ECT
Environmental Consulting & Technology, Inc.

July 31, 2001

SENT VIA OVERNIGHT MAIL ON JULY 31, 2001

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-AC (PSD-FL-316)
Broward Energy Center – New 775 MW Gas Turbine Power Plant

Dear Mr. Linero:

On behalf of El Paso Merchant Energy Company (EPMEC), the following information is provided regarding the EPMEC Broward Energy Center (BEC) Air Construction Permit Application submitted to the Department in March 2001:

Item 1. Emergency Generator Diesel Engine

The BEC will include a 2,600-horsepower (HP) emergency diesel-fired electrical generator. EPMEC requests that the Department's draft PSD permit include a condition limiting annual diesel fuel usage for the 2,600-HP emergency diesel-fired electrical generator to no more than 32,000 gallon per year such that the diesel engine qualifies for the categorical permit exemption of Rule 62-210.300(3)(a)20., F.A.C. A revised Air Construction Permit Application, Appendix C, potential emission inventory worksheet for the 2,600-HP emergency diesel-fired electrical generator is attached.

Item 2. Emergency Fire Water Pump Diesel Engine

The BEC will include a 250-HP emergency diesel-fired fire water pump. This diesel engine qualifies for the categorical permit exemption of Rule 62-210.300(3)(a)21., F.A.C.

Item 3. Emergency Diesel Engine Fuel Storage Tanks

As noted above, the BEC will include a 2,600-HP emergency diesel-fired electrical generator and a 250-HP emergency diesel-fired fire water pump. Each of these emergency diesel engines will include a small (i.e., less than 1,000 gallon) diesel fuel storage tank. Emissions of volatile organic compounds (VOCs) from each small diesel fuel oil storage tank will well below the potential emission thresholds of Rule 62-210.300(3)(b), F.A.C. The emergency diesel engine diesel fuel

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storage tanks therefore qualify for an exemption from permitting pursuant to Rule 62-210.300(3)(b), F.A.C.

Your continued expeditious processing of the EPMEC Broward Energy Center permit application is appreciated. Please contact Mr. Krish Ravishankar at (713) 420-5563 if there are any further questions regarding this permit application.

ENVIRONMENTAL CONSULTING & TECHNOLOGY, INC.

Thomas W. Davis, P.E.
Principal Engineer

Attachment

cc: Mr. Krish Ravishankar, EPMEC
Mr. Isidore Goldman, FDEP Southeast District
Ms. Daniela Banu, Broward County DPEP
Mr. Gregg Worley, EPA Region 4
Mr. John Bunyak, National Park Service
A. Linero
D. Galbraith

ECT
Environmental Consulting & Technology, Inc.

June 26, 2001

SENT VIA OVERNIGHT MAIL ON JUNE 26, 2001

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: Response to Request for Additional Information Dated April 27, 2001
DEP File No. 0112545-AC (PSD-FL-316)
Broward Energy Center – New 775 MW Gas Turbine Power Plant

Dear Mr. Linero:

On behalf of El Paso Merchant Energy Company (EPMEC), responses to the issues raised in your April 27, 2001 correspondence concerning the Broward Energy Center permit application are provided as follows:

Items 1. and 2. FPPSA Requirements and Steam-Electrical Capacity

The steam turbine generator (STG) planned for the Broward Energy Center (BEC) combined cycle (CC) unit will have a maximum generating capacity of 120 megawatts (MW). The CC unit will have a modern distributed control system (DCS) that will serve as a means to control STG operation utilizing plant instrumentation and equipment. In conjunction with the steam turbine governor, a control management system will be implemented that will limit the STG output to less than 75 MW. The power output of the STG will be recorded on the plant DCS for records purposes and reporting needs as required. The CC unit will feature hardware provisions that will allow diversion of steam produced by the heat recovery steam generator (HRSG) from the STG thereby limiting its output. The main hardware features that will limit STG electrical output include CTG steam mass flow augmentation, STG controls, and a STG steam bypass system. Each of these systems is described in the following sections.

A. CTG Steam Mass Flow Augmentation

- The CC unit CTG will incorporate steam injection nozzles and design features that will allow a portion of the high-pressure steam generated by the HRSG to be diverted from the STG to the CTG. This introduction of steam to the CTG allows for a mass flow enhancement. The increased mass flow that results from steam

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injection will increase CTG output as well as fuel consumption. At ambient temperatures of about 50°F or less, steam mass flow augmentation will be limited by CTG equipment limitations. For instance, CTG backpressure could increase to levels beyond those recommended by the vendor. At these colder ambient temperature conditions, steam injection into the CTG will be curtailed and alternate means of steam diversion from the STG will be called on to a greater extent.

- The specifics of the limitations on CTG steam injection will be developed by the CTG vendor. Additionally, the specifics of steam introduction will be developed in conjunction with the CTG control systems for proper coordination with the dry low-NO_x (DLN) combustor control algorithms.

- Steam flow to the CTG steam injection nozzles, including CTG control integration, will be controlled from a signal generated within the DCS. This control signal will operate a control valve that regulates steam flow by modulation of the valve seat or opening area thereby allowing steam flow modulation.

- Steam flow to the CTG injection nozzles will be measured with classical steam flow measurement devices such as an orifice plate or an annubar. The steam flow measurement device will have a differential pressure transmitter attached to pressure sensing lines that will monitor the process and produce a proportional 4-20 milliamp (ma) signal that will tie in to the plant DCS. This signal will be converted to flow and signals will be transmitted to the CTG combustion control systems as well as to the balance of the plant DCS. During base load operations, the steam flow to the CTG injection nozzles will likely be a fixed steam mass flow or fixed percent of CTG mass flow. Injection of steam will occur at 100 percent load only. During upsets/startups and conditions such as low ambient temperatures, the steam flow will be controlled to coordinate with CTG combustion control to allow stable operation and avoid surge and stall within the CTG. During these periods, alternate STG steam diversion paths will be used.

B. Steam Turbine Generator (STG) Controls

- The STG will be fitted with an electronic governor and control system that will control the steam flow into the STG and hence the STG electrical output. Additional instrumentation will be used to adjust this control loop. For instance, condenser back pressure, intermediate pressure and low pressure steam flows, steam temperatures and pressure will each have a significant impact on the determination of the proper steam flow to the STG.

- The primary measurement of STG electrical output will be the main input to the STG governor control loops. This power measurement will be feed to the STG governor to compare to the primary set point. As an example, the primary set

point may have a value of 74.9 MW. Following control system tuning, the set point will be adjusted to allow for control swings and upsets such that the hourly STG electrical production average will never exceed 75 MW.

C. STG Steam Bypass System

- Whenever steam to the CTG injection nozzles and to all other locations are not sufficient to reduce STG output to the set point, the primary means of final control will be a STG steam bypass system. The STG steam bypass system will allow steam flow from the HRSG to bypass the STG and "dump" directly into the condenser. The DCS will generate a final control signal that will modulate this steam dump. A CC plant typically includes this hardware to allow for steam dumping during upsets or malfunctions. Additional control signals and associated hardware will regulate this dump steam as the final means of disposal of excess HRSG steam. In addition, an economizer bypass system may be used to reduce the flow of water passing through the economizer stage of the HRSG, which will reduce the flow of steam produced.

The control systems described above will typically scan each instrument every second and recalculate and update the status and driving signals going to each field device. Following control system tuning, the control systems will regulate STG output to the required level.

Item 3. Steam Mass Flow Augmentation Operation

As noted above, steam mass flow augmentation will be only be used at 100 percent load and when ambient air temperatures are above approximately 50°F. EPMEC plans to operate the BEC CC unit to provide base load electrical power. The maximum annual hours of steam mass flow augmentation will therefore primarily depend on ambient temperatures as well as electrical power demand. At a 68°F CTG inlet air temperature and 100 percent load, steam mass flow augmentation will increase CTG electrical output by approximately 12.8 MW.

Item 4. Emissions During Steam Mass Flow Augmentation

The emissions data provided with the submitted permit application represent the CTG vendor's (General Electric) estimate performance with respect to emission rates; reference Appendix B of the permit application dated March 2001. This vendor data indicates that CO exhaust concentrations during steam mass flow augmentation will not exceed 12 ppmvd, corrected to 15% O_2. Because CTG vendors typically include some margin on their estimated emission rates, the vendor data is considered to provide reasonable assurance that CO exhaust concentrations during steam mass flow augmentation will not exceed 12 ppmvd, corrected to 15% O_2.

The CO exhaust concentration expected during steam mass flow augmentation for the BEC CC CTG is lower than the limits contained in recent Department permits for combustion turbine projects utilizing steam mass flow augmentation. For example, the July 2000 CO BACT permit limit for Gulf Power Company's Lansing Smith Plant Unit 3 (also a GE 7FA CC unit) is 23 ppmvd at 15 percent oxygen with steam mass flow augmentation. The draft Department permit for Calpine's Blue Heron Project, issued in February 2001, proposes a CO BACT limit of 17 ppmvd at 15 percent oxygen during steam mass flow augmentation. The Department's April 2001 draft permit for the CPV Atlantic combustion turbine power project specifies a CO BACT limit of 15.0 ppmvd at 15 percent oxygen with steam mass flow augmentation.

Item 5. Fuel Heaters

The BEC will include one, 12.8 MMBtu/hr (HHV) gas-fired natural gas fuel heater that uses water as the heat transfer medium. This heater is exempt from permitting pursuant to Rule 62-210.300(3)(a)2., F.A.C., categorical exemption for individual hot water heaters rated at less than 100 MMBtu/hr burning annually no more than 150 MM ft^3 of natural gas. At a natural gas heat content of 1,020 MMBtu/ft^3 (HHV) and 8,760 hrs/yr operation, the BEC gas-fired natural gas fuel heater will burn 109.9 MM ft^3/yr of natural gas. Note that NSPS Subpart Dc, applicable to new steam generating units (including units which heat water or any other heat transfer medium) greater than 10 MMBtu/hr heat input, does not contain any emission limitations for natural gas-fired units.

Responses to the National Park Service comments, and EPA Region IV comments when received, will be provided in a separate letter to the Department.

A professional engineer certification pursuant to Rule 62-4.050(3), F.A.C. is attached. Your continued expeditious processing of the BEC permit application is appreciated. Please contact Mr. Krish Ravishankar at (713) 420-5563 if there are any further questions regarding the BEC permit application.

ENVIRONMENTAL CONSULTING & TECHNOLOGY, INC.

Thomas W. Davis, P.E.
Principal Engineer

Attachment

cc: Mr. Krish Ravishankar, EPMEC
Mr. Isidore Goldman, FDEP Southeast District
Ms. Daniela Banu, Broward County DPEP
Mr. Gregg Worley, EPA Region 4
Mr. John Bunyak, National Park Service

El Paso Merchant Energy Company
Broward Energy Center

Professional Engineer Certification

Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the information provided to the Department regarding the El Paso Merchant Energy Company's proposed Broward Energy Center is in accordance with all applicable Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of air pollutants not regulated for an emissions unit, based solely upon the materials, information and calculations provided with this certification.

Thomas W. Davis — Signature

6/26/01 — Date

(seal)

* Certification is applicable to the information provided in response to the Department's April 27, 2001 request for additional information regarding the proposed El Paso Merchant Energy Company's Broward Energy Center.

Department of Environmental Protection

Jeb Bush
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

April 27, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. William Mack, Sr. Managing Director
El Paso Merchant Energy Company
Coastal Tower, Nine Greenway Plaza, Suite 1682A
Houston, Texas 77046-0995

Re: Request for Additional Information -001-
DEP File No. 0112545-AC (PSD-FL-316)
Broward Energy Center

Dear Mr. Mack:

On March 28, 2001 the Department has received your application for an air construction permit for one 250-MW combined cycle and three 170-MW simple cycle gas-fired GE "7FA" combustion turbines for the proposed Broward Energy Center in Deerfield Beach. The application is incomplete. In order to continue processing your application, the Department will need the additional information below. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. Provide a written rationale for non-applicability of Sections 501-518, F.S., Florida Electrical Power Plant Siting Act.
2. Please describe the physical and digital logic constraints that control steam turbine output to less than 75 megawatts on an hourly basis. Describe the method of security and management responsibility that ensures there will be no exceedance of this value.
3. Provide a schematic of the power augmentation operation mode. What is the maximum manufacturer's recommended period (hr/year, hr/month) for operation in the power augmentation mode. Please advise how many hours the unit will actually operate in that mode based on conditions in Florida and other technical considerations.
4. Determine what actual emissions typically occur during power augmentation (especially for CO). We have found that emissions during gas and oil firing are typically around 1 ppm for new units and much less than manufacturer guarantees. However we do not have any information obtained while such units operate in power augmentation mode. There should be information available through GE. Provide reasonable assurance that the proposed limit under the power augmentation mode will not exceed 12 ppmvd @ 15 % O_2.

5. Does this project include any gas-fired natural gas fuel heaters? If so, please provide the maximum heat input and emission rates (lb/hour and tons per year).

Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Please note that per Rule 62-4.055(1): *"The applicant shall have ninety days after the Department mails a timely request for additional information to submit that information to the Department..... Failure of an applicant to provide the timely requested information by the applicable date shall result in denial of the application."*

Attached are comments from the National Park Service. We will forward any comments from EPA Region IV as soon as they are received. If you have any questions regarding this matter, please contact me at 850/921-9523 or Cleve Holladay (meteorologist) at 850/921-8986.

Sincerely,

A.A. Linero, P.E. Administrator
New Source Review Section

AAL/al

cc: Gregg Worley, EPA
John Bunyak, NPS
Isidore Goldman, DEP SED
Daniela Banu, Broward County DPEP
Thomas W. Davis, P.E.

April 24, 2001

Memorandum

To: Cleve Holladay

From: Dee Morse

Subject: El Paso Merchant Energy – Broward County

Background

El Paso Merchant Energy (EPME) is proposing to construct a 775 MW, independent power production facility in Broward County, Florida. The facility consists of three GE Frame 7FA simple cycle turbines using Dry Low NO_x (DLN) and one GE Frame 7FA combined cycle turbine using Selective Catalytic Reduction (SCR). All of the turbines operate exclusively on natural gas.

EPME is proposing the following NO_x limits

Natural Gas	
Simple Cycle (DLN)	9ppm
Combined Cycle (SCR)	3.5ppm

Best Available Control Technology (BACT) analysis

We agree that SCR meets the BACT criteria for combined cycle turbines, however, we have found other similar sources that have permits for lower NO_x emissions using SCR during combined cycle operation. There are two sources with permitted levels of 2.5ppm NO_x or lower, Westbrook Power in Maine and the Goldendale facility in Washington. While these sources are not yet operating, the New Source Review Workshop Manual states "a commercially available control option will be presumed applicable if it has been or is soon to be deployed (e. g., is specified in a permit) on the same or a similar source type." [1] EPME could reduce annual emissions of NO_x by approximately 25 tons by employing an emissions limit of 2.5ppm NO_x. We believe that based on the two permits specifying NO_x limits on similar sources at or below 2.5ppm, EPME should further evaluate the costs of reducing NO_x below 3.5ppm.

We agree with the emissions limit of 9ppm NO_x for the simple cycle turbines.

[1] New Source Review Workshop Manual, EPA, 1990, p. B.18.

POTENTIAL EMISSION INVENTORY WORKSHEET

EPMEC Broward Energy Center

EG-ENG

EMISSION SOURCE TYPE

DIESEL ENGINES - CRITERIA POLLUTANTS

FACILITY AND SOURCE DESCRIPTION

Emission Source Description:	Stationary Diesel Engine
Emission Control Method(s)/ID No.(s):	None
Emission Point Description:	2,600 HP Emergency Generator Diesel Engine

EMISSION ESTIMATION EQUATIONS

Emission (lb/hr) = Emission Factor (lb/hr)

Emission (ton/yr) = Emission Factor (lb/hr) x Operating Period (hrs/yr) x (1 ton/ 2,000 lb)

Source: ECT, 2000.

INPUT DATA AND EMISSIONS CALCULATIONS

Operating Hours:	175	hrs/yr	
Fuel Flow:	28,324	gal/yr	
Fuel Flow:	161.9	gal/hr	
Diesel Fuel Oil Sulfur Content:	0.05	weight %	
Diesel Fuel Oil Heat Content:	141,000	Btu/gal (HHV)	
Heat Input:	22.82	MMBtu/hr (HHV)	

Criteria Pollutant	Emission Factor (lb/hr)	Potential Emission Rates (lb/hr)	Potential Emission Rates (tpy)
NO_x	37.24	37.24	3.26
CO	8.34	8.34	0.73
TOC	2.05	2.05	0.18
SO_2	0.820	0.82	0.07
PM	1.380	1.38	0.12
PM_{10}	1.380	1.38	0.12

SOURCES OF INPUT DATA

Parameter	Data Source
Operating Hours (annual)	EPMEC, 2001.
Fuel Flow Rate (gal/yr)	ECT, 2001.
Emission Factors (all except TOC)	ECT, 2001.
Emission Factor (TOC)	AP-42, Table 3.4-1, EPA, October 1996.

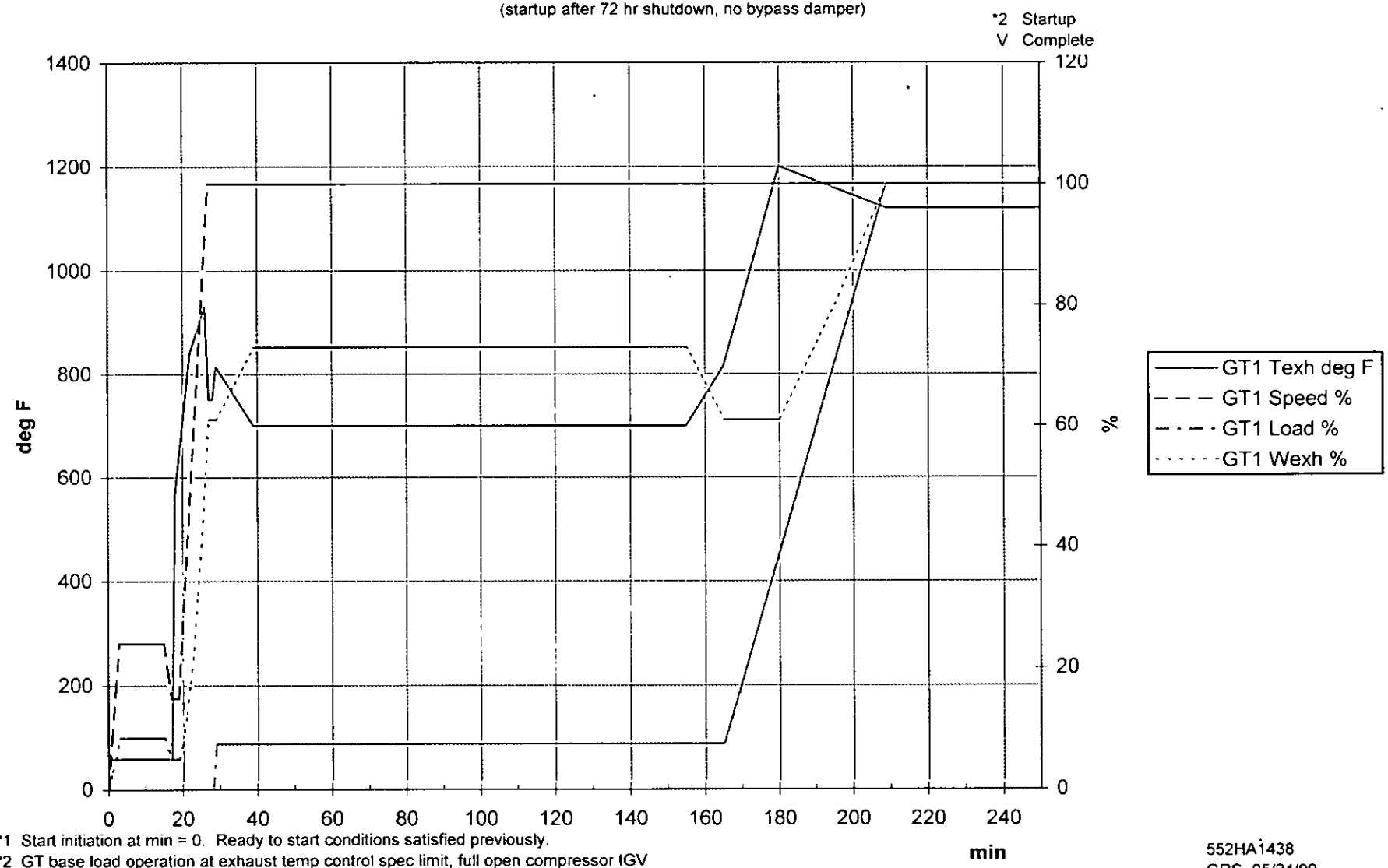
NOTES AND OBSERVATIONS

DATA CONTROL

Data Collected by:	K. Ravishankar	Date:	Jul-01
Data Entered by:	T.Davis	Date:	Jul-01
Reviewed by:	K. Ravishankar	Date:	Jul-01

Typical 207FA Coldstart

(startup after 72 hr shutdown, no bypass damper)



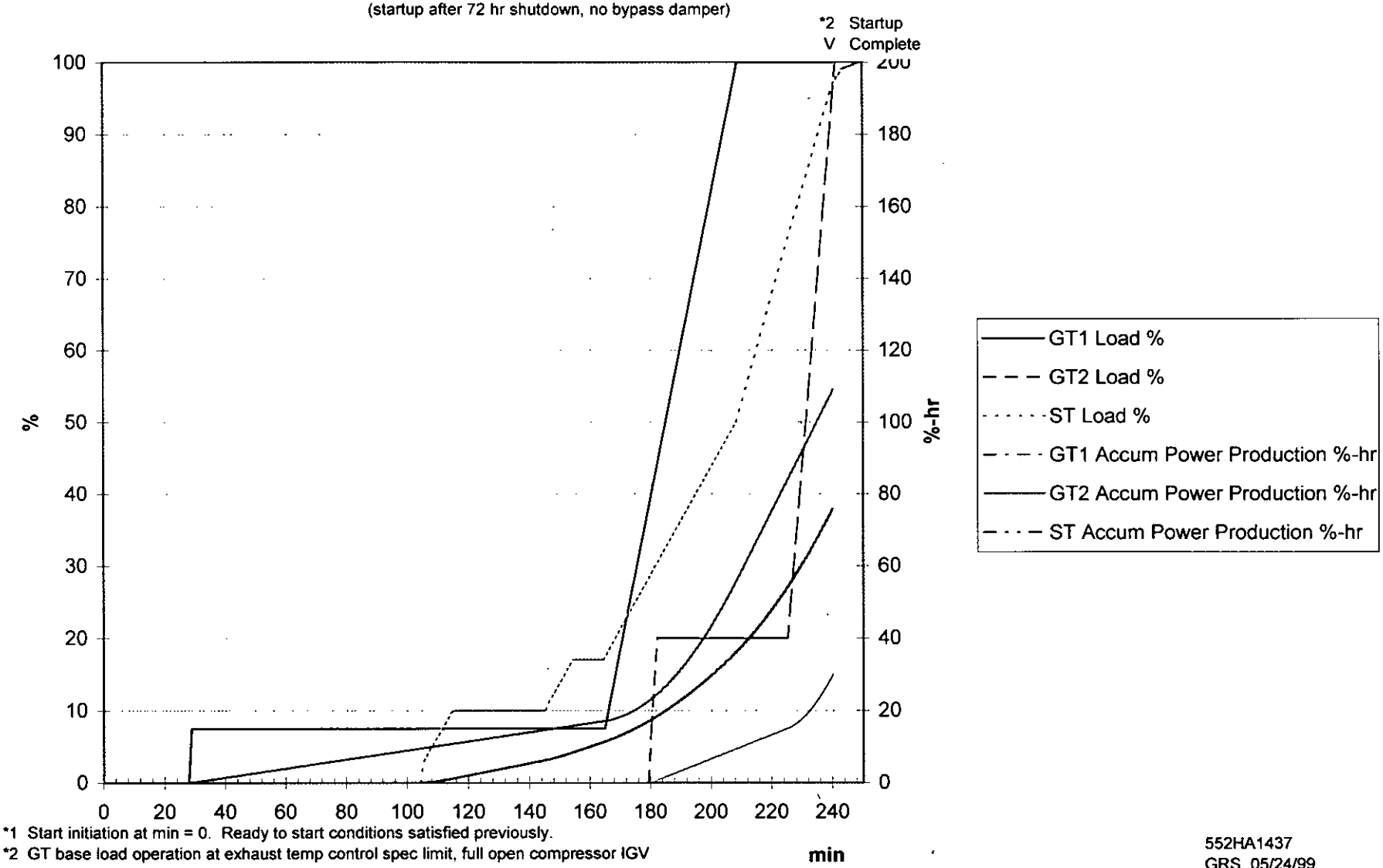
*1 Start initiation at min = 0. Ready to start conditions satisfied previously.

*2 GT base load operation at exhaust temp control spec limit, full open compressor IGV position, ST valves full open.

552HA1438
GRS 05/24/99

Typical 207FA Coldstart

(startup after 72 hr shutdown, no bypass damper)



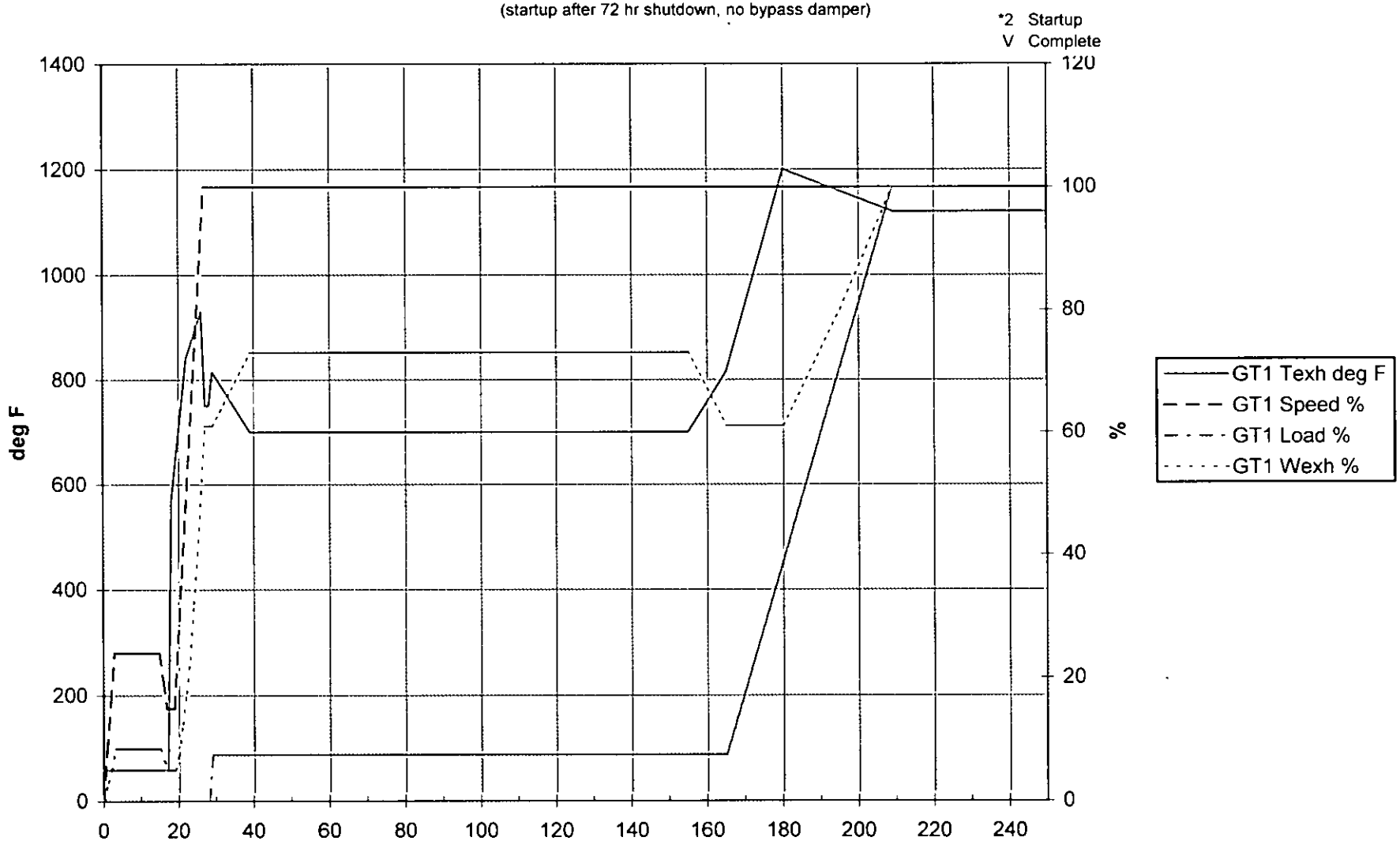
*1 Start initiation at min = 0. Ready to start conditions satisfied previously.

*2 GT base load operation at exhaust temp control spec limit, full open compressor IGV position, ST valves full open.

552HA1437
GRS 05/24/99

Typical 207FA Coldstart

(startup after 72 hr shutdown, no bypass damper)



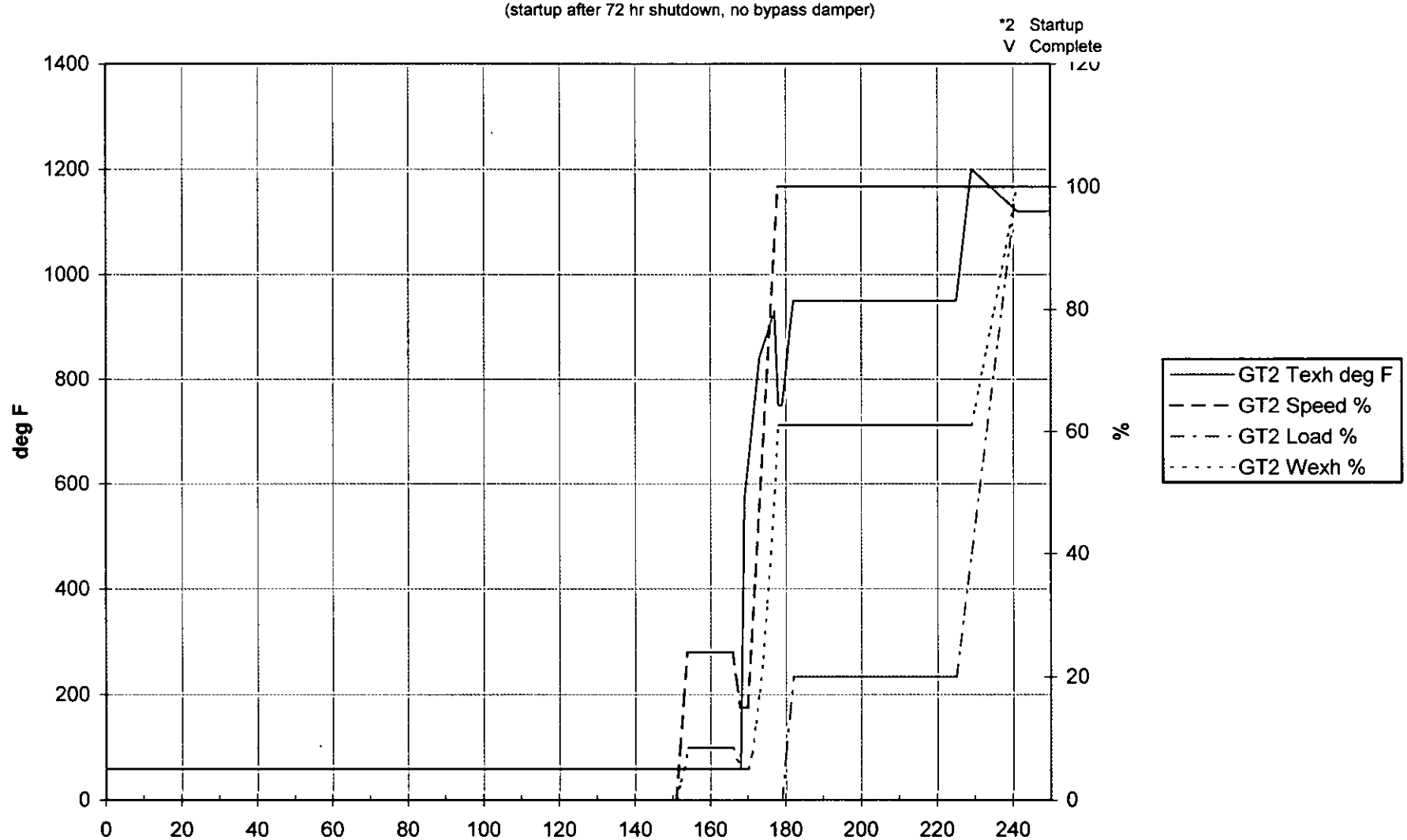
*1 Start initiation at min = 0. Ready to start conditions satisfied previously.

*2 GT base load operation at exhaust temp control spec limit, full open compressor IGV position, ST valves full open.

552HA1438
GRS 05/24/99

Typical 207FA Coldstart

(startup after 72 hr shutdown, no bypass damper)



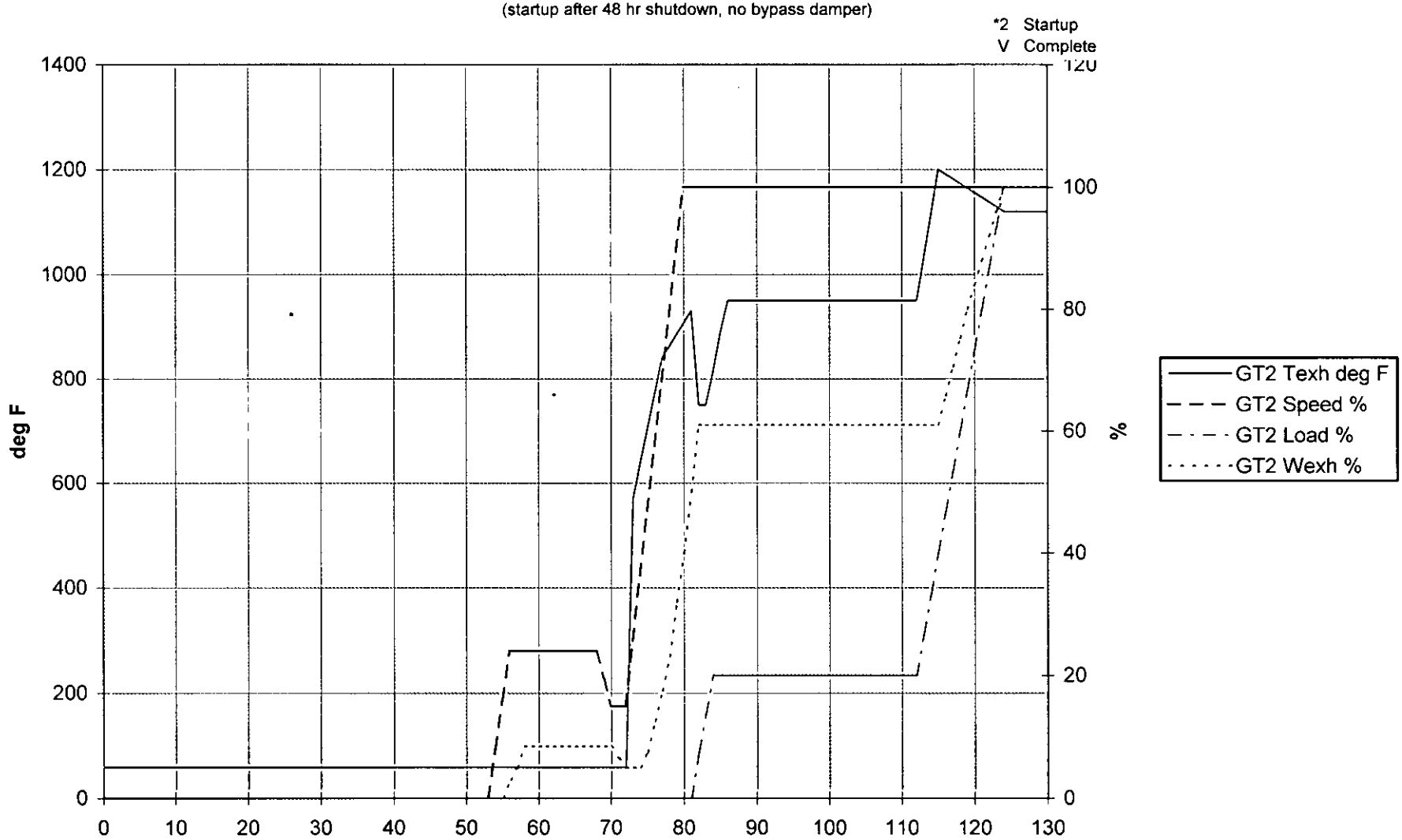
*1 Start initiation at min = 0. Ready to start conditions satisfied previously.

*2 GT base load operation at exhaust temp control spec limit, full open compressor IGV position, ST valves full open.

552HA1439
GRS 05/24/99

Typical 207FA Warmstart

(startup after 48 hr shutdown, no bypass damper)



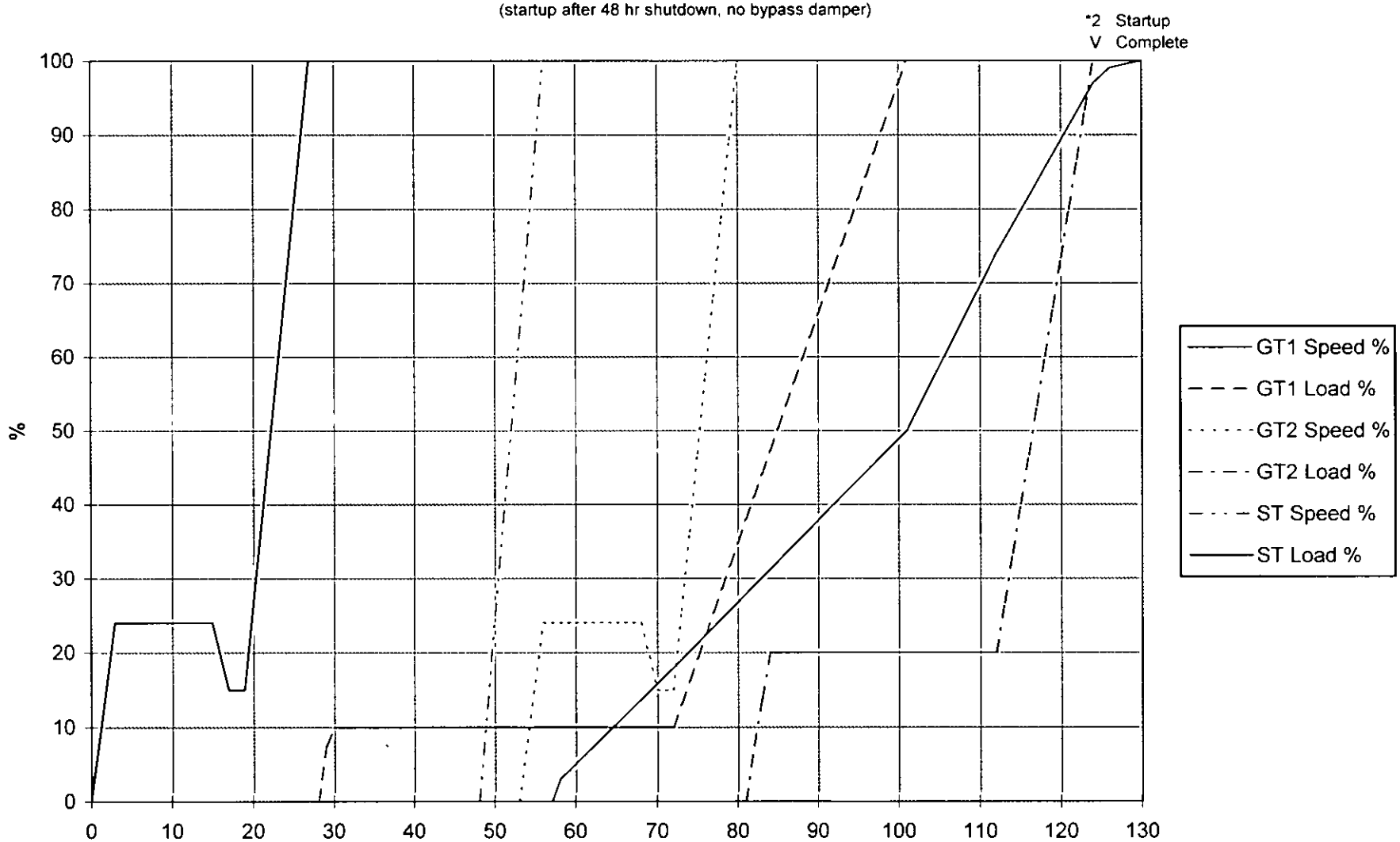
*1 Start initiation at min = 0. Ready to start conditions satisfied previously.

*2 GT base load operation at exhaust temp control spec limit, full open compressor IGV position, ST valves full open.

551HA565
GRS 06/19/98

Typical 207FA Warmstart

(startup after 48 hr shutdown, no bypass damper)



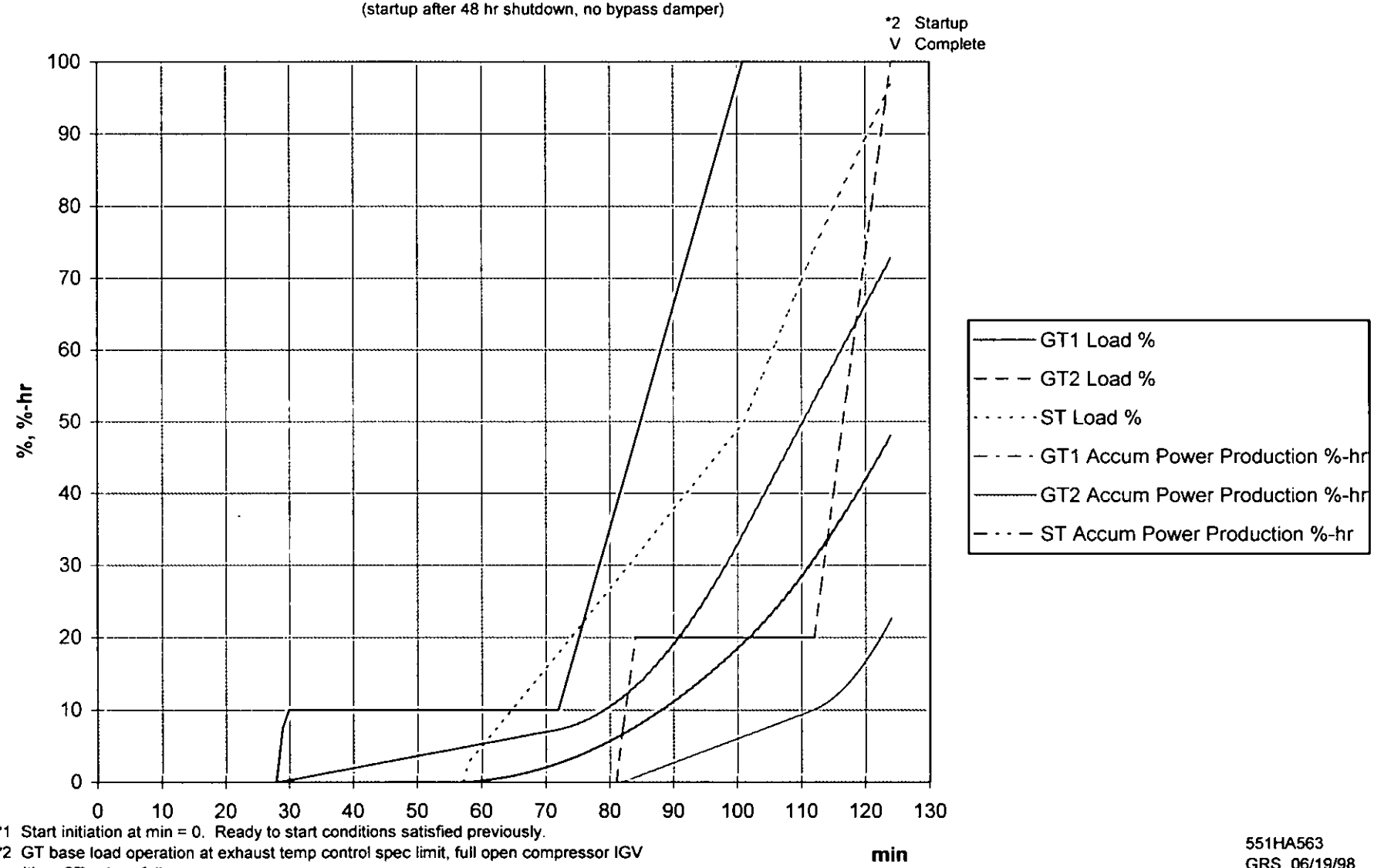
*1 Start initiation at min = 0. Ready to start conditions satisfied previously.

*2 GT base load operation at exhaust temp control spec limit, full open compressor IGV position, ST valves full open.

551HA561
GRS 06/19/98

Typical 207FA Warmstart

(startup after 48 hr shutdown, no bypass damper)



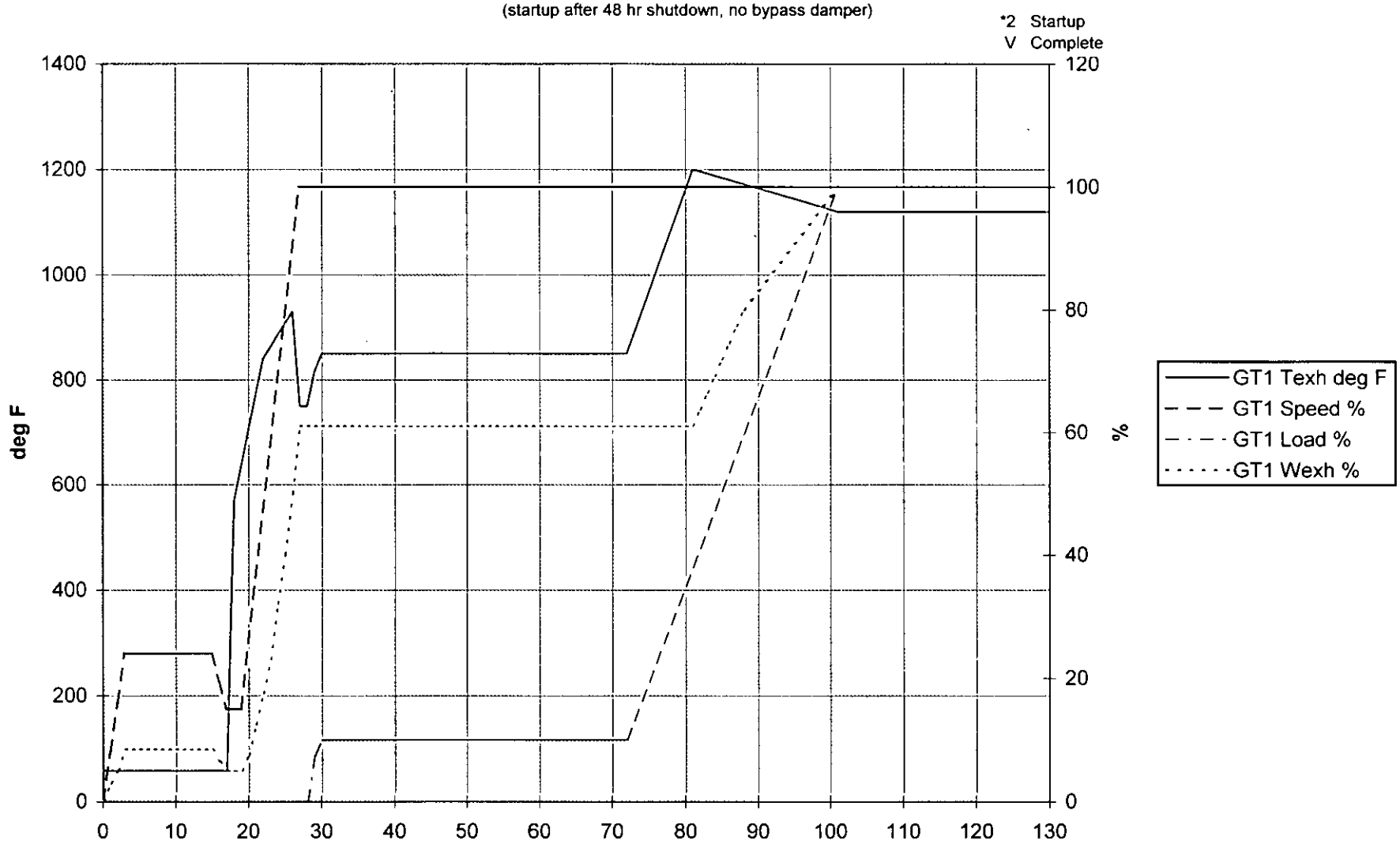
*1 Start initiation at min = 0. Ready to start conditions satisfied previously.

*2 GT base load operation at exhaust temp control spec limit, full open compressor IGV position, ST valves full open.

551HA563
GRS 06/19/98

Typical 207FA Warmstart

(startup after 48 hr shutdown, no bypass damper)

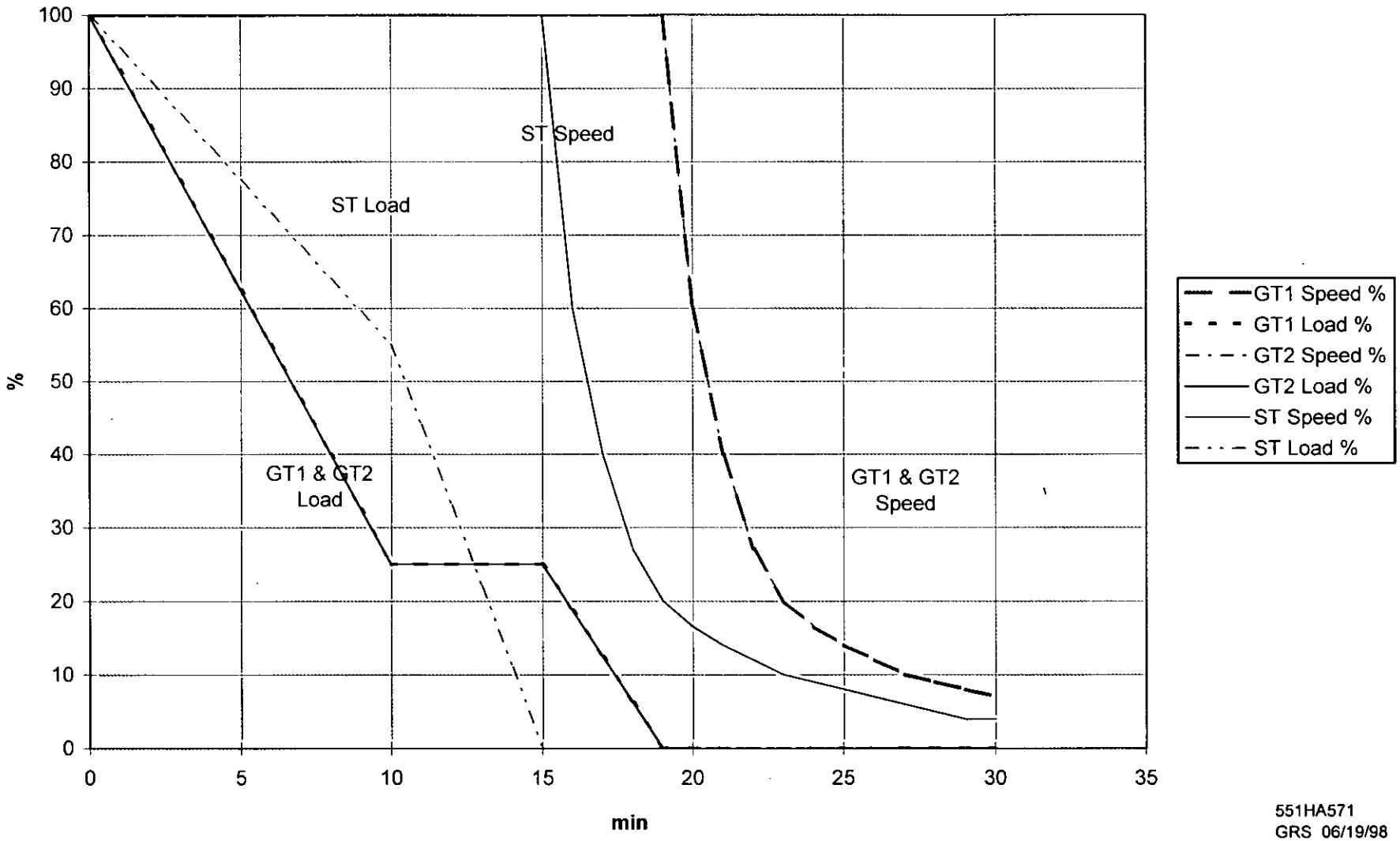


*1 Start initiation at min = 0. Ready to start conditions satisfied previously.

*2 GT base load operation at exhaust temp control spec limit, full open compressor IGV position, ST valves full open.

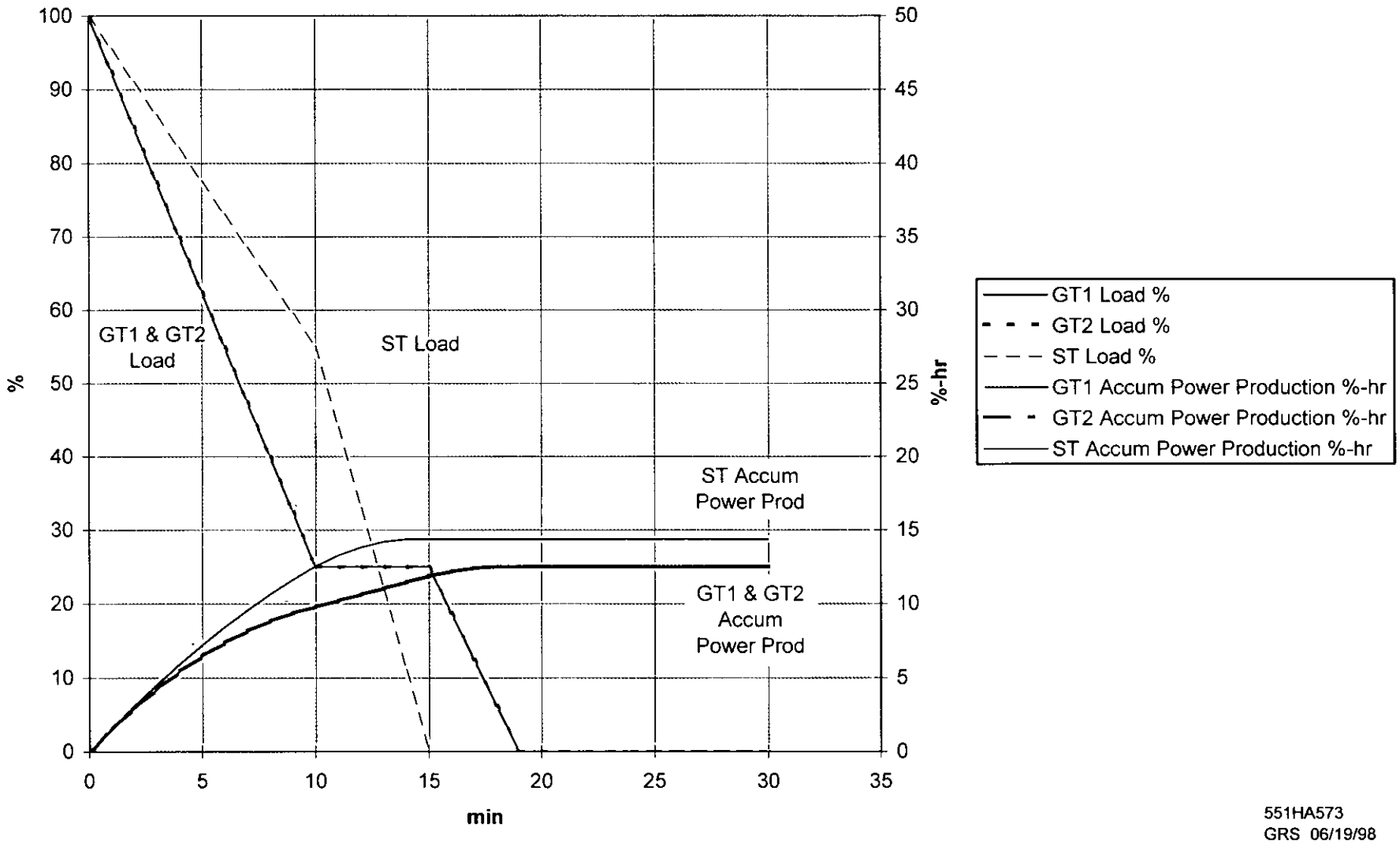
551HA564
GRS 06/19/98

Typical 207FA Shutdown



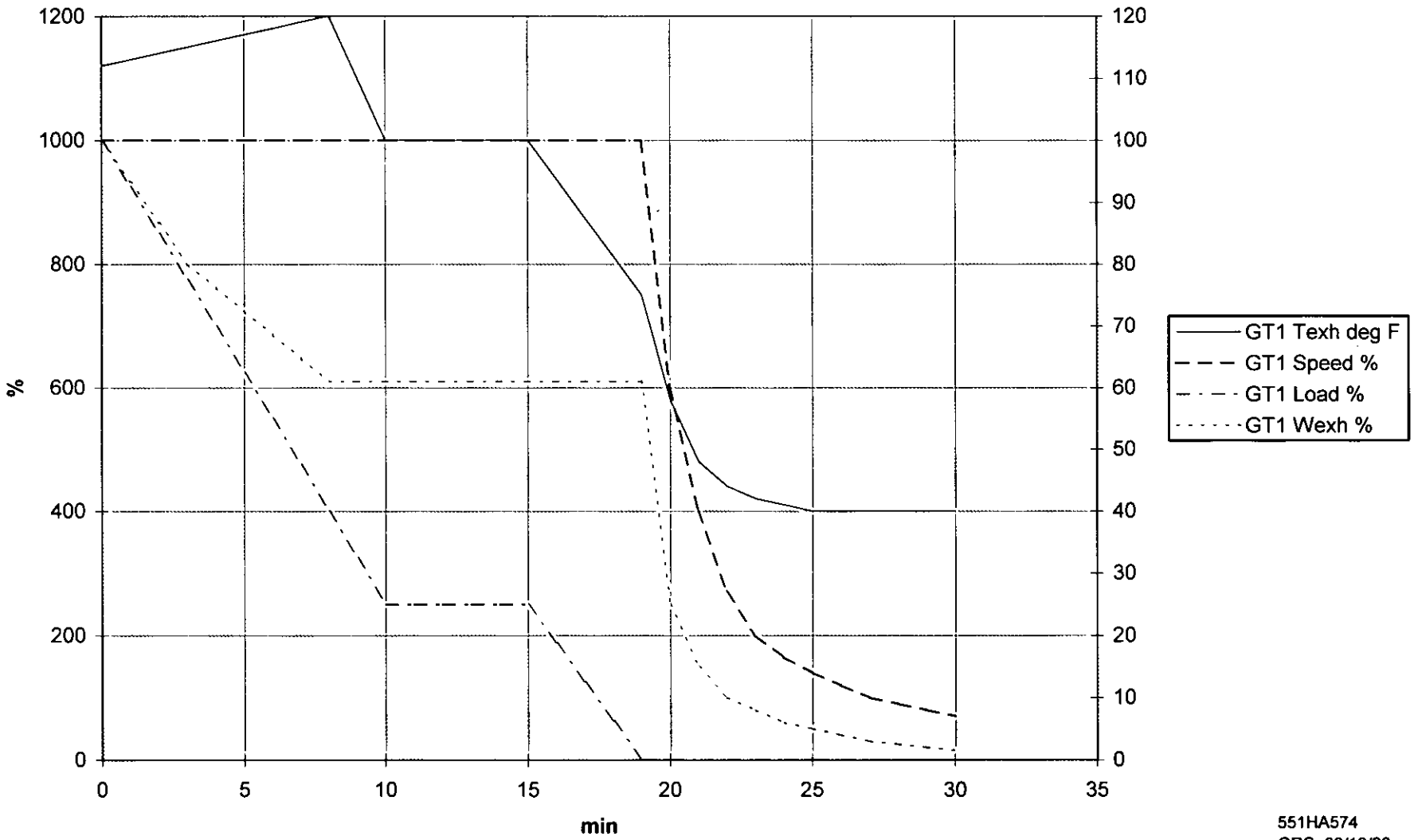
551HA571
GRS 06/19/98

Typical 207FA Shutdown



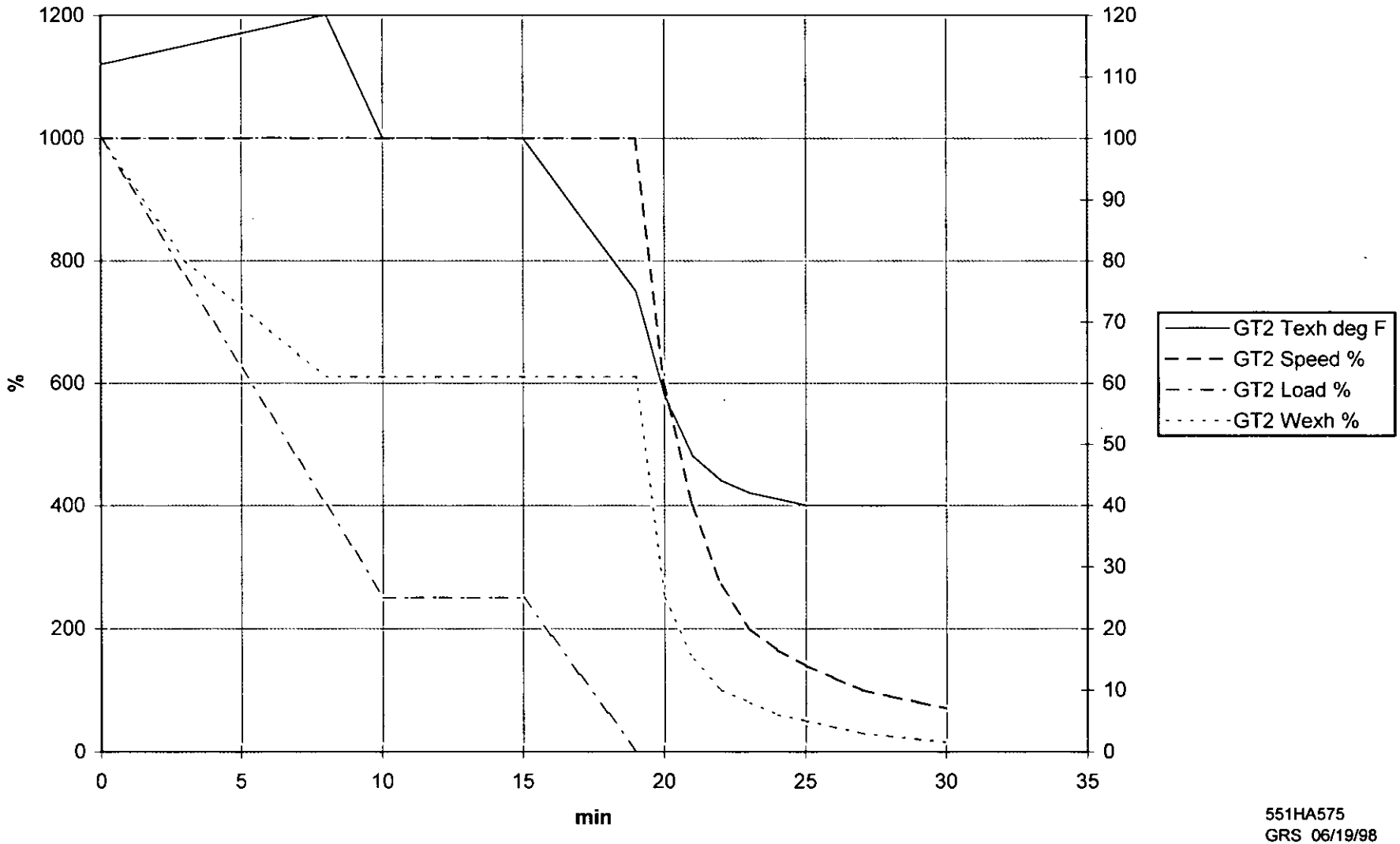
551HA573
GRS 06/19/98

Typical 207FA Shutdown



551HA574
GRS 06/19/98

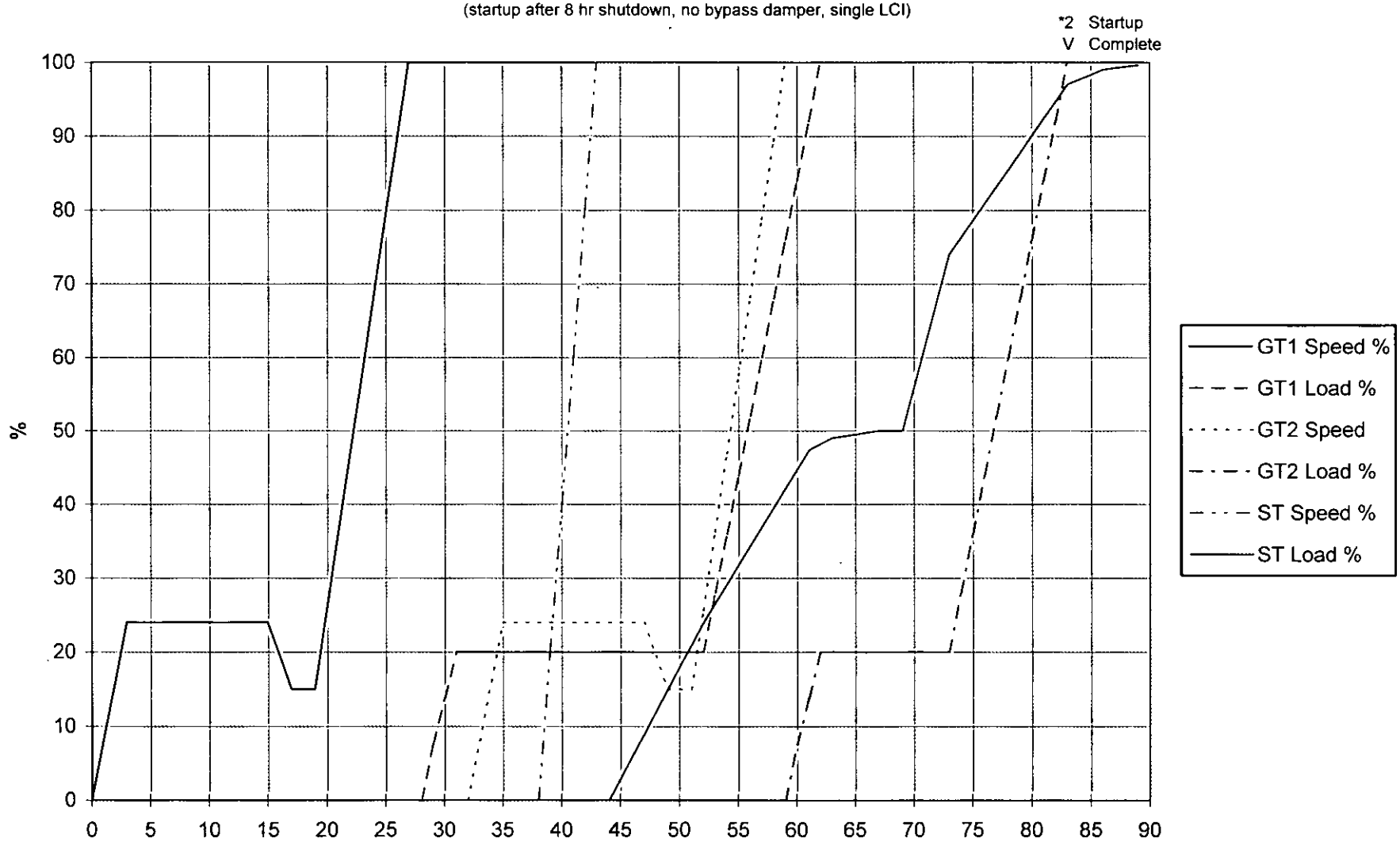
Typical 207FA Shutdown



551HA575
GRS 06/19/98

Typical 207FA Hotstart

(startup after 8 hr shutdown, no bypass damper, single LCI)



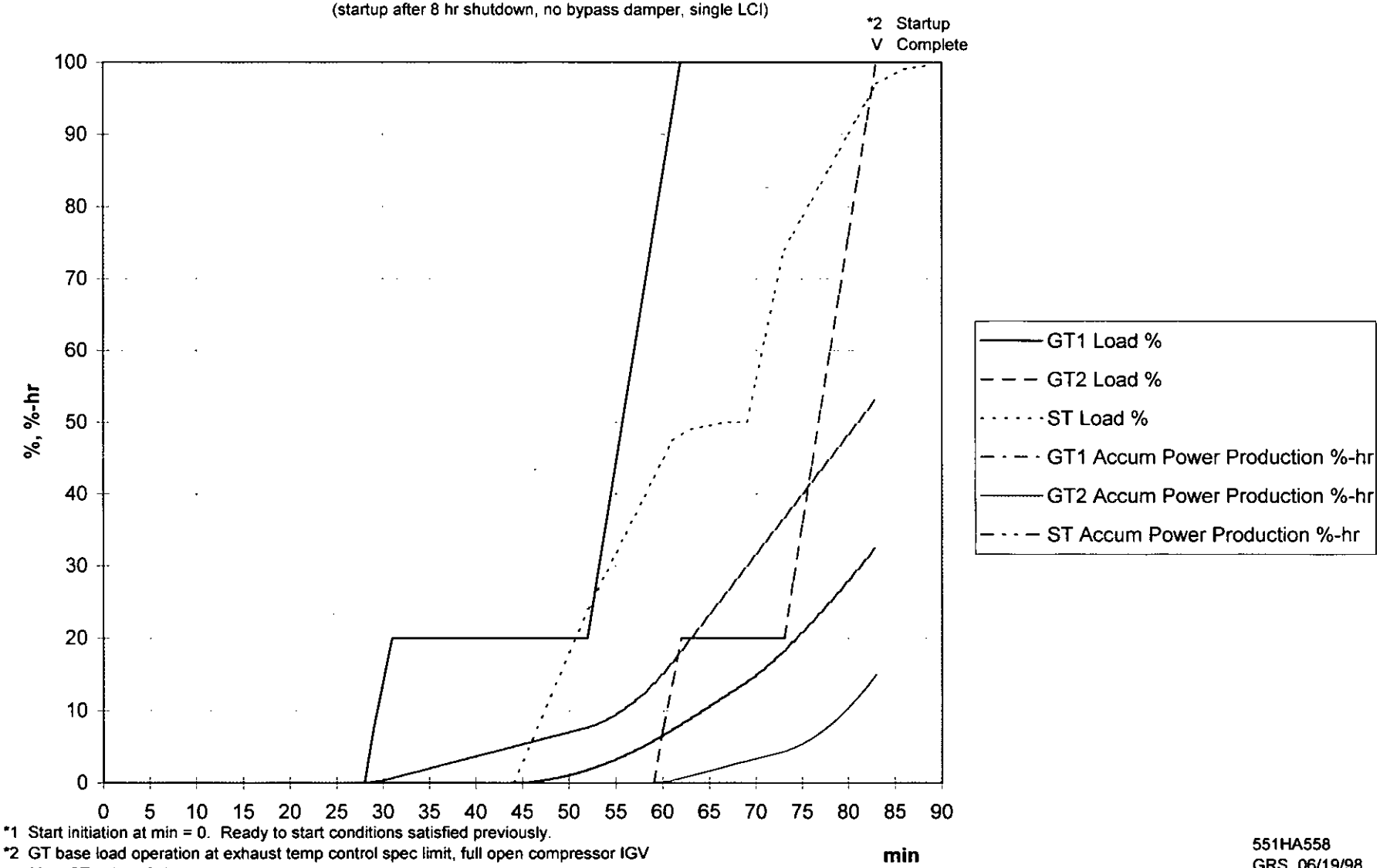
*1 Start initiation at min = 0. Ready to start conditions satisfied previously.

*2 GT base load operation at exhaust temp control spec limit, full open compressor IGV position, ST valves full open.

551HA556
GRS 06/19/98

Typical 207FA Hotstart

(startup after 8 hr shutdown, no bypass damper, single LCI)



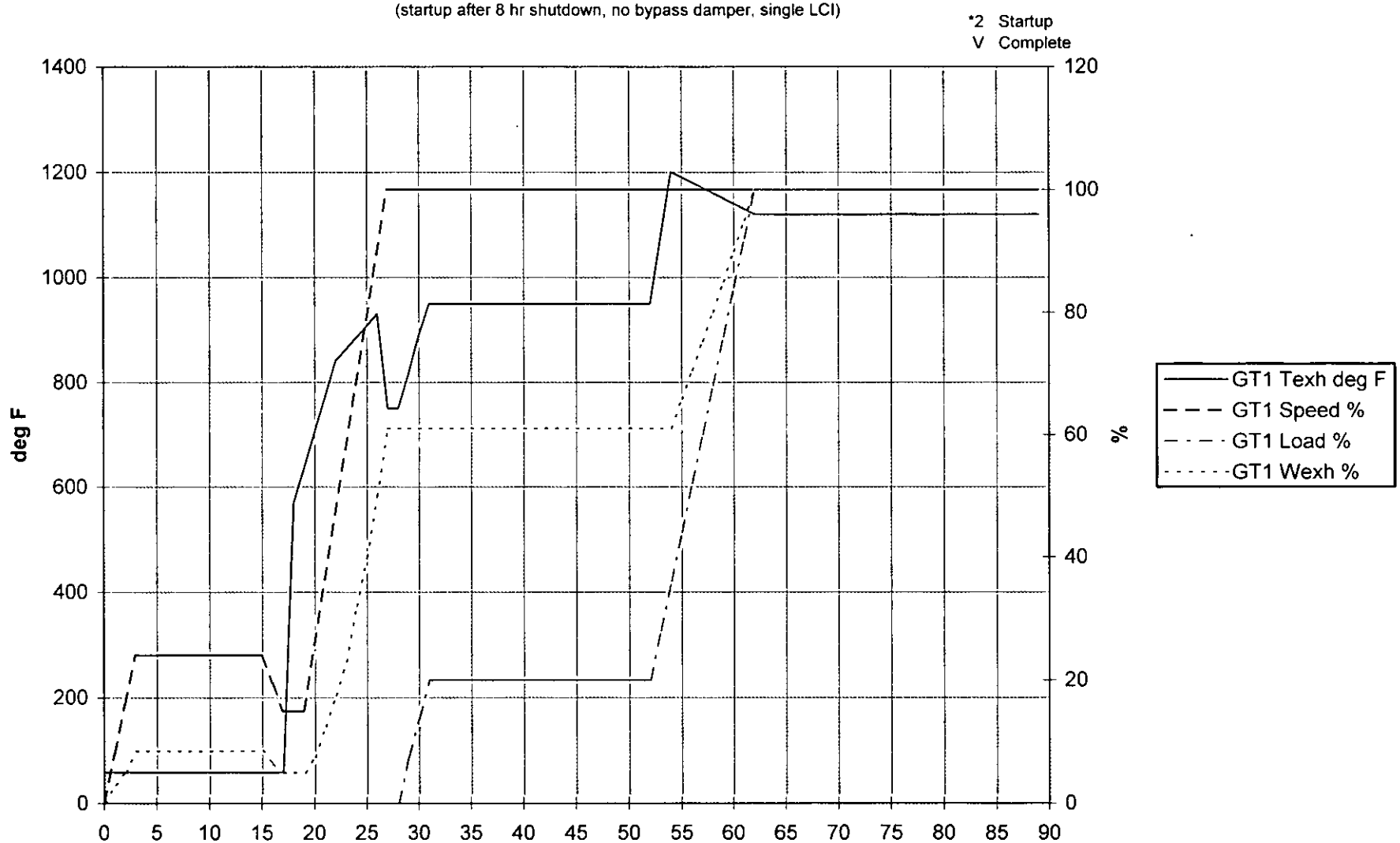
*1 Start initiation at min = 0. Ready to start conditions satisfied previously.

*2 GT base load operation at exhaust temp control spec limit, full open compressor IGV position, ST valves full open.

551HA558
GRS 06/19/98

Typical 207FA Hotstart

(startup after 8 hr shutdown, no bypass damper, single LCI)



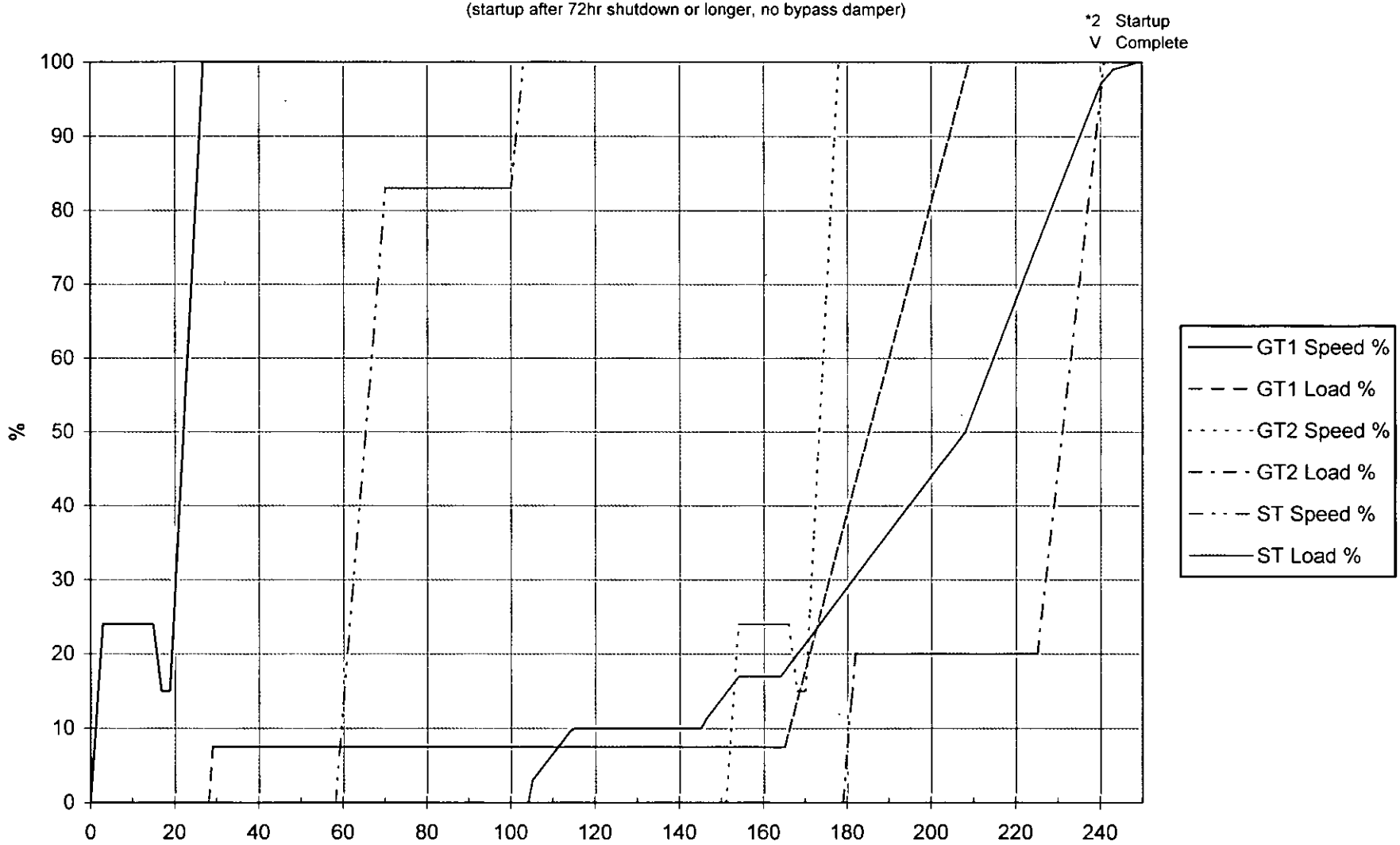
*1 Start initiation at min = 0. Ready to start conditions satisfied previously.

*2 GT base load operation at exhaust temp control spec limit, full open compressor IGV position, ST valves full open.

551HA559
GRS 06/19/98

Typical 207FA Coldstart

(startup after 72hr shutdown or longer, no bypass damper)



*1 Start initiation at min = 0. Ready to start conditions satisfied previously.

*2 GT base load operation at exhaust temp control spec limit, full open compressor IGV position, ST valves full open.

552HA1435
GRS 05/24/99

Department of
Environmental Protection

Jeb Bush
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

April 3, 2001

Mr. John Bunyak, Chief
Policy, Planning & Permit Review Branch
NPS – Air Quality Division
Post Office Box 25287
Denver, Colorado 80225

RE: Facility ID No. 0112545-001-AC, PSD-FL-316
Broward Energy Center

Dear Mr. Bunyak:

Enclosed for your review and comment is an application for El Paso Merchant Energy Company to construct and operate a new electric power generating plant in Broward County, Florida.

Your comments may be forwarded to my attention at the letterhead address or faxed to the Bureau of Air Regulation at 850/922-6979. If you have any questions, please contact me at 850/921-9523.

Sincerely,

Patty Adams

for Al Linero, P.E.
Administrator
New Source Review Section

AAL/pa

Enclosure

Department of Environmental Protection

Jeb Bush
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

April 3, 2001

Mr. Gregg Worley, Chief
Air, Radiation Technology Branch
Preconstruction/HAP Section
U.S. EPA, Region 4
61 Forsyth Street
Atlanta, Georgia 30303

RE: Facility ID No. 0112545-001-AC, PSD-FL-316
Broward Energy Center

Dear Mr. Worley:

Enclosed for your review and comment is an application for El Paso Merchant Energy Company to construct and operate a new electric power generating plant in Broward County, Florida.

Your comments may be forwarded to my attention at the letterhead address or faxed to the Bureau of Air Regulation at 850/922-6979. If you have any questions, please contact me at 850/921-9523.

Sincerely,

Patty Adams

for Al Linero, P.E.
Administrator
New Source Review Section

AAL/pa

Enclosure