

SUN-SENTINEL
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FORT LAUDERDALE, BROWARD COUNTY, FLORIDA
BOCA RATON, PALM BEACH COUNTY, FLORIDA
MIAMI, MIAMI DADE COUNTY, FLORIDA

RECEIVED
DEC 04 2001
BUREAU OF AIR REGULATION

STATE OF FLORIDA
COUNTY OF BROWARD/PALM BEACH/MIAMI DADE
BEFORE THE UNDERSIGNED AUTHORITY, PERSONALLY APPEARED

Patricia Ag WHO, ON OATH, SAYS THAT
HE/SHE IS A DULY AUTHORIZED REPRESENTATIVE OF THE CLASSIFIED
DEPARTMENT OF THE SUN-SENTINEL, DAILY NEWSPAPER PUBLISHED
IN BROWARD/PALM BEACH/MIAMI DADE COUNTY, FLORIDA, THAT THE
ATTACHED COPY OF ADVERTISEMENT, BEING A:

NOTICE OF PUBLIC MEETING

IN THE MATTER OF:

EL PASO BROWARD (Deerfield) POWER PROJECT

IN THE CIRCUIT COURT, WAS PUBLISHED IN SAID NEWSPAPER IN THE
ISSUES OF:

c, 10/30, 1x

AFFIANT FURTHER SAYS THAT THE SAID SUN-SENTINEL IS A NEWSPAPER
PUBLISHED IN SAID BROWARD/PALM BEACH/MIAMI DADE COUNTY, FLORIDA,
AND THAT THE SAID NEWSPAPER HAS HERETOFORE BEEN CONTINUOUSLY
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EACH DAY, AND HAS BEEN ENTERED AS SECOND CLASS MATTER AT THE
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FOR A PERIOD OF ONE YEAR NEXT PRECEDING THE FIRST PUBLICATION OF
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CORPORATION, ANY DISCOUNT, REBATE, COMMISSION, OR REFUND, FOR THE
PURPOSE OF SECURING THIS ADVERTISEMENT FOR PUBLICATION IN SAID
NEWSPAPER.

Patricia Ag
(SIGNATURE OF AFFIANT)

SWORN TO AND SUBSCRIBED BEFORE ME
ON: October 30, A.D. 2001

Barbara Strickland
(SIGNATURE OF NOTARY PUBLIC)



Barbara Strickland
Commission # OC 944074
Expires July 24, 2004
Bonded Thru:
Atlantic Bonding Co., Inc.

(NAME OF NOTARY, TYPED, PRINTED, OR STAMPED)

PERSONALLY KNOWN ☒ OR
PRODUCED IDENTIFICATION _____

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF
PUBLIC MEETING
EL PASO BROWARD (DEERFIELD) POWER PROJECT
The Department of Environmental Protection gives notice that a public meeting will be held regarding the Department's intent to issue an air construction permit pursuant to the rules for the Prevention of Significant Deterioration of Air Quality (PSD) to El Paso Merchant Energy Company for construction of a 775 megawatt natural gas-fueled power plant East of the Turnpike and North of Northwest 48th Street in Deerfield Beach, Broward County.
The meeting will be held from 4:00 to 6:00 p.m. on Wednesday, November 7, 2001 at the City of Coconut Creek Government Center, City Commission Chambers, 4800 West Coconuts Road, Coconut Creek, Florida 33063.
The Department's Public Notice of Intent to Issue an Air Construction Permit was published in the Sun-Sentinel on August 24, 2001. This public meeting was requested pursuant to the procedures described in that Public Notice. The application, Meeting Agenda, Public Notices, Technical Evaluation, Draft Best Available Control Technology (BACT), Draft Permit, and file are available for review during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays at:
Dept. of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, FL 32301
Telephone: 850/488-0114
Fax: 850/922-6979
Dept. of Environmental Protection
Southeast District Office
400 North Congress Avenue
West Palm Beach, FL 33416
Telephone: 561/681-6600
Fax: 561/681-6755
Broward County Department of Planning & Environmental Protection
218 Southwest 1st Avenue
Ft. Lauderdale, FL 33301
Telephone 954/519-1220
Fax: 954/519-1495
The Public Notice of Intent to Issue an Air Construction Permit, Technical Evaluation, Draft Permit, and Draft BACT may be accessed at www.dep.state.fl.us/air/permitting/construction.htm by clicking on the Southeast part of the map.
A separate Notice of this public meeting was published in the Florida Administrative Weekly dated October 26, 2001 and can be viewed at faw.dos.state.fl.us/index.html. Pursuant to the provisions of the Americans with Disabilities Act, any person requiring special accommodations to participate in this meeting is asked to advise the agency at least 48 hours before the meeting by contacting the Personnel Service Specialist in the Bureau of Personnel at (850)488-2996. If you are hearing or speech impaired, please contact the agency by calling (800)955-8771 (TDD).
October 30, 2001



FAX COVER SHEET

P.O. Box 2511
Houston, Texas 77252-2511
Fax: 713-420-2483

DATE: October 31, 2001
TO: Al Linero
COMPANY: Florida DEP
FAX: 850 922 6979
FROM: Nick Skelton
PHONE: 713-420- 2867
NUMBER OF PAGES INCLUDING COVER SHEET: 2

If transmission is not received in good order, please call 713-420-3924 or 713-420-2858.

Message:

As per our telephone conference yesterday, please find the attached letter from GE dated September 21, 2001.

Thanks

A handwritten signature in cursive script, appearing to read "Nick Skelton".

Nick Skelton

CC Krish Ravishankar

Tom Davis ECT 352 332 6722

NOTICE OF PUBLIC MEETING

The Department of Environmental Protection announces a public meeting to which all persons are invited:

DATE AND TIME: Wednesday, November 7, 2001 from 4:00 p.m. until 6:00 p.m.

PLACE: City of Coconut Creek Government Center, City Commission Chambers, 4800 West Copans Road, Coconut Creek, Florida 33063.

PURPOSE: To accept public comments and provide status of Department's Intent to Issue an Air Construction Permit to El Paso Merchant Energy Company to construct a nominal 775 megawatt gas-fueled power plant East of the Florida Turnpike, West of Powerline Road, and immediately North of Northwest 48th Street. (Hilton Road) in Deerfield Beach, Broward County. The location is between the Lakeview/Waterways Community to the North and the Waste Management Landfill to the South. The permitting action is subject to the Department's rules for the Prevention of Significant Deterioration of Air Quality (PSD) and Best Available Control Technology (BACT).

A copy of the agenda and the Department's proposed permit and supporting documents can be obtained by contacting: Debbie Galbraith, Department of Environmental Protection at 2600 Blair Stone Road, MS 5505, Tallahassee, Florida 32399, phone (850) 921-9537, or by phoning the Bureau of Air Regulation's New Source Review Section at (850) 921-9505.

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OCT 17 1999
DEPARTMENT OF ENVIRONMENTAL PROTECTION
TALLAHASSEE, FLORIDA

Pursuant to the provisions of the Americans with Disabilities Act, any person requiring special accommodations to participate in this meeting is asked to advise the agency at least 48 hours before the meeting by contacting the Personnel Service Specialist in the Bureau of Personnel at (850) 488-2996. If you are hearing or speech impaired, please contact the agency by calling (800) 955-8771 (TDD).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

SEP 24 2001

4APT-APB

Mr. A. A. Linero, P.E.
Florida Department of Environmental Protection
Mail Station 5500
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED

SEP 27 2001

BUREAU OF AIR REGULATION

Dear Mr. Linero:

Thank you for sending the prevention of significant deterioration preliminary determination (PSD) and draft permit for the combustion turbine facility proposed by El Paso Merchant Energy Company (El Paso) in Broward County (Air Permit No. PSD-FL-316). The project is referred to as the Broward Energy Center and consists of one General Electric (GE) 7FA combined cycle combustion turbine with an unfired heat recovery steam generator and three GE 7FA simple cycle combustion turbines. Based on the Florida Department of Environmental Protection's (FDEP's) estimated emission rates, the project is subject to PSD review for nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), particulate matter (PM/PM₁₀), and sulfuric acid mist.

We have reviewed FDEP's preliminary determination and draft permit and El Paso's permit application and have the following comments:

1. The permit application package includes a draft permit with appendices including Appendix BD, the best available control technology (BACT) determination. We understand that the draft permit takes precedence over Appendix BD and that any items in Appendix BD that appear to be a requirement must be incorporated in the permit to be enforceable. This understanding lies at the base of some of the comments below.
2. We understood the reason for El Paso proposing to configure only one of the combustion turbines as part of a combined cycle system (that is, to avoid the requirements of Florida's Power Plant Siting Act). But at the same time, we were concerned that El Paso might sequentially convert the simple cycle combustion turbines to combined cycle operation without going through the same level of control technology assessment that would have been required had combined cycle operation been proposed from the start. Therefore, we were pleased to see the permit condition requiring a revised CO and NO_x BACT analysis should El Paso propose to convert a simple cycle combustion turbine to combined cycle service and further requiring that this analysis be performed as though the turbine had never been built (thus precluding any "equity in the ground" advantage).

3. The 2.5 ppmvd NO_x emission limit determined to represent BACT for the combined cycle combustion turbine is equal to the lowest BACT emission rate that has been established in Region 4 to date and is similar to many of the lowest BACT emission rates that have been established in other regions as well. On the other hand, the 24-hour compliance averaging period associated with the 2.5 ppmvd limit is longer than many of the combustion turbine NO_x compliance averaging periods for similar projects. (Compliance averaging periods of 1 to 3 hours appear in many permits.) However, we consider 24 hours to be an acceptable averaging period in light of the low emission limit.
4. Regarding the CO BACT determination and associated emissions limits, we have the following comments:
 - a. The draft permit CO emission limit of 8 ppmvd for the simple cycle combustion turbines and for the combined cycle combustion turbine when not operating in power augmentation mode is among the lower BACT limits established in Region 4 for combustion turbines. We further understand FDEP's expectation that the turbines will in fact typically operate with even lower emissions based on inherent combustor design and good combustion practices alone. However, please note that the specification of catalytic oxidation for further control of combustion turbine CO emissions, especially for combined cycle combustion turbines, has become much more common as part of BACT determinations for combustion turbine projects. Catalytic oxidation has the added advantage of controlling volatile organic compound emissions including volatile organic hazardous air pollutants.
 - b. Further related to the CO draft permit emission limit of 8 ppmvd, we note that Appendix BD (the BACT determination) indicates an emission rate of 7.4 ppmvd at full load for either combined cycle or simple cycle combustion turbines. Based on our understanding that the draft permit has precedence over Appendix BD, we presume that 8 ppmvd will be the enforceable limit.
 - c. Emissions of CO from combustion turbines increase sharply below a certain load level (unless an add-on control device is in use). For GE 7FA combustion turbines, this sharp increase occurs with operation below about a 50-percent load level. It is not clear to us that the draft permit restricts normal operation (that is, operation other than during startup and shutdown) to load levels of 50 percent and higher. Condition A.17.c. prohibits operation of the combined cycle combustion turbine at "DLN Modes 1, 2, 3, and 4" (except during startup and shutdown), and Condition B.13.c. specifies a similar restriction for the simple cycle combustion turbines. Since the load levels equivalent to these modes are not specifically stated, however, we are not certain what load levels are prohibited. Furthermore, we would appreciate your identifying which monitoring requirements in the draft permit serve to track compliance with the low-load restrictions.

5. We have the following comments concerning the startup and shutdown provisions of the permit package:
 - a. As we have often commented, startup and shutdown are part of normal combustion turbine operation and need to be addressed in PSD permits. FDEP has done so for this project by establishing a work practice standard and by limiting the number of hours of emissions that can be excluded from NO_x and CO compliance demonstrations for the combined cycle combustion turbine and from NO_x compliance demonstration for the simple cycle combustion turbines. Other permit options that could be considered include limitations on the number of startups and shutdowns in any 12-month period; mass emission limits for NO_x and CO emissions during any 24-hour period to include emissions during startup and shutdown; and future establishment of startup and shutdown BACT emission limits for NO_x and CO derived from test results during the first few months of commercial operation. In addition, compliance with any explicit or implicit annual emissions limits should be assessed with startup and shutdown emissions included. Regarding the option of mass emission limits, we acknowledge FDEP's comments that such limits may be difficult to quantify.
 - b. The only definition of startup that we find is in Appendix BD of the package. As mentioned previously, we understand that the provisions of Appendix BD are not necessarily enforceable. Furthermore, the definition in Appendix BD denotes when startup commences but does not state the operating level or other characteristic marking the end of startup and the beginning of normal operation. We recommend that a more complete definition be developed so that the emission measurements eligible for exclusion under the excess emissions provisions can be confirmed easily.
6. Draft permit Condition 14 pertaining to simple cycle combustion turbines requires testing initially and at permit renewal for PM/PM_{10} , CO, NO_x , and volatile organic compounds (VOC). The draft permit conditions for the combined cycle combustion turbine do not require PM/PM_{10} and VOC initial and renewal testing. We have agreed with FDEP in the past that PM/PM_{10} and VOC testing is not required for combined cycle combustion turbines with continuous emission monitoring systems (CEMS) for CO. However, a permit for a project with both combined cycle and simple cycle combustion turbines that has different initial and renewal testing requirements for the two types of turbines may be perceived as inconsistent. On a related point, we recommend that FDEP give consideration to requiring CO CEMS for the simple cycle combustion turbines as well as for the combined cycle combustion turbine in view of the fact that the simple cycle combustion turbines will be allowed to operate up 5,000 hours per year at full load (and even more hours at a combination of full and partial loads).
7. The term "pipeline-quality natural gas" appears several times in the draft permit. We have sought in the past for a government agency or industry trade group definition of "pipeline-quality" and have never succeeded in finding such a definition. We presume that the term

"pipeline-quality natural gas" means natural gas obtained from an intrastate or interstate commercial natural gas pipeline.

8. The draft permit contains an emission limit for ammonia of 5 ppmvd. Ammonia is not regulated under the PSD program, and we do not have a definitive policy on ammonia emissions. However, we can comment that the limit in the draft permit is consistent with (although not equal to the lowest) ammonia limits we are aware of from projects outside Region 4.
9. In the air quality impact evaluations prepared for this project, we see no acknowledgment that NO_x emissions are precursors to ground-level ozone formation. Such acknowledgment would help demonstrate why control of NO_x emissions from combustion turbines is important.

If you have any questions concerning the comments in this letter, please call Jim Little at (404) 562-9118.

Sincerely,

Kay T. Prince

Kay T. Prince
Chief
Air Planning Branch

cc: *D. Galbraith ✓*
C. Halladay ✓
D. Bane, Broward Co. ✓
J. Goldman, SED ✓
J. Buncyal, WPS ✓
K. Ranshaw, El Paso ✓



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

FACSIMILE TRANSMITTAL SHEET

To	Al Linero - FDEP
Fax Number	(850) 922-6979
From	Jim Little Air and Radiation Technology Branch, Air Permits Section Phone: (404) 562-9118 Fax: (404) 562-9019 E-mail: little.james@epa.gov
Subject	Broward Energy Center
Date	September 24, 2001
Pages	5 (including this sheet)

We will mail the original letter.

From (please print and press hard)

7/26/01

Sender's FedEx Account Number 1043-1506-2

Al Linero

Phone (850) 921-9523

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2600 BLAIR STONE RD

Dept./Floor/Suite/Room

TALLAHASSEE

State FL ZIP 32399

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Optional (First 24 characters will appear on invoice) 37550204000

To (please print and press hard)

Reuben Glickman

Phone (954) 978-9083

3000 Palm Aire Drive

Apt. 103

Dept./Floor/Suite/Room

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State FL ZIP 33069

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Write "Return Receipt Requested" on the mailpiece below the article number.

The Return Receipt will show to whom the article was delivered and the date delivered.

Article Addressed to:

Mr. William Mack

El Paso Merchant Energy Co.

Coastal Tower, 9 Greenway Plaza

Suite 1682A

Houston, TX 77046-0995

4a. Article Number

7099 3400 0000 1450 2552

4b. Service Type

☐ Registered

☐ Express Mail

☐ Return Receipt for Merchandise

☒ Certified

☐ Insured

☐ COD

7. Date of Delivery

5.2.01

8. Addressee's Address (Only if requested and fee is paid)

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2. ☐ Restricted Delivery

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Signature: (Addressee or Agent)

X *William Mack*

Form 3811, December 1994

102595-98-B-0229

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(Call for delivery schedule. See back for detailed descriptions of freight services.)

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El Paso Energy Center

Street, Apt. No. or P.O. Box No.

Coastal Tower, 9 Greenway Plaza

City, State, ZIP

Houston, TX 77046-0995

PS Form 3800, July 1999

See Reverse for Instructions

edEx USA Airbill
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0215

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City TALLAHASSEE State FL ZIP 32399
Your Internal Billing Reference MC 5515
Recipient's Name MS Judy K. Queiroz Phone (904) 975-6444
Company
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See back for application instructions.

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To AL LINERO Phone (850) 487-3922
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City TALLAHASSEE State FL ZIP 32399
Your Internal Billing Reference MC 5515
Recipient's Name MC ROBIN ALICKMAN Phone (904) 978-9083
Company
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☐ FedEx Express Saver Third business day
☐ NEW FedEx Extra Hours Later drop-off with next business morning delivery to select locations

4b Express Freight Service

☐ FedEx 1Day Freight* Next business day
☐ FedEx 2Day Freight Second business day
☐ FedEx 3Day Freight Third business day

5 Packaging

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Environmental Consulting & Technology, Inc.

September 20, 2001

SENT VIA OVERNIGHT MAIL ON SEPTEMBER 20, 2001

RECEIVED
SEP 21 2001
BUREAU OF AIR REGULATION

Mr. A.A. Linero, P.E.
Administrator, New Source Review Section
Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road, MS #5505
Tallahassee, FL 32399-2400

**Re: El Paso Merchant Energy Company
DEP File No. 0112545-001-AC (PSD-FL-316)
Broward Energy Center
Comments on Draft Permit**

Dear Mr. Linero:

On behalf of El Paso Merchant Energy Company (EPMEC), comments on the Department's draft Prevention of Significant Deterioration (PSD) permit for the Broward Energy Center are attached for your consideration. To facilitate your review, a marked up electronic version of the Department's draft PSD permit showing the requested revisions are also being sent to you via electronic mail. As previously arranged, a meeting to discuss these comments is scheduled with the Department for 9:00 AM next Wednesday, September 26th.

Your review of these comments and continued processing of the EPMEC Broward Energy Center PSD permit application is appreciated. Please contact Mr. Krish Ravishankar at (713) 420-5563 or the undersigned at (352) 332-6230, Ext. 351 if there are any questions regarding these comments.

ENVIRONMENTAL CONSULTING & TECHNOLOGY, INC.

Thomas W. Davis, P.E.
Principal Engineer

Attachments

cc: Mr. Krish Ravishankar

O. Bulbrith ✓
O. Bane, Broward Co. ✓
L. Goldmann, SED ✓
C. Holladay ✓
G. Worley, EPA ✓
Q. Bumpal, NPS ✓

3701 Northwest
98th Street
Gainesville, FL
32606

(352)
332-0444

FAX (352)
332-6722

16079 ON XR/XLI 11:51 AM 10/12/00

**GE Energy Services**

David R. Horstman
Sales Manager
Mid-America Region

GE Energy Services Sales
General Electric International, Inc.
2025 W. Beltline Rd., Carrollton, Texas 75006, U.S.A.
Tel: 972.389.7780, Dial Comm: 8*389.7780
Fax: 972.245.2918, Mobil: 972.672.4203
Email: David.Horstman@ps.ge.com

September 21, 2001

Mr. Nicholas Skelton
Project Engineer
El Paso Energy Company
1001 Louisiana Street, Suite N828B
Houston, TX

Re: Engineering Review

Dear Mr. Skelton:

As requested, I have asked our Application Engineering group to evaluate the feasibility of the Florida DEP recommendation paraphrased below:

"The Florida DEP has decreed that the start up times for combined cycle plants is too long and have proposed that the turbine be in DLN mode within 18 minutes of ignition. To allow this they are suggesting running the turbine up to more than 50% load up a bypass stack and then warming the HRSG by using the stack bypass damper as a modulating valve".

GEPS Application Engineering's position on this issue is as follows:

"Operating the damper door as a modulating valve is not recommended. We are aware of a similar application on a project at KEPCO. Because of the turbulent flows, damage to the damper door and its seal allowed leakage to the atmosphere after the damper was closed resulting in a significant loss in performance."

I hope this helps. Please don't hesitate to call if you need any additional assistance.

Very truly yours,

David R. Horstman