (1) Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.
 - b. Minimum Sample Volume. Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet.
 - c. Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, F.A.C.
 - d. Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1.
 - e. Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube.

TABLE 297.310-1 CALIBRATION SCHEDULE			
ITEM	MINIMUM CALIBRATION FREQUENCY	REFERENCE INSTRUMENT	TOLERANCE
Liquid in glass thermometer	Annually	ASTM Hg in glass ref. thermometer or equivalent or thermometric points	+/-2%
Bimetallic thermometer	Quarterly	Calibration liquid in glass	5° F
Thermocouple	Annually	ASTM Hg in glass ref. thermometer,	5° F

SECTION 4. APPENDIX D (DRAFT)

Common Testing Requirements

TABLE 297.310-1 CALIBRATION SCHEDULE			
		NBS calibrated reference and potentiometer	
Barometer	Monthly	Hg barometer or NOAA station	+/-1% scale
Pitot Tube	When required or when damaged	By construction or measurements in wind tunnel D greater than 16" and standard pitot tube	See EPA Method 2, Fig. 2-2 & 2-3
Probe Nozzles	Before each test or when nicked, dented, or corroded	Micrometer	+/- 0.001" mean of at least three readings; Max. deviation between readings, 0.004"
Dry Gas Meter and Orifice Meter	1. Full Scale: When received, when 5% change observed, annually	Spirometer or calibrated wet test or dry gas test meter	2%
	2. One Point: Semiannually		
	3. Check after each test series	Comparison check	5%

[Rule 62-297.310(4), F.A.C.]

5. Determination of Process Variables:

- a. *Required Equipment.* The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
- b. *Accuracy of Equipment.* Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

6. Sampling Facilities: In accordance with the current Title V permit, the permittee shall provide adequate sampling facilities that meet the requirements of Rule 62-297.310(6), F.A.C. [Rule 62-297.310(6), F.A.C.]

Livingston, Sylvia

From: Livingston, Sylvia
Sent: Wednesday, February 16, 2011 4:15 PM
To: 'stantonjw@gru.com'
Cc: 'jonesmc@gru.com'; 'klemansrw@gru.com'; 'martinrc@gru.com'; Kirts, Christopher; Halpin, Mike; 'forney.kathleen@epa.gov'; 'abrams.heather@epa.gov'; Gibson, Victoria; Coggins, Heidi; Koerner, Jeff; Walker, Elizabeth (AIR)
Subject: City of Gainesville - Deehaven Generating Station; 0010006-014-AC
Attachments: 0010006-014-AC_Intent.pdf

Tracking:	Recipient	Read
	'stantonjw@gru.com'	
	'jonesmc@gru.com'	
	'klemansrw@gru.com'	
	'martinrc@gru.com'	
	Kirts, Christopher	Read: 2/17/2011 12:22 PM
	Halpin, Mike	Read: 2/16/2011 4:20 PM
	'forney.kathleen@epa.gov'	
	'abrams.heather@epa.gov'	
	Gibson, Victoria	Read: 2/16/2011 4:24 PM
	Coggins, Heidi	Read: 2/17/2011 8:14 AM
	Koerner, Jeff	
	Walker, Elizabeth (AIR)	

Dear Sir/ Madam:

Attached is the official **Notice of Intent to Issue** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".

Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Click on the following link to access the permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0010006.014.AC.D_pdf.zip

Owner/Company Name: CITY OF GAINESVILLE, GRU

Facility Name: DEERHAVEN GENERATING STATION

Project Number: 0010006-014-AC

Permit Status: DRAFT

Permit Activity: CONSTRUCTION

Facility County: ALACHUA

Processor: Heidi Coggins

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the "Air Permit Documents Search" website at <http://www.dep.state.fl.us/air/emission/apds/default.asp>.

Livingston, Sylvia

From: Stanton, John W [StantonJW@gru.com]
Sent: Wednesday, February 16, 2011 4:49 PM
To: Livingston, Sylvia
Cc: Klemans, Robert W
Subject: Re: City of Gainesville - Deehaven Generating Station; 0010006-014-AC

Ms. Livingston,

I am acknowledging receipt of the documents and the ability to view them.

Thank you,

John Stanton
Assistant General Manager; Energy Supply Gainesville Regional Utilities P.O. Box 147117,
Station 132
301 SE 4th Avenue
Gainesville, Florida 32614-7117
352/393-1789
954/646-1639 (cell)

From: "Livingston, Sylvia"
<Sylvia.Livingston@dep.state.fl.us<mailto:Sylvia.Livingston@dep.state.fl.us>>
Date: Wed, 16 Feb 2011 16:15:22 -0500
To: John <stantonjw@gru.com<mailto:stantonjw@gru.com>>
Cc: "Jones, Melissa C" <JonesMC@gru.com<mailto:JonesMC@gru.com>>, "Klemans, Robert W"
<KLEMANSRW@gru.com<mailto:KLEMANSRW@gru.com>>, "Martin, Ruth C"
<MARTINRC@gru.com<mailto:MARTINRC@gru.com>>, "Kirts, Christopher"
<Christopher.Kirts@dep.state.fl.us<mailto:Christopher.Kirts@dep.state.fl.us>>, "Halpin, Mike"
<Mike.Halpin@dep.state.fl.us<mailto:Mike.Halpin@dep.state.fl.us>>,
"forney.kathleen@epa.gov<mailto:forney.kathleen@epa.gov>"
<forney.kathleen@epa.gov<mailto:forney.kathleen@epa.gov>>,
"abrams.heather@epa.gov<mailto:abrams.heather@epa.gov>"
<abrams.heather@epa.gov<mailto:abrams.heather@epa.gov>>, "Gibson, Victoria"
<Victoria.Gibson@dep.state.fl.us<mailto:Victoria.Gibson@dep.state.fl.us>>, "Coggins, Heidi"
<Heidi.Coggins@dep.state.fl.us<mailto:Heidi.Coggins@dep.state.fl.us>>, "Koerner, Jeff"
<Jeff.Koerner@dep.state.fl.us<mailto:Jeff.Koerner@dep.state.fl.us>>, "Walker, Elizabeth
(AIR)" <Elizabeth.Walker@dep.state.fl.us<mailto:Elizabeth.Walker@dep.state.fl.us>>
Subject: City of Gainesville - Deehaven Generating Station; 0010006-014-AC

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http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0010006.014.AC.D_pdf.zip

Owner/Company Name: CITY OF GAINESVILLE, GRU Facility Name: DEERHAVEN GENERATING STATION
Project Number: 0010006-014-AC Permit Status: DRAFT Permit Activity: CONSTRUCTION Facility
County: ALACHUA

Livingston, Sylvia

From: Klemans, Robert W [KLEMANSRW@gru.com]
Sent: Wednesday, February 16, 2011 4:35 PM
To: Livingston, Sylvia
Subject: RE: City of Gainesville - Deehaven Generating Station; 0010006-014-AC

I have received the email and can access the documents>
Thanks!

Robert W. Klemans, PE

Supervising Utility Engineer
Gainesville Regional Utilities
P.O. Box 147114, Station A136
Gainesville, Florida 32614-7117
work - 352-393-1283
fax - 352-334-3151
cell - 352-317-0684

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Wednesday, February 16, 2011 4:15 PM
To: Stanton, John W
Cc: Jones, Melissa C; Klemans, Robert W; Martin, Ruth C; Kirts, Christopher; Halpin, Mike; forney.kathleen@epa.gov; abrams.heather@epa.gov; Gibson, Victoria; Coggins, Heidi; Koerner, Jeff; Walker, Elizabeth (AIR)
Subject: City of Gainesville - Deehaven Generating Station; 0010006-014-AC

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