



Lawton Chiles  
Governor

# Florida Department of Environmental Protection

Marjory Stoneman Douglas Building  
3900 Commonwealth Boulevard  
Tallahassee, Florida 32399-3000

Virginia B. Wetherell  
Secretary

June 7, 1994

Mr. Gordon L. Gillette  
Hardee Power Partners Limited  
Post Office Box 111  
Tampa, Florida 33601-0111

Re: Hardee Power Station, PA 89-25, PSD-FL-140

Dear Mr. Gillette:

I have reviewed your letter of June 3, 1994, requesting modification of Condition II.A.8.a. to include Method 17. Condition II.A.8. contains the sentence, "Other DER approved methods may be used for compliance testing after prior DER approval." A letter of approval from the Department can be provided to authorize use of this method.

If you wish the department to proceed with a formal modification of the Conditions of Certification, then you must file the \$10,000.00 modification fee as required by the statute and rule. Any unexpended funds remaining after the department's review will be returned to you.

The Division of Air Resources Management may proceed to modify the PSD permit as they see fit.

Sincerely,

*Hamilton S. Oven*  
Hamilton S. Oven, P.E.  
Administrator, Siting  
Coordination Office

cc: Richard Donelan  
Clair Fancy  
Robert Soich  
Larry Curtin

RECEIVED

JUN 07 1994

Bureau of  
Air Regulation

Department of Environmental ~~Protection~~ <sup>Protection</sup>  
**Routing and Transmittal Slip**



To: (Name, Office, Location)

- 1. ~~Clair Fancy~~ *Patty*
- 2. ~~MS 5505~~
- 3.
- 4.

Remarks: *FYE*

*Please return to me for file*

*thanks  
Patty*

From  

Date *6-7-94*  
Phone *7-0473*

JUN 07 1994

June 3, 1994

Bureau of  
Air Regulation

Via Certified Mail  
P 278 132 733

Hamilton S. Oven  
Siting Coordinator  
Florida Department of  
Environmental Protection  
Marjory Stoneman Douglas Bldg.  
3900 Commonwealth Boulevard  
Suite 953A  
Tallahassee, FL 32399-3000

Via Certified Mail  
P 278 132 734

Clair H. Fancy, P.E.  
Chief  
Bureau of Air Regulations  
Florida Department of  
Environmental Protection  
Twin Towers Office Bldg.  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Re: Hardee Power Station  
Conditions of Certification PA 89-25  
PSD Permit PSD-FL-140  
Compliance Testing for Air Emissions

Gentlemen:

As you know, the combustion turbines at Hardee Power Station (HPS) are capable of being fired on natural gas or oil. HPS uses natural gas as the primary fuel and distillate oil as a backup fuel. The Conditions of Certification and PSD-FL-140 permit were issued for the HPS on November 27, 1991 and January 4, 1991, respectively. Both the Conditions of Certification and PSD permit require that EPA reference method number 5 be used for particulate testing. Since the combustion turbine units burn primarily natural gas and only a limited amount of oil (less than 400 hours during the 12 months preceding the most recent test), testing on oil for particulates and other constituents was not required for the most recent tests completed in October 1993. Therefore, method 17 was used rather than method 5. Hardee Power Partners has discussed this methodology with several of the Department's district personnel in the air and enforcement branches and they have suggested we modify both the Conditions of Certification and the permit to best address the Department's overall requirements. A copy of that correspondence is enclosed.

Based on these discussions, we request that the Conditions of Certification be modified to reflect that for particulate testing on oil, either method 5 or 17 can be used and that no particulate testing be required on natural gas. We propose that Condition II.A.8.a. be changed to read as follows:

" a. 5 or 17 for PM (I, A, for oil only) "

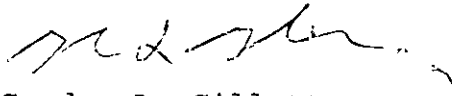
Florida Department of  
Environmental Protection  
June 3, 1994  
Page 2

It is our understanding that once this change has been accomplished, the situation described in the April 8, 1994 letter (enclosed) will be resolved and, in accordance with DEP rules, particulate testing will not be required for any of our facilities that do not burn liquid or solid fuel for a total of more than 400 hours in a federal fiscal year.

We understand that the Department has authority under the Conditions of Certification to approve this change. We also request that the PSD permit be changed to parallel the change to the Conditions of Certification. Please let us know if additional information is required.

Thank you for your cooperation.

Sincerely,



Gordon L. Gillette  
Director, Project Services

GLG/gdb

Enclosure

cc: Mr. Robert Soich, Air Compliance (FDEP)  
L. N. Curtin, Holland & Knight

*M. Hawley*  
*P. Lewis*  
*B. Thomas, SCO Dist,*  
*J. Harty, EPA*



Lawton Chiles  
Governor

# Florida Department of Environmental Protection

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619  
813-744-6100

RECEIVED

APR 14 1994

TECO Power Services  
Virginia B. Wetherell  
Secretary

April 8, 1994

Paul L. Carpinone, P.E.  
Hardee Power Partners Limited  
P.O. Box 111  
Tampa, Fl. 33601-0111

RE: December 1993 Hardee Power Particulate Compliance Test.

Dear Mr. Carpinone:

Hardee Power Partners performed a compliance test on units CT-1A and CT-1B on October 21st and 22nd 1993. Permit # PSD-FL-140 requires that EPA reference method 5 be used for particulate testing. Hardee Power used EPA reference method 17.

The proper method was not performed per the permit. The DEP does not allow sources to deviate from the permit prescribed methods unless an alternate sampling procedure request (ASP) received prior approval.

After discussion with Mr. Bill Thomas, P. E., Southwest District Air Program Administrator, and Mr. Donald Garrepy, District Enforcement Coordinator, it was determined that enforcement action was not warranted because of the following:

Testing must be done once every federal fiscal year starting on October 1st. This test was performed in October, Hardee Power still has until Sept. 30th. of 1994 to perform their method 5 test. Hardee Power Partners can amend their permit in the meantime, so that they only have to test for particulate when oil is burned for 400 hrs. or more. This would reflect what is in the state regulations and alleviate the need for particulate testing under the current plant operating conditions where only natural gas is burned.

Method 17 uses an in-stack filter. The Stack temperatures were around 240-250 F and velocities were not extreme. Method 5 Requires an out of stack filter temperature of 248 F + or - 25 F. There should be no difference in sample capture of particulate. 17-297.340 (1), (e) states that a particulate test is not required for any fuel burning source that, in a federal fiscal year, does not burn liquid and/ or solid fuel, other than startup, for a total of more than 400 hours. Only natural gas was burned.

Mike Harley (DEP Tall. Source Sampling and Compliance) stated that they should only have to perform a particulate test if they burned oil for 400 hrs. or more for the federal fiscal year. He feels the permit should have reflected the rules and now needs to be amended. Mr. Harely did say that they have to honor the current permit conditions in the meantime.

The Southwest District requests that Hardee Power Partners Limited apply to the DEP for a permit amendment of permit # PSD-FL-140. The permit should be amended to reflect 17-297.340 (1), (e) FAC and all testing requirements, as prescribed by the amended permit, should be strictly followed. If incorrect test methods are used in the future, enforcement action may be warranted.

The method 17 test will be accepted as an annual compliance test for this year only contingent on the amendment of permit # PSD-FL-140 reflecting the conditions of 17-297.340 (1), (e) FAC.

Sincerely,

A handwritten signature in cursive script that reads "Robert Soich".

Robert Soich, Air Compliance



HARDEE POWER PARTNERS LIMITED

Via Federal Express

August 20, 1992

Mr. Howard Rhodes  
Director  
Division of Air Resource Management  
Florida Department of Environmental  
Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

RECEIVED  
AUG 20 1992  
Division of Air  
Resources Management

Re: Hardee Power Partners  
Hardee Power Station  
Initial Compliance Test Notification  
Conditions of Certification PA 89-25

Dear Mr. Rhodes:

Pursuant to Condition II.A.15 of the Conditions of Certification for Hardee Power Station, please be advised that the initial sampling test will begin in approximately 30 days. In accordance with this condition, after the required sampling is completed, a written report of the test results will be submitted to the Department within 45 days of test completion. We will notify you if there are any changes in our testing schedule.

If you need further information concerning this, please call me at (813) 228-4492 or Paul Carpinone, Senior Environmental Coordinator, at (813) 228-4858.

Sincerely,

A handwritten signature in black ink, appearing to read 'G. L. Gillette'.

Gordon L. Gillette  
Director, Project Services

PLC/gdb



QUESTIONS? CALL 800-238-5355 TOLL FREE

2721284473

AIRBILL  
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2721284473

Date: 8/20/92

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Company: [Faded]  
Street Address: [Faded]  
City: [Faded] State: FL ZIP Required: [Faded]

Your Phone Number (Very Important): [Faded]  
Department/Floor No.: P7

To (Recipient's Name) Please Print: Howard Hodges  
Company: [Faded]  
Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip Codes):  
Tower Towers Bldg. 200 Blair Stone Dr.  
City: Tallahassee State: FL ZIP Required: 32309-2400

Recipient's Phone Number (Very Important): [Faded]  
Department/Floor No.: [Faded]

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5  Cash/Check

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**5 DELIVERY AND SPECIAL HANDLING (Check services required)**

1 <input type="checkbox"/> HOLD FOR PICK-UP (Fill in Box H) 2 <input checked="" type="checkbox"/> DELIVER WEEKDAY 3 <input type="checkbox"/> DELIVER SATURDAY (Extra charge) 4 <input type="checkbox"/> DANGEROUS GOODS (Extra charge) 5 <input type="checkbox"/> 6 <input type="checkbox"/> DRY ICE _____ Lbs 7 <input type="checkbox"/> OTHER SPECIAL SERVICE 8 <input type="checkbox"/> 9 <input type="checkbox"/> SATURDAY PICK-UP (Extra charge) 10 <input type="checkbox"/> 12 <input type="checkbox"/> HOLIDAY DELIVERY (if offered) (Extra charge)	<b>6 PACKAGES</b> WEIGHT in Pounds Only YOUR DECLARED VALUE Total Total Total DIM SHIPMENT (Chargeable Weight) <input type="checkbox"/> Regular Stop <input type="checkbox"/> Drop Box <input type="checkbox"/> On-Car Stop <input type="checkbox"/> Shipper's Mark
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AUG 20 1992  
Division of Air Resources Management

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HARDEE POWER PARTNERS LIMITED

Hand Delivered

August 20, 1992

Richard Garrity, Ph.D.  
Florida Department of Environmental  
Regulation  
Southwest District Office  
4520 Oak Fair Boulevard  
Tampa, FL 33610-7347

Re: Hardee Power Partners  
Hardee Power Station  
Initial Compliance Test Notification  
Conditions of Certification PA 89-25

Dear Dr. Garrity:

Pursuant to Condition II.A.15 of the Conditions of Certification for Hardee Power Station, please be advised that the initial sampling test will begin in approximately 30 days. In accordance with this condition, after the required sampling is completed, a written report of the test results will be submitted to the Department within 45 days of test completion. We will notify you if there are any changes in our testing schedule.

If you need further information concerning this, please call me at (813) 228-4492 or Paul Carpinone, Senior Environmental Coordinator, at (813) 228-4858.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gordon L. Gillette'.

Gordon L. Gillette  
Director, Project Services

PLC/gdb

cc: H. C. Oven, FDER-Tallahassee  
H. Rhodes, FDER-Tallahassee