

# Department of Environmental Protection

Jeb Bush  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400  
October 30, 2000

David B. Struhs  
Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Michael F. Vogt  
Granite Power Partners II, L.P.  
655 Craig Road, Suite 336  
St. Louis, Missouri 63141

Re: DEP File No. 0490044-001-AC (PSD-FL-281)  
Hardee County Generation Facility  
Three Simple Cycle Combustion Turbines

Dear Mr. Vogt:

We received your letter dated October 26 requesting a modification of the referenced permit to include 300 hours of fuel oil firing for the Siemens-Westinghouse 501F option. Please submit a \$250 fee and four copies of the information required by the first four pages of Form DEP No. 62-210.900(1). The form must be signed and sealed by a professional engineer licensed to practice in the State of Florida.

After receipt of the fee and form, we will review the application for completeness. At this time, we do not have reasonable assurance that the proposed Siemens-Westinghouse 501F can continuously achieve a 15 ppmvd nitrogen oxides emission rate while firing gas in a dual fuel unit. We need updated information from the manufacturer on that matter.

Per the enclosed table, please note that all recent PSD permits issued by the Department for simple cycle dual-fuel units require achievement of less than 15 ppmvd NO<sub>x</sub>. Therefore we would be interested in knowing how much under 15 ppmvd this unit will be able to achieve if it is permitted to burn limited fuel oil quantities.

As an example of our concern, attached is a letter from the City of Lakeland detailing the problems with oil burning at a similar but larger unit (501G). Although these are problems associated with new technology (higher flame temperature and a bigger unit), the Dry Low NO<sub>x</sub> technology for the 501F (to achieve less than 15 ppmvd) is also new technology for Siemens-Westinghouse that may be complicated in an analogous manner by a dual-fuel design.

We are aware that Siemens-Westinghouse plans to upgrade the combustors on the 501F units at the FPC Hines Energy Complex to achieve 12 ppmvd while firing gas in a dual-fuel combined cycle unit. Per the enclosed letter, they recently requested an extension to October 2002 to meet these commitments. If they remain on the newly proposed schedule, it would appear that they could provide the same combustors for your project.

In short, the Department requires much more detail about the proposal to satisfy the requirements for reasonable assurance under Rule 62-4.070, Standards for Issuing and Denying Permits. If you have any questions regarding this matter, please call me at 850/921-9523.

Sincerely,

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

AAL/al

Enclosures

"More Protection, Less Process"

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 Mr. Michael F. Vogt

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Name (Please Print Clearly) (to be completed by mailer)  
 Mr. Michael F. Vogt  
 Street, Apt. No., or PO Box No.  
 655 Craig Rd.-Ste 336  
 City, State, ZIP+4  
 St. Louis, MO 63141

PS Form 3800, July 1999 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Received by (Please Print Clearly) B. Date of Delivery                  11-30</p> <p>C. Signature                  X <i>[Signature]</i> <input type="checkbox"/> Agent  <input type="checkbox"/> Addressee</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes                  If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:                  Mr. Michael F. Vogt                  Granite Power Partners II, L.P.                  655 Craig Rd., Ste 336                  St. Louis, Mo 63141</p>	<p>3. Service Type  <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail  <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>

2. Article Number (Copy from service label)  
 7099 3400 0000 1453 1460

Project Location	Power Output (MW)	NO <sub>x</sub> Limit ppmvd @ 15% O <sub>2</sub> and Fuel	Technology	Comments
DeSoto County, FL	510	9 - NG 42 - No. 2 FO	DLN WI	3x170 MW GE PG7241FA CTs Application 10/99. 1000 hrs on oil
Shady Hills Pasco, FL	510	9 - NG 42 - No. 2 FO	DLN WI	3x170 MW GE PG7241FA CTs Application 10/99. 1000 hrs on oil
Vandolah Hardee, FL	680	9 - NG 42 - No. 2 FO	DLN WI	4x170 MW GE PG7241FA CTs Issued 11/99. 1000 hrs on oil
Oleander Brevard, FL	850	9 - NG 42 - No. 2 FO	DLN WI	5x170 MW GE PG7241FA CTs Issued 11/99. 1000 hrs on oil
JEA Baldwin, FL	510	10.5 - NG 42 - No. 2 FO	DLN WI	3x170 MW GE MS7241FA CTs Issued 10/99. 750 hrs on oil
Reliant Osceola, FL	510	10.5 - NG 42 - No. 2 FO	DLN WI	3x170 MW GE MS7241FA CTs Draft 11/99. 750 hrs on oil
TEC Polk Power, FL	330	10.5 - NG 42 - No. 2 F.O.	DLN WI	2x165 MW GE MS7241FA CTs Issued 10/99. 750 hrs on oil
Dynegy, FL	510	15 - NG	DLN	3x170 MW WH 501F CTs Issued. Gas only
Granite Hardee, FL	510	10.5 - NG 42 - No. 2 FO	DLN WI	3x170 MW GE 7FA CTs 500 hrs on oil
Granite Hardee, FL	510	15 - NG	DLN	3x170 MW WH 501F CTs Gas Only
Granite Hardee, FL	360	15 - NG	DLN	3x170 MW WH 501D5A CTs Gas Only
Granite Hardee, FL	540	5 - NG 10/42 - FO	HSCR HSCR/WI	3x180 MW ABB GT-24 CTs 500 hrs on oil
Peace River, FL	510	10 - NG 42 - No. 2 FO	DLN WI	3x170 MW GE 7FA CTs 720 hrs on oil
FPL Martin, FL	340	10/12 - NG/PA 42 - FO	DLN WI	2x170 MW GE 7FA CTs 500 hrs on oil, 500 hrs on PA

CON = Continuous      DLN = Dry Low NO<sub>x</sub> Combustion      FO = Fuel Oil      GE = General Electric  
 SC = Simple Cycle      SCR = Selective Catalytic Reduction      NG = Natural Gas      WH = Westinghouse  
 INT = Intermittent      HSCR = Hot SCR      WI = Water or Steam Injection      ABB = Asea Brown Boveri



**LS POWER, LLC**

655 Craig Road, Suite 336  
St. Louis, Missouri 63141  
(314) 993-2700 • Fax: (314) 993-2790

**RECEIVED**

OCT 27 2000

BUREAU OF AIR REGULATION

**Michael F. Vogt**  
*Project Manager*

October 26, 2000

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

Re: **Hardee County Generating Facility**  
DEP File No. 0490044-001-AC (PSD-FL-281)

Dear Mr. Linero:

Based on our recent discussions, Granite Power Partners II, L.P. hereby requests the Florida Department of Environmental Protection ("FDEP") to consider a request to modify the above referenced PSD permit. The amendment that we are requesting would allow the Westinghouse 501F alternative to operate on low sulfur fuel oil in accordance with the control technology and emission rates as previously requested (and modeled) in our air permit application. As further described below, we believe the permit modification being proposed can be implemented with no incremental impact to the environment above what is currently permitted.

The permit change is being requested for two main reasons. First, we have secured delivery of and currently contemplate utilizing three Westinghouse 501F machines for the Hardee County Generating Facility and second, and more importantly, ensuring that the facility has a reliable source of fuel. It is critically important for us, and the customers served by this facility, to have the permitted ability, even if limited, to be able to operate on fuel oil as a backup.

The permit amendment that we are proposing is simple; each Westinghouse 501F turbine would be allowed to operate up to 300 hours per year on fuel oil. Fuel oil operation would only be allowed provided that the total annual NO<sub>x</sub> emissions (for all hours of operation except hours of excess emission allowed by the permit) do not exceed 175.5 tons per year per turbine (175.5 tons represents 3000 hours of operation for the Westinghouse 501F utilizing natural gas). The following is an illustrative example: 234 FO hours @ 329 lb/hr + 2342 NG hours @ 117 lb/hr = 175.5 tons/year.

Mr. A. A. Linero, P.E.  
October 26, 2000

Page 2

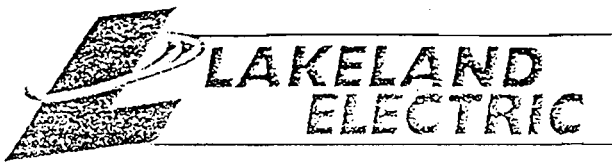
It is our understanding that this request for permit modification can be processed (and/or denied or withdrawn) without affected the validity of our existing permit. If this is not the case, please notify us prior to processing this request.

We appreciate your consideration of this request and look forward to your response.

Sincerely,

A handwritten signature in black ink that reads "Michael F. Vogt". The signature is written in a cursive style with a prominent "M" and "V".

Michael F. Vogt



Farzie Shelton, chE; REM

Manager of Environmental Affairs - Energy Supply

October 23, 2000

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OCT 26 2000

BUREAU OF AIR REGULATION

Greg Worley, Chief  
Pre-Construction/HAP Section  
United States Environmental Protection Agency  
Region 4  
Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, Georgia 30303-8909

Re: Air Construction Permit, DEP File No. 1050004-004-AC ( PSD-FL-245)  
250 Megawatt Combustion Turbine - McIntosh Power Plant Unit No. 5

Dear Mr. Worley:

As you are aware, Unit No. 5 is the first generation of Westinghouse 501G series Combustion Turbine that commenced initial operation on April 14, 1999. In accordance with the 40 CFR 60.8(a) as referenced in Specific Condition 29 of our permit, demonstration of compliance with the New Source Performance Standards (NSPS) and emission limits while burning Natural gas was conducted on March 2, 2000. However, this demonstration did not include tests while burning fuel oil as the unit had not commenced oil burning at that time.

On July 24, 2000 Siemens Westinghouse Power Corporation (SWPC), the manufacturer and supplier of the gas turbine 501G series, commenced firing fuel oil in this unit with the intention of demonstrating NSPS compliance tests after the initial shake down of equipment and tuning of the control system. Hence, on August 31, 2000 SWPC was able to synchronize the unit. However, due to multitude of problems (please see attached letter from SWPC addressed to Mr. Al Dodd) the operation of Unit No. 5 had to be stopped and presently the unit is none operational while SWPC is trying to remedy the problems.

As you will note from the attached document this unit operated a mere 13 hours at below 25% load (unit rated at 250 MW) utilizing 11000 MMBTU of fuel oil. Therefore, with the present circumstances SWPC does not believe they will be able to meet the requirement of our construction permit as specified in condition 29 as modified on December 9, 2000 which reads:

*Compliance with allowable emission limiting standards shall be determined for applicable New Source Performance Standards in accordance with the most recent approved EPA schedule. Initial compliance with all other applicable emission limiting standards shall be determined concurrently with the*

City of Lakeland • Department of Electric

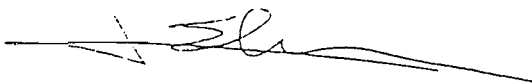
October 23, 2000

Page 2

*demonstration of compliance with New Source Performance Standards with the exception that compliance with emissions limits applicable to fuel oil firing shall be determined not later than 90 days after the first oil firing that occurs after December 8, 1999. ...*

Therefore, we are writing to request a 90-day window from the time Unit No. 5 is operational again and burning fuel oil to perform NSPS compliance testing while utilizing fuel oil. Your cooperation in this matter is greatly appreciated. As always, we look forward to working with you and your staff in finding a suitable solution to our request. If you should have questions, please do not hesitate to contact me.

Sincerely,



Farzie Shelton

Cc: Mr. C.H. Fancy, P.E. - DEP  
Mr. Hamilton Owen P.E. - DEP  
Mr. Al Linero P.E. - DEP  
Mr. David McNeal - EPA

Attachment



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AUG 11 2000

BUREAU OF AIR REGULATION

August 4, 2000

Mr. Al Linero, P.E.  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Dear Mr. Linero:

Re: Hines Power Block 1 - Extension of Time to Install Dry Low-NOx Combustors

Specific Condition B.1.i. of the PSD permit for Power Block 1 of Florida Power Corporation's (FPC) Hines Energy Complex (PSD-FL-195A) states that a dry low-NOx (DLN) burner system may be installed to replace the selective catalytic reduction control system under certain conditions. The DLN system must control NOx emissions to the limit of 12 ppm corrected to 15% O<sub>2</sub>, and the burners must be installed by November 1, 2000.

Based on the enclosed letter from Siemens Westinghouse outlining its continuing low-NOx development program, FPC requests that the DEP extend the November 1, 2000 deadline by two years, to November 1, 2002. Siemens Westinghouse requests that the DEP treat the enclosed information as proprietary.

Please contact Mike Kennedy at (727) 826-4334 if you have any questions or need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Jeffrey Pardue", is written over a circular scribble.

W. Jeffrey Pardue, C.E.P.  
Director

Enclosure



STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
NOTICE OF FINAL PERMIT

In the Matter of an  
Application for Permit by:


Mr. Michael F. Vogt  
Granite Power Partners II, L.P.  
655 Craig Road, Suite 336  
St. Louis, Missouri ~~63025~~ **63191**

DEP File No. 0490044-001-AC  
Permit No.: PSD-FL-281  
Hardee County Generation Facility  
Hardee County

Enclosed is the Final Permit Number PSD-FL-281 to construct: three nominal 120-170 megawatt (MW) natural gas and distillate fuel oil-fired combustion turbine-electrical generators with 100-foot stacks, a 10 million Btu per hour natural gas-fired heater, and one 1.5 million gallon fuel oil storage tanks for the proposed Hardee County Generation Facility. This permit is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; 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 of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

  
C.H. Fancy, P.E., Chief  
Bureau of Air Regulation

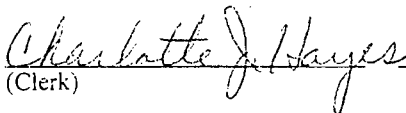
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT (including the FINAL permit) was sent by certified mail\* and copies were mailed by U.S. Mail before the close of business on 8/7/00 to the person(s) listed:

Michael F. Vogt, GPP-II, L.P.\*  
Nancy Grant\*  
Gregg Worley, EPA  
John Bunyak, NPS  
Bill Thomas, DEP SWD  
Tom Davis, P.E., ECT  
Doug Beason, Esq., DEP OGC  
Chair, Hardee County BCC

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

  
(Clerk) 8/7/00 (Date)

TEB2 ESH1 0000 004E 6607

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 Mr Michael F Vogt

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Name (Please Print Clearly) (to be completed by mailer)  
 Mr. Michael F Vogt - Granite Power

Street, Apt. No., or PO Box No.  
 655 Craig Rd Ste 336

City, State, ZIP+4  
 St. Louis, MO ~~63025~~ *63141*

PS Form 3800, July 1999 See Reverse for Instructions

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<p>1. Article Addressed to:          MR MICHAEL F VOGT          GRANITE POWER PARTNERS II LP          655 CRAIG RD STE 336          ST LOUIS MO <del>63025</del> <i>63141</i></p>	<p>3. Service Type  <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail  <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>
<p>2. Article Number (Copy from service label)          7099 3400 0000 1453 2931</p>	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p> <p style="text-align: center;"><b>USPS</b></p>

FINAL DETERMINATION  
GRANITE POWER PARTNERS II, L.P.  
HARDEE COUNTY GENERATION FACILITY  
THREE SIMPLE CYCLE COMBUSTION TURBINES

The Department distributed a Public Notice package on April 17, 2000 for the project to construct a nominal 360-510 megawatt (MW) natural gas and distillate fuel oil-fired simple cycle power plant east of west of Wauchula, DeSoto County. The project includes: three nominal 120-170 MW combustion turbine-electrical generators with 100-foot stacks, a natural gas-fired heater, and one 1.5 million gallon distillate fuel oil storage tank. The Public Notice of Intent to Issue was published on April 27<sup>th</sup> in The Herald-Advocate.

The Department received comments from the U.S. EPA Region IV in letters dated April 12 and May 26, 2000. Comments were received from the Fish and Wildlife Service (FWS) during the Department's review of the application and no additional comments were received following issuance of the Department's Intent. Comments were received from the applicant via letter dated May 30. In response to a request for a public meeting regarding this project, a public meeting was held the evening of July 12, 2000 at the Hardee County Board of County Commissioners Building in Wauchula. Written and oral comments were received from the public at that meeting.

EPA commented on the emissions estimates for hazardous air pollutants (HAPs), excess emissions provisions, and the cost calculation methodology. The Department recalculated HAPs emissions based on the most recent proposed EPA emission factors and confirmed that emissions of all HAPs will be less than 25 tons per year and emissions of formaldehyde will be less than 10 TPY. Therefore the project is not subject to a case-by-case determination of Maximum Achievable Control Technology (MACT).

The Department notes that carbon monoxide emissions will be lower and flame temperatures will be higher than corresponding values for the bulk of the population used to derive the EPA emission factors. Also wet injection will be practiced only when back-up oil is used. These conditions at the proposed project will be less conducive to HAPs formation than the conditions under which much of the background data were collected. For these reasons the Department believes that emissions will be less than predicted by the EPA emission factors.

The applicant also believes that the EPA emission estimation techniques are biased to the high side and that actual emissions will be much lower. Nevertheless, the applicant re-submitted calculations via letter dated July 12 in accordance with the most recent EPA AP-42 estimation technique. According to the applicant's revised calculation, emissions of formaldehyde and all HAPs (including formaldehyde) will be less than 10 TPY.

EPA recommended that control costs be calculated on the basis that any single unit can actually operate 4000 hours in a year although the three units together are restricted to 3,000 hours per unit (9000 total for three units). Granite only estimated SCR control costs (\$9,394 per ton of NO<sub>x</sub> removed) for the ABB-GT24 option, which they have since withdrawn. Costs per ton of pollutant removed for the other options are greater than estimated for the ABB GT-24 option even when estimated over 4000 hours instead of 3000 hours. The Department's conclusion is that high temperature selective catalytic reduction (ammonia injection) was appropriate for the discarded ABB GT-24 option, but is still not cost-effective for the other options (General Electric 7FA, Siemens-Westinghouse 501F, and Siemens-Westinghouse 501D5A).

No comments were received from the Public within the 30-day comment period. Few people attended the public meeting or provided comments during or after the meeting. It was pointed out that SO<sub>2</sub> emissions will double in the county and that the Department lacks authority to look at the cumulative impact of the "25-30 plants currently located in Florida." Another commentor asked "although the presentation notes minimal effects of PM, SO<sub>2</sub>, NO<sub>x</sub> on people, how about greenways?" He also asked that someone "research (literature review) effects on people."

The emissions increase and impact from the project on ambient levels in Hardee County will be minimal. The total impact on air quality will still be minimal even if the effects of all of the more distant new gas-fired projects are included in the review.

No information was presented disputing any of the Department's conclusions in the draft Permit, Technical Evaluation and Preliminary Determination, or draft Best Available Control Technology Determination. The concerns expressed will be transmitted to the newly formed committee that is evaluating power plant siting in Florida. However they are beyond the scope of the Department's authority for this specific permitting action.

The applicant provided comments via FAX on May 30. These are given below in italics and followed by the Department's response.

1. General Comment.

*GPP requests that the ABB GT24 product be removed from the permit. GPP is no longer considering this product for the project.*

The Department acknowledges the request and will remove that option from the permit. The Department will keep the analysis of this option in the Final Best Available Control Technology (BACT) determination.

2. Specific Condition No. 8

*GPP requests that additional language be added to clarify that the heat limits are included only for the purposes of determining capacity and is not intended to be a continuous limitation subject to compliance or enforcement. Suggested additional language is as follows:*

*{Permitting note: The heat input limitations have been placed in the permit to identify the capacity of each emissions unit for purposes of confirming that emissions testing is conducted within 90-100 percent of the emissions unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate limits and to aid in determining future rule applicability.*

Heat input is analogous to a production limit. This is one of the key components to federal enforceability of permits. The language proposed by Granite is typically used in Title V permits for fossil fuel steam electric generators, particularly where no heat input limits were ever established by construction permits. Such situations are typified by projects built before implementation of the PSD program.

The language proposed by the Department allows for the possibility of modifying the heat-input limits based on the actual characteristics and performance of the units installed.

3. Specific Condition No. 19 (now No. 18)

- *GPP requests that the base load CO limit for oil firing be increased from 20 ppmvd to 25 ppmvd at 15% O<sub>2</sub> to cover all of the oil-fired CTs under consideration. Alternatively, base load CO limits could be set on an individual CT basis as was done for NO<sub>x</sub>.*

The CO BACT value of 20 ppmvd determined by the Department is equal to determinations made for the IPS projects are Vandolah, Shady Hills, and DeSoto as well as the Oleander Brevard, Reliant Osceola, and JEA Baldwin projects. In fact this determination is less stringent because it allows correction to 15% O<sub>2</sub>. All the mentioned projects are based on the GE 7FA combustion turbine, which is the only option under which Granite can fire oil.

According to information available to the Department, F-Class unit can achieve CO emissions at full load of less than 10 ppmvd (reference: full loads tests under gas at FPL Martin and under fuel oil at FPC Hines). The contracts available from the manufacturers have not yet caught up with the technical reality of inherently low CO design and emissions at full load. The Department cannot deem a contract value as BACT when much lower values are routinely experienced in the field. The high flame temperatures should guarantee sufficient CO burnout and minimize emissions to levels comfortably within 20 ppmvd at full load. While wet injection will increase CO emissions, they are not expected to be as high as requested.

- *GPP requests that CO limits be included to address partial load operations for the Westinghouse CTs. A CO limit during gas-firing of 83 ppmvd at 15% O<sub>2</sub> for partial loads between 50 and 70 percent load is requested for the Westinghouse 501F CT. A CO limit during gas-firing of 232 ppmvd at 15% O<sub>2</sub> for partial loads between 50 and 70 percent load is requested for the Westinghouse 50ID5A CT.*

The requested CO values for the Siemens-Westinghouse units do not represent BACT at partial load. If HAPs emissions are related to CO, then the conclusion that emissions of formaldehyde will be less than 10 tons per year will be questionable. By comparison, the GE units will very likely achieve less than 10 ppmvd of CO at partial loads between 50 and 70 percent.

Some level of partial operation is already implicit in Conditions 26 and 27 (now 25 and 26) that allow excess emissions due to startup, shutdown or malfunction. Note per EPA's letter dated May 26 that they do not agree with that provision (i.e., they believe no periods of excess emissions should be allowed). The Department's expectation is that the Siemens-Westinghouse units will be started up and ramped quickly through the partial operation phase (less than 70 percent of full load). Similarly the units should be brought down quickly to avoid continuous operation in the partial load phase.

We recommend that Granite consult with Siemens-Westinghouse to determine if their features (such as Opti-cool) or the various technologies (such as catalytic pilot) under development to meet the Low NO<sub>x</sub> challenge can also help to reduce CO emissions at partial loads. A single fuel burner on the Siemens-Westinghouse units will make it easier to design for lower CO and NO<sub>x</sub> emissions.

- *GPP requests that VOC limits be included to address partial load operations for the Westinghouse CTs. A VOC limit during gas-firing of 20 ppmvd at 15% O<sub>2</sub> for partial loads between 50 and 70 percent load is requested for the Westinghouse 501F and 501D5A CTs.*

Analogous argument as above.

- *GPP requests that NO<sub>x</sub> limits be included to address partial load operations for the Westinghouse 501D5A CT. A NO<sub>x</sub> limit during gas-firing of 45 ppmvd at 15% O<sub>2</sub> for partial loads between 50 and 70 percent load is requested for the Westinghouse 501D5A CT.*

Analogous argument as above and the operation at 45 ppmvd NO<sub>x</sub> would be accompanied by the higher CO, VOC, and possibly HAPs emissions rates described above.

- *For the Westinghouse 501F and 501D5A CTs, an annual limit of no more than 500 hours per year operation at partial load (i.e., loads between 50 and 70 percent) is also requested.*

Operation at loads between 50 and 70 percent would cause the higher CO, VOC, NO<sub>x</sub>, and possibly HAPs emissions rates described above.

4. Specific Condition No. 20 (now No. 19)

*GPP requests that NO<sub>x</sub> limits be included to address partial load operations for the Westinghouse 501D5A CT. A NO<sub>x</sub> limit during gas-firing of 45 ppmvd at 15% O<sub>2</sub> for partial loads between 50 and 70 percent load is requested for the Westinghouse 501D5A CT. For the Westinghouse 501D5A CT, an annual limit of no more than 500 hours per year operation at partial load (i.e., loads between 50 and 70 percent) is also requested.*

See response to 3 above.

5. Specific Condition No. 21 (now No. 20)

- *GPP requests that the base load CO limit for oil-firing be increased from 20 ppmvd to 25 ppmvd at 15% O<sub>2</sub> to cover all of the oil-fired CTs under consideration. Alternatively, base load CO limits could be set on an individual CT basis as was done for NO<sub>x</sub>.*

See response to 3 above.

- *Consistent with prior FDEP permits for CT projects, GPP requests that compliance with the CO limits be verified by initial and annual source testing and not by CEMS. The installation of CO CEMs is costly and has not been required by FDEP for comparable CT projects. Air quality CO impacts were shown to be insignificant for the proposed Hardee County Generation Facility.*

The Department agrees that it will not be necessary to install a CO continuous emissions monitoring system for the GE 7FA option at this project as manufacturer data indicate that the emissions profile is "flat" between 50 and 100 percent of full load. The same is not true of the Siemens-Westinghouse units. The Department did, in fact, require a CO CEMS on the only comparable Siemens-Westinghouse-based project, namely the Dynegy Palmetto Power Project. (Refer to DEP Construction Permit Webpage at [www.dep.state.fl.us/air](http://www.dep.state.fl.us/air) for details).

- *GPP requests that CO limits be included to address partial load operations for the Westinghouse CTs. A CO limit during gas-firing of 83 ppmvd at 15%O<sub>2</sub> for partial loads between 50 and 70 percent load is requested for the Westinghouse 501F CT. A CO limit during gas-firing of 232 ppmvd at 15% O<sub>2</sub> for partial loads between 50 and 70 percent load is requested for the Westinghouse 501D5A CT. For the Westinghouse 501F and 501D5A CTs, an annual limit of no more than 500 hours per year operation at partial load (i.e., loads between 50 and 70 percent) is also requested.*

See response to 3 above.

- *GPP requests that the base load natural gas- and oil-firing CO limits for the GE 7FA CT at ISO conditions be changed from 57 lb/hr to 53 lb/hr and from 71 lb/hr to 117 lb/hr, respectively, consistent with the proposed BACT limits of 12 and 23 ppmvd at 15% O<sub>2</sub> for natural gas- and oil-firing, respectively.*

The Department will lower the lb/hr CO limit for gas-firing as requested and will adjust the CO limit to 12 ppmvd @15% O<sub>2</sub>. For reference the allowable CO emission rate at 12 ppmvd (not corrected for O<sub>2</sub>) for the IPSAPC projects is actually lower (42.5 lb/hr).

The Department will correct the CO emission limit to 94 lb/hr CO limit for oil-firing. The initial emission rate proposed by the Department was marked to 20 ppmvd CO and not corrected to 15%O<sub>2</sub>. For reference, the limit for oil firing given in the recent IPSAPC projects is 71.4 lb/hr marked to 20 ppmvd. Lower actual emissions can be expected as discussed in 3 above.

- *GPP requests that the base load gas-firing CO limit for the Westinghouse 501 F CT at ISO conditions be changed from 57 lb/hr to 76 lb/hr consistent with the proposed BACT limit of 16 ppmvd at 15% O<sub>2</sub>.*

The Department will correct the emission rate to 76 lb/hr to reflect 15% O<sub>2</sub>.

- *GPP requests that the base load gas-firing CO limit for the Westinghouse 50D5A CT at ISO conditions be changed from 42 lb/hr to 32 lb/hr consistent with the proposed BACT limit of 10 ppmvd at 15% O<sub>2</sub>.*

The Department will lower the lb/hr and ppmvd CO limits as requested. Note that correction to 10% O<sub>2</sub> makes almost no difference for this unit.

6. Specific Condition No. 22 (now No. 21)

- *GPP requests that VOC limits be included to address partial load operations for the Westinghouse CTs. A VOC limit during gas-firing of 20 ppmvd at 15% O<sub>2</sub> for partial loads between 50 and 70 percent load is requested for the Westinghouse 501F and 501D5A CTs.*

See response to 3 above.

- *GPP requests that the base load gas-firing VOC limit for the Westinghouse 501F CT at ISO conditions be changed from 7.8 lb/hr to 8.8 lb/hr consistent with the proposed BACT limit of 3.0 ppmvd at 15% O<sub>2</sub>.*

The Department will correct the VOC lb/hr limit as requested. The Department will also correct the VOC limit for the GE 7FA at ISO conditions from 71.4 to 17.4 lb/hr consistent with the Department's BACT limit of 7.5 ppbvw.

7. Specific Condition No. 23 (now No. 22)

*GPP requests that the note comment be revised to specify ISO conditions as follows:*

*[Note: Emissions of SO<sub>2</sub> and SAM (at ISO conditions) will be limited by this condition to 9.3 lb/hr and 1.1 lb/hr respectively while firing natural gas, and 98.1 lb/hr and 11.3 lb/hr respectively.]*

The Department will indicate the ISO reference as requested and notes that EPA approved the custom fuel monitoring schedule that allows limitation of emissions by very low sulfur gas and fuel oil specification.

8. Specific Condition No. 24 (now No. 23)

*Consistent with prior FDEP permits for CT projects, GPP requests that this condition be deleted; i.e., use Specific Condition No. 25 (now No. 24) opacity limits as a surrogate for PM/PM<sub>10</sub>.*

EPA has required specification of PM<sub>10</sub> limits in the most recent projects (e.g. IPSAPC DeSoto – see webpage) because PM<sub>10</sub> is a pollutant subject to PSD and a BACT determination.

9. Specific Condition No. 30 (now 29)

*Consistent with prior FDEP permits for CT projects, GPP requests that PM/PM<sub>10</sub> testing using EPA Reference Methods 5 or 7 be deleted. CTs, and in particular simple-cycle CTs, generate large volumes of exhaust gas with very low PM concentrations making PM stack testing impractical.*

Department rules require testing of major sources of specific pollutants per Rule 62-297.310, F.A.C. Note that the Department will require only an initial test and not annual tests.

10. Specific Condition No. 41 (now 40)

*Consistent with prior FDEP permits for CT projects, GPP requests that compliance with the CO limits be verified by initial and annual source testing and not by CEMS. The installation of CO CEMS is costly and has not been required by FDEP for comparable CT projects. Air quality CO impacts were shown to be insignificant for the proposed Hardee County Generation Facility.*

See response to 5 above.

11. Specific Condition No. 42 (now 41)

*GPP requests deletion of the reference to CO CEMS in Specific Condition No. 10; see Comment 9 above.*

See response to 5 above.



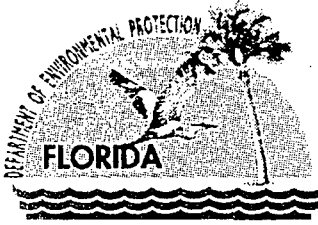
12. Section 39 (now Specific Condition No. 38)

*The first line of the sentence includes a typographic error. "IPSAPC" should be "Granite Power Partners."*

The Department acknowledges the typographical error and will correct it in the final permit.

A petition for an administrative hearing was faxed to the Department on May 23. It was dismissed on June 8 with leave to amend by June 23. No subsequent petition was filed.

The final action is to issue the permit as proposed with minor changes in the final permit to address EPA and certain applicant comments.



# Department of Environmental Protection

Jeb Bush  
Governor

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

David B. Struhs  
Secretary

## PERMITTEE:

Granite Power Partners II, LP  
655 Craig Road, Suite 336  
St. Louis, Missouri ~~63025~~  
**63141**

Permit No.	PSD-FL-281
File No.	0490044-001-AC
SIC No.	4911
Expires:	June 30, 2002

## Authorized Representative:

Michael F. Vogt

## PROJECT AND LOCATION:

Air Construction Permit pursuant to the requirements for the Prevention of Significant Deterioration of Air Quality Permit for: three nominal 120-170 megawatt (MW) combustion turbine-electrical generators; three 100-foot stacks; a 10 million Btu per hour natural gas-fired heater; and one 1.5 million gallon fuel oil storage tank. The units will operate in simple cycle mode and intermittent duty.

The project will be located near Vandolah and Fort Green Roads, approximately 5 miles West of Wauchula, Hardee County. This site is approximately 138 kilometers South/Southeast of the Chassahowitzka Class I National Wilderness Area. UTM coordinates for this facility are Zone 17; 408.49 km E; 3045.73 km N.

## STATEMENT OF BASIS:

This Air 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 above named permittee is authorized to modify the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

Attached Appendices and Tables made a part of this permit:

Appendix BD	BACT Determination
Appendix GC	Construction Permit General Conditions

Howard L. Rhodes, Director  
Division of Air Resources  
Management

"More Protection, Less Process"

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# AIR CONSTRUCTION PERMIT PSD-FL-281 (0490044-001-AC)

## SECTION I. FACILITY INFORMATION

### FACILITY DESCRIPTION

This facility is a new site. This project is subject to the requirements for the Prevention of Significant Deterioration of Air Quality for: three nominal 120-170 megawatt (MW) combustion turbine-electrical generators; three 100-foot stacks; a 10 million Btu per hour natural gas-fired heater; and one 1.5 million gallon fuel oil storage tank. The units will operate in simple cycle mode and intermittent duty. Inherently clean fuels and good combustion practices will be employed to control all pollutants.

### EMISSION UNITS

This permit addresses the following emission units:

ARMS EMISSIONS UNIT	SYSTEM	EMISSION UNIT DESCRIPTION
001	Power Generation	One nominal 120 - 170 Megawatt Simple Cycle Gas Combustion Turbine-Electrical Generator
002	Power Generation	One nominal 120 - 170 Megawatt Simple Cycle Gas Combustion Turbine-Electrical Generator
003	Power Generation	One nominal 120 - 170 Megawatt Simple Cycle Gas Combustion Turbine-Electrical Generator
004	Fuel Storage	One 1.5 Million Gallon Fuel Oil Storage Tank
005	Fuel Heating	One 10 million Btu/hr gas heater

### REGULATORY CLASSIFICATION

The facility is classified as a Major or Title V Source of air pollution because emissions of at least one regulated air pollutant, such as particulate matter (PM/PM<sub>10</sub>), sulfur dioxide (SO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), or volatile organic compounds (VOC) exceeds 100 tons per year (TPY).

This facility is not within an industry included in the list of the 28 Major Facility Categories per Table 212.400-1, F.A.C. Because emissions are greater than 250 TPY for at least one criteria pollutant, the facility is also a Major Facility with respect to Rule 62-212.400, Prevention of Significant Deterioration (PSD). Pursuant to Table 62-212.400-2, modifications at this facility resulting in emissions increases greater than any of the following values require review per the PSD rules as well as a determination of Best Available Control Technology (BACT): 40 TPY of NO<sub>x</sub>, SO<sub>2</sub>, or VOC; 25/15 TPY of PM/PM<sub>10</sub>; 100 TPY of CO; or 7 TPY of sulfuric acid mist (SAM). This facility and the project are also subject to applicable provisions of Title IV, Acid Rain, of the Clean Air Act.

**SECTION I. FACILITY INFORMATION**

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**PERMIT SCHEDULE**

- 08/04/00 Permit issued
- 07/12/00 Held Public Meeting in Wauchula
- 06/08/00 Petition dismissed with Leave to Amend until June 23
- 05/10/00 Third-Party Petition filed via FAX
- 04/27/00 Notice of Intent published in The Herald-Advocate
- 04/14/00 Distributed Intent to Issue Permit
- 03/27/00 Application deemed complete
- 01/18/00 Received Application

**RELEVANT DOCUMENTS:**

The documents listed below are the basis of the permit. They are specifically related to this permitting action, but not all are incorporated into this permit. These documents are on file with the Department.

- Application received on January 18, 2000
- Department letters dated January 20 and February 16
- Air Quality Impact Analysis from ECT (for applicant) received March 27
- EPA Region 4 letters dated April 12, May 16, and May 26
- Department's Intent to Issue and Public Notice Package dated April 14
- Comments from applicant dated May 30
- Comments from applicant dated July 12 in response to EPA comments dated May 26
- Department's Final Determination and Best Available Control Technology Determination issued concurrently with this permit.

# AIR CONSTRUCTION PERMIT PSD-FL-281 (0490044-001-AC)

## SECTION II. ADMINISTRATIVE REQUIREMENTS

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1. Regulating Agencies: All documents related to applications for permits to construct, operate or modify an emissions unit should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection (FDEP), at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 and phone number (850) 488-0114. All documents related to reports, tests, and notifications should be submitted to the DEP Southwest District office, 3804 Coconut Palm Drive, Tampa, Florida 33619-8218 and phone number 813/744-6100.
2. General Conditions: The owner and operator is subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in Appendix GC of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]
3. Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.
4. Forms and Application Procedures: The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. [Rule 62-210.900, F.A.C.]
5. Modifications: The permittee shall give written notification to the Department when there is any modification to this facility. This notice shall be submitted sufficiently in advance of any critical date involved to allow sufficient time for review, discussion, and revision of plans, if necessary. Such notice shall include, but not be limited to, information describing the precise nature of the change; modifications to any emission control system; production capacity of the facility before and after the change; and the anticipated completion date of the change. [Chapters 62-210 and 62-212]
6. Expiration: Approval to construct shall become invalid if construction is not commenced within 18 months after receipt of such approval, or if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. The Department may extend the 18-month period upon a satisfactory showing that an extension is justified. [40 CFR 52.21(r)(2)].
7. BACT Determination: In accordance with Rule 62-212.400(6)(b), F.A.C. (and 40 CFR 51.166(j)(4)), the Best Available Control Technology (BACT) determination shall be reviewed and modified as appropriate in the event of a plant conversion. This paragraph states: "For phased construction project, the determination of best available control technology shall be reviewed and modified as appropriate at the latest reasonable time which occurs no later than 18 months prior to commencement of construction of each independent phase of the project. At such time, the owner or operator of the applicable stationary source may be required to demonstrate the adequacy of any previous determination of best available control technology for the source." This reassessment will also be conducted for this project if there are any increases in heat input limits, hours of operation, oil firing, low or baseload operation (e.g. conversion to combined-cycle operation) short-term or annual emission limits; annual fuel heat input limits or similar changes. [40 CFR 51.166(j)(4) and Rule 62-212.400(6)(b), F.A.C.]

**SECTION II. ADMINISTRATIVE REQUIREMENTS**

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8. Final Selection of Manufacturer: The Applicant shall provide the Department with the final model, characteristics, and performance/emissions guarantees upon making a final selection of combustion turbines to be installed. The Department may review the adequacy of the BACT determination as described in Condition 7 above.
9. Application for Title V Permit: An application for a Title V operating permit, pursuant to Chapter 62-213, F.A.C., must be submitted to the DEP's Bureau of Air Regulation, and a copy to the Department's Southwest District office. [Chapter 62-213, F.A.C.]
10. New or Additional Conditions: Pursuant to Rule 62-4.080, F.A.C., 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.]
11. Annual Reports: Pursuant to Rule 62-210.370(2), F.A.C., Annual Operation Reports, the permittee is required to submit annual reports on the actual operating rates and emissions from this facility. Annual operating reports shall be sent to the DEP's Southwest District office by March 1st of each year. [Rule 62-210.370(2), F.A.C.]
12. Stack Testing Facilities: Stack sampling facilities shall be installed in accordance with Rule 62-297.310(6), F.A.C.
13. Permit Extension: The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit [Rule 62-4.080, F.A.C.]
14. Quarterly Reports: Quarterly excess emission reports, in accordance with 40 CFR 60.7 (a)(7) (c) (1998 version), shall be submitted to the DEP's Southwest District office. Each excess emission report shall include the information required in 40 CFR 60.7(c) and 60.334.

**SECTION III. EMISSION UNITS SPECIFIC CONDITIONS**

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**APPLICABLE STANDARDS AND REGULATIONS:**

1. Unless otherwise indicated in this permit, the construction and operation of the subject emission unit(s) 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 Florida Administrative Code Chapters 62-4, 62-103, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296, 62-297; and the applicable requirements of the Code of Federal Regulations Section 40, Parts 60, 72, 73, and 75.
2. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations. [Rule 62-210.300, F.A.C.]
3. These emission units shall comply with all applicable requirements of 40CFR60, Subpart A, General Provisions including:
  - 40CFR60.7, Notification and Recordkeeping
  - 40CFR60.8, Performance Tests
  - 40CFR60.11, Compliance with Standards and Maintenance Requirements
  - 40CFR60.12, Circumvention
  - 40CFR60.13, Monitoring Requirements
  - 40CFR60.19, General Notification and Reporting requirements
4. ARMS Emission Units 001-003, Power Generation, consisting of three 120-170 megawatt combustion turbines shall comply with all applicable provisions of 40CFR60, Subpart GG, Standards of performance for Stationary Gas Turbines, adopted by reference in Rule 62-204.800(7)(b), F.A.C. The Subpart GG requirement to correct test data to ISO conditions applies. However, such correction is not used for compliance determinations with the BACT standard(s). [Rule 62-204.800(7)(b), F.A.C.]
5. ARMS Emission Unit 004, Fuel Storage, consisting of one 1.5 million gallon distillate fuel oil storage tank shall comply with all applicable provisions of 40CFR60, Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels, adopted by reference in Rule 62-204.800, F.A.C. [Rule 62-204.800(7)(b), F.A.C.]
6. All notifications and reports required by the above specific conditions shall be submitted to the DEP's Southwest District.

**GENERAL OPERATION REQUIREMENTS**

7. Fuels: Only pipeline natural gas or maximum 0.05 percent sulfur fuel oil No. 2 or superior grade of distillate fuel oil shall be fired in these units. [Applicant Request, Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)] {Note: The limitation of this specific condition is more stringent than the NSPS sulfur dioxide limitation and thus assures compliance with 40 CFR 60.333 and 60.334}

SECTION III. EMISSION UNITS SPECIFIC CONDITIONS

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8. Capacity:

- General Electric 7FA: The maximum heat input rates, based on the lower heating value (LHV) of each fuel to each Unit (1-3) at ambient conditions of 59°F temperature, 60% relative humidity, 100% load, and 14.7 psi pressure shall not exceed 1,596 million Btu per hour (mmBtu/hr) when firing natural gas and shall not exceed 1,795 mmBtu/hr when firing No. 2 or superior grade of distillate fuel oil.
- Westinghouse 501F: The maximum heat input rates, based on the lower heating value (LHV) to each Siemens-Westinghouse 501F combustion turbine at ambient conditions of 59°F temperature, 60% relative humidity, 100% load, and 14.7 psi pressure shall not exceed 1,660 million Btu per hour (mmBtu/hr).
- Westinghouse 501D5A: The maximum heat input rates, based on the lower heating value (LHV) to each Siemens-Westinghouse 501D5A combustion turbine at ambient conditions of 59°F temperature, 60% relative humidity, 100% load, and 14.7 psi pressure shall not exceed 1,188 million Btu per hour (mmBtu/hr).

These maximum heat input rates will vary depending upon ambient conditions and the combustion turbine characteristics. Manufacturer's curves corrected for site conditions or equations for correction to other ambient conditions shall be provided to the Department of Environmental Protection (DEP) within 45 days of completing the initial compliance testing. [Design, Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)]

9. 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.]
10. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the owner or operator shall notify the DEP Southwest District as soon as possible, but at least within (1) working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; the steps being taken to correct the problem and prevent future recurrence; and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit and the regulations. [Rule 62-4.130, F.A.C.]
11. Operating Procedures: Operating procedures shall include good operating practices and proper training of all operators and supervisors. The good operating practices shall meet the guidelines and procedures as established by the equipment manufacturers. All operators (including supervisors) of air pollution control devices shall be properly trained in plant specific equipment. [Rule 62-4.070(3), F.A.C.]



**SECTION III. EMISSION UNITS SPECIFIC CONDITIONS**

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12. Circumvention: The owner or operator shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rules 62-210.650, F.A.C.]
13. Maximum allowable hours: The stationary gas turbines shall only operate up to 3,000 hours on average per unit during any calendar year. Within the 3,000 hours, up to 500 hours may be on fuel oil for the GE 7FA or the ABB GT-24 only. No single combustion turbine shall operate more than 4,000 hours in a single year. [Applicant Request, Rule 62-210.200, F.A.C. (Definitions - Potential Emissions), Rule 62-212.400, F.A.C. (BACT)]
14. Fuel oil usage: The amount of back-up fuel (fuel oil) burned at the site (in BTU's) shall not exceed the amount of natural gas (primary fuel) burned at the site (in BTU's) during any consecutive 12-month period [Rule 62-210.200, F.A.C. (BACT)]

**Control Technology**

15. General Electric: Dry Low NO<sub>x</sub> (DLN) combustors shall be installed on the stationary combustion turbines to control nitrogen oxides (NO<sub>x</sub>) emissions while firing natural gas. A wet injection system shall be installed for use when firing No. 2 or superior grade distillate fuel oil for control of NO<sub>x</sub> emissions. [Design, Rules 62-4.070 and 62-212.400, F.A.C. (BACT)]
16. Westinghouse 501F or D5A: DLN combustors shall be installed on the stationary combustion turbines to control nitrogen oxides (NO<sub>x</sub>) emissions while firing natural gas. [Design, Rules 62-4.070 and 62-212.400, F.A.C. (BACT)]
17. The permittee shall provide manufacturer's emissions performance versus load diagrams for the DLN and wet injection systems prior to their installation. DLN systems shall each be tuned upon initial operation to optimize emissions reductions consistent with normal operation and maintenance practices and shall be maintained to minimize NO<sub>x</sub> emissions and CO emissions, consistent with normal operation and maintenance practices. Operation of the DLN systems in the diffusion-firing mode shall be minimized when firing natural gas. [Rule 62-4.070 and 62-210.650 F.A.C.]

**EMISSION LIMITS AND STANDARDS**

18. Following is a summary of the emission limits and required technology. Values for NO<sub>x</sub> and CO are corrected to 15 % O<sub>2</sub> on a dry basis. These limits or their equivalent in terms of lb/hr or NSPS units, as well as the applicable averaging times, are followed by the applicable specific conditions [Rules 62-212.400, 62-204.800(7)(b) (Subpart GG), 62-210.200 (Definitions-Potential Emissions) F.A.C.]

AIR CONSTRUCTION PERMIT PSD-FL-281 (0490044-001-AC)

**SECTION III. EMISSION UNITS SPECIFIC CONDITIONS**

POLLUTANT	CONTROL TECHNOLOGY	EMISSION LIMIT
PM/PM <sub>10</sub> , VE	Pipeline Natural Gas, Low Sulfur Fuel Oil	10/17 lb/hr (Gas/Fuel Oil) 5/10% Opacity (Gas/Fuel Oil)
VOC	As Above	3.0 ppmvd (Gas) 7.5 ppmvw (Fuel Oil)
CO (GE 7FA)	As Above	12 ppmvd (Gas) 20 ppmvd (Fuel Oil)
CO (WH 501F)	As Above	16 ppmvd
CO (WH 501D5A)	As Above	10 ppmvd
SO <sub>2</sub> and Acid Mist	As Above	2 gr S/100 ft <sup>3</sup> (in Gas) 0.05% S (in Fuel Oil)
NO <sub>x</sub> (GE 7FA)	Dry Low NO <sub>x</sub> for Natural Gas Wet Injection and limited Fuel Oil usage	10.5 ppmvd (Gas) 42 ppmvd (Fuel Oil) – 500 hours
NO <sub>x</sub> (WH 501F)	Dry Low NO <sub>x</sub> , Natural Gas Only	15 ppmvd
NO <sub>x</sub> (WH 501D5A)	Dry Low NO <sub>x</sub> , Natural Gas Only	15 ppmvd

19. Nitrogen Oxides (NO<sub>x</sub>) Emissions:

- General Electric 7FA: While firing natural gas, the emission rate of NO<sub>x</sub> in the exhaust gas shall not exceed 10.5 ppmvd @15% O<sub>2</sub> on a 24 hr block average (of valid hours during which the unit is operated only) as measured by the continuous emission monitoring system (CEMS). Refer to Condition 30 for valid hours contributing to the block average. In addition, NO<sub>x</sub> emissions calculated as NO<sub>2</sub> shall not exceed 75.7 pounds per hour (at ISO conditions) and 9 ppmvd @15% O<sub>2</sub> to be demonstrated by the initial “new and clean” GE performance stack test. [Rule 62-212.400, F.A.C.]

While firing fuel oil, the concentration of NO<sub>x</sub> in the exhaust gas shall not exceed 42 ppmvd at 15% O<sub>2</sub> on the basis of a 3-hr average (of valid hour hours during which the unit is actually operated only) as measured by the continuous emission monitoring system (CEMS). In addition, NO<sub>x</sub> emissions calculated as NO<sub>2</sub> shall not exceed 351 lb/hr (at ISO conditions) and 42 ppmvd @15% O<sub>2</sub> to be demonstrated by stack test. [Rule 62-212.400, F.A.C.]

- Westinghouse 501F: The emission rate of NO<sub>x</sub> in the exhaust gas shall not exceed 15 ppmvd @15% O<sub>2</sub> on a 24 hr block average (of valid hours during which the unit is operated only) as measured by the continuous emission monitoring system (CEMS). Refer to Condition 30 for valid hours contributing to the block average. In addition, NO<sub>x</sub> emissions calculated as NO<sub>2</sub> shall not exceed 117 pounds per hour (at ISO conditions) and 15 ppmvd @15% O<sub>2</sub> to be demonstrated by the initial stack test. [Rule 62-212.400, F.A.C.]

SECTION III. EMISSION UNITS SPECIFIC CONDITIONS

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- Westinghouse 501D5A: The emission rate of NO<sub>x</sub> in the exhaust gas shall not exceed 15 ppmvd @15% O<sub>2</sub> on a 24 hr block average (of valid hours during which the unit is operated only) as measured by the continuous emission monitoring system (CEMS). Refer to Condition 30 for valid hours contributing to the block average. In addition, NO<sub>x</sub> emissions calculated as NO<sub>2</sub> shall not exceed 80.6 pounds per hour (at ISO conditions) and 15 ppmvd @15% O<sub>2</sub> to be demonstrated by the initial stack test. [Rule 62-212.400, F.A.C.]
20. Carbon Monoxide (CO) Emissions: The concentration of CO in the stack exhaust gas shall not exceed 16 ppmvd @15% O<sub>2</sub>, and shall not exceed 20 ppmvd @15% O<sub>2</sub> while firing fuel oil, where applicable, on a 24 hr block average (of valid hours during which the unit is operated only) as measured by the continuous emission monitoring system (CEMS). In addition, emissions shall not exceed the limits specified below. The permittee shall demonstrate compliance with the following limits by stack test using EPA Method 10. [Rule 62-212.400, F.A.C.]
- General Electric 7FA: Emissions of CO in the stack shall exceed neither 12 ppmvd @15% O<sub>2</sub> nor 53 lb/hr (at ISO conditions) while firing natural gas and neither 20ppmvd @15% O<sub>2</sub> nor 94 lb/hr while firing fuel oil (at ISO conditions). The permittee shall demonstrate compliance with these limits by stack test using EPA Method 10. [Rule 62-212.400, F.A.C. and Applicant Request]
  - Westinghouse 501F: Emissions of CO shall exceed neither 16 ppmvd @15% O<sub>2</sub> nor 76 lb/hr (at ISO conditions) on a 24 hr block average (of valid hours during which the unit is operated only) as measured by the continuous emission monitoring system (CEMS).. [Rule 62-212.400, F.A.C.]
  - Westinghouse 501D5A: Emissions of CO shall exceed neither 10 ppmvd @10% O<sub>2</sub> nor 32 lb/hr (at ISO conditions) on a 24 hr block average (of valid hours during which the unit is operated only) as measured by the continuous emission monitoring system (CEMS). [Rule 62-212.400, F.A.C. and Applicant Request on Limit]
21. Volatile Organic Compounds (VOC) Emissions: The concentration of VOC in the stack exhaust gas with the combustion turbine operating on natural gas shall not exceed 3.0 ppmvd while firing natural gas and shall not exceed 7.5 ppmvw while firing fuel oil (ISO conditions). In addition, emissions shall not exceed the hourly emission limits specified below. The permittee shall demonstrate compliance with these limits by initial stack test using EPA Method 18, 25 or 25A. [Rule 62-212.400, F.A.C.]
- General Electric 7FA: Emissions of VOC shall not exceed 7.8 lb/hr while firing natural gas and shall not exceed 17.4 lb/hr while firing fuel oil (at ISO conditions). [Rule 62-212.400, F.A.C.]
  - Westinghouse 501F: Emissions of VOC shall not exceed 8.8 lb/hr (at ISO conditions). [Rule 62-212.400, F.A.C.]

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## SECTION III. EMISSION UNITS SPECIFIC CONDITIONS

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- Westinghouse 501D5A: Emissions of VOC shall not exceed 5.4 lb/hr (at ISO conditions). [Rule 62-212.400, F.A.C.]
- 22. Sulfur Dioxide (SO<sub>2</sub>) and Sulfuric Acid Mist Emissions (SAM): SO<sub>2</sub> and SAM emissions shall be limited by firing pipeline natural gas (sulfur content less than 2 grain per 100 standard cubic foot) or by firing No. 2 or superior grade distillate fuel oil with a maximum 0.05 percent sulfur. [40CFR60 Subpart GG and Rules 62-4.070, 62-212.400, and 62-204.800(7), F.A.C.]  
[Note: Emissions of SO<sub>2</sub> and SAM will be limited by this condition to 9.2 lb/hr and 1.1 lb/hr respectively while firing natural gas, and 98.1 lb/hr and 11.3 respectively while firing fuel oil.]
- 23. Particulate Matter (PM/PM<sub>10</sub>) PM/PM<sub>10</sub> emissions shall not exceed 10 lb/hr when operating on natural gas and shall not exceed 17 lb/hr when operating on fuel oil. [Rule 62-212.400, F.A.C.]
- 24. Visible Emissions (VE): VE emissions shall serve as a surrogate for PM/PM<sub>10</sub> emissions and shall not exceed 5% opacity while operating on natural gas and 10% opacity while operating on fuel oil. [Rules 62-4.070, 62-212.400, and 62-204.800(7), F.A.C.]

### EXCESS EMISSIONS

- 25. Excess emissions resulting from startup, shutdown, or malfunction shall be permitted provided that best operational practices are adhered to and the duration of excess emissions shall be minimized. Excess emissions occurrences shall in no case exceed two hours in any 24-hour period for other reasons unless specifically authorized by DEP for longer duration. Operation below 50% output shall be limited to two hours in any 24-hour period, regardless of unit cycles (breaker closed to breaker open).
- 26. Excess emissions entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction, shall be prohibited pursuant to Rule 62-210.700, F.A.C. These emissions shall be included in the 24-hr average for NO<sub>x</sub>.
- 27. Excess Emissions Report: If excess emissions occur due to malfunction, the owner or operator shall notify DEP's Southwest District within (1) working day of: the nature, extent, and duration of the excess emissions; the cause of the excess emissions; and the actions taken to correct the problem. In addition, the Department may request a written summary report of the incident. Following the NSPS format, 40 CFR 60.7 Subpart A, periods of startup, shutdown, malfunction, shall be monitored, recorded, and reported as excess emissions when emission levels exceed the permitted standards listed in Specific Condition Nos. 18, 19 and 20. [Rules 62-4.130, 62-204.800, 62-210.700(6), F.A.C., and 40 CFR 60.7 (1998 version)].

### COMPLIANCE DETERMINATION

- 28. Compliance with the allowable emission limiting standards shall be determined within 60 days after achieving the maximum production rate, but not later than 180 days of initial operation of

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### SECTION III. EMISSION UNITS SPECIFIC CONDITIONS

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the unit, and annually thereafter as indicated in this permit, by using the following reference methods as described in 40 CFR 60, Appendix A (1998 version), and adopted by reference in Chapter 62-204.800, F.A.C.

29. Initial (I) performance tests (for both fuels, where applicable) shall be performed on each unit while firing natural gas as well as while firing oil. Initial tests shall also be conducted after any modifications (and shake down period not to exceed 100 days after re-starting the CT) of air pollution control equipment such as change or tuning of combustors. Annual (A) compliance tests shall be performed during every federal fiscal year (October 1 - September 30) pursuant to Rule 62-297.310(7), F.A.C., on each unit as indicated. The following reference methods shall be used. No other test methods may be used for compliance testing unless prior DEP approval is received in writing. Where initial tests only are indicated, these tests shall be repeated prior to renewal of each operation permit.

- EPA Reference Method 5 or 17, "Determination of Particulate Emissions from Stationary Sources" (I).
- EPA Reference Method 9, "Visual Determination of the Opacity of Emissions from Stationary Sources" (I, A).
- EPA Reference Method 10, "Determination of Carbon Monoxide Emissions from Stationary Sources" or RATA test data may be used to demonstrate compliance for annual test requirements (I, A).
- EPA Reference Method 20, "Determination of Oxides of Nitrogen Oxide, Sulfur Dioxide and Diluent Emissions from Stationary Gas Turbines." Initial test only for compliance with 40CFR60 Subpart GG and (I, A) short-term NO<sub>x</sub> BACT limits (EPA reference Method 7E, "Determination of Nitrogen Oxides Emissions from Stationary Sources" or RATA test data may be used to demonstrate compliance for annual test requirements).
- EPA Reference Method 18, 25 and/or 25A, "Determination of Volatile Organic Concentrations." Initial test only.

30. Continuous compliance with the NO<sub>x</sub> emission limits: Continuous compliance with the NO<sub>x</sub> emission limits shall be demonstrated with the CEM system based on the applicable averaging time of 24-hr block average (DLN) and 3-hr block average (SCR or WI). Based on CEMS data, a separate compliance determination is conducted at the end of each operating day and a new average emission rate is calculated from the arithmetic average of all valid hourly emission rates from the previous operating day. A valid hourly emission rate shall be calculated for each hour in which at least two NO<sub>x</sub> concentrations are obtained at least 15 minutes apart. Valid hourly emission rates shall not include periods of start up, shutdown, or malfunction unless prohibited by 62-210.700 F.A.C. These excess emissions periods shall be reported as required in Condition 27. [Rules 62-4.070 F.A.C., 62-210.700, F.A.C., 40 CFR 75 and BACT]

SECTION III. EMISSION UNITS SPECIFIC CONDITIONS

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- All continuous monitoring systems (CEMS) for NO<sub>x</sub> (or CO per Condition 32 below) shall be in continuous operation except for breakdowns, repairs, calibration checks, and zero and span adjustments. These CEMS shall meet minimum frequency of operation requirements: one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period. Data recorded during periods of continuous monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments shall not be included in the data average. [40CFR60.13]
31. Test Methods for Natural Gas Sulfur Content: For the purposes of demonstrating compliance with the 40 CFR 60.333 SO<sub>2</sub> standard, ASTM methods D4084-82 or D3246-81 (or equivalent) for sulfur content of gaseous fuel shall be utilized in accordance with the EPA-approved custom fuel monitoring schedule or natural gas supplier data may be submitted or the natural gas sulfur content referenced in 40 CFR 75 Appendix D may be utilized. However, the applicant is responsible for ensuring that the procedures in 40 CFR 60.335 or 40 CFR 75 are used when determination of fuel sulfur content is made. Analysis may be performed by the owner or operator, a service contractor retained by the owner or operator, the fuel vendor, or any other qualified agency pursuant to 40 CFR 60.335(e) (1998 version).
32. Compliance with CO emission limit:
- For the GE 7FA unit(s), an initial test for CO shall be conducted concurrently with the initial NO<sub>x</sub> test, as required. The initial NO<sub>x</sub> and CO test results shall be the average of three valid one-hour runs. Annual compliance testing for CO may be conducted at less than capacity when compliance testing is conducted concurrent with the annual RATA testing for the NO<sub>x</sub> CEMS required pursuant to 40 CFR 75.
  - For the Westinghouse unit(s), continuous compliance with the CO emission limits shall be demonstrated with the CEM system based on a 24-hr block average (DLN) and 3-hr block average. Based on CEMS data, a separate compliance determination is conducted at the end of each operating day and a new average emission rate is calculated from the arithmetic average of all valid hourly emission rates from the previous operating day. A valid hourly emission rate shall be calculated for each hour in which at least two CO concentrations are obtained at least 15 minutes apart. Valid hourly emission rates shall not include periods of start up, shutdown, or malfunction unless prohibited by 62-210.700 F.A.C. These excess emissions periods shall be reported as required in Condition 27. [Rules 62-4.070 F.A.C., 62-210.700, F.A.C., 40 CFR 75 and BACT]
33. Compliance with the VOC emission limit: An initial test is required to demonstrate compliance with the VOC emission limit. Thereafter, the CO emission limit and periodic tuning data will be employed as surrogate and no annual testing is required.
34. Testing procedures: Testing of emissions shall be conducted with the combustion turbine operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum heat input rate allowed by the permit, corrected for the average ambient air temperature during the test (with 100 percent represented by a curve depicting heat input vs. ambient temperature). If it is impracticable to test at permitted capacity, the source may be tested at less than permitted

## AIR CONSTRUCTION PERMIT PSD-FL-281 (0490044-001-AC)

### SECTION III. EMISSION UNITS SPECIFIC CONDITIONS

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capacity. In this case, subsequent operation is limited by adjusting the entire heat input vs. ambient temperature curve downward by an increment equal to the difference between the maximum permitted heat input (corrected for ambient temperature) and 110 percent of the value reached during the test 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 purposes of additional compliance testing to regain the permitted capacity. Procedures for these tests shall meet all applicable requirements (i.e., testing time frequency, minimum compliance duration, etc.) of Chapters 62-204 and 62-297, F.A.C.

35. Test Notification: The DEP's Southwest District shall be notified, in writing, at least 30 days prior to the initial performance tests and at least 15 days before annual compliance test(s).
36. Special Compliance Tests: The DEP may request a special compliance test pursuant to Rule 62-297.310(7), F.A.C., when, after investigation (such as complaints, increased visible emissions, or questionable maintenance of control equipment), there is reason to believe that any applicable emission standard is being violated.
37. Test Results: Compliance test results shall be submitted to the DEP's Southwest District no later than 45 days after completion of the last test run. [Rule 62-297.310(8), F.A.C.]

#### NOTIFICATION, REPORTING, AND RECORDKEEPING

38. Records: All measurements, records, and other data required to be maintained by Granite Power Partners II shall be recorded in a permanent form and retained for at least five (5) years following the date on which such measurements, records, or data are recorded. These records shall be made available to DEP representatives upon request.
39. Compliance Test Reports: A test report indicating the results of the required compliance tests shall be filed as per Condition No. 37 above. The test report shall provide sufficient detail on the tested emission unit and the procedures used to allow the Department to determine if the test was properly conducted and if the test results were properly computed. At a minimum, the test report shall provide the applicable information listed in Rule 62-297.310(8), F.A.C.

#### MONITORING REQUIREMENTS

40. Continuous Monitoring System: The permittee shall install, calibrate, maintain, and operate a continuous emission monitor in the stack to measure and record the nitrogen oxides and carbon monoxide emissions from these units. CO CEMS are required for the Siemens-Westinghouse units only. Upon request from EPA or DEP, the CEMS emission rates for NO<sub>x</sub> on these Units shall be corrected to ISO conditions to demonstrate compliance with the NO<sub>x</sub> standard established in 40 CFR 60.332. [Rules 62-204.800, 62-210.700, 62-4.130, 62-4.160(8), F.A.C., 40 CFR 75 and 40 CFR 60.7 (1998 version)].

**SECTION III. EMISSION UNITS SPECIFIC CONDITIONS**

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41. CEMS for reporting excess emissions: Excess Emissions and Monitoring System Performance Reports shall be submitted as specified in 40 CFR 60.7(c). CEM monitor downtime shall be calculated and reported according to the requirements of 40 CFR 60.7(c)(3) and 40CFR 60.7(d)(2). Periods when NO<sub>x</sub> and CO emissions (ppmvd @ 15% oxygen) are above the BACT standards, listed in Specific Conditions No 18, 19 and 20, shall be reported to the DEP Southwest District as required by Specific Condition 27.
42. CEMS in lieu of Water to Fuel Ratio: The NO<sub>x</sub> CEMS shall be used in lieu of the water/fuel monitoring system for reporting excess emissions in accordance with 40 CFR 60.334(c)(1), Subpart GG (1998 version). The calibration of the water/fuel monitoring device required in 40 CFR 60.335 (c)(2) (1998 version) will be replaced by the 40 CFR 75 certification tests of the NO<sub>x</sub> CEMS.
43. Continuous Monitoring Certification and Quality Assurance Requirements: The monitoring devices shall comply with the certification and quality assurance, and any other applicable requirements of Rule 62-297.520, F.A.C., 40 CFR 60.13, including certification of each device in accordance with 40 CFR 60, Appendix B, Performance Specifications and 40 CFR 60.7(a)(5) or 40 CFR Part 75. Quality assurance procedures must conform to all applicable sections of 40 CFR 60, Appendix F or 40CFR75. The monitoring plan, consisting of data on CEM equipment specifications; manufacturer, type, calibration and maintenance needs, and its proposed location shall be provided to the DEP Emissions Monitoring Section Administrator and EPA for review no later than 45 days prior to the first scheduled certification test pursuant to 40 CFR 75.62.
44. Natural Gas Monitoring Schedule: A custom fuel monitoring schedule pursuant to 40 CFR 75 Appendix D for natural gas may be used in lieu of the daily sampling requirements of 40 CFR 60.334 (b)(2) provided the following requirements are met:
- The permittee shall apply for an Acid Rain permit within the deadlines specified in 40 CFR 72.30.
  - The permittee shall submit a monitoring plan, certified by signature of the Designated Representative, that commits to using a primary fuel of pipeline supplied natural gas (sulfur content less than 20 gr/100 scf pursuant to 40 CFR 75.11(d)(2)).
  - Each unit shall be monitored for SO<sub>2</sub> emissions using methods consistent with the requirements of 40 CFR 75 and certified by the USEPA.
- This custom fuel monitoring schedule will only be valid when pipeline natural gas is used as a primary fuel. If the primary fuel for these units is changed to a higher sulfur fuel, SO<sub>2</sub> emissions must be accounted for as required pursuant to 40 CFR 75.11(d). [EPA Letter dated May 16, 2000]
45. Fuel Oil Monitoring Schedule: The following monitoring schedule for No. 2 or superior grade fuel oil shall be followed: For all bulk shipments of No. 2 fuel oil received at this facility an analysis which reports the sulfur content and nitrogen content of the fuel shall be provided by the fuel vendor. The analysis shall also specify the methods by which the analyses were conducted and shall comply with the requirements of 40 CFR 60.335(d). [EPA Letter dated May 16, 2000]



**SECTION III. EMISSION UNITS SPECIFIC CONDITIONS**

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46. Determination of Process Variables:

- The permittee shall operate and maintain equipment and/or instruments necessary to determine process variables, such as process weight input or heat input, when such data is needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
- Equipment and/or instruments used to directly or indirectly determine such process variables, including devices such as belt scales, weigh 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]

**APPENDIX GC**  
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

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- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. 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.
- G.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 or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, 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 or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does 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.
- G.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.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or 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.
- G.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 a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- a) Have access to and copy and records that must be kept under the 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.

- G.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 non-compliance; and
  - b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

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.

APPENDIX GC  
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

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- G.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 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- G.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.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 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.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- a) Determination of Best Available Control Technology (X)
  - b) Determination of Prevention of Significant Deterioration (X); and
  - c) Compliance with New Source Performance Standards (X).
- G.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 or 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:
    - 1. The date, exact place, and time of sampling or measurements;
    - 2. The person responsible for performing the sampling or measurements;
    - 3. The dates analyses were performed;
    - 4. The person responsible for performing the analyses;
    - 5. The analytical techniques or methods used; and
    - 6. The results of such analyses.
- G.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.

**APPENDIX BD**  
**BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)**

**Granite Hardee County Generation Facility**  
**PSD-FL-281 and 049044-001-AC**  
**Hardee County, Florida**

**BACKGROUND**

The applicant, Granite Power Partners II (GPP or Granite) proposes to install three nominal 120 to 180-megawatt (MW) combustion turbine-electrical generators at the planned Hardee County Generation Facility (HCGF), near Wauchula, Hardee County. The new units will operate in simple cycle mode and intermittent duty and exhaust through separate 100-foot stacks. Granite proposes to operate these units up to 3,000 hours per year per unit of which 500 hours per year per unit may be on maximum 0.05 percent sulfur distillate fuel oil.

The proposed project will constitute a New Major Facility per Rule 62-212.400(d)2.a., Florida Administrative Code (F.A.C.) because it will have the potential to emit at least 250 tons per year of a regulated pollutant. It is therefore subject to review for the Prevention of Significant Deterioration (PSD) and a determination of Best Available Control Technology (BACT) per Rule 62-212.400, F.A.C.

The application was received on January 18, 2000 and included a BACT proposal prepared by the applicant's consultant, ECT, Inc. Additional information was received on March 27. According to the application, the maximum emissions from the facility will be approximately 950 tons per year (TPY) of NO<sub>x</sub>, 518 TPY of CO, 125 TPY of PM/PM<sub>10</sub>, 108 TPY of SO<sub>2</sub>, 14 TPY of SAM, and 73 TPY of VOC. Emissions of each pollutant will exceed its "Significant Emission Rate" with respect to Table 212.400-2, (F.A.C.) thus requiring a BACT Determination. Descriptions of the process, project, air quality effects, and rule applicability are given in the Technical Evaluation and Preliminary Determination dated April 14, 2000, accompanying the Department's Intent to Issue.

**BACT DETERMINATION REQUESTED BY THE APPLICANT:**

Following are the ranges of values proposed by the applicant as BACT for each pollutant. The ranges reflect the four combustion turbine options originally proposed by Granite. The option for ABB technology was withdrawn. A breakdown of these options is provided in subsequent sections.

POLLUTANT	CONTROL TECHNOLOGY	PROPOSED BACT LIMIT
Nitrogen Oxides	Dry Low NO <sub>x</sub> Combusts Water Injection (Oil)	10.5 to 25 ppmvd @ 15% O <sub>2</sub> (gas) 42 ppmvd @ 15% O <sub>2</sub> (oil)
Particulate Matter	Pipeline Natural Gas No. 2 Distillate Oil (500 hr/yr) Combustion Controls	10 to 20 percent opacity
Carbon Monoxide	As Above	6 to 16 ppmvd (gas, baseload) 20 to 25 ppmvd (oil baseload)
Volatile Organic Compounds	As Above	1.2 to 3 ppmvd (gas, baseload) 7 to 10 ppmvw (oil baseload)
Sulfur Dioxide and Sulfuric Acid Mist	As Above	2 grain S/100 std cubic feet (gas) 0.05 percent sulfur (oil)

**APPENDIX BD**  
**BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)**

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**BACT DETERMINATION PROCEDURE:**

In accordance with Rule 62-212.400, F.A.C., this BACT determination is based on the maximum degree of reduction of each pollutant emitted which the Department of Environmental Protection (Department), on a case by case basis, taking into account energy, environmental and economic impacts, and other costs, determines is achievable through application of production processes and available methods, systems, and techniques. In addition, the regulations state that; in making the BACT determination, the Department shall give consideration to:

- Any Environmental Protection Agency determination of BACT pursuant to Section 169, and any emission limitation contained in 40 CFR Part 60 - Standards of Performance for New Stationary Sources or 40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants.
- All scientific, engineering, and technical material and other information available to the Department.
- The emission limiting standards or BACT determination of any other state.
- The social and economic impact of the application of such technology.

The EPA currently stresses that BACT should be determined using the "top-down" approach. The first step in this approach is to determine, for the emission unit in question, the most stringent control available for a similar or identical emission unit or emission unit category. If it is shown that this level of control is technically or economically unfeasible for the emission unit in question, then the next most stringent level of control is determined and similarly evaluated. This process continues until the BACT level under consideration cannot be eliminated by any substantial or unique technical, environmental, or economic objections.

**STANDARDS OF PERFORMANCE FOR NEW STATIONARY SOURCES:**

The minimum basis for a BACT determination is 40 CFR 60, Subpart GG, Standards of Performance for Stationary Gas Turbines (NSPS). The Department adopted subpart GG by reference in Rule 62-204.800, F.A.C. The key emission limits required by Subpart GG are 75 ppmvd NO<sub>x</sub> @ 15% O<sub>2</sub> (assuming 25 percent efficiency) and 150 ppmvd SO<sub>2</sub> @ 15% O<sub>2</sub> (or <0.8% sulfur in fuel). The BACT proposed by Granite is within the NSPS limit, which allows NO<sub>x</sub> emissions in the range of 100-110 ppmvd for the high efficiency units to be purchased for the Hardee County Generation Facility.

No National Emission Standard for Hazardous Air Pollutants exists for stationary gas turbines.

**DETERMINATIONS BY EPA AND STATES:**

The following tables include some recently permitted intermittent-duty simple cycle turbines. Two continuous-duty projects (Lakeland and PREPA) are also included. The BACT applications for the four options proposed for the Granite project are included to facilitate comparison. Two intermittent duty projects (Carson and McClellan) with Lowest Achievable Emission Rate (LAER) determinations are included as the Top technology. A combined cycle project based on the Westinghouse 501 D5A is included for comparison as the only information available on this model.

**APPENDIX BD**  
**BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)**

Project Location	Power Output (MW)	NO <sub>x</sub> Limit ppmvd @ 15% O <sub>2</sub> and Fuel	Technology	Comments
Granite Hardee, FL	510	10.5 - NG 42 - No. 2 FO	DLN WI	3x170 MW GE 7FA CTs 500 hrs on oil
Granite Hardee, FL	510	15 - NG 42 - No. 2 FO	DLN WI	3x170 MW WH 501F CTs 500 hrs on oil
Granite Hardee, FL	360	15 - NG 42 - No. 2 FO	DLN WI	3x170 MW WH 501D5A CTs 500 hrs on oil
Granite Hardee, FL	540	25 - NG 42 - No. 2 FO	DLN WI	3x180 MW ABB GT-24 CTs 500 hrs on oil. <b>Withdrawn</b>
Shady Hills Pasco, FL	510	9 - NG 42 - No. 2 FO	DLN WI	3x170 MW GE PG7241FA CTs Issued 01/00. 1000 hrs on oil
DeSoto Arcadia, FL	510	9 - NG 42 - No. 2 FO	DLN WI	3x170 MW GE PG7241FA CTs Issued 06/00. 1000 hrs on oil
Vandolah Hardee, FL	680	9 - NG 42 - No. 2 FO	DLN WI	4x170 MW GE 7FA CTs Issued 11/99. 1000 hrs on oil
Oleander Brevard, FL	850	9 - NG 42 - No. 2 FO	DLN WI	5x170 MW GE 7FA CTs Issued 11/99. 1000 hrs on oil
JEA Baldwin, FL	510	10.5 - NG 42 - No. 2 FO	DLN WI	3x170 MW GE 7FA CTs Issued 10/99. 750 hrs on oil
Reliant Osceola, FL	510	10.5 - NG 42 - No. 2 FO	DLN WI	3x170 MW GE 7FA CTs Issued 01/00. 750 hrs on oil
TEC Polk Power, FL	330	10.5 - NG 42 - No. 2 FO	DLN WI	2x165 MW GE 7FA CTs Issued 10/99. 750 hrs on oil
Dynergy, FL	510	15 - NG	DLN	3x170 MW WH 501F CTs Issued 06/00. Gas only
Dynergy Heard, GA	510	15 - NG	DLN	3x170 MW WH 501F CTs Issued 1999. Gas only
Tenaska Heard, GA	960	15 - NG 42 - No. 2 FO	DLN WI	6x170 MW GE 7FA CTs Issued 12/98. 720 hrs on oil
Calvert City, KY	340	25 - NG	WI	2x170 MW GE 7FA CTs Draft 1999. ?? hrs on oil
Mid-GA Cogen	308	9 NG 20 - FO	DLN & SCR	2x119 MW WH 501D5A CT's Achieves 15 ppmvd by DLN alone
Dynergy Reidsville, NC	900	15 - NG (by 2002) 42 - No. 2 FO	DLN WI	5x180 MW WH 501F CTs Initially 25 ppm NO <sub>x</sub> limit on gas Draft 5/98. 1000 hrs on oil.
Lyondell Harris, TX	160	25 - NG	DLN	1x160 MW WH 501F CTs Issued 11/99. Gas only
Southern Energy, WI	525	15/12 - NG 42 - No. 2 FO	DLN WI	3x175 MW GE 7FA CTs 15/12 ppm are on 1/24 hr basis Issued 1/99. 800 hrs on oil
RockGen Cristiana, WI	525	15/12 - NG 42 - No. 2 FO	DLN WI	3x175 MW GE 7FA CTs 15/12 ppm are on 1/24 hr basis Issued 1/99. 800 hrs on oil
Carson Energy, CA	42	5 - NG (LAER)	Hot SCR	42 MW LM6000PA. Startup 1995. Ammonia limit is 20 ppmvd
McClelland AFB, CA	85	5 - NG (LAER)	Hot SCR	85 MW GE 7EA. Applied 1999 Ammonia proposal 10 ppmvd
Lakeland, FL	250 CON	9/9 - NG (by 2002) 42/15 - No. 2 FO	DLN/HSCR WI/HSCR	250 MW WH 501G CT Initially 25 ppm NO <sub>x</sub> limit on gas Issued 7/98. 250 hrs on oil.
PREPA, PR	248 CON	10 - No. 2 FO	WI & HSCR	3x83 MW ABB GT11N CTs Issued 12/95.

CON = Continuous      DLN = Dry Low NO<sub>x</sub> Combustion      FO = Fuel Oil      GE = General Electric  
 SC = Simple Cycle      SCR = Selective Catalytic Reduction      NG = Natural Gas      WH = Westinghouse  
 INT = Intermittent      HSCR = Hot SCR      WI = Water or Steam Injection      ABB = Asea Brown Boveri

GPP Hardee County Generation Facility  
 Three Combustion Turbines and One Storage Tank

Permit No. PSD-FL-281  
 Facility I.D. No. 0490044

**APPENDIX BD**  
**BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)**

Project Location	CO – ppm (or as indicated)	VOC – ppm (or as indicated)	PM – lb/hr (or as indicated)	Technology and Comments
Granite Hardee, FL GE	12 – NG 23 – FO	1.2 – NG 2.8 – FO	10% Opacity	Clean Fuels Good Combustion
Granite Hardee, FL 501F	16 – NG 20 – FO	3 – NG 10 – FO	10% Opacity	Clean Fuels Good Combustion
Granite Hardee, FL D5A	10 – NG 28 – FO	3 – NG 10 – FO	10% Opacity	Clean Fuels Good Combustion
Granite Hardee, FL ABB (Withdrawn)	6 – NG 25 – FO	1.5 – NG 7.5 – FO	10% Opacity	Clean Fuels Good Combustion
Shady Hills Pasco, FL	12 – NG 20 – FO	1.4 – NG 7 – FO	10 lb/hr – NG 17 lb/hr – FO	Clean Fuels Good Combustion
Vandolah Hardee, FL	12 – NG 20 – FO	1.4 – NG 7 – FO	10 lb/hr – NG 17 lb/hr – FO	Clean Fuels Good Combustion
Oleander Brevard, FL	12 – NG 20 – FO	3 – NG 6 – FO	10% Opacity	Clean Fuels Good Combustion
JEA Baldwin, FL	12 – NG 20 – FO	1.4 – NG/FO Not PSD	9/17 lb/hr – NG/FO 10% Opacity	Clean Fuels Good Combustion
Reliant Osceola, FL	10.5 – NG 20 – FO	2.8 lb/hr – NG 7.5 lb/hr – FO	9 lb/hr – NG 17 lb/hr – FO	Clean Fuels Good Combustion
TEC Polk Power, FL	15 – NG 33 – FO	7 – NG 7 – FO	10% Opacity	Clean Fuels Good Combustion
Dynegy, FL	25 – NG		8.2 lb/hr – NG 10% Opacity	Clean Fuels Good Combustion
Dynegy Heard Co., GA	25 – NG	? – NG	0.005 lb/mmBtu – NG 10% Opacity	Clean Fuels Good Combustion
Tenaska Heard Co., GA	15 – NG 20 – FO	? – NG ? – FO	? – NG ? lb/hr – FO	Clean Fuels Good Combustion
Calvert City, KY	30 – NG (full load) 90 – NG (other loads)	? – NG	? – NG	Clean Fuels Good Combustion
Mid-GA Cogen	10 – NG 30 – FO	6 – NG 30 – FO	18 – NG 55 lb/hr – FO	Clean Fuels Good Combustion
Dynegy Reidsville, NC	25 – NG 50 – FO	6 lb/hr – NG 8 lb/hr – FO	6 lb/hr – NG 23 lb/hr – FO	Clean Fuels Good Combustion
Lyondell Harris, TX	25 – NG			Clean Fuels Good Combustion
RockGen Cristiana, WI	12@>50% load – NG 15@>75% 24@<75% – FO	2 – NG 5 – FO	18 lb/hr – NG 44 lb/hr – FO	Clean Fuels Good Combustion
RockGen Cristiana, WI	12@>50% load – NG 15@>75% 24@<75% – FO	2 – NG 5 – FO	18 lb/hr – NG 44 lb/hr – FO	Clean Fuels Good Combustion
Carson Energy, CA	6 – NG			Oxidation Catalyst
McClelland AFB, CA	23 – NG	3.9 – NG	7 lb/hr	Clean Fuels Good Combustion
Lakeland, FL	25 – NG or 10 by Ox Cat 75 – FO @ 15% O <sub>2</sub>	4 – NG 10 – FO	10% Opacity	Clean Fuels Good Combustion
PREPA, PR	9 – FO @ 15% O <sub>2</sub>	11 – FO @ 15% O <sub>2</sub>	0.0171 gr/dscf	Clean Fuels Good Combustion

**REVIEW OF NITROGEN OXIDES CONTROL TECHNOLOGIES:**

Some of the discussion in this section is based on a 1993 EPA document on Alternative Control Techniques for NO<sub>x</sub> Emissions from Stationary Gas Turbines. Project-specific information is included where applicable.

**APPENDIX BD**  
**BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)**

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**Nitrogen Oxides Formation**

Nitrogen oxides form in the gas turbine combustion process as a result of the dissociation of molecular nitrogen and oxygen to their atomic forms and subsequent recombination into seven different oxides of nitrogen. Thermal  $\text{NO}_x$  forms in the high temperature area of the gas turbine combustor. Thermal  $\text{NO}_x$  increases exponentially with increases in flame temperature and linearly with increases in residence time. Flame temperature is dependent upon the ratio of fuel burned in a flame to the amount of fuel that consumes all of the available oxygen.

In all but the most recent gas turbine combustor designs, the high temperature combustion gases are cooled to an acceptable temperature with dilution air prior to entering the turbine (expansion) section. The sooner this cooling occurs, the lower the thermal  $\text{NO}_x$  formation. Cooling is also required to protect the first stage nozzle. When this is accomplished by air cooling, the air is injected into the component and is ejected into the combustion gas stream, causing a further drop in combustion gas temperature. This, in turn, lowers achievable thermal efficiency for the unit.

The relationship between flame temperature, firing temperature, unit efficiency, and  $\text{NO}_x$  formation can be appreciated from Figure 1 which is from a General Electric discussion on these principles.

By maintaining a low fuel ratio (lean combustion), the flame temperature will be lower, thus reducing the potential for  $\text{NO}_x$  formation. Prompt  $\text{NO}_x$  is formed in the proximity of the flame front as intermediate combustion products. The contribution of Prompt to overall  $\text{NO}_x$  is relatively small in near-stoichiometric combustors and increases for leaner fuel mixtures. This provides a practical limit for  $\text{NO}_x$  control by lean combustion.

Fuel  $\text{NO}_x$  is formed when fuels containing bound nitrogen are burned. This phenomenon is not important when combusting natural gas. It is not a significant issue for the Granite project because these units will not be continuously operated, but rather will be "peakers". Also, low sulfur fuel oil (which has more fuel-bound nitrogen than natural gas) is proposed to be used for no more than 500 hours per year (per CT).

Uncontrolled emissions range from about 100 to over 600 parts per million by volume, dry, corrected to 15 percent oxygen (ppmvd @15%  $\text{O}_2$ ). The Department estimates uncontrolled emissions at approximately 200 ppmvd @15%  $\text{O}_2$  for each turbine of the Granite Project. The proposed  $\text{NO}_x$  controls will reduce these emissions significantly.

**$\text{NO}_x$  Control Techniques**

Wet Injection

Injection of either water or steam directly into the combustor lowers the flame temperature and thereby reduces thermal  $\text{NO}_x$  formation. Typical emissions achieved by wet injection are in the range of 15–25 ppmvd when firing gas and 42 ppmvd when firing fuel oil in large combustion turbines. These values often form the basis, particularly in combined cycle turbines, for further reduction to BACT limits by other techniques. Carbon monoxide (CO) and hydrocarbon (HC) emissions are relatively low for most gas turbines. However steam and (more so) water injection may increase emissions of both of these pollutants.



## Gas Turbine - Hot Gas Path Parts

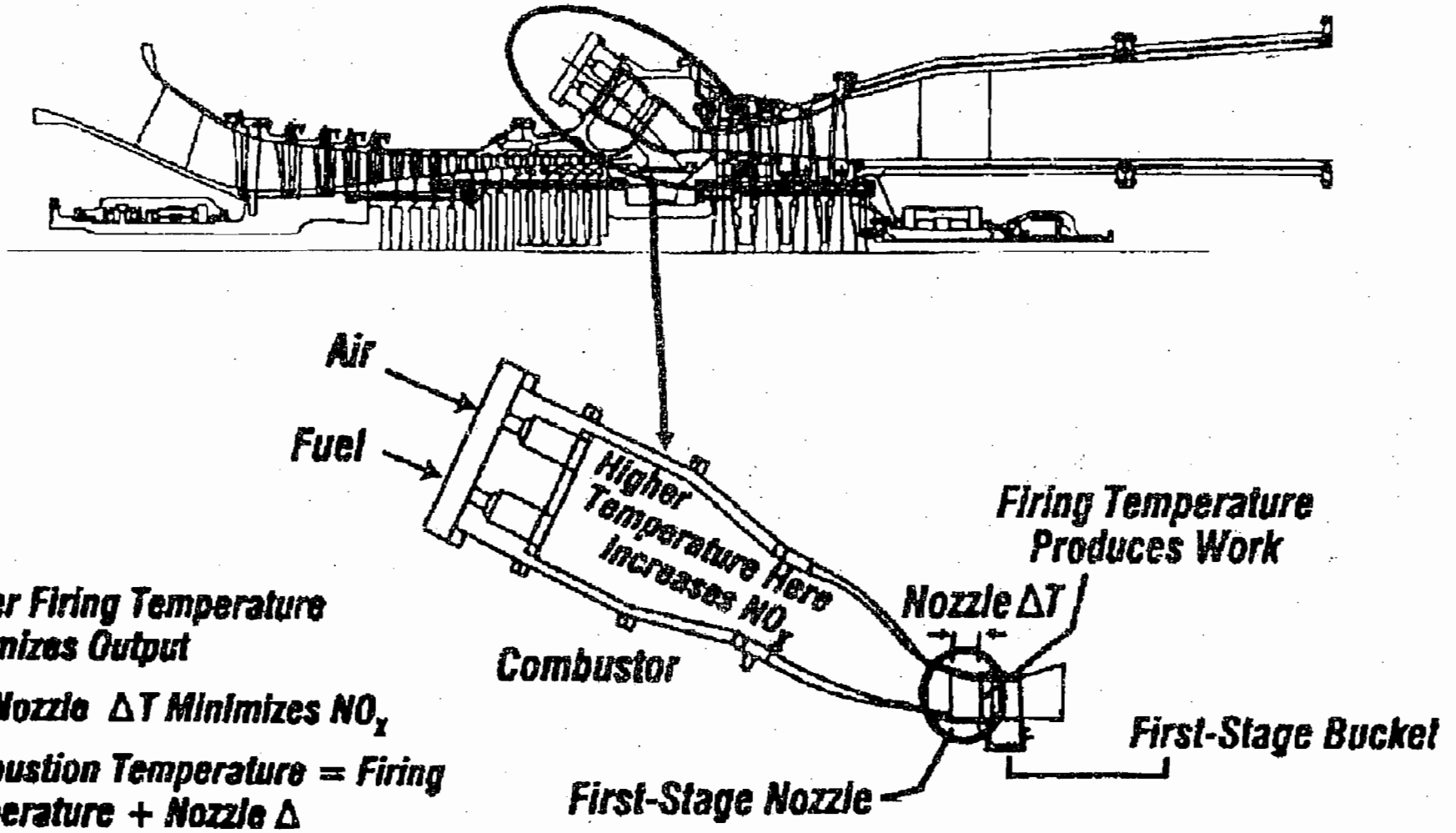


Figure 1 – Relation Between Flame Temperature and Firing Temperature

**APPENDIX BD**  
**BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)**

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Combustion Controls

The excess air in lean combustion cools the flame and reduces the rate of thermal  $\text{NO}_x$  formation. Lean premixing of fuel and air prior to combustion can further reduce  $\text{NO}_x$  emissions. This is accomplished by minimizing localized fuel-rich pockets (and high temperatures) that can occur when trying to achieve lean mixing within the combustion zones.

The above principle is depicted in Figure.2 for a can-annular combustor operating on gas. For ignition, warm-up, and acceleration to approximately 20 percent load, the first stage serves as the complete combustor. Flame is present only in the first stage, which is operated as lean stable combustion will permit. With increasing load, fuel is introduced into the secondary stage, and combustion takes place in both stages. When the load reaches approximately 40 percent, fuel is cut off to the first stage and the flame in this stage is extinguished. The venturi ensures the flame in the second stage cannot propagate upstream to the first stage. When the fuel in the first-stage flame is extinguished (as verified by internal flame detectors), fuel is again introduced into the first stage, which becomes a premixing zone to deliver a lean, unburned, uniform mixture to the second stage. The second stage acts as the complete combustor in this configuration.

To further reduce  $\text{NO}_x$  emissions, GE developed the DLN-2.0 (cross section shown in Figure 2) wherein air usage (other than for premixing) was minimized. The venturi and the centerbody assembly were eliminated and each combustor has a single burning zone. So-called "quaternary fuel" is introduced through pegs located on the circumference of the outward combustion casing.

GE has made further improvements in the DLN design. The most recent version is the DLN-2.6. The combustor is similar to the DLN-2 with the addition of a sixth (center) fuel nozzle. The emission characteristics of the DLN-2.6 combustor while firing natural gas are given in Figure 3 for a unit tuned to meet a 15 ppmvd  $\text{NO}_x$  limit (by volume, dry corrected to at 15 percent oxygen) at JEA's Kennedy Station.

$\text{NO}_x$  concentrations are higher in the exhaust at lower loads because the combustor does not operate in the lean pre-mix mode. Therefore such a combustor emits  $\text{NO}_x$  at concentrations of 15 ppmvd at loads between 50 and 100 percent of capacity, but concentrations as high as 100 ppmvd at less than 50 percent of capacity. Note that VOC comprises a very small amount of the "unburned hydrocarbons" which in turn is mostly non-VOC methane.

The combustor can be tuned differently to achieve emissions as low as 9 ppm of  $\text{NO}_x$  and 9 ppm of CO. Emissions characteristics by wet injection  $\text{NO}_x$  control while firing oil are expected to be similar for the DLN-2.6 as they are for those of the DLN-2.0 shown in Figure 4. Simplified cross sectional views of the totally premixed (while firing natural gas) DLN-2.6 combustor (a candidate for the GPP Hardee project) are shown in Figure 5.

Figure 6 shows some of the burners typically used in Westinghouse products including the 501F and 501D5A turbines proposed as options for this project. These combustors incorporate lean premixed fuel mixing zones surrounding a central pilot.<sup>1</sup> The central pilot provides stability but limits the ability to achieve very low  $\text{NO}_x$  generation. The characteristics of the gas-only burners to be installed on a Westinghouse 501F at a project in Florida are shown in Figure 7.

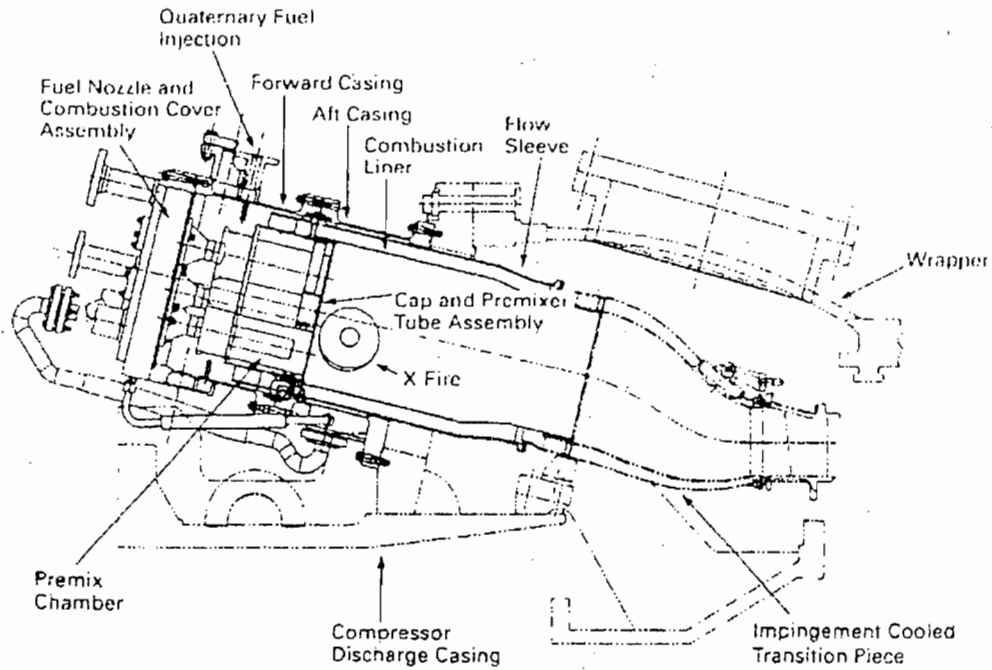
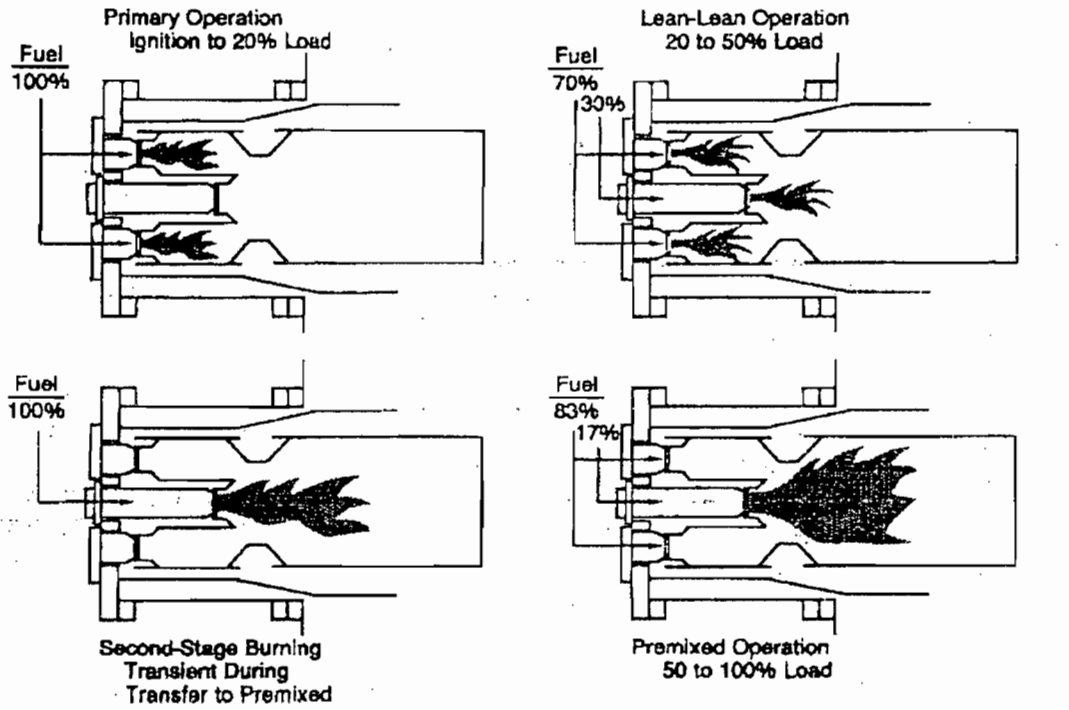


Figure 2 – Dry Low NO<sub>x</sub> Operating Modes – DLN-1  
 Cross Section of GE DLN-2

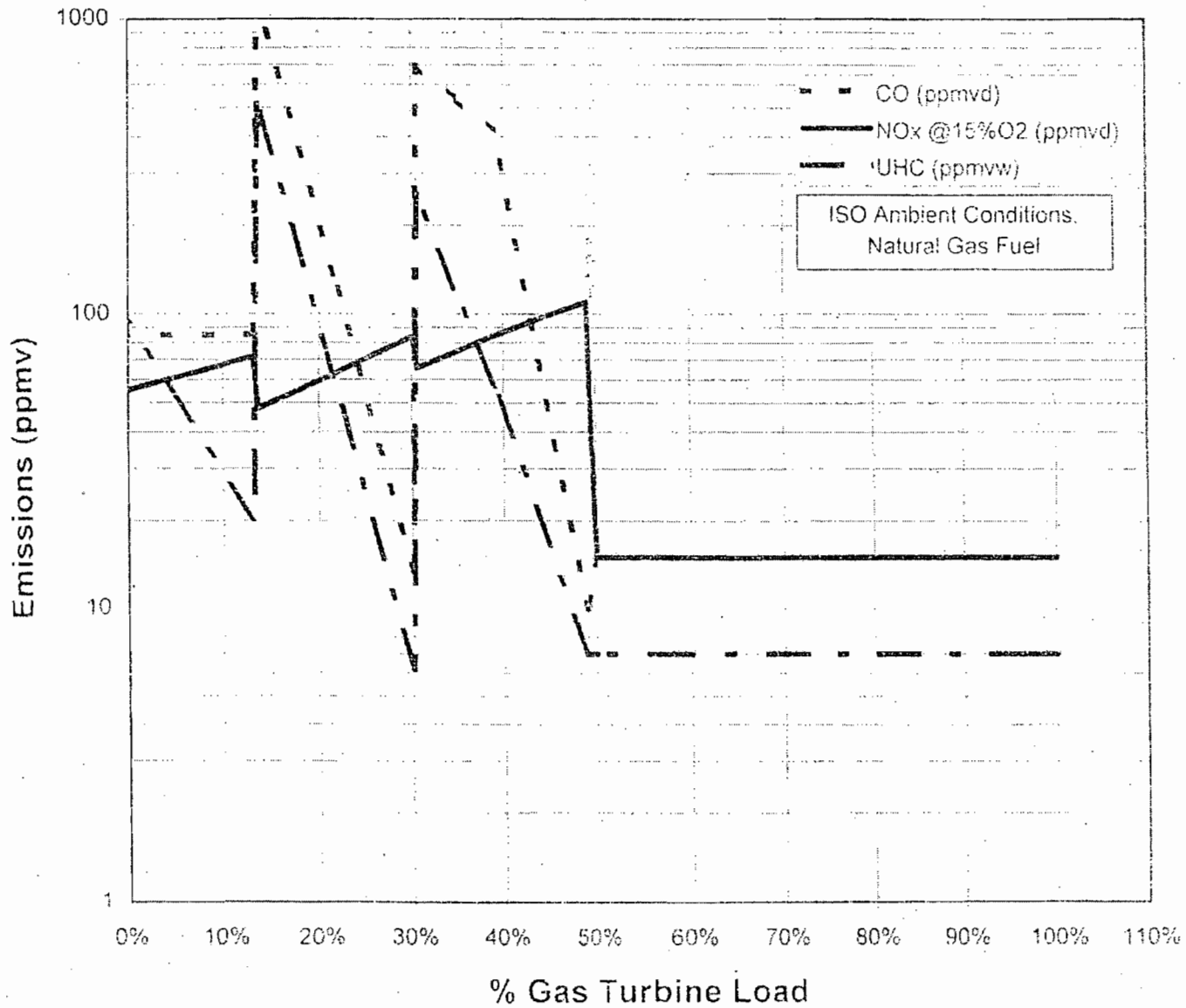


Figure 3 – Emissions Performance Curves for GE DLN-2.6 Combustor Firing Natural Gas in a Dual Fuel GE 7FA Combustion Turbine (Simple Cycle Intermittent Duty – If Tuned to 15 ppmvd NO<sub>x</sub>)

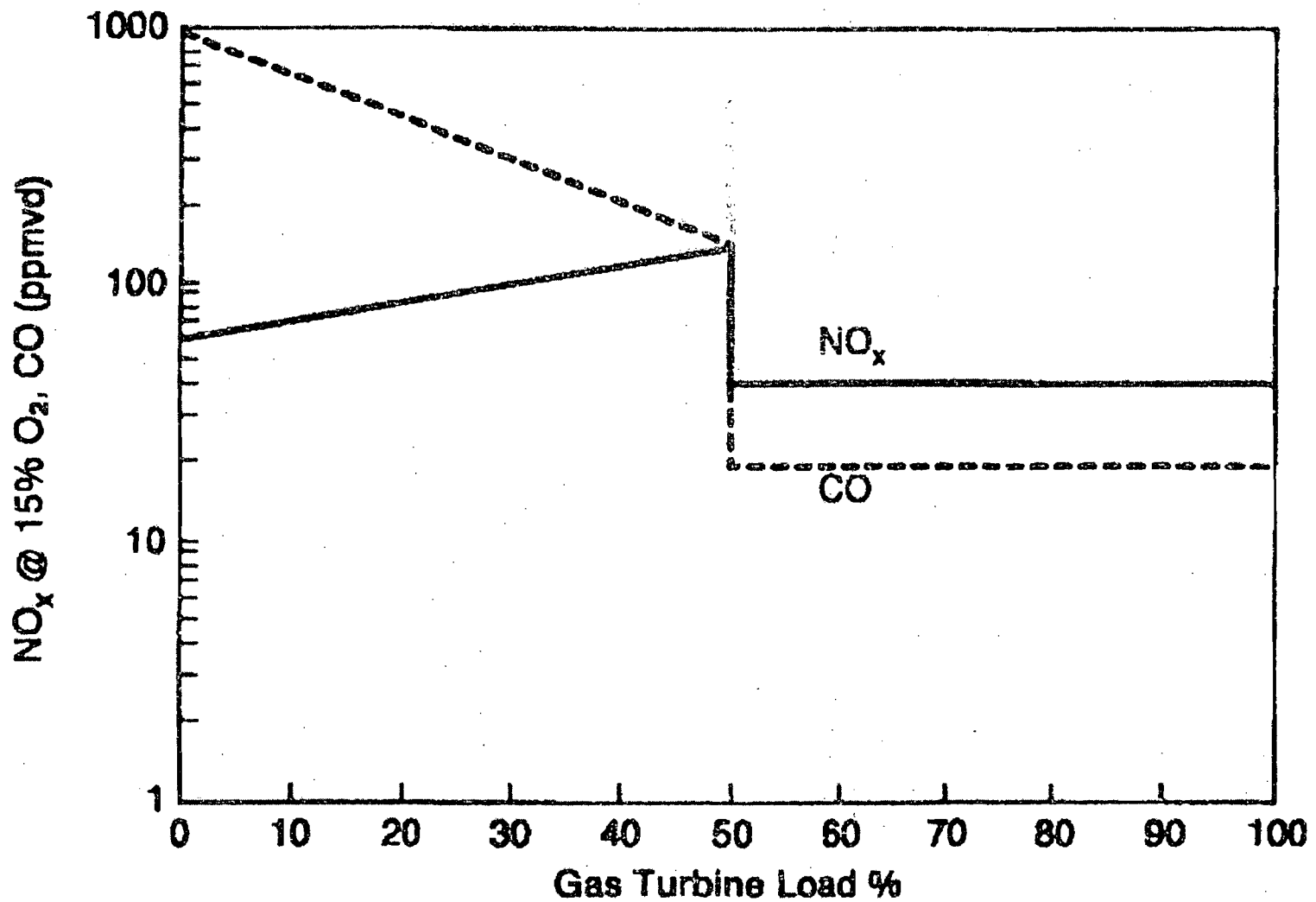
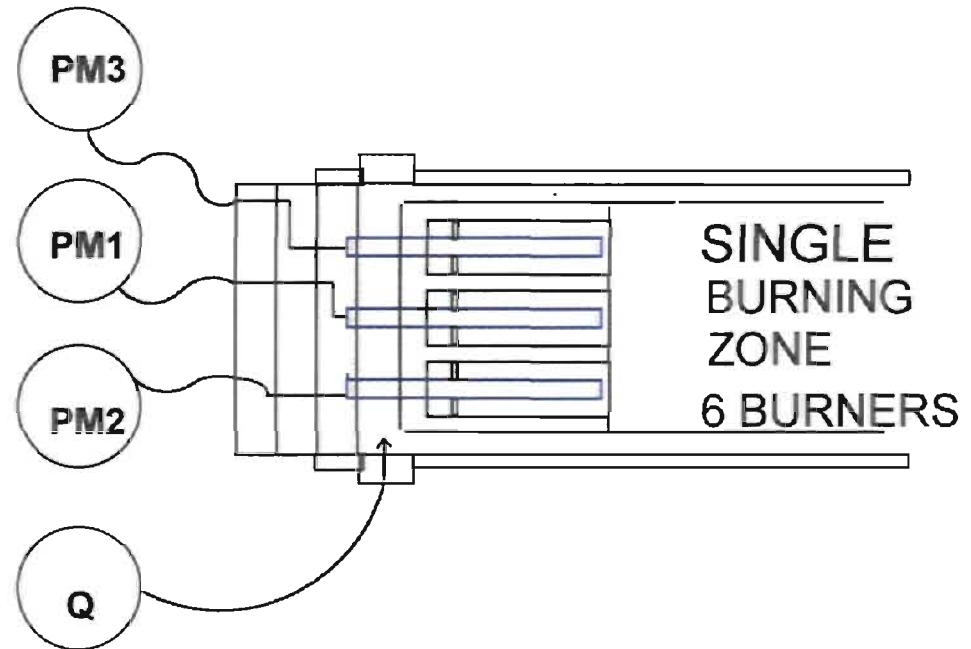
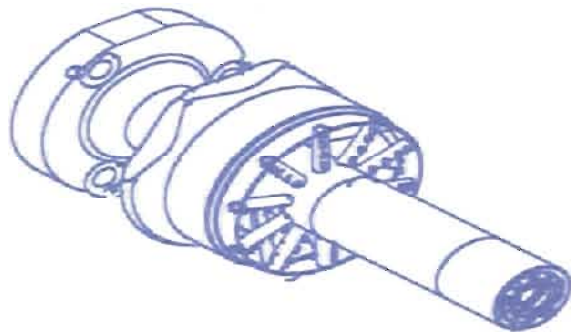
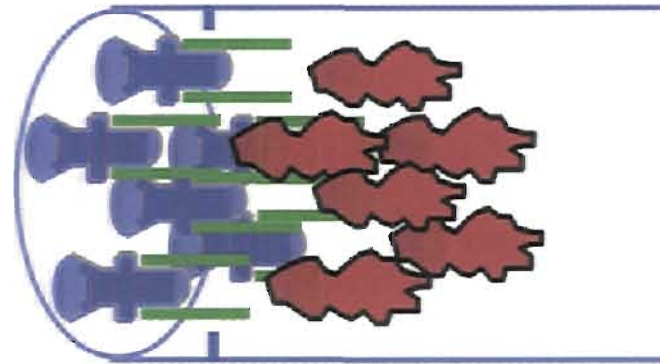
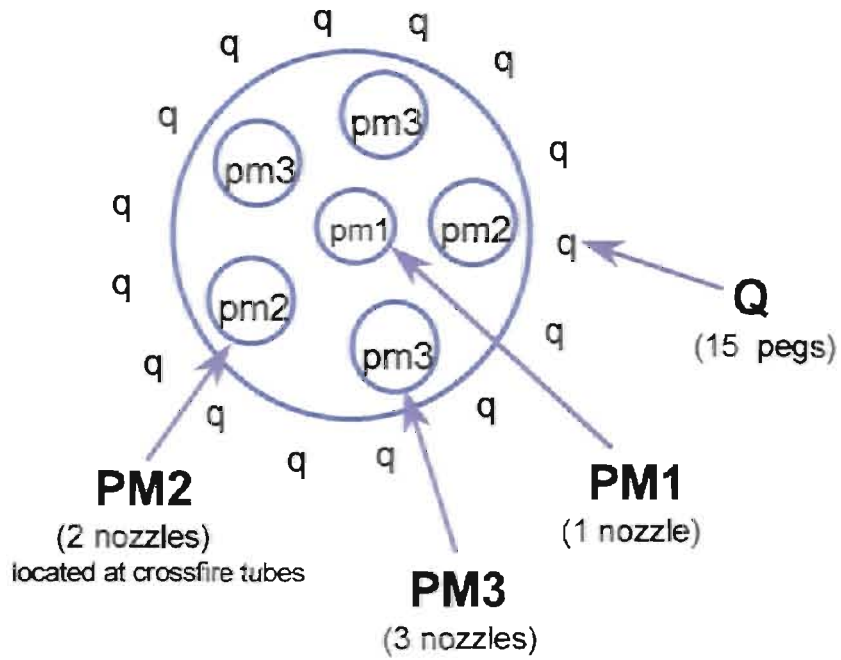
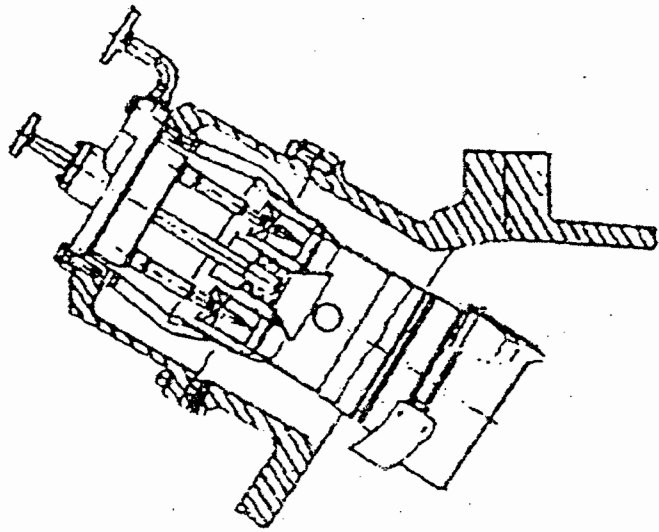


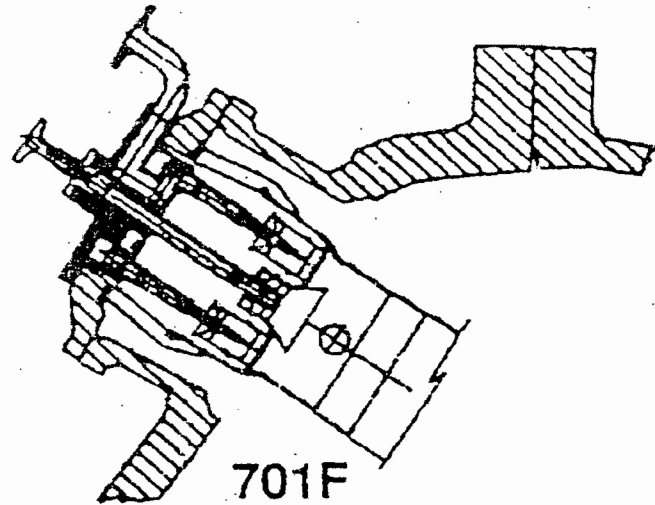
Figure 4 – Emissions Performance for DLN-2 Combustors  
Firing Fuel Oil in Dual Fuel GE 7FA Turbine



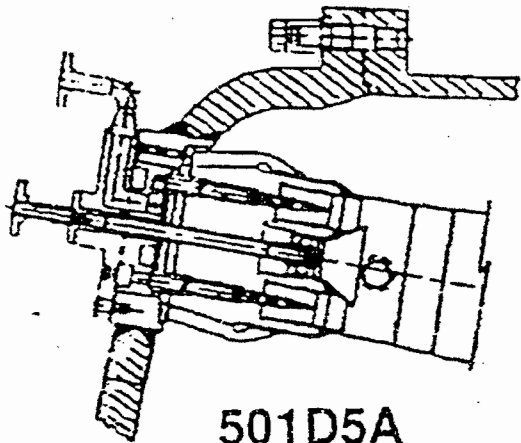
**Figure 5 - DLN2.6 Fuel Nozzle Arrangement**



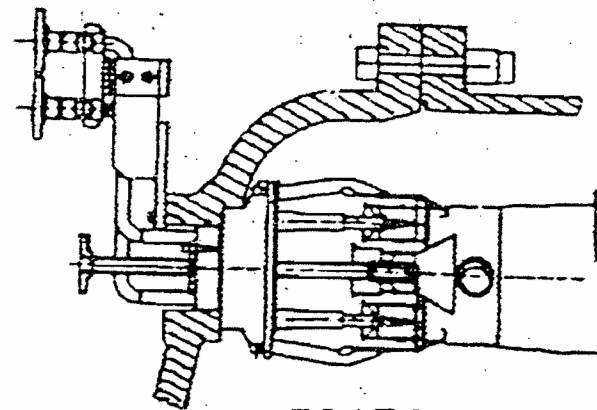
501F



701F



501D5A



501D5

Figure 6 – Typical Westinghouse DLN Combustors

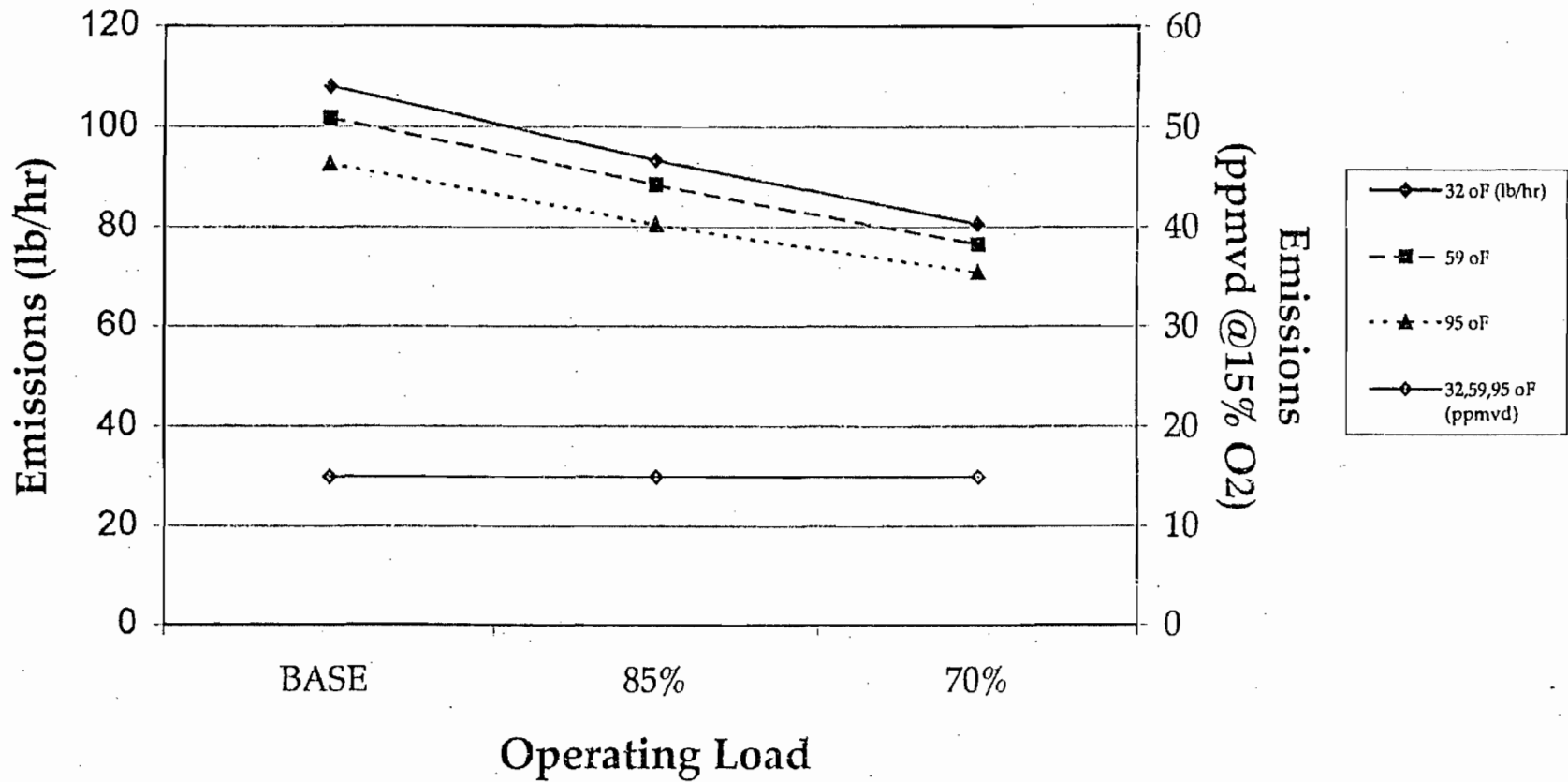


Figure 7 – Emissions Performance for WH501 Combustors Firing Natural Gas Only (Source: Dynege Palmetto Power Project)



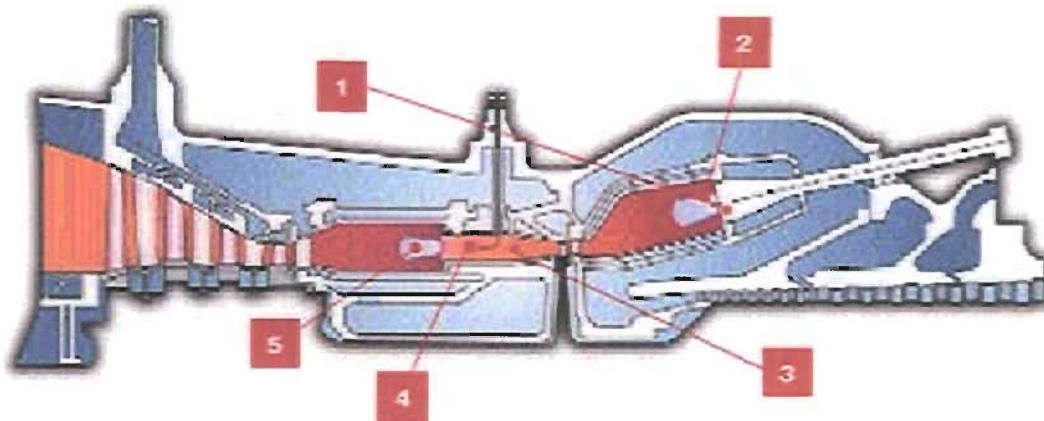
## APPENDIX BD

### BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

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Westinghouse is evaluating and testing fully pre-mixed systems as well as a partial catalytic combustion system.<sup>2</sup> The latter will use the premixed fuel mixing zones, but will replace the central pilot with a flameless catalytic component (see catalytic combustion below).

The ABB GT24 takes an approach known as Sequential Combustion. There are two annular combustion chambers, which utilize so-called EV (Environmental) and SEV (Sequential EV) burners, respectively. Sequential combustion means that fuel is injected simultaneously in both chambers, in a manner that provides higher specific output and efficiency. The precise sequence is described by ABB as follows<sup>3</sup>:



**Figure 8 – ABB GT24/26 Sequential Combustion**

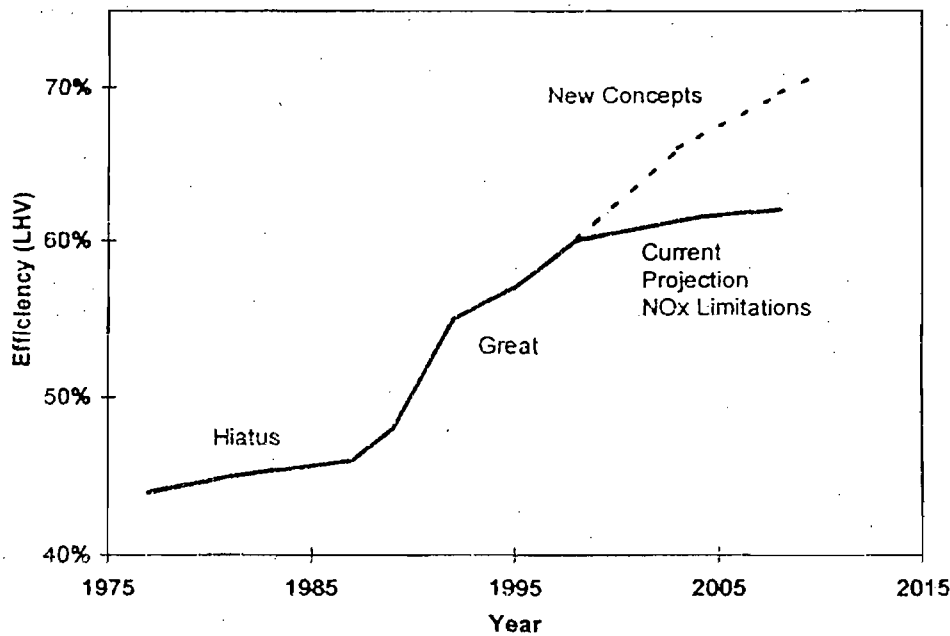
1. Compressed air is fed into the double-cone EV burner, creating a homogeneous, lean fuel/air mixture. The vortex flow, induced by the shape of the burner, breaks down at the EV burner exit into the combustion zone, forming a recirculation zone.
2. The mixture ignites into a single, low temperature flame ring. The recirculation zone stabilizes the flame in free space within the combustion zone, avoiding contact with the combustor wall.
3. The hot exhaust gas exits this first combustor, moving through the high pressure turbine stage before entering the SEV combustor.
4. Vortex generators in the SEV combustor enhance the SEV mixing process, while carrier air, injected with the fuel at the fuel lance, delays spontaneous ignition until outside of the SEV combustor.
5. Ignition occurs when the fuel reaches self-ignition temperature in the free space of the SEV combustion zone. The hot gas then continues its path into the low pressure turbine.

The Department does not have emissions characteristics for the ABB GT24 product. Granite proposes a NO<sub>x</sub> limit of 25 ppmvd for this option.

**APPENDIX BD**  
**BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)**

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An important consideration is that power and efficiency are sacrificed in the effort to achieve low  $\text{NO}_x$  by combustion technology. This limitation is seen in Figure 9 from an EPRI report.<sup>4</sup> Basically developments such as single crystal blading, aircraft compressor design, high technology blade cooling have helped to greatly increase efficiency and lower capital costs. Further improvements are more difficult in large part because of the competing demands for air to support lean premix combustion and to provide blade cooling. New concepts are under development by all of the manufacturers to meet the challenges implicit in Figure 9.



**Figure 9 – Efficiency Increases in Combustion Turbines**

Further  $\text{NO}_x$  reductions related to flame temperature control are possible such as closed loop steam cooling. This feature is available only in larger units (G or H Class technology) than the ones under consideration by Granite. It is more feasible for a combined cycle unit with a heat recovery steam generator (HRSG). In simple cycle, a once-through steam generator would be required. Steam is circulated through the internal portion of the nozzle component, the transition piece between the combustor and the nozzle, or certain turbine blades. The difference between flame temperature and firing temperature into the first stage is minimized and higher efficiency is attained. Flame temperatures and  $\text{NO}_x$  emissions can therefore be maintained at comparatively low levels even at high firing temperatures (refer back to figure 1). At the same time, thermal efficiency should be greater when employing steam cooling instead of air cooling.

At the present time, emissions achieved by combustion controls are as low as 9 ppmvd from large simple cycle gas turbines. Specialized dual fuel DLN burners were installed in a project in Israel<sup>5</sup>, but their performance on fuel oil is not known to the Department. Mitsubishi (who also make a 501F) is also developing a dual-fuel DLN Optimization of premix fuel-air nozzle and performance was verified in high-pressure combustion tests. Commissioning tests on gas and oil burning were completed at an undesignated site.<sup>6</sup> The details are not available in English.

**APPENDIX BD**  
**BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)**

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Catalytic Combustion

Catalytic combustion involves using a catalytic bed to oxidize a lean air and fuel mixture within a combustor instead of burning with a flame as described above. In a catalytic combustor the air and fuel mixture oxidizes at lower temperatures, producing less NO<sub>x</sub>.<sup>7</sup> In the past, the technology was not reliable because the catalyst would not last long enough to make the combustor economical.

There has been increased interest in catalytic combustion as a result of technological improvements and incentives to reduce NO<sub>x</sub> emissions without the use of add-on control equipment and reagents. As previously mentioned, Westinghouse is working to replace the central pilot in its DLN technology with a catalytic pilot in a project with Precision Combustion Inc.

Catalytica has developed a system know as XONON™, which works by partially burning fuel in a low temperature pre-combustor and completing the combustion in a catalytic combustor. The overall result is low temperature partial combustion (and thus lower NO<sub>x</sub> combustion) followed by flameless catalytic combustion to further attenuate NO<sub>x</sub> formation.

In 1998, Catalytica announced the startup of a 1.5 MW Kawasaki gas turbine equipped with XONON™.<sup>8</sup> The turbine is owned by Catalytica and is located at the Gianera Generating Station of Silicon Valley Power, a municipally owned utility serving the City of Santa Clara, California. Previously, this turbine and XONON™ system had successfully completed over 1,200 hours of extensive full-scale tests at a project development facility in Oklahoma which documented XONON's ability to limit emissions of NO<sub>x</sub> to less than 3 ppmvd.

Recently, Catalytica and GE announced that the XONON™ combustion system has been specified as the preferred emissions control system with GE 7FA turbines that have been ordered for Enron's proposed 750 MW Pastoria Energy Facility.<sup>9</sup> The project will enter commercial operation by the summer of 2001.

In principle, XONON™ will work on a simple cycle project. However, the Department does not have information regarding the status of the technology to for fuel oil firing and cycling operations.

Selective Catalytic Combustion

Selective catalytic reduction (SCR) is an add-on NO<sub>x</sub> control technology that is employed in the exhaust stream following the gas turbine. SCR reduces NO<sub>x</sub> emissions by injecting ammonia into the flue gas in the presence of a catalyst. Ammonia reacts with NO<sub>x</sub> in the presence of a catalyst and excess oxygen yielding molecular nitrogen and water. The catalysts used in combined cycle, low temperature applications (conventional SCR), are usually vanadium or titanium oxide and account for almost all installations. For high temperature applications (Hot SCR up to 1100 °F), such as simple cycle turbines, zeolite catalysts are available but used in few applications to-date. SCR units are typically used in combination with wet injection or DLN combustion controls.

In the past, sulfur was found to poison the catalyst material. Sulfur-resistant catalyst materials are now becoming more available. Catalyst formulation improvements have proven effective in resisting sulfur-induced performance degradation with fuel oil in Europe and Japan, where conventional SCR catalyst life in excess of 4 to 6 years has been achieved, while 8 to 10 years catalyst life has been reported with natural gas.

Excessive ammonia use tends to increase emissions of CO, ammonia (slip) and particulate matter (when sulfur-bearing fuels are used).

**APPENDIX BD**  
**BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)**

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As of early 1992, over 100 gas turbine installations already used SCR in the United States. Only one combustion turbine project in Florida (FPC Hines Power Block 1) employs SCR. The equipment was installed on a temporary basis because Westinghouse had not yet demonstrated emissions as low as 12 ppmvd by DLN technology at the time the units were to start up in 1998. Seminole Electric will install SCR on a previously permitted 501F unit at the Hardee Unit 3 (Paynes Creek) project. The reasons are similar to those for the FPC Hines Power Block I.

Permit limits as low as 2.0 to 3.5 ppmvd NO<sub>x</sub> have been specified using SCR on combined cycle F Class projects throughout the country. The recently permitted Kissimmee Cane Island Unit 3 project is one example.<sup>10</sup>

Selective Non-Catalytic Combustion

Selective non-catalytic reduction (SNCR) reduction works on the same principle as SCR. The differences are that it is applicable to hotter streams than conventional or hot SCR, no catalyst is required, and urea can be used as a source of ammonia. No applications have been identified wherein SNCR was applied to a gas turbine because the exhaust temperature of 1100 °F is too low to support the NO<sub>x</sub> removal mechanism.

The Department did, however, specify SNCR as one of the available options for the combined cycle Santa Rosa Energy Center. The project will incorporate a large 600 MMBtu/hr duct burner in the heat recovery steam generator (HRSG) and can provide the acceptable temperatures (between 1400 and 2000 °F) and residence times to support the reactions.

SCONO<sub>x</sub><sup>TM</sup>

SCONO<sub>x</sub><sup>TM</sup> is a catalytic add-on technology that achieves NO<sub>x</sub> control by oxidizing and then absorbing the pollutant onto a honeycomb structure coated with potassium carbonate. The pollutant is then released as molecular nitrogen during a regeneration cycle that requires dilute hydrogen gas. The technology has been demonstrated on small units in California and has been purchased for a small source in Massachusetts.<sup>11</sup>

California regulators and industry sources have stated that the first 250 MW block to install SCONO<sub>x</sub><sup>TM</sup> will be at PG&E's La Paloma Plant near Bakersfield.<sup>12</sup> The overall project includes several more 250 MW blocks with SCR for control.<sup>13</sup> USEPA has identified an "achieved in practice" BACT value of 2.0 ppmvd over a three-hour rolling average based upon the recent performance of a Vernon, California natural gas-fired 32 MW combined cycle turbine equipped with SCONO<sub>x</sub><sup>TM</sup>.

SCONO<sub>x</sub><sup>TM</sup> technology (at 2.0 ppmvd) is considered to represent LAER in non-attainment areas where cost is not a factor in setting an emission limit. It competes with less-expensive SCR in those areas, but has the advantages that it does not cause ammonia emissions in exchange for NO<sub>x</sub> reduction. Advantages of the SCONO<sub>x</sub><sup>TM</sup> process include in addition to the reduction of NO<sub>x</sub>, the elimination of ammonia and the control of VOC and CO emissions. SCONO<sub>x</sub><sup>TM</sup> has not been applied on any major sources in ozone attainment areas.

Recently EPA Region IX acknowledged that SCONO<sub>x</sub><sup>TM</sup> was demonstrated in practice to achieve 2.0 ppmv NO<sub>x</sub>.<sup>14</sup> Permitting authorities planning to issue permits for future combined cycle gas turbine systems firing exclusively on natural gas, and subject to LAER must recognize this limit which, in most cases, would result in a LAER determination of 2.0 ppmv.

**APPENDIX BD**  
**BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)**

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According to a recent press release, the Environmental Segment of ABB Alstom Power offers the technology (with performance guarantees) to “all owners and operators of natural gas-fired combined cycle combustion turbines, regardless of size.”<sup>15</sup>

SCONO<sub>x</sub> requires a much lower temperature regime that is not available in simple cycle units and is therefore not feasible for this project. Therefore the SCONO<sub>x</sub> system cannot be considered as achievable or demonstrated in practice for this application.

**REVIEW OF SULFUR DIOXIDE (SO<sub>2</sub>) AND SULFURIC ACID MIST (SAM)**

SO<sub>2</sub> control processes can be classified into five categories: fuel/material sulfur content limitation, absorption by a solution, adsorption on a solid bed, direct conversion to sulfur, or direct conversion to sulfuric acid. A review of the BACT determinations for combustion turbines contained in the BACT Clearinghouse shows that the exclusive use of low sulfur fuels constitutes the top control option for SO<sub>2</sub>.

For this project, the applicant has proposed as BACT the use of 0.05% sulfur oil and pipeline natural gas. The applicant estimated total emissions for the project at 108 TPY of SO<sub>2</sub> and 14 TPY of SAM. The Department expects the emissions to be lower because of the limited oil consumption and the typical natural gas in Florida that contains less than 2 grain of sulfur per 100 standard cubic feet (gr S/100scf). This value is well below the “default” maximum value of 20 gr. S/100 scf, but high enough to require a BACT determination.

**REVIEW OF PARTICULATE MATTER (PM/PM<sub>10</sub>) CONTROL TECHNOLOGIES:**

Particulate matter is generated by various physical and chemical processes during combustion and will be affected by the design and operation of the NO<sub>x</sub> controls. The particulate matter emitted from this unit will mainly be less than 10 microns in diameter (PM<sub>10</sub>).

Natural gas and 0.05 percent sulfur No. 2 (or superior grade) distillate fuel oil will be the only fuels fired and are efficiently combusted in gas turbines. Such fuels are necessary to avoid damaging turbine blades and other components already exposed to very high temperature and pressure. Natural gas is an inherently clean fuel and contains no ash. The fuel oil to be combusted contains a minimal amount of ash and its use is proposed for only 500 hours per year making any conceivable add-on control technique for PM/PM<sub>10</sub> either unnecessary or impractical.

A technology review indicated that the top control option for PM/PM<sub>10</sub> is a combination of good combustion practices, fuel quality, and filtration of inlet air. Total annual emissions of PM<sub>10</sub> for the project are expected to be approximately 125 tons per year.

**REVIEW OF CARBON MONOXIDE (CO) CONTROL TECHNOLOGIES**

CO is emitted from combustion turbines due to incomplete fuel combustion. Combustion design and catalytic oxidation are the control alternatives that are viable for the project. The most stringent control technology for CO emissions is the use of an oxidation catalyst.

All combustion turbines using catalytic oxidation appear to be combined cycle units. Among the most recently permitted ones are the 500 MW Wyandotte Energy project in Michigan, the El Dorado project in Nevada, Ironwood in Pennsylvania, Millenium in Massachusetts, and Sutter Calpine in California. The permitted CO values of these units are between 3 and 5 ppm. Catalytic

**APPENDIX BD**  
**BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)**

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oxidation was recently installed at a cogeneration plant at Reedy Creek (Walt Disney World), Florida to avoid PSD review which would have been required due to increased operation at low load. Seminole Electric recently proposed catalytic oxidation in order to meet the permitted CO limit at its planned 244 MW Westinghouse 501FD combined cycle unit in Hardee County, Florida.<sup>16</sup>

Most combustion turbines incorporate good combustion to minimize emissions of CO. So far this appears to be the only technology proposed at simple cycle turbine projects. These installations are typically permitted between 10 and 25 ppmvd at full load while firing gas. The ranges of 6-16 and 20-25 ppm for gas and oil respectively at baseload proposed in Granite's original application are within the range of recent determinations for simple cycle CO BACT determinations.

There is a great deal of uncertainty regarding actual CO emissions from installed units. Despite the relatively high BACT limits typically proposed, much lower emissions have actually been reported from several facilities without use of oxidation catalyst. For example, although Westinghouse does not offer a single digit CO guarantee on the 501F, the units installed at the FPC Hines Energy Complex achieved CO emissions in the range of 1-3 ppmvd on both gas and fuel oil.<sup>17</sup> GE 7FA units achieved similar results when firing gas at the FPL Martin Power Plant.<sup>18</sup>

**REVIEW OF VOLATILE ORGANIC COMPOUND (VOC) CONTROL TECHNOLOGIES**

Volatile organic compound (VOC) emissions, like CO emissions, are formed due to incomplete combustion of fuel. There are no viable add-on control techniques, particularly for simple cycle combustion turbines. The high flame temperature is very efficient at destroying VOC. The applicant has proposed good combustion practices to control VOC. The ranges of 1.2 to 3 ppmvw (gas) and 7 to 10 ppmvw (oil) at baseload proposed in Granite's original application are roughly within the range of recent determinations for simple cycle CO BACT determinations.

**BACKGROUND ON PROPOSED GAS TURBINES**

GPP plans the purchase of three simple cycle gas turbines. They have not yet determined from which manufacturer they will purchase the units. The most obvious difference between the units under consideration is their performance with respect to NO<sub>x</sub> emissions.

Typically, companies obtain a guarantee from GE to achieve 9 ppmvd during a test on a "new and clean unit." The test must be conducted at a steady-state load of 50 to 100 percent and completed within the first 100 fired hours of operation. With the frequent start-ups and shutdowns of the units, some applicants are concerned about the ability to maintain the low NO<sub>x</sub> values for long periods of time. As a result, some of them agreed to a "new and clean" limit of 9 ppmvd but requested a continuing BACT limit of 10.5 ppmvd.

As detailed in the table above, the Department has issued quite a number of permits for simple cycle GE 7FA requiring achievement of 9-10.5 ppmvd without the requirement of any additional control equipment. The ones with limits of 9 ppmvd are allowed to operate for as many as 1000 hours per year on back-up fuel oil whereas the ones permitted at 10.5 ppmvd are allowed only 750 hours per year of fuel oil. A smaller GE unit known as the 7EA can routinely achieve 9 ppmvd NO<sub>x</sub> or lower based on numerous installations in Florida and elsewhere. The 7EA has a lower flame temperature, compression ratio, and power rating (85 MW versus 170) than the 7FA.

**APPENDIX BD**  
**BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)**

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The ability to meet a NO<sub>x</sub> emission limit of 9 ppmvd by DLN technology involves a substantial efficiency and energy penalty as previously discussed. For example, the 7FA is characterized by a 15.5:1 compression ratio, a 2400 °F firing temperature, 56 percent efficiency, and produces 263 MW in combined cycle. On the other hand, GE offers more efficient F-Class model known as the 7FB, but guarantees a NO<sub>x</sub> limit of 25 ppmvd by DLN.

The 7FB is characterized by an 18.5:1 compression ratio, a 2500 °F firing temperature, 57.3 percent efficiency, and produces 280 MW in combined cycle. The clear implication is that the power penalty to reduce NO<sub>x</sub> from 25 to 9 ppmvd by DLN technology alone is on the order of 20 MW for a combined cycle (roughly 13 MW on a simple cycle unit).<sup>19</sup>

Granite proposes to meet 15 ppmvd at startup for Westinghouse 501F option for this project. However the Department is not aware of any Westinghouse 501F installations where 15 ppmvd is actually achieved (or even proposed at startup) when burning gas in a dual-fuel burner. The Department is aware that this type of unit was proposed for the Calvert City Project in Kentucky. The proposed limit was to be accomplished by wet injection. EPA objected to the issuance of the PSD and Title V Operation Permit for this facility and requires achievement of 15 ppmvd or lower.<sup>20</sup>

FPC recently requested that the Department provide until October, 2001 to install dual fuel combustors capable of meeting 12 ppmvd when burning gas at the existing Hines Energy Complex. The existing 501F units are controlled to that level with SCR technology.<sup>21</sup> The Department issued a separate permit to Dynegy, who proposed a gas-only project based on the Westinghouse 501F combustion turbine. Dynegy requested a limit for NO<sub>x</sub> of 15 ppmvd.

According to the application, the Westinghouse 501F and the GE7FA have similar characteristics (e.g. 9,150 versus 9,370 mmBtu/KWh and 170 MW nominal ratings at 59°F). In order to achieve 9 ppmvd NO<sub>x</sub>, Westinghouse needs time and a breakthrough that allows the central pilot flame to operate in fully, but stable, pre-mixed mode or in catalytic combustion.

Granite proposes to meet 15 ppmvd at startup for the 501D5A option for this project. The 501D5A units at Mid-Georgia Cogen can possibly achieve less than 15 ppmvd NO<sub>x</sub> while burning gas in a dual fuel burner.<sup>22</sup> This is logical based on the lower firing temperature, compression ratio and power rating of the 501D5A compared with the 501F. The Department does not have reasonable assurance, such as a manufacturer guarantee or actual test results to support a lower limit.

For the ABB GT24 option (withdrawn), GPP proposed to meet 25 ppmvd by DLN technology while firing gas. According to one reference, the Berkshire Power combined cycle ABB GT-24 at Agawam, Connecticut "is being fitted with a catalyst to bring the NO<sub>x</sub> level from 15 to 3.5 ppmvd."<sup>23</sup> This implies that the unit might achieve 15 ppmvd in simple cycle operation. However conversations with ABB Environmental suggest that a 15 ppmvd guarantee is not yet available.<sup>24</sup>

The ABB GT24 is characterized by a 30:1 compression ratio and 58 percent efficiency in combined cycle. It is not surprising that some compromises were made which resulted in greater power, higher efficiency but slowed progress toward single-digit NO<sub>x</sub> emissions. According to ABB, "rather than just concentrating on ever lower NO<sub>x</sub> levels, ABB has chosen a total solution that limits pollutants and at the same time increases energy efficiency."<sup>25</sup> A lower compression, lower efficiency version of the ABB GT24 might not have the difficulty achieving 15 or even 9 ppmvd by DLN technology alone.

**APPENDIX BD**  
**BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)**

**DEPARTMENT BACT DETERMINATION**

Following are the BACT limits determined for the GPP Hardee project assuming full load. Values for NO<sub>x</sub> and CO are corrected to 15% O<sub>2</sub> on a dry volume basis. The emission limits or their equivalents in terms of pounds per hour and NSPS units, as well as the applicable averaging times, are given in the permit Specific Conditions Nos. 20 through 25 of the air construction permit.

Turbine Model	NO <sub>x</sub> ppmvd	CO ppmvd	VOC ppmvw	PM - lb/hr opacity	SO <sub>2</sub> /SAM Fuel Sulfur	Comments
GE 7FA	10.5 - NG 42 - FO	12 - NG 20 - FO	3 - NG 7.5 - FO	10/17 lb/hr - NG/FO 10% Opacity	.02 gr/dscf 0.05 % S	500 hrs on fuel oil
WH 501F	15 - NG	16 - NG 20 - FO	3 - NG	10 lb/hr - NG 10% Opacity		No fuel oil firing
WH 501D5A	15 - NG	10 - NG 20 - FO	3 - NG	10 lb/hr - NG 10% Opacity		No fuel oil firing
ABB GT-24 (Withdrawn)	5 - NG 10/42 - FO	6 - NG 20 - FO	3 - NG 7.5 - FO	10/17 lb/hr - NG/FO 10% Opacity	.02 gr/dscf 0.05 % S	First 250 hrs on FO at 42 ppmvd Additional 250 hrs at 10 ppmvd

**RATIONALE FOR DEPARTMENT'S DETERMINATION**

- The Top technology and Lowest Achievable Emission Rate (LAER) for simple cycle combustion turbines are Hot SCR and an emission limit of 5 ppmvd NO<sub>x</sub>.
- It is possible that catalytic combustion technology such as XONON™ can be applied to this project, but only for the GE 7FA option in the foreseeable future. Theoretically XONON can achieve the 5 ppmvd NO<sub>x</sub> value and would equate to the top technology.
- An example of the top technology is the Carson Plant in Sacramento, California where there is a Hot SCR system on a simple cycle LM6000PA combustion turbine with a limit of 5 ppmvd.
- Hot SCR is proposed as LAER for the Sacramento Municipal Utilities District simple cycle GE 7EA project at McClellan Air Force Base to achieve 5 ppmvd by Hot SCR.
- The levelized costs of NO<sub>x</sub> removal by Hot SCR for the worst case option (ABB GT-24) were estimated in Granite's application as \$9,394 per ton. This assumes: 2,500 hours of operation on natural gas; 500 hours on fuel oil; reduction from 25 to 3.5 ppmvd on gas; and reduction from 42 to 10 ppmvd on fuel oil. The capital costs were estimated at \$28,344,000. Annualized costs were estimated at \$7,405,000.
- In the face of a real requirement to install Hot SCR, a system could be engineered to cool the gases and use the heat in a recuperator of some kind. Additionally a once-through steam generator could accomplish the same end with the generated steam used for steam augmentation. This could increase revenues to defray some of the additional equipment and possibly reduce the cost-effectiveness values.
- While the capital and annualized costs of Hot SCR for the GE and Westinghouse products will be less compared to the (withdrawn) ABB product, the levelized costs will be greater. The Department already determined that Hot SCR is not cost-effective for several simple cycle GE 7FA projects that will achieve 9 to 10.5 ppmvd NO<sub>x</sub> without a Hot SCR system.



**APPENDIX BD**  
**BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)**

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- The proposed emission limit of 25 ppmvd NO<sub>x</sub> for the ABB GT-24 option is too high compared with the 10.5 limit for the similar class GE product. The added power and efficiency characteristics of the ABB GT-24 do not justify a BACT for NO<sub>x</sub> more than twice that of the GE product. (Note: Applicant withdrew this option during comment period)
- The Department is aware of technical difficulties encountered with Hot SCR at the PREPA project where smaller ABB GT-11 gas turbines were used. The chief problem at PREPA relates to the exclusive use of 0.15 percent sulfur fuel oil. The Department believes that such problems will be minimized for the Granite project by use of natural gas and only occasional use of 0.05 percent sulfur backup fuel oil.
- BACT for the ABB option is determined to be 5 ppmvd by Hot SCR while firing natural gas. Up to 250 hours of fuel oil operation are permitted with the Hot SCR system off (NO<sub>x</sub> equal to 42 ppmvd) and another 250 hours are permitted with the Hot SCR system in operation (NO<sub>x</sub> equal to 10 ppmvd). (Note: will not be in permit since applicant withdrew this option)
- The proposed emission limit of 15 ppmvd for the Westinghouse 501 D5A option is higher than the 10.5 limit for the GE 7FA product. The Department is aware of a Westinghouse 501D5A dual-fuel burner (Mid-Georgia Cogen) that can probably achieve 15 ppmvd of NO<sub>x</sub> when firing gas. BACT for the Granite Westinghouse 501 D5A option is determined to be 15 ppmvd and exclusive use of natural gas. No fuel oil operation is permitted.
- The proposed emission limit of 15 ppmvd for the Westinghouse 501 F option is higher than the 10.5 limit for the similar class GE 7FA product. The Department is not aware of a Westinghouse 501F dual-fuel burner that can achieve 15 ppmvd of NO<sub>x</sub> when firing gas. Region IV has advised the State of Kentucky that a limit of 15 ppmvd (or lower) is required for the Calvert City project, which is based on the Westinghouse 501F. BACT for Granite's Westinghouse 501F option is determined to be 15 ppmvd and exclusive use of natural gas. No fuel oil firing is authorized.
- The units will be operated in intermittent duty and simple cycle mode. Therefore control options, which are feasible only for combined cycle units, are not applicable. This rules out Low Temperature (conventional) SCR, which achieves 3.5 ppmvd NO<sub>x</sub> or lower. It also rules out the possibility of SCONO<sub>x</sub>.
- The Department is aware that ABB offers a DLN technology for fuel oil firing applicable to at least certain smaller combustion turbines (ABB-GTX). GE and Mitsubishi are experimenting with DLN technologies on 7FA and 501F units. It is doubtful that this technology would be cost-effective except when fuel oil is the main fuel and where water resources are scarce. The Department will continue to monitor developments in this field.
- It is possible that the NO<sub>x</sub> emissions while firing oil from may be reduced from 42 ppmvd by increasing the water injection rate. In order to address this possibility, a specific condition will be added to conduct appropriate testing and prepare an engineering report. The report will be submitted for the Department's review to ensure that the lowest reliable NO<sub>x</sub> emission rates while firing oil have been achieved.
- VOC emissions will be set at 3 ppmvd while firing gas and 7.5 ppmvw while firing fuel oil.

**APPENDIX BD**  
**BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)**

- Granite evaluated the use of an oxidation catalyst to control CO for the project. The oxidation catalyst control system was estimated to increase the capital cost of the project by \$5,839,000 with an annualized cost of \$1,534,000 and a levelized cost of \$3,312 per ton of CO removed. The Department does not necessarily adopt this estimate, but would agree that even lower estimates would not be cost-effective for removal of CO.
- The Department accepts the CO limits proposed by the applicant for gas-firing. These are 12, 16, 10 and 6 ppmvd @15% O<sub>2</sub> for the GE 7FA; the Siemens-Westinghouse 501F; the Siemens-Westinghouse 501D5A, and the ABB GT-24 respectively while firing gas. These values are greater than the CO concentrations measured (~0-5.3 ppmvd at full load) during FPL Martin GE 7FA performance tests of 1994. The CO limit while firing fuel oil will be set at 20 ppmvd @15% O<sub>2</sub>. This value is well in excess of the CO concentration measured (~1-3 ppmvd at full load) during the FPC Hines Siemens-Westinghouse 501F performance tests of 1999.
- BACT for PM<sub>10</sub> was determined to be good combustion practices consisting of: inlet air filtering; use of pipeline natural gas; use of clean, low ash, low sulfur fuels, and operation of the unit in accordance with the manufacturer-provided manuals. The emission limits for PM<sub>10</sub> will be set at 10 pounds per hour during gas operation and 17 pounds per hour while operating on fuel oil.
- The Department will set a Visible Emission standard of 5 and 10 percent opacity as BACT for natural gas and fuel oil firing, respectively, consistent with the definition of BACT.

POLLUTANT	COMPLIANCE PROCEDURE
PM <sub>10</sub>	Method 5 or 17
Visible Emissions	Method 9
Carbon Monoxide	Annual Method 10 (can use RATA)
NO <sub>x</sub> (performance)	Annual Method 20 (can use RATA if at capacity)
NO <sub>x</sub> (gas - 24-hr block average) (oil - 3-hr block average) CO (24-hr block average) (Westinghouse units)	NO <sub>x</sub> and CO CEMS, O <sub>2</sub> or CO <sub>2</sub> diluent monitor, and flow device as needed. During gas operation, a separate compliance determination is conducted at the end of each operating day and a new average emission rate is calculated from the arithmetic average of all valid hourly emission rates from the previous operating day. A valid hourly emission rate shall be calculated for each hour in which at least two NO <sub>x</sub> or CO concentrations are obtained at least 15 minutes apart. Valid hourly emission rates shall not include periods of start up, shutdown, or malfunction unless prohibited by 62-210.700 F.A.C.
SO <sub>2</sub> and SAM	Custom Fuel Monitoring Schedule

**APPENDIX BD**  
**BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)**


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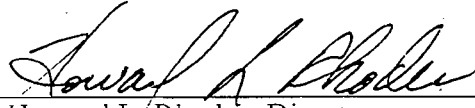
**DETAILS OF THE ANALYSIS MAY BE OBTAINED BY CONTACTING:**

A. A. Linero, P.E. Administrator \_\_\_\_\_  
New Source Review Section  
Department of Environmental Protection  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Recommended By:

Approved By:

  
\_\_\_\_\_  
C. H. Fancy, P.E., Chief  
Bureau of Air Regulation

  
\_\_\_\_\_  
Howard L. Rhodes, Director  
Division of Air Resources Management

8/3/00  
\_\_\_\_\_  
Date:

8/4/00  
\_\_\_\_\_  
Date:

**APPENDIX BD**  
**BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)**

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**REFERENCES**



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- <sup>1</sup> Westinghouse. "Technology Update - Westinghouse Family of Combustion Turbines." March 1998.
- <sup>2</sup> Presentation. Siemens-Westinghouse at EPA Region IV office. Informational Presentation. May 12, 1999.
- <sup>3</sup> ABB Combined Cycle Website. Combustion Turbines. GT24/26.Sequential.Combustion.: www.abbccpp.com.
- <sup>4</sup> Paper. Cohn, A. and Scheibel, J., EPRI: Current Gas Turbine Developments and Future Projects. October 1997.
- <sup>5</sup> Telecom. Linero, A.A., FDEP and Chalfin, J., GE. NO<sub>x</sub> control technology for fuel oil.
- <sup>6</sup> Paper. Mandai, S., et. al., MHI. "Development of Low NO<sub>x</sub> Combustor for Firing Dual Fuel." Mitsubishi Juko Giho, Vol.36 No.1 (1999).
- <sup>7</sup> Compliance Manual. California EPA; CARB Compliance Division. Gas Turbines. June 1996.
- <sup>8</sup> News Release. Catalytica. First Gas Turbine with Catalytica's XONON installed to Produce Electricity at a Utility. October 8, 1998.
- <sup>9</sup> News Release. Catalytica. XONON™ Specified With GE 7FA Gas Turbines For Enron Power Project. December 15, 1999.
- <sup>10</sup> Permit. Florida DEP. KUA Cane Island Unit 3. File PSD-FL-254. November, 1999.
- <sup>11</sup> News Release. Goaline. Genetics Institute Buys SCONOX Clean Air System. August 20, 1999.
- <sup>12</sup> Publication "Control Maker Strives to Sway Utility Skeptics." Air Daily. Volume 5, No. 199. October 14, 1998.
- <sup>13</sup> Telecom. Linero, A.A., FDEP, and Beckham, D., U.S. Generating. Circa November 1998.
- <sup>14</sup> Letter. Haber, M., EPA Region IX to Danziger, R., GLET. SCONOX at Federal Cogeneration. March 23, 1998.
- <sup>15</sup> News Release. ABB Alstom Power, Environmental Segment. ABB Alstom Power to Supply Groundbreaking SCONOX™ Technology. December 1, 1999.
- <sup>16</sup> Letter. Opalinski, M.P., SECI to Linero, A.A., FDEP. Turbines and Related Equipment at Hardee Unit 3. December 9, 1998.
- <sup>17</sup> Reports. Cubix Corporation. "Initial Compliance Reports – Power Block I." February and May, 1999.
- <sup>18</sup> Report. Florida Power & Light. "Final Dry Low NO<sub>x</sub> Verification Testing at Martin Combine Cycle Plant." August 7, 1995.
- <sup>19</sup> Information Release. General Electric Power Systems. MS7001FB Gas Turbine. Power-Gen, November 1999.
- <sup>20</sup> Letter. Smith, W.A., EPA Region IV to Hornback, J.E., Kentucky DEP. Draft PSD/Title V Permit for Calvert City Power I Facility. August 23, 2000.
- <sup>21</sup> Letter. W. Jeffrey Pardue, FPC to Sheplak, S., FDEP. Draft Title V Permit – Hines Energy Complex. February
- <sup>22</sup> Telecom. Linero, A.A., FDEP, and Mid-Georgia Cogen personnel. D5A Combustors. February 7, 2000.
- <sup>23</sup> Article. Jeffs, E., European Editor. "ABB Alstom Takes New England Market by Storm." Turbomachinery. November/December, 1999.
- <sup>24</sup> Telecom. Linero, A.A., FDEP, and Windham, E., ABB Environmental. SCONOX and GT Line of Combustion Turbines. February 28, 2000.
- <sup>25</sup> ABB Combined Cycle Website. Combustion Turbines. Environmental Burner. www.abbccpp.com.

# Memorandum

# Florida Department of Environmental Protection

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TO: Howard L. Rhodes  
THRU: Clair Fancy   
FROM: Al Linero  e/r  
DATE: August 2, 2000  
SUBJECT: GPP-II Hardee County Generation Facility  
Three 120-170 MW Combustion Turbines  
DEP File No. 0490044-001-AC (PSD-FL-281)

Attached is the Final Determination, Notice, Permit, and BACT for construction of three dual-fuel, intermittent duty, simple cycle, 120-170 MW combustion turbines and one 1.5 million gallon fuel oil storage tank at the planned Hardee Generation Facility.

The applicant presented four scenarios (turbine models) each of which consists of three combustion turbines. The possible models are 170 MW GE 7FA, 120 MW Westinghouse 501D5A, 170 MW Westinghouse 501F, 170 MW GE 7FA. The applicant withdrew an option for three 180 MW ABB GT-24 units. Because the capabilities of these machines vary greatly, the BACT determinations are different.

Nitrogen Oxides (NO<sub>x</sub>) emissions from the GE 7FA units will be controlled by Dry Low NO<sub>x</sub> (DLN-2.6). The applicant proposed an NO<sub>x</sub> emission limit of 10.5 ppmvd @15% O<sub>2</sub>. We are requiring compliance on a continuous (24-hour average) basis. 500 hours hours per year of fuel oil use will be allowed.

NO<sub>x</sub> from the Westinghouse 501D5A and 501F units will be controlled by DLN to 15 ppmvd. No fuel oil will be allowed. Otherwise a more complicated burner would be required that would cause NOX emissions during gas-firing to be higher than 15 ppmvd.

In response to a request for a public meeting regarding this project, a public meeting was held on April 19, 2000 at the DeSoto County Administrative Building at 7:00 PM. Few comments and questions were received. Technical questions were answered on the spot to the satisfaction of the commentors. Concerns were also voiced about the permitting of simple cycle facilities outside of the Power Plant Siting Act.

The applicant submitted comments (33 days after public notice) requesting operation of the Westinghouse units at low load (< 70 percent of full load). At such loads, emissions of CO can be an order of magnitude higher than allowed and two orders of magnitude higher than actually achieved at full load. We denied this request for technical reasons.

A petition for an Administrative Hearing was also filed for this project. The petition was dismissed (with leave to amend) by OGC and no amended petition was received.

I sent a copy of this package last week to the applicant and learned through his consultant (ECT) that will accept it. They pointed out that the 33 days referenced above included the Memorial Day weekend. I recommend your approval and signature on the Permit and BACT determination.

AAL/al

Attachments

**STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

**NANCY GRANT,**

**Petitioner,**

vs.

**OGC CASE NO. 00-1040**

**GRANITE POWER PARTNERS II, L.P. and  
STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION,**

**Respondents.**

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**ORDER DISMISSING PETITION WITH LEAVE TO AMEND**

On May 10, 2000, the Florida Department of Environmental Protection (Department) received a petition for hearing from Petitioner Nancy Grant. See Exhibit 1. The petition challenged the Department's decision to issue Permit No. 0490044-001-AC (PSD-281), to Granite Power Partners II, L.P. to construct three combustion turbine-electrical generators with 100-foot stacks, a natural gas fired heater, and one 1.5 million gallon fuel oil storage tank for the Hardee County Generation Facility in Hardee.

Section 120.54(5)(b)4 of the Florida Statutes (1999), Florida Administrative Code Rule 28-106.201(2), and the notice provided to Petitioner explain what must be included in a petition for a formal administrative proceeding. This petition does not comply with Rule 28-106.201(2) and therefore does not contain sufficient information to determine whether a formal administrative proceeding should be held. Specifically, the request does not include:

- (a) An explanation of how the petitioner's substantial interests are or will be affected by the Department's decision;
- (b) A statement of all issues of material fact disputed by the petitioner or a statement that there are no disputed facts;

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T-004 P.003/007 F-008

(c) A concise statement of the ultimate facts alleged, including a statement of the specific facts that the petitioner contends warrant reversal or modification of the Department's proposed decision; and

(d) A statement of the specific rules or statutes that the petitioner contends require reversal or modification of the Department's proposed decision.

Without this information, the petition must be dismissed as required by Florida Administrative Code Rule 28-106.201(4). Therefore, IT IS ORDERED:

The petition for hearing filed by Nancy Grant is *DISMISSED*, without prejudice to Nancy Grant to amend her petition to provide the information listed above. The amended petition must be filed (received) in the Office of General Counsel, Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, within fifteen (15) days after the date set forth in the certificate of service on the last page of this Order. This Order constitutes final agency action of the Department unless a timely amended petition is filed in conformance with this Order.

Any party to this Order has the right to seek judicial review of the Order under Section 120.68 of the Florida Statutes by the filing of a notice of appeal under Rules 9.110 and 9.190 of the Florida Rules of Appellate Procedure with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station 35, 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 of appeal must be filed within thirty days after this order is filed with the Clerk of the Department.

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T-004 P.004/007 F-006

DONE AND ORDERED this 8th day of June, 2000, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Teri L. Donaldson  
Teri L. Donaldson  
General Counsel  
3900 Commonwealth Boulevard  
Tallahassee, Florida 32399-3000

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Matthew Chapman  
CLERK DATE 6/8/00

CERTIFICATE OF SERVICE

I CERTIFY that a true copy of the foregoing was mailed to:

Nancy Grant  
Post Office Box 573  
Arcadia, Florida 33865

Lawrence Sellers, Jr., Esq.  
Holland & Knight  
315 South Calhoun Street, Ste 600  
Tallahassee, Florida 32301-1807

on this 8th day of June, 2000.

W. Douglas Beason  
W. DOUGLAS BEASON  
Assistant General Counsel  
3900 Commonwealth Boulevard  
Mail Station 35  
Tallahassee, Florida 32399-3000  
Telephone: (850) 488-9314



JUN-08-2000 02:34AM FROM:HOLLAND AND KNIGHT

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~~MAX-INT-FF, FROM:XXXXXX~~ Fax:850-922-6979

May 10 '00 12:52

P.03/05

## Best Available Copy

May 10, 2000

Petition for Administrative Proceeding  
under sections 120.569 and 120.57 of the Florida Statutes

DGP File No. 0490044-001-AC (PSD-FL-281)  
Granite Power Partners II, L.P.  
Hardee County Generation Station-Units 1-3

(a) Agency affected:

Department of Environmental Protection  
Bureau of Air Regulation  
111 S. Magnolia Drive, Suite 4  
Tallahassee, Florida 32301  
Telephone: 850/488-0114  
Fax: 850/488-6967

(b) Petitioner:

Nancy Grant  
P.O. Box 573  
Arcadia, Florida 34265  
Telephone: 863/494-9696  
FAX: 863/993-3700

(b) How the petitioner's substantial interests will be  
affected by the agency determination:

As you have heard from petitions throughout the State of Florida the substantial interests remain the same. The health, well being, and quality of my life as well as yours, my grandchildren and yours will be directly felt by the decisions that you make. Contaminating the air we breath and using the state guidelines for excuses will be met with deadly results.

(c) statement of how petitioner received notice of agency  
action or proposed action:

I followed the trail from the Leads of John  
Ellis's, (I.P.S. Powers, Avon Park Corporation) and  
from the notice of intent from the Hardee paper.

EXHIBIT 1

JUN-08-2000 02:34AM FROM:HOLLAND AND KNIGHT

18502228188

T-004

P.005/007 F-008

~~MAX-11-27, 11-27-2000~~ Fax:850-922-6979

May 10 '00 12:52

P.05/05

**Best Available Copy**

May 10, 2000

Petition for Administrative Proceeding  
under sections 120.669 and 120.67 of the Florida Statutes

DWP File No. 0490044-001-AC (PSD-FL-281)  
Granite Power Partners II, L.P.  
Hardee County Generation Station-Units 1-3

**(a) Agency affected:**

Department of Environmental Protection  
Bureau of Air Regulation  
111 S. Magnolia Drive, Suite 4  
Tallahassee, Florida 32301  
Telephone: 850/488-0114  
Fax: 850/488-6967

**(b) Petitioner:**

Nancy Grant  
P.O. Box 573  
Arcadia, Florida 34265  
Telephone: 863/494-9696  
FAX: 863/993-3700

**(b) How the petitioner's substantial interests will be affected by the agency determination:**

As you have heard from petitions throughout the State of Florida the substantial interests remain the same. The health, well being, and quality of my life as well as yours, my grandchildren and yours will be directly felt by the decisions that you make. Contaminating the air we breath and using the state guidelines for excuses will be met with deadly results.

**(c) statement of how petitioner received notice of agency action or proposed action:**

I followed the trail from the leads of John Elin's (I.P.S. Powers, Avon Park Corporation) and from the notice of intent from the Hardee paper.

**EXHIBIT 1**

JUN-09-2000 02:35AM FROM:HOLLAND AND KNIGHT

18502228185

T-004 P.008/007 F-008

MAY-10-00 FAX:800-422-6979

May 10 '00 12:53 P.04/05

**Best Available Copy**

Petition: page 2

**(d) statement of all disputed issues of material fact:**

Our utilities, FPL has stated, would not build plants such as proposed outside our towns. These plants are not for any other purpose than lining the applicants wallet. Excess pollution for this purpose is wrong.

This is a violation of our God given rights under the Constitution of the United States for clean air, pure water and sunshine.

The Clean Air Act of the United States has set standards that should ensure we as a people do not become ill or suffer disease because of the air we breathe from polluting, unnecessary, money making, plants that benefit no one except the narrow minded, money hungry, monsters that don't care about even the planet they live on. They would destroy even their own family to make that money. When is enough enough.

There are a lot of material facts that will stand up in court and that is where this is going. Did any of you pay any attention at all to the Earth Day Rally in Washington DC just recently?

**(e) statement of ultimate facts alleged and facts that warrant reversal:**

The obvious fact is that you cannot permit unlimited polluting factories in an already polluted environment. The accumulated effect of all of these plants is going to have a destructive effect on Hardee County as well as the surrounding area. The taxes from these plants are what Little Backwoods Commissioners look at, that is what the Phosphate Industry calls them. This is a wake-up petition.

The entire Florida Statutes need to be updated to meet our desperate environmental needs before we have destroyed completely our home, planet Earth. Our elected officials will now be held accountable for their neglect. They haven't kept up with the times.

JUN-09-2000 02:35AM FROM: HOLLAND AND KNIGHT

18502228185

T-004 P.007/007 F-008

~~MAY-10-00~~ Fax: 850-922-6979

May 10 '00 12:53 P.05/05

### Best Available Copy

Petition: page 3

(f) a statement of the specific rules or statutes the petitioner contends require reversal or modification

That is putting it mildly, these so called rules are dated 1977. They need to be updated as previously stated. The hand writing is on the wall. They don't address the problem that is facing this state, this nation AT ALL!

(g) statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take:

Do not permit any more merchant plants. It doesn't take a whole lot of common sense to see the problem. We as a nation are like a flock of sheep following these rules to our destruction. Permit all these plants that come your way and I'm afraid you are going to be held responsible for the damage they cause, the lives they take.

I am also requesting the Administrative hearing be held in Hardee County.

*Nancy Grant*  
*May 10, 2000*



**LS POWER, LLC**

655 Craig Road, Suite 336  
St. Louis, Missouri 63141  
(314) 993-2700 • Fax: (314) 993-2790

**RECEIVED**

**JUL 13 2000**

**BUREAU OF AIR REGULATION**

**Michael F. Vogt**  
*Project Manager*

July 12, 2000

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

Re: Hardee County Generating Facility  
DEP File No. 0490044-001-AC (PSD-FL-281)

Dear Mr. Linero:

In accordance with your recent request, please find enclosed revised estimates of hazardous air pollutant ("HAP") emission rates for the Hardee County Generation Facility.

Our environmental consultant, Environmental Consulting & Technology, Inc. (ECT), developed the enclosed emission estimates. They are based on the April 2000 revisions to AP-42, Section 3.1 (Stationary Gas Turbines). The revised AP-42 factors are based on stack test results for small (<40 MW) combustion turbines (CTs) which show considerable variability. The revised AP-42 HAP emission factors are considered to over-estimate actual HAP emissions from large "F" class CTs such as those proposed for the Hardee County Generation Facility. The AP-42 HAP emission estimates demonstrate that the proposed Hardee County Generation Facility will not qualify as a major HAP source.

Should you have any questions regarding these estimates, please do not hesitate to contact me at (314) 993-2700.

Sincerely,

Michael F. Vogt

Enclosure

**HAP EMISSION ESTIMATES  
GENERAL ELECTRIC 7241FA CTs**

**Table 4A. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
General Electric 7241FA CTs  
Natural Gas-Firing: Hazardous Air Pollutants**

Parameter	Units	Case		
		100% - 20 °F	100% - 59 °F	100 % - 90 °F
Maximum Hourly Fuel Flow:	10 <sup>6</sup> Btu/hr (HHV)	1,890.2	1,768.4	1,627.6
Maximum Annual Hours:	hrs/yr	N/A	3,000	N/A

Pollutant	Emission Factor <sup>(a)</sup> (lb/10 <sup>6</sup> Btu)	Emission Rates (Per CT)				CT1-3 Annual (ton/yr)
		20 °F (lb/hr)	59 °F (lb/hr)	90 °F (lb/hr)	Annual (ton/yr)	
1,3-Butadiene	4.30E-07	0.001	0.001	0.001	0.001	0.003
Acetaldehyde	4.00E-05	0.076	0.071	0.065	0.106	0.318
Acrolein	6.40E-06	0.012	0.011	0.010	0.017	0.051
Arsenic	N/A	N/A	N/A	N/A	N/A	N/A
Benzene	1.20E-05	0.023	0.021	0.020	0.032	0.095
Beryllium	N/A	N/A	N/A	N/A	N/A	N/A
Cadmium	N/A	N/A	N/A	N/A	N/A	N/A
Chromium	N/A	N/A	N/A	N/A	N/A	N/A
Ethylbenzene	3.20E-05	0.060	0.057	0.052	0.085	0.255
Formaldehyde	7.10E-04	1.342	1.256	1.156	1.883	5.650
Lead	N/A	N/A	N/A	N/A	N/A	N/A
Manganese	N/A	N/A	N/A	N/A	N/A	N/A
Mercury	N/A	N/A	N/A	N/A	N/A	N/A
Naphthalene	1.30E-06	0.002	0.002	0.002	0.003	0.010
Nickel	N/A	N/A	N/A	N/A	N/A	N/A
Polycyclic Aromatic Hydrocarbons	2.20E-06	0.004	0.004	0.004	0.006	0.018
Propylene Oxide	2.90E-05	0.055	0.051	0.047	0.077	0.231
Selenium	N/A	N/A	N/A	N/A	N/A	N/A
Toluene	1.30E-04	0.246	0.230	0.212	0.345	1.034
Xylene	6.40E-05	0.121	0.113	0.104	0.170	0.509
Maximum Individual HAP		1.342	1.256	1.156	1.883	5.650
Total HAPs		1.942	1.817	1.672	2.725	8.175

<sup>(a)</sup> - EPA AP-42, Table 3.1-3., April 2000.

Source: ECT, 2000.

**Table 4B. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
General Electric 7241FA CTs  
Natural Gas-Firing: Hazardous Air Pollutants**

Parameter	Units	Case		
		100% - 20 °F	100% - 59 °F	100% - 90 °F
Maximum Hourly Fuel Flow:	10 <sup>6</sup> Btu/hr (HHV)	1,903.6	1,776.9	1,617.4
Maximum Annual Hours:	hrs/yr	N/A	2,500	N/A

Pollutant	Emission Factor <sup>(a)</sup> (lb/10 <sup>6</sup> Btu)	Emission Rates (Per CT)				CT1-3 Annual (ton/yr)
		20 °F	59 °F	90 °F	Annual	
		(lb/hr)	(lb/hr)	(lb/hr)	(ton/yr)	
1,3-Butadiene	4.30E-07	0.001	0.001	0.001	0.001	0.003
Acetaldehyde	4.00E-05	0.076	0.071	0.065	0.089	0.267
Acrolein	6.40E-06	0.012	0.011	0.010	0.014	0.043
Arsenic	N/A	N/A	N/A	N/A	N/A	N/A
Benzene	1.20E-05	0.023	0.021	0.019	0.027	0.080
Beryllium	N/A	N/A	N/A	N/A	N/A	N/A
Cadmium	N/A	N/A	N/A	N/A	N/A	N/A
Chromium	N/A	N/A	N/A	N/A	N/A	N/A
Ethylbenzene	3.20E-05	0.061	0.057	0.052	0.071	0.213
Formaldehyde	7.10E-04	1.352	1.262	1.148	1.577	4.731
Lead	N/A	N/A	N/A	N/A	N/A	N/A
Manganese	N/A	N/A	N/A	N/A	N/A	N/A
Mercury	N/A	N/A	N/A	N/A	N/A	N/A
Naphthalene	1.30E-06	0.002	0.002	0.002	0.003	0.009
Nickel	N/A	N/A	N/A	N/A	N/A	N/A
Polycyclic Aromatic Hydrocarbons	2.20E-06	0.004	0.004	0.004	0.005	0.015
Propylene Oxide	2.90E-05	0.055	0.052	0.047	0.064	0.193
Selenium	N/A	N/A	N/A	N/A	N/A	N/A
Toluene	1.30E-04	0.247	0.231	0.210	0.289	0.866
Xylene	6.40E-05	0.122	0.114	0.104	0.142	0.426
Maximum Individual HAP		1.352	1.262	1.148	1.577	4.731
Total HAPs		1.956	1.825	1.662	2.282	6.845

<sup>(a)</sup> - EPA AP-42, Table 3.1-3., April 2000.

Source: ECT, 2000.



**Table 5. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
General Electric 7241FA CTs  
Distillate Fuel Oil-Firing: Hazardous Air Pollutants**

Parameter	Units	Case		
		100% - 18 °F	100% - 59 °F	100% - 90 °F
Maximum Hourly Fuel Flow:	10 <sup>6</sup> Btu/hr (HHV)	1,997.8	1,882.3	1,711.8
Maximum Annual Hours:	hrs/yr	N/A	500	N/A

Pollutant	Emission Factor <sup>(a)</sup> (lb/10 <sup>6</sup> Btu)	Emission Rates (Per CT)				CT1-3 Annual (ton/yr)
		18 °F (lb/hr)	59 °F (lb/hr)	90 °F (lb/hr)	Annual (ton/yr)	
1,3-Butadiene	1.60E-05	0.032	0.030	0.027	0.008	0.023
Acetaldehyde	N/A	N/A	N/A	N/A	N/A	N/A
Acrolein	N/A	N/A	N/A	N/A	N/A	N/A
Arsenic	1.10E-05	0.022	0.021	0.019	0.005	0.016
Benzene	5.50E-05	0.110	0.104	0.094	0.026	0.078
Beryllium	3.10E-07	0.001	0.001	0.001	0.000	0.000
Cadmium	4.80E-06	0.010	0.009	0.008	0.002	0.007
Chromium	1.10E-05	0.022	0.021	0.019	0.005	0.016
Ethylbenzene	N/A	N/A	N/A	N/A	N/A	N/A
Formaldehyde	2.80E-04	0.559	0.527	0.479	0.132	0.395
Lead	1.40E-05	0.028	0.026	0.024	0.007	0.020
Manganese	7.90E-04	1.578	1.487	1.352	0.372	1.115
Mercury	1.20E-06	0.002	0.002	0.002	0.001	0.002
Naphthalene	3.50E-05	0.070	0.066	0.060	0.016	0.049
Nickel	4.60E-06	0.009	0.009	0.008	0.002	0.006
Polycyclic Aromatic Hydrocarbons	4.00E-05	0.080	0.075	0.068	0.019	0.056
Propylene Oxide	N/A	N/A	N/A	N/A	N/A	N/A
Selenium	2.50E-05	0.050	0.047	0.043	0.012	0.035
Toluene	N/A	N/A	N/A	N/A	N/A	N/A
Xylene	N/A	N/A	N/A	N/A	N/A	N/A
Maximum Individual HAP		1.578	1.487	1.352	0.372	1.115
Total HAPs		2.573	2.424	2.205	0.606	1.818

<sup>(a)</sup> - EPA AP-42, Tables 3.1-4. and 3.1-5., April 2000.

Source: ECT, 2000.

**Table 7. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
General Electric 7241FA CTs  
Annual Emission Rates: Hazardous Air Pollutants**

<b>Pollutant</b>	<b>Annual Emissions (ton/yr)</b>
1,3-Butadiene	0.025
Acetaldehyde	0.318
Acrolein	0.051
Arsenic	0.016
Benzene	0.158
Beryllium	0.000
Cadmium	0.007
Chromium	0.016
Ethylbenzene	0.255
Formaldehyde	5.650
Lead	0.020
Manganese	1.115
Mercury	0.002
Naphthalene	0.058
Nickel	0.006
Polycyclic Aromatic Hydrocarbons	0.071
Propylene Oxide	0.231
Selenium	0.035
Toluene	1.034
Xylene	0.509
Maximum Individual HAP	5.650
Total HAPs	9.577

Source: ECT, 2000.

**HAP EMISSION ESTIMATES  
WESTINGHOUSE 501F CTs**

**Table 4A. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
Westinghouse 501F CTs  
Natural Gas-Firing: Hazardous Air Pollutants**

Parameter	Units	Case		
		100% - 32 °F	100% - 59 °F	100% - 95 °F
Maximum Hourly Fuel Flow:	10 <sup>6</sup> Btu/hr (HHV)	1,962.1	1,836.2	1,686.0
Maximum Annual Hours:	hrs/yr	N/A	3,000	N/A

Pollutant	Emission Factor <sup>(a)</sup> (lb/10 <sup>6</sup> Btu)	Emission Rates (Per CT)				CT1-3 Annual (ton/yr)
		32 °F	59 °F	95 °F	Annual	
		(lb/hr)	(lb/hr)	(lb/hr)	(ton/yr)	
1,3-Butadiene	4.30E-07	0.001	0.001	0.001	0.001	0.004
Acetaldehyde	4.00E-05	0.078	0.073	0.067	0.110	0.331
Acrolein	6.40E-06	0.013	0.012	0.011	0.018	0.053
Arsenic	N/A	N/A	N/A	N/A	N/A	N/A
Benzene	1.20E-05	0.024	0.022	0.020	0.033	0.099
Beryllium	N/A	N/A	N/A	N/A	N/A	N/A
Cadmium	N/A	N/A	N/A	N/A	N/A	N/A
Chromium	N/A	N/A	N/A	N/A	N/A	N/A
Ethylbenzene	3.20E-05	0.063	0.059	0.054	0.088	0.264
Formaldehyde	7.10E-04	1.393	1.304	1.197	1.956	5.867
Lead	N/A	N/A	N/A	N/A	N/A	N/A
Manganese	N/A	N/A	N/A	N/A	N/A	N/A
Mercury	N/A	N/A	N/A	N/A	N/A	N/A
Naphthalene	1.30E-06	0.003	0.002	0.002	0.004	0.011
Nickel	N/A	N/A	N/A	N/A	N/A	N/A
Polycyclic Aromatic Hydrocarbons	2.20E-06	0.004	0.004	0.004	0.006	0.018
Propylene Oxide	2.90E-05	0.057	0.053	0.049	0.080	0.240
Selenium	N/A	N/A	N/A	N/A	N/A	N/A
Toluene	1.30E-04	0.255	0.239	0.219	0.358	1.074
Xylene	6.40E-05	0.126	0.118	0.108	0.176	0.529
Maximum Individual HAP		1.393	1.304	1.197	1.956	5.867
Total HAPs		2.016	1.886	1.732	2.830	8.489

<sup>(a)</sup> - EPA AP-42, Table 3.1-3., April 2000.

Source: ECT, 2000.

**Table 4B. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
Westinghouse 501F CTs  
Natural Gas-Firing: Hazardous Air Pollutants**

Parameter	Units	Case		
		100% - 32 °F	100% - 59 °F	100% - 95 °F
Maximum Hourly Fuel Flow:	10 <sup>6</sup> Btu/hr (HHV)	1,962.1	1,836.2	1,686.0
Maximum Annual Hours:	hrs/yr	N/A	2,500	N/A

Pollutant	Emission Factor <sup>(a)</sup> (lb/10 <sup>6</sup> Btu)	Emission Rates (Per CT)				CT1-3 Annual (ton/yr)
		32 °F	59 °F	95 °F	Annual	
		(lb/hr)	(lb/hr)	(lb/hr)	(ton/yr)	
1,3-Butadiene	4.30E-07	0.001	0.001	0.001	0.001	0.003
Acetaldehyde	4.00E-05	0.078	0.073	0.067	0.092	0.275
Acrolein	6.40E-06	0.013	0.012	0.011	0.015	0.044
Arsenic	N/A	N/A	N/A	N/A	N/A	N/A
Benzene	1.20E-05	0.024	0.022	0.020	0.028	0.083
Beryllium	N/A	N/A	N/A	N/A	N/A	N/A
Cadmium	N/A	N/A	N/A	N/A	N/A	N/A
Chromium	N/A	N/A	N/A	N/A	N/A	N/A
Ethylbenzene	3.20E-05	0.063	0.059	0.054	0.073	0.220
Formaldehyde	7.10E-04	1.393	1.304	1.197	1.630	4.889
Lead	N/A	N/A	N/A	N/A	N/A	N/A
Manganese	N/A	N/A	N/A	N/A	N/A	N/A
Mercury	N/A	N/A	N/A	N/A	N/A	N/A
Naphthalene	1.30E-06	0.003	0.002	0.002	0.003	0.009
Nickel	N/A	N/A	N/A	N/A	N/A	N/A
Polycyclic Aromatic Hydrocarbons	2.20E-06	0.004	0.004	0.004	0.005	0.015
Propylene Oxide	2.90E-05	0.057	0.053	0.049	0.067	0.200
Selenium	N/A	N/A	N/A	N/A	N/A	N/A
Toluene	1.30E-04	0.255	0.239	0.219	0.298	0.895
Xylene	6.40E-05	0.126	0.118	0.108	0.147	0.441
Maximum Individual HAP		1.393	1.304	1.197	1.630	4.889
Total HAPs		2.016	1.886	1.732	2.358	7.074

<sup>(a)</sup> - EPA AP-42, Table 3.1-3., April 2000.

Source: ECT, 2000.

**Table 5. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
Westinghouse 501F CTs  
Distillate Fuel Oil-Firing: Hazardous Air Pollutants**

Parameter	Units	Case		
		100% - 32 °F	100% - 59 °F	100 % - 95 °F
Maximum Hourly Fuel Flow:	10 <sup>6</sup> Btu/hr (HHV)	1,888.8	1,768.2	1,620.4
Maximum Annual Hours:	hrs/yr	N/A	500	N/A

Pollutant	Emission Factor <sup>(a)</sup> (lb/10 <sup>6</sup> Btu)	Emission Rates (Per CT)				CT1-3 Annual (ton/yr)
		32 °F (lb/hr)	59 °F (lb/hr)	95 °F (lb/hr)	Annual (ton/yr)	
1,3-Butadiene	1.60E-05	0.030	0.028	0.026	0.007	0.021
Acetaldehyde	N/A	N/A	N/A	N/A	N/A	N/A
Acrolein	N/A	N/A	N/A	N/A	N/A	N/A
Arsenic	1.10E-05	0.021	0.019	0.018	0.005	0.015
Benzene	5.50E-05	0.104	0.097	0.089	0.024	0.073
Beryllium	3.10E-07	0.001	0.001	0.001	0.000	0.000
Cadmium	4.80E-06	0.009	0.008	0.008	0.002	0.006
Chromium	1.10E-05	0.021	0.019	0.018	0.005	0.015
Ethylbenzene	N/A	N/A	N/A	N/A	N/A	N/A
Formaldehyde	2.80E-04	0.529	0.495	0.454	0.124	0.371
Lead	1.40E-05	0.026	0.025	0.023	0.006	0.019
Manganese	7.90E-04	1.492	1.397	1.280	0.349	1.048
Mercury	1.20E-06	0.002	0.002	0.002	0.001	0.002
Naphthalene	3.50E-05	0.066	0.062	0.057	0.015	0.046
Nickel	4.60E-06	0.009	0.008	0.007	0.002	0.006
Polycyclic Aromatic Hydrocarbons	4.00E-05	0.076	0.071	0.065	0.018	0.053
Propylene Oxide	N/A	N/A	N/A	N/A	N/A	N/A
Selenium	2.50E-05	0.047	0.044	0.041	0.011	0.033
Toluene	N/A	N/A	N/A	N/A	N/A	N/A
Xylene	N/A	N/A	N/A	N/A	N/A	N/A
Maximum Individual HAP		1.492	1.397	1.280	0.349	1.048
Total HAPs		2.433	2.277	2.087	0.569	1.708

<sup>(a)</sup> - EPA AP-42, Tables 3.1-4. and 3.1-5., April 2000.

Source: ECT, 2000.

**Table 7. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
Westinghouse 501F CTs  
Annual Emission Rates: Hazardous Air Pollutants**

<b>Pollutant</b>	<b>Annual Emissions (ton/yr)</b>
1,3-Butadiene	0.024
Acetaldehyde	0.331
Acrolein	0.053
Arsenic	0.015
Benzene	0.156
Beryllium	0.000
Cadmium	0.006
Chromium	0.015
Ethylbenzene	0.264
Formaldehyde	5.867
Lead	0.019
Manganese	1.048
Mercury	0.002
Naphthalene	0.055
Nickel	0.006
Polycyclic Aromatic Hydrocarbons	0.068
Propylene Oxide	0.240
Selenium	0.033
Toluene	1.074
Xylene	0.529
Maximum Individual HAP	5.867
Total HAPs	9.803

Source: ECT, 2000.

**HAP EMISSION ESTIMATES  
WESTINGHOUSE 501D5A CTs**



**Table 4A. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
Westinghouse 501D5A CTs  
Natural Gas-Firing: Hazardous Air Pollutants**

Parameter	Units	Case		
		100% - 20 °F	100% - 59 °F	100% - 95 °F
Maximum Hourly Fuel Flow:	10 <sup>6</sup> Btu/hr (HHV)	1,429.2	1,319.4	1,218.1
Maximum Annual Hours:	hrs/yr	N/A	3,000	N/A

Pollutant	Emission Factor <sup>(a)</sup> (lb/10 <sup>6</sup> Btu)	Emission Rates (Per CT)				CT1-3 Annual (ton/yr)
		32 °F (lb/hr)	59 °F (lb/hr)	95 °F (lb/hr)	Annual (ton/yr)	
1,3-Butadiene	4.30E-07	0.001	0.001	0.001	0.001	0.003
Acetaldehyde	4.00E-05	0.057	0.053	0.049	0.079	0.237
Acrolein	6.40E-06	0.009	0.008	0.008	0.013	0.038
Arsenic	N/A	N/A	N/A	N/A	N/A	N/A
Benzene	1.20E-05	0.017	0.016	0.015	0.024	0.071
Beryllium	N/A	N/A	N/A	N/A	N/A	N/A
Cadmium	N/A	N/A	N/A	N/A	N/A	N/A
Chromium	N/A	N/A	N/A	N/A	N/A	N/A
Ethylbenzene	3.20E-05	0.046	0.042	0.039	0.063	0.190
Formaldehyde	7.10E-04	1.015	0.937	0.865	1.405	4.215
Lead	N/A	N/A	N/A	N/A	N/A	N/A
Manganese	N/A	N/A	N/A	N/A	N/A	N/A
Mercury	N/A	N/A	N/A	N/A	N/A	N/A
Naphthalene	1.30E-06	0.002	0.002	0.002	0.003	0.008
Nickel	N/A	N/A	N/A	N/A	N/A	N/A
Polycyclic Aromatic Hydrocarbons	2.20E-06	0.003	0.003	0.003	0.004	0.013
Propylene Oxide	2.90E-05	0.041	0.038	0.035	0.057	0.172
Selenium	N/A	N/A	N/A	N/A	N/A	N/A
Toluene	1.30E-04	0.186	0.172	0.158	0.257	0.772
Xylene	6.40E-05	0.091	0.084	0.078	0.127	0.380
Maximum Individual HAP		1.015	0.937	0.865	1.405	4.215
Total HAPs		1.468	1.355	1.251	2.033	6.100

<sup>(a)</sup> - EPA AP-42, Table 3.1-3., April 2000.

Source: ECT, 2000.

**Table 4B. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
Westinghouse 501D5A CTs  
Natural Gas-Firing: Hazardous Air Pollutants**

Parameter	Units	Case		
		100% - 20 °F	100% - 59 °F	100% - 95 °F
Maximum Hourly Fuel Flow:	10 <sup>6</sup> Btu/hr (HHV)	1,429.2	1,319.4	1,218.1
Maximum Annual Hours:	hrs/yr	N/A	2,500	N/A

Pollutant	Emission Factor <sup>(a)</sup> (lb/10 <sup>6</sup> Btu)	Emission Rates (Per CT)				CT1-3 Annual (ton/yr)
		20 °F	59 °F	95 °F	Annual	
		(lb/hr)	(lb/hr)	(lb/hr)	(ton/yr)	
1,3-Butadiene	4.30E-07	0.001	0.001	0.001	0.001	0.002
Acetaldehyde	4.00E-05	0.057	0.053	0.049	0.066	0.198
Acrolein	6.40E-06	0.009	0.008	0.008	0.011	0.032
Arsenic	N/A	N/A	N/A	N/A	N/A	N/A
Benzene	1.20E-05	0.017	0.016	0.015	0.020	0.059
Beryllium	N/A	N/A	N/A	N/A	N/A	N/A
Cadmium	N/A	N/A	N/A	N/A	N/A	N/A
Chromium	N/A	N/A	N/A	N/A	N/A	N/A
Ethylbenzene	3.20E-05	0.046	0.042	0.039	0.053	0.158
Formaldehyde	7.10E-04	1.015	0.937	0.865	1.171	3.513
Lead	N/A	N/A	N/A	N/A	N/A	N/A
Manganese	N/A	N/A	N/A	N/A	N/A	N/A
Mercury	N/A	N/A	N/A	N/A	N/A	N/A
Naphthalene	1.30E-06	0.002	0.002	0.002	0.002	0.006
Nickel	N/A	N/A	N/A	N/A	N/A	N/A
Polycyclic Aromatic Hydrocarbons	2.20E-06	0.003	0.003	0.003	0.004	0.011
Propylene Oxide	2.90E-05	0.041	0.038	0.035	0.048	0.143
Selenium	N/A	N/A	N/A	N/A	N/A	N/A
Toluene	1.30E-04	0.186	0.172	0.158	0.214	0.643
Xylene	6.40E-05	0.091	0.084	0.078	0.106	0.317
Maximum Individual HAP		1.015	0.937	0.865	1.171	3.513
Total HAPs		1.468	1.355	1.251	1.694	5.083

<sup>(a)</sup> - EPA AP-42, Table 3.1-3., April 2000.

Source: ECT, 2000.

**Table 5. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
Westinghouse 501D5A CTs  
Distillate Fuel Oil-Firing: Hazardous Air Pollutants**

Parameter	Units	Case		
		100% - 20 °F	100% - 59 °F	100% - 95 °F
Maximum Hourly Fuel Flow:	10 <sup>6</sup> Btu/hr (HHV)	1,425.6	1,316.4	1,215.6
Maximum Annual Hours:	hrs/yr	N/A	500	N/A

Pollutant	Emission Factor <sup>(a)</sup> (lb/10 <sup>6</sup> Btu)	Emission Rates (Per CT)				CT1-3 Annual (ton/yr)
		20 °F	59 °F	95 °F	Annual	
		(lb/hr)	(lb/hr)	(lb/hr)	(ton/yr)	
1,3-Butadiene	1.60E-05	0.023	0.021	0.019	0.005	0.016
Acetaldehyde	N/A	N/A	N/A	N/A	N/A	N/A
Acrolein	N/A	N/A	N/A	N/A	N/A	N/A
Arsenic	1.10E-05	0.016	0.014	0.013	0.004	0.011
Benzene	5.50E-05	0.078	0.072	0.067	0.018	0.054
Beryllium	3.10E-07	0.000	0.000	0.000	0.000	0.000
Cadmium	4.80E-06	0.007	0.006	0.006	0.002	0.005
Chromium	1.10E-05	0.016	0.014	0.013	0.004	0.011
Ethylbenzene	N/A	N/A	N/A	N/A	N/A	N/A
Formaldehyde	2.80E-04	0.399	0.369	0.340	0.092	0.276
Lead	1.40E-05	0.020	0.018	0.017	0.005	0.014
Manganese	7.90E-04	1.126	1.040	0.960	0.260	0.780
Mercury	1.20E-06	0.002	0.002	0.001	0.000	0.001
Naphthalene	3.50E-05	0.050	0.046	0.043	0.012	0.035
Nickel	4.60E-06	0.007	0.006	0.006	0.002	0.005
Polycyclic Aromatic Hydrocarbons	4.00E-05	0.057	0.053	0.049	0.013	0.039
Propylene Oxide	N/A	N/A	N/A	N/A	N/A	N/A
Selenium	2.50E-05	0.036	0.033	0.030	0.008	0.025
Toluene	N/A	N/A	N/A	N/A	N/A	N/A
Xylene	N/A	N/A	N/A	N/A	N/A	N/A
Maximum Individual HAP		1.126	1.040	0.960	0.260	0.780
Total HAPs		1.836	1.695	1.566	0.424	1.272

<sup>(a)</sup> - EPA AP-42, Tables 3.1-4. and 3.1-5., April 2000.

Source: ECT, 2000.

**Table 7. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
Westinghouse 501D5A CTs  
Annual Emission Rates: Hazardous Air Pollutants**

<b>Pollutant</b>	<b>Annual Emissions (ton/yr)</b>
1,3-Butadiene	0.018
Acetaldehyde	0.237
Acrolein	0.038
Arsenic	0.011
Benzene	0.114
Beryllium	0.000
Cadmium	0.005
Chromium	0.011
Ethylbenzene	0.190
Formaldehyde	4.215
Lead	0.014
Manganese	0.780
Mercury	0.001
Naphthalene	0.041
Nickel	0.005
Polycyclic Aromatic Hydrocarbons	0.050
Propylene Oxide	0.172
Selenium	0.025
Toluene	0.772
Xylene	0.380
Maximum Individual HAP	4.215
Total HAPs	7.079

Source: ECT, 2000.

DEPARTMENT OF ENVIRONMENTAL PROTECTION  
PUBLIC MEETING  
HARDEE COUNTY BOARD OF COUNTY COMMISSIONERS BUILDING  
WAUCHULA, HARDEE COUNTY, FLORIDA  
July 12, 2000 6:00 p.m.

THIS MEETING IS OPEN TO THE PUBLIC

- |    |  |                  |
|----|--|------------------|
| 1. | Call to Order/Introduction                             | Al Linero        |
| 2. | Description of the Department's PSD Permitting Process | Department Staff |
| 3. | Description of the Proposed Project                    | Department Staff |
| 4. | Department's Review To Date                            | Department Staff |
| 5. | Ambient Impact Analysis                                | Department Staff |
| 6. | Public Comment   |                  |
| 7. | Conclusion/Adjournment                                 | Department Staff |



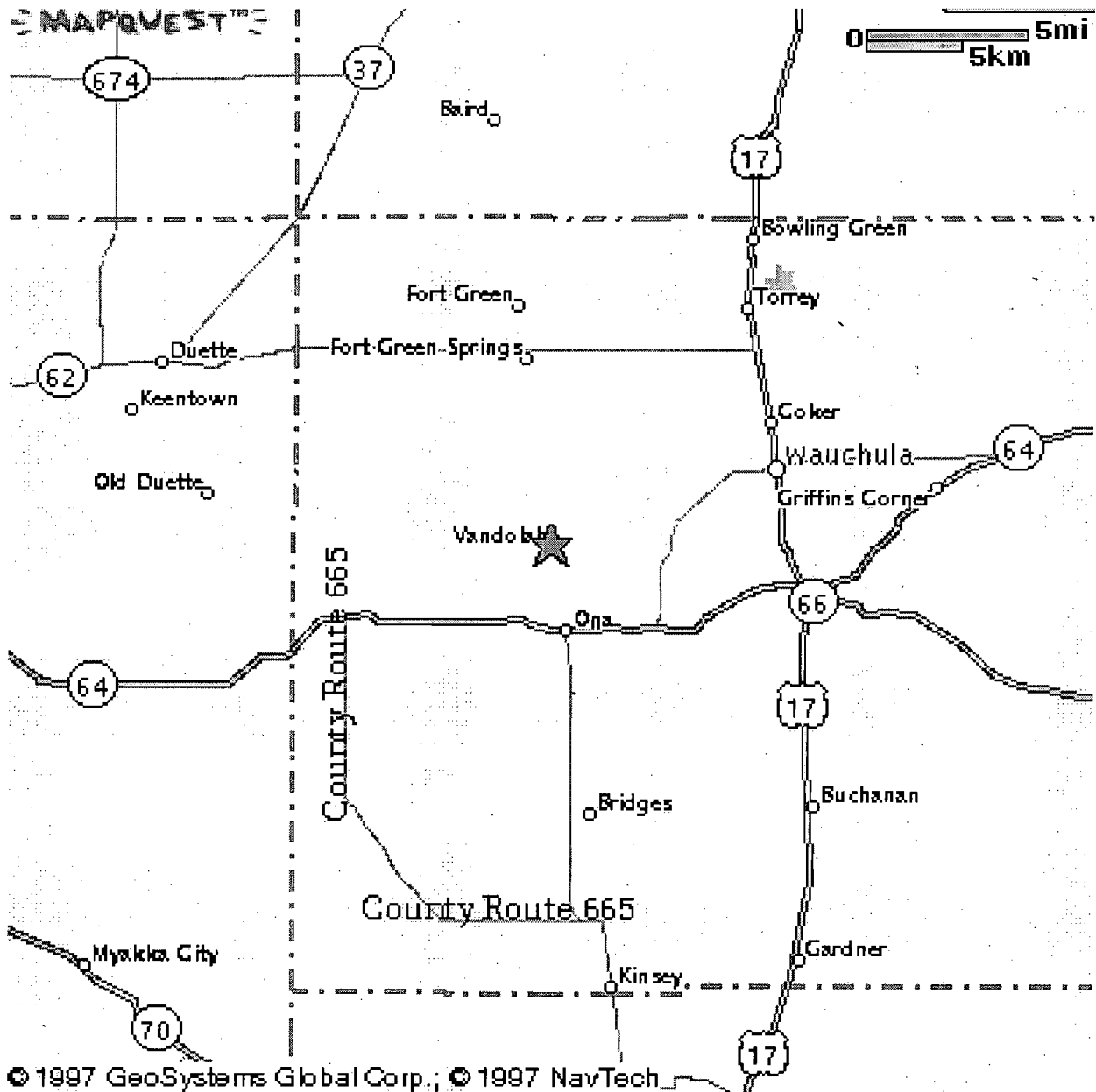






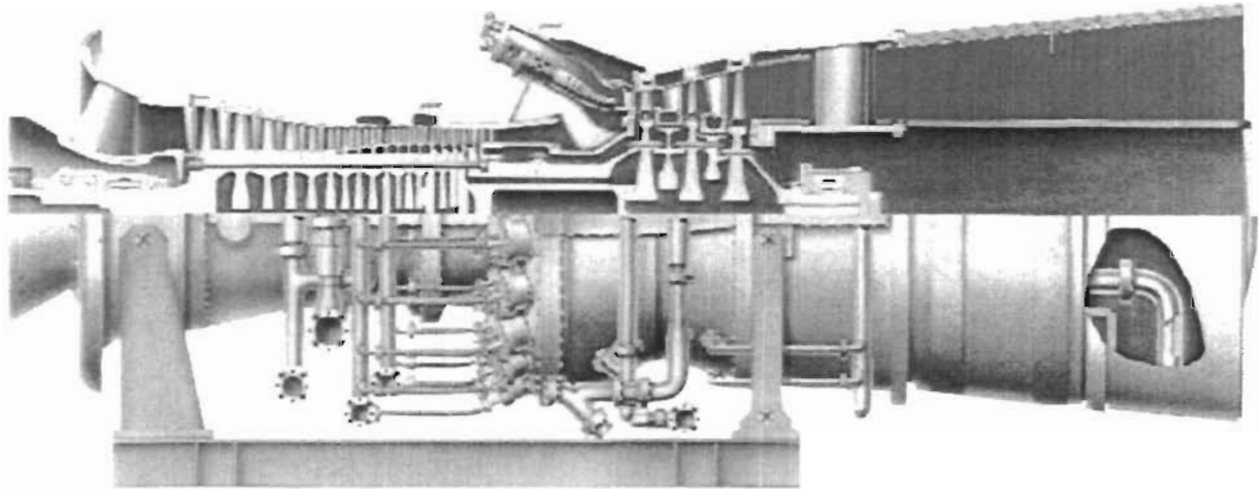
**FLORIDA DEP AIR PERMITTING SUMMARY SHEET**  
**GRANITE POWER PARTNERS II – HARDEE COUNTY GENERATION FACILITY**  
**THREE 120-170 MEGAWATT GAS -FIRED COMBUSTION TURBINES**  
**PUBLIC MEETING – WAUCHULA, HARDEE COUNTY**  
**JULY 12, 2000**

Granite Power Partners II, L.P. (GPP-II, L.P.) submitted an application to construct three 120-180 megawatt (MW) combustion turbine electrical generators and ancillary equipment in Hardee County. The location is near Vandolah and Fort Green Ona Roads, approximately 5 miles West of Wauchula, Hardee County.



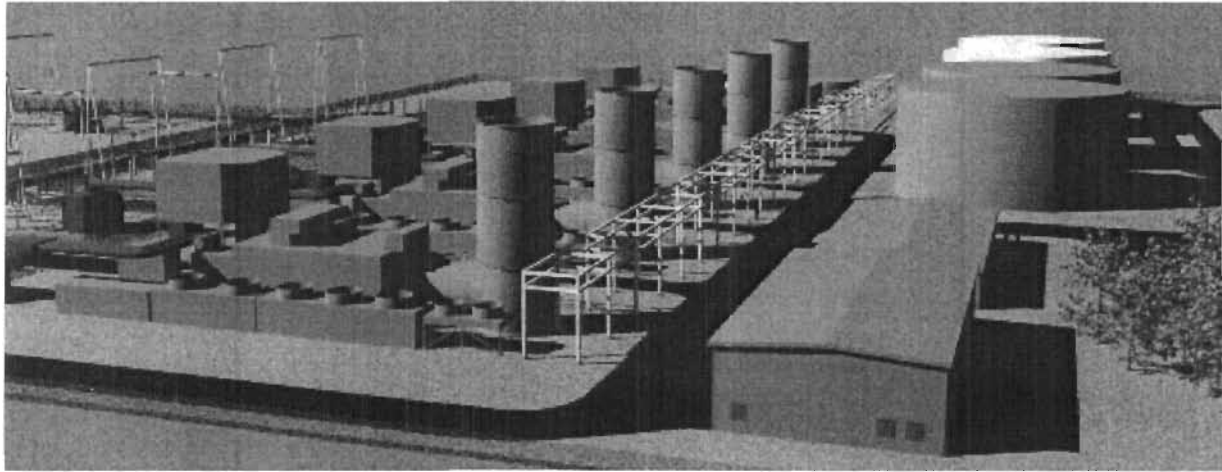
Each unit will be a gas-fired combustion turbine that will directly generate approximately 120-170 MW of electricity. The manufacturer has not yet been but will certainly be General Electric or Siemens-Westinghouse. A 180 MW ABB option was withdrawn. The units will operate in simple cycle and intermittent duty. There will not be separate heat recovery steam generators and steam-driven electrical generators. The project includes three 100-foot stacks, a 1.5 million-gallon storage tank for back-up diesel fuel, and a 10 million Btu per hour gas heater.

Following is a picture of a GE 7FA, which is one of the models proposed for this project.



Basically these units are like jet engines. Air is drawn in and compressed. Fuel is introduced in the combustors. Hot exhaust gases expand in the rotor section. The rotational motion of the shaft drives the compressor and the electrical generator normally located before the compressor section.

We do not have an artist's rendition of the site. Following is a picture borrowed from a similar project for five of these units in Brevard County (reference Oleander website [www.oleanderpower.com](http://www.oleanderpower.com))



The key air emissions will consist of nitrogen oxides, carbon monoxide, particulate matter, and sulfur dioxide. Air pollution control will be accomplished through "Dry-Low NO<sub>x</sub> combustion" and use of natural gas with low sulfur diesel oil as backup. If Westinghouse is chosen as the manufacturer, the units will operate only on natural gas without any back-up fuel. GPP-II, L.P. requested only 3,000 hours per year of operation. That is roughly 40 percent of the time in a year. Actual hours of operation are more likely to be on the order of 1000 hours per year. The next speakers will explain the details of the emission limits, control technology, and ambient impacts in more detail.

The Florida Department of Environmental Protection (DEP) is the permitting authority for the air construction permit under Chapter 403 of the Florida Statutes, Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code.

The DEP Bureau of Air Regulation in Tallahassee received the application on January 18 of this year. We distributed it to the EPA Region 4 office in Atlanta, the U.S. Fish and Wildlife Service's Air Quality Branch in Denver, Colorado, and our DEP Southwest District Office in Tampa.

The Technical Evaluation and Preliminary Determination and the draft air permit were completed and sent to the applicant on April 14 along with the Department's Intent to Issue. Copies were provided to the previously - mentioned agencies and to Hardee County. Copies were made available for public inspection at DEP offices in Tallahassee and Tampa. We also posted these materials at [www.dep.state.fl.us/air/permitting.htm](http://www.dep.state.fl.us/air/permitting.htm)

The Department's Public Notice of Intent to Issue Air Construction Permit was published by the applicant in the Herald-Advocate on April 27. It provided a 30-day period for anyone to submit comments on the Department's proposed action or to request this public meeting. It also provided a 14-day period for anyone whose substantial interests are affected by the Department's decision to file a petition for an administrative hearing. We have not received any public comments in response to the Public Notice except for a request by a citizen to hold this public meeting. Our Office of General Counsel received one petition for an administrative hearing from the same citizen.

This public meeting was noticed in the Florida Administrative Weekly on June 30 (this publication is available free of charge on the web at [election.dos.state.fl.us](http://election.dos.state.fl.us)). This meeting was also noticed in the Herald-Advocate.

Copies of the Intent to Issue package are available at this meeting. We also have a few copies on diskette. If we run out, we will be happy to make you copies and send them to you. As I mentioned before, you can view this package on our website. The actual application and entire file are available for public review and copying at our offices in Tallahassee and Tampa.

Issues such as noise and the plant location are beyond the scope of our authority in making this permitting decision. These fall within local ordinances and local planning and zoning authorities. We also do not exercise authority over the pipeline that will provide fuel to the plant. This is within the purview of separate federal, state and local approval processes.

DEP will consider comments specifically related to air emissions and control that are submitted here and over the next week. These comments will be reviewed when issuing the final permit decision. The request for an administrative hearing before a judge was dismissed with leave to amend the petition. The petition was not amended and resubmitted.

Comments may be submitted at this public meeting, E-Mailed, or mailed to:

CONTACT: A. A. Linero, P.E Administrator  
New Source Review Section  
Bureau of Air Regulation  
2600 Blair Stone Road., M.S. 5505  
Tallahassee, Florida 32399  
Tel: (850)921-9523  
Fax: (850)922-6979  
Internet: [alvaro.linero@dep.state.fl.us](mailto:alvaro.linero@dep.state.fl.us)

AIR MODELING: Chris Carlson, Meteorologist  
New Source Review Section, Tallahassee  
Tel: (850)921-9537

AIR COMPLIANCE: Bill Proses  
DEP S.W. District, Tampa  
Tel: (813)744-6100

LEGAL CONTACT: Douglas Beason, Attorney  
Office of General Counsel, Tallahassee  
Tel: (850)488-9730

MEETING MODERATOR: Gerry Kissell, P.E.  
DEP S.W. District, Tampa  
Tel: (813)744-6100

**COMMENT CARD**  
**DEP PUBLIC MEETING**  
**July 12, 2000**

(please print)

**NAME:** Ann Vanek / citizens for a Rational Energy Policy  
**ADDRESS:** 345 Crest St.  
Sanford, FL 32771

**COMMENTS:**

thank you  
for a Wonderful Presentation - well done.

We are concerned with the DEP's lack of authority to look at the cumulative impact of the 25-30 plants currently locating in FL. We feel these plants pose a serious threat to the ambient air quality and therefore Human Health. Even this plant will increase the emissions in the city by nearly 100%.

**COMMENT CARD**  
**DEP PUBLIC MEETING**  
**July 12, 2000**

(please print)

**NAME:** Anay Quint, POLE SIERRA  
**ADDRESS:** PO Box 2237  
LAKELAND, FL 33806

**COMMENTS:**

THANKS FOR THE PRESENTATION. PLEASE CONSIDER CUMULATIVE EFFECTS OF POWER PLANTS IN FLORIDA. ALTHOUGH THE PRESENTATION NOTES MINIMAL EFFECTS OF PM, SO<sub>2</sub>, NOX ON PEOPLE, HOW ABOUT ON GREENWAYS. CONSIDER HAVING SOMEONE RESEARCH EFFECTS ON PEOPLE. (JUST DO A LITERATURE REVIEW)

FACSIMILE COVER SHEET



LS POWER, LLC  
655 Craig Road, Suite 336  
St. Louis, MO 63141  
(314) 993-2700 Fax (314) 993-2790

DATE: 7/10/00

Fax #: 850-922-6979

TO: Al Lenora

FROM: Mike Vogt

SUBJECT: Nancy Grant Petition

PAGES TO FOLLOW:

*Per our conversation*

RECEIVED

JUN 29 2000

FLORIDA DEPARTMENT OF STATE  
Katherine Harris Secretary of State  
Division of Elections  
Bureau of Administrative Code

BUREAU OF AIR REGULATION

The Elliot Building - 401 South Monroe St. - Tallahassee, Fl. 32399-0250 - (850)488-8427

Billed to:  
DEPT OF ENVIRONMENTAL PROTECTION  
AIR RESOURCES MANAGEMENT OFFICE  
2600 BLAIR STONE ROAD  
MAIL STATION 5505  
TALLAHASSEE, FL 32399-2400  
Attn: AL LINERO

*PA  
6-29-00*

<b>Account: 7627</b>		<b>Invoice Date: 06/30/2000</b>		<b>Invoice Number: 043965</b>	
P.O. #	Publication in Florida Administrative Weekly	# units	\$each	Extension	
1 00798	Volume:26/26 Pages:3113	28	0.79	\$22.12	
Invoice # must appear on all checks and correspondence. Please pay balance due:				<b>\$22.12</b>	
F.E.I.D. number: 59-3466865		*** Net Due - 15 days - No Discount ***			

-----  
**TO INSURE PROPER CREDIT, PLEASE RETURN THIS PORTION.**

Department of State - Division of Administrative Services - Bureau of Planning, Budget and Financial Services  
The Capitol - Room 1901 - Tallahassee, Fl. 32399-0250

**Account: 7627      Invoice Date: 6/27/00      Number: 43965      Amount Due: \$22.12**

State Agencies - Journal Transfer to Account Code: 45-50-2-561001-45100000-00  
Org Code / EO : 4510-3020 R3    Object: 010000    Category: 001903

For Accounting Use Only:    Object Code: 019032    Cat: 001903    ARGL: 16300    GL: 67100  
Samas Account Code/Vendor: 37-20-2-035001-37550000-00

**PLACE:** Division of Real Estate, Commission Meeting Room 301, North Tower, 400 West Robinson Street, Orlando, Florida

**PURPOSE:** Official business of Commission – among topics included, but not limited to, are proposed legislation affecting Chapter 475, Part I, F.S., rule development workshops, Florida Administrative Code 61J2 rule amendments, budget discussions, escrow disbursement requests, Recovery Fund Claims, education issues, petitions for declaratory statement, and disciplinary actions.

If a person decides to appeal a decision made by the Commission, with respect to any matter considered at this meeting or hearing, a record of the proceedings for such purpose, upon which the appeal is based, may be required. Probable Cause Panel(s) may also meet during this session. Portions of the Probable Cause are not open to the public.

A copy of the agenda may be obtained by writing: Deputy Clerk, Florida Real Estate Commission, Administration Office, P. O. Box 1900, Orlando, Florida 32802-1900.

Any person requiring a special accommodation at this meeting because of a disability or physical impairment should contact the Department of Business and Professional Regulation, (407)245-0800, at least five (5) calendar days prior to the meeting. If you are hearing or speech impaired, please call the Division of Real Estate using the Florida Dual Party Relay System, which can be reached at 1(800)955-8770 (Voice) and 1(800)955-8771 (TDD).

#### DEPARTMENT OF ENVIRONMENTAL PROTECTION

The Department of Environmental Protection (DEP) announces two public meetings of the TMDL Allocation Technical Advisory Committee (TAC) to which all persons are invited.

**DATE AND TIME:** Monday, July 10, 2000, 9:00 a.m. – 4:30 p.m.

**PLACE:** Department of Environmental Protection, Room 609, Twin Towers Office Building, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400

**DATE AND TIME:** Monday, July 31, 2000, 9:30 a.m. – 4:30 p.m.

**PLACE:** Orlando Public Library, 101 East Central Boulevard, The Oak Room, Orlando, Florida 32801

**PURPOSE:** The purpose of the Allocation TAC is to assist in the development of a report, pursuant to s. 403.067(6), Florida Statutes, providing recommendations for allocating load reductions to contributing source(s) once Total Maximum Daily Loads (TMDLs) have been determined for parameters of concern. Discussion may include options to fairly and equitably allocate pollution loads to both nonpoint and point sources, including consideration of existing treatment levels and management practices, and environmental, economic, and technological feasibility.

A copy of the agenda for the meeting may be obtained by contacting: Jan Mandrup-Poulsen, Department of Environmental Protection, 2600 Blair Stone Road, MS 3555, Tallahassee, Florida 32399-2400 or by calling him at (850)921-9488.

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 Services Specialist, Bureau of Personnel, (850)488-2996. If you are hearing or speech impaired, please contact the agency by calling 1(800)955-8771 (TDD).

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

**DATE AND TIME:** July 12, 2000, 7:00 p.m. – 9:00 p.m.

**PLACE:** Hardee County Board of County Commissioners Building, 412 West Orange Street, Room A-202, Wauchula, Florida

**PURPOSE:** To accept public comments and provide status of Department's Intent to Issue an Air Construction Permit to Granite Power Partners II, L.P. to construct three 170 megawatt simple cycle combustion turbine-electrical generators West of Wauchula in unincorporated Hardee County, Florida. The permitting action is subject to the Department's rules for the Prevention of Significant Deterioration of Air Quality 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: Al Linero, Department of Environmental Protection, 2600 Blair Stone Road, MS 5505, Tallahassee, Florida 32399, phone (850)921-9529, or by phoning the Bureau of Air Regulation's New Source Review Section, (850)921-9533.

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, Bureau of Personnel, (850)488-2996. If you are hearing or speech impaired, please contact the agency by calling 1(800)955-8771 (TDD).

The Florida Department of Environmental Protection, Division of Recreation and Parks announces a public workshop to which all persons are invited.

**DATE AND TIME:** Thursday, July 13, 2000, 7:00 p.m. (CDT)

**PLACE:** Sandestin Golf and Beach Resort, Bayside Conference Center, 9300 Highway 98, West, Sandestin, Florida

**PURPOSE:** To receive comments regarding management and land uses for Grayton Beach State Recreation Area before the development of a management plan for the park.



# Memorandum

# Florida Department of Environmental Protection

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**To:** Interested Parties

**From:** Al Linero, P.E.  
New Source Review Section

**Date:** June 27, 2000

**Re:** Public Meeting Regarding an Application for PSD Permit from Granite Power Partners II, L.P.

---

You are on our list of interested parties for the air permit application for Granite Power Partners II, L.P. Please see the enclosed notice and agenda for a public meeting that the Department has scheduled to accept comments from the public about the permit application for this proposed project.

This meeting is scheduled for Wednesday July 6, 2000, and will start at 6:00 p.m. and conclude at 9:00 p.m. The meeting will be held at the Hardee County Board of County Commissioners Building, 412 West Orange Street, Room A-202, Wauchula, Hardee County, Florida. All interested persons are invited to attend to provide oral or written comments to the Department about this permit application.

If you have any questions about the meeting or need directions to the community center, please call the Division of Air Resources Management at (850) 488-0114.

enclosures

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
NOTICE OF PUBLIC MEETING  
GRANITE POWER PARTNERS II, L.P.

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 Granite Power Partners II, L.P. for construction of three 170 megawatt simple cycle combustion turbine-electrical generators and ancillary equipment west of Wauchula in unincorporated Hardee County.

The formal meeting will be held at 7:00 p.m. on Wednesday, July 12, 2000 at the Hardee County Board of County Commissioners Building, 412 West Orange Street, Room A-202, Wauchula. Department staff will also be available from 6:00 to 7:00 p.m. to discuss the proposed permit on an informal basis. Granite Power Partners may also have representatives present to discuss their proposed project from 6:00 to 7:00 p.m. Beginning at 7:00 p.m., the Department will provide the status of the permit application and receive oral and written comments regarding the Department's Intent to Issue an Air Construction Permit.

The Department's Public Notice of Intent to Issue an Air Construction Permit was published in the Herald Advocate on April 27, 2000. 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:

Department of Environmental Protection  
Bureau of Air Regulation  
111 S. Magnolia Drive, Suite 4  
Tallahassee, Florida 32301  
Telephone: 850/488-0114  
Fax: 850/922-6979

Department Environmental Protection  
Southwest District Office  
3804 Coconut Palm Drive  
Tampa, Florida 33619-8218  
Telephone: 813/744-6100  
Fax: 813/744-6084

The Public Notice of Intent to Issue an Air Construction Permit, Technical Evaluation, draft permit, and draft BACT may also be accessed at [www.dep.state.fl.us/air/permitting.htm](http://www.dep.state.fl.us/air/permitting.htm)

A separate notice of this public meeting was published in the Florida Administrative Weekly dated June 30, 2000 and can be viewed at [election.dos.state.fl.us/faw/issues.shtml](http://election.dos.state.fl.us/faw/issues.shtml)

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).

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
PUBLIC MEETING  
REGARDING AN APPLICATION FOR PSD PERMIT FROM  
GRANITE POWER PARTNERS II, L.P.

DATE AND TIME: Wednesday, July 12, 2000 at 6:00 p.m.

PLACE: Hardee County Board of County Commissioners Building, Wauchula, Hardee County, Florida

PURPOSE: To receive comments regarding the Department's receipt of an application for an air construction permit subject to the requirements of the Prevention of Significant Deterioration program (PSD permit) from Granite Power Partners II, L.P. (GPP). The applicant's address is 655 Craig Road, Suite 336, St. Louis, MO 63025. The application is for the construction of three 170 megawatt simple cycle combustion turbine-electrical generators and ancillary equipment to be located west of Wauchula in unincorporated Hardee County.

GPP proposes to construct three nominal 170 MW simple cycle, intermittent duty combustion turbine-electrical-generators with 60-foot stacks and one 1.5-million gallon fuel oil storage tank at the planned Hardee County Generation Facility (HCGF). The main fuel will be natural gas and the units are proposed by GPP to operate up to 3,000 hours per year per unit of which 500 hours per year per unit may be on maximum 0.05 percent sulfur distillate fuel oil.

This meeting is held, in part, to satisfy the public hearing requirements of Rule 62-210.350, F.A.C. The Department will formally receive oral or written comments on issues specifically related to the PSD permit application. At the meeting the Department may impose a limit on the time allowed for oral statements from each person. Written statements are encouraged. All statements will become part of the Department's public record of this project.

The complete application and official 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 the Department's Bureau of Air Regulation, 111 S. Magnolia Drive, Tallahassee. Written comments may be directed to Al Linero, P.E., Dept. of Environmental Protection, Bureau of Air Regulation, Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Written comments may also be sent to Al Linero via e-mail at [Alvaro.Linero@dep.state.fl.us](mailto:Alvaro.Linero@dep.state.fl.us).

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).

AGENDA

- 7:00 p.m.      INTRODUCTION  
                    DESCRIPTION OF THE DEPARTMENT'S PSD PERMITTING PROCESS  
                    DESCRIPTION OF THE PROPOSED PROJECT  
                    DEPARTMENT'S REVIEW TO DATE  
                    AMBIENT IMPACT ANALYSIS
- 7:30 p.m.      COMMENTS BY INTERESTED PARTIES
- 9:00 p.m.      CONCLUSION

## FACSIMILE COVER SHEET



LS POWER, LLC  
655 Craig Road, Suite 336  
St. Louis, MO 63141  
(314) 993-2700 Fax (314) 993-2790

---

DATE: May 30, 2000 FAX #: (850) 922-6979  
TO: Al Linero / Joe Kahn  
FROM: Mike Vogt  
SUBJECT: Comments to Granite Power Partners II, L.P. Hardee Project  
PAGES TO FOLLOW: 5

Please see attached letter. Original to follow via regular mail.

Joe,

I don't believe that any of the requested changes in this letter will change the results of the modeling. In the original A.P., they conducted a modeling screening analysis that considered all of the possible CT's, loads, and temperatures. Refined modeling was then conducted using the worst case scenario.

Chris



**LS POWER, LLC**

655 Craig Road, Suite 336  
St. Louis, Missouri 63141  
(314) 993-2700 • Fax: (314) 993-2790

**RECEIVED**

**JUN 05 2000**

**BUREAU OF AIR REGULATION**

**Michael F. Vogt**  
*Project Manager*

May 30, 2000

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

Re: Hardee County Generating Facility  
Notice of Intent to Issue Air Construction Permit  
DEP File No. 0490044-001-AC (PSD-FL-281)

Dear Mr. Linero:

In accordance with the Notice of Intent to Issue Air Construction Permit, Granite Power Partners II, L.P., is hereby providing comments to the subject draft permit. Please see the enclosure with our detailed comments.

Should you have any questions, please do not hesitate to contact me at (314) 993-2700

Sincerely,

Michael F. Vogt

Enclosure

CC: Joe Kahn - FDEP, Bureau of Air Regulation

cc: Kiseel, SWD  
EPA  
NPS

**GRANITE POWER PARTNERS II, L.P.**  
**Hardee County Generation Facility**  
**Comments on Proposed PSD Permit No. PSD-FL-282**

1. General Comment.

GPP requests that the ABB GT24 product be removed from the permit. GPP is no longer considering this product for the project.

2. Specific Condition No. 8, Page 7 of 16

GPP requests that additional language be added to clarify that the heat limits are included only for the purposes of determining capacity and is not intended to be a continuous limitation subject to compliance or enforcement. Suggested additional language is as follows:

{Permitting note: The heat input limitations have been placed in the permit to identify the capacity of each emissions unit for purposes of confirming that emissions testing is conducted within 90-100 percent of the emissions unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate limits and to aid in determining future rule applicability}

3. Specific Condition No. 19, Page 9 of 16

GPP requests that the base load CO limit for oil-firing be increased from 20 ppmvd to 25 ppmvd at 15% O<sub>2</sub> to cover all of the oil-fired CTs under consideration. Alternatively, base load CO limits could be set on an individual CT basis as was done for NO<sub>x</sub>.

GPP requests that CO limits be included to address partial load operations for the Westinghouse CTs. A CO limit during gas-firing of 83 ppmvd at 15% O<sub>2</sub> for partial loads between 50 and 70 percent load is requested for the Westinghouse 501F CT. A CO limit during gas-firing of 232 ppmvd at 15% O<sub>2</sub> for partial loads between 50 and 70 percent load is requested for the Westinghouse 501D5A CT.

GPP requests that VOC limits be included to address partial load operations for the Westinghouse CTs. A VOC limit during gas-firing of 20 ppmvd at 15% O<sub>2</sub> for partial loads between 50 and 70 percent load is requested for the Westinghouse 501F and 501D5A CTs.

GPP requests that NO<sub>x</sub> limits be included to address partial load operations for the Westinghouse 501D5A CT. A NO<sub>x</sub> limit during gas-firing of 45 ppmvd at 15% O<sub>2</sub> for partial loads between 50 and 70 percent load is requested for the Westinghouse 501D5A CT.

For the Westinghouse 501F and 501D5A CTs, an annual limit of no more than 500 hours per year operation at partial load (i.e., loads between 50 and 70 percent) is also requested.

**GRANITE POWER PARTNERS II, L.P.**  
**Hardee County Generation Facility**  
**Comments on Proposed PSD Permit No. PSD-FL-282**

4. Specific Condition No. 20, Page 10 of 16

GPP requests that NO<sub>x</sub> limits be included to address partial load operations for the Westinghouse 501D5A CT. A NO<sub>x</sub> limit during gas-firing of 45 ppmvd at 15% O<sub>2</sub> for partial loads between 50 and 70 percent load is requested for the Westinghouse 501D5A CT. For the Westinghouse 501D5A CT, an annual limit of no more than 500 hours per year operation at partial load (i.e., loads between 50 and 70 percent) is also requested.

5. Specific Condition No. 21, Page 10, 11 of 16

GPP requests that the base load CO limit for oil-firing be increased from 20 ppmvd to 25 ppmvd at 15% O<sub>2</sub> to cover all of the oil-fired CTs under consideration. Alternatively, base load CO limits could be set on an individual CT basis as was done for NO<sub>x</sub>.

Consistent with prior FDEP permits for CT projects, GPP requests that compliance with the CO limits be verified by initial and annual source testing and not by CEMS. The installation of CO CEMS is costly and has not been required by FDEP for comparable CT projects. Air quality CO impacts were shown to be insignificant for the proposed Hardee County Generation Facility.

GPP requests that CO limits be included to address partial load operations for the Westinghouse CTs. A CO limit during gas-firing of 83 ppmvd at 15%O<sub>2</sub> for partial loads between 50 and 70 percent load is requested for the Westinghouse 501F CT. A CO limit during gas-firing of 232 ppmvd at 15%O<sub>2</sub> for partial loads between 50 and 70 percent load is requested for the Westinghouse 501D5A CT. For the Westinghouse 501F and 501D5A CTs, an annual limit of no more than 500 hours per year operation at partial load (i.e., loads between 50 and 70 percent) is also requested.

GPP requests that the base load natural gas- and oil-firing CO limits for the GE 7FA CT at ISO conditions be changed from 57 lb/hr to 53 lb/hr and from 71 lb/hr to 117 lb/hr, respectively, consistent with the proposed BACT limits of 12 and 23 ppmvd at 15% O<sub>2</sub> for natural gas- and oil-firing, respectively.

GPP requests that the base load gas-firing CO limit for the Westinghouse 501F CT at ISO conditions be changed from 57 lb/hr to 76 lb/hr consistent with the proposed BACT limit of 16 ppmvd at 15% O<sub>2</sub>.

GPP requests that the base load gas-firing CO limit for the Westinghouse 50D5A CT at ISO conditions be changed from 42 lb/hr to 32 lb/hr consistent with the proposed BACT limit of 10 ppmvd at 15% O<sub>2</sub>.

**GRANITE POWER PARTNERS II, L.P.**  
**Hardee County Generation Facility**  
**Comments on Proposed PSD Permit No. PSD-FL-282**

6. Specific Condition No. 22, Page 11 of 16

GPP requests that VOC limits be included to address partial load operations for the Westinghouse CTs. A VOC limit during gas-firing of 20 ppmvd at 15%O<sub>2</sub> for partial loads between 50 and 70 percent load is requested for the Westinghouse 501F and 501D5A CTs.

GPP requests that the base load gas-firing VOC limit for the Westinghouse 501F CT at ISO conditions be changed from 7.8 lb/hr to 8.8 lb/hr consistent with the proposed BACT limit of 3.0 ppmvd at 15% O<sub>2</sub>.

7. Specific Condition No. 23, Page 11 of 16

GPP requests that the note comment be revised to specify ISO conditions as follows:

[Note: Emissions of SO<sub>2</sub> and SAM (at ISO conditions) will be limited by this condition to 9.3 lb/hr and 1.1 lb/hr respectively while firing natural gas, and 98.1 lb/hr and 11.3 lb/hr respectively.]

8. Specific Condition No. 24, Page 11 of 16

Consistent with prior FDEP permits for CT projects, GPP requests that this condition be deleted; i.e., use Specific Condition No. 25 opacity limits as a surrogate for PM/PM<sub>10</sub>.

9. Specific Condition No. 30, Page 13 of 16

Consistent with prior FDEP permits for CT projects, GPP requests that PM/PM<sub>10</sub> testing using EPA Reference Methods 5 or 7 be deleted. CTs, and in particular simple-cycle CTs, generate large volumes of exhaust gas with very low PM concentrations making PM stack testing impractical.

10. Specific Condition No. 41, Page 15 of 16

Consistent with prior FDEP permits for CT projects, GPP requests that compliance with the CO limits be verified by initial and annual source testing and not by CEMS. The installation of CO CEMS is costly and has not been required by FDEP for comparable CT projects. Air quality CO impacts were shown to be insignificant for the proposed Hardee County Generation Facility.



**GRANITE POWER PARTNERS II, L.P.**  
**Hardee County Generation Facility**  
**Comments on Proposed PSD Permit No. PSD-FL-282**

11. Specific Condition No. 42, Page 15 of 16

GPP requests deletion of the reference to CO CEMS in Specific Condition No. 10; see Comment 9 above.

12. Section 39, Page 14 of 16.

The first line of the sentence includes a typographic error. "IPSAPC" should be "Granite Power Partners."



# FAX Cover Sheet

USEPA - Region 4  
61 Forsyth St., SW  
Atlanta, Georgia 30303

**TO:** AL Lincro  
FOEP

① Joe  
② File

**FAX #:** 850-922-6979

**RE:** Granite Power Partners II

cc: Nancy Grant ✓  
Tom Davis, ECT ✓  
Mike Vogt of Granite ✓  
5/30/00

**FROM:** Katy Forney  
Air Permits Section, Region 4 USEPA

**Phone #:** 404-562-9130

**Date:** 5-26-00

**# of Pages** (including cover): 3

**COMMENTS:**

If this FAX is poorly received, please call  
Katy Forney: 404-562-9130





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

MAY 26 2000

4APT-ARB

Mr. A. A. Linero, P.E.  
Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

SUBJ: Preliminary Determination and draft PSD Permit for Granite Power Partners II -  
Hardee County Generating Facility located near Wauchula, FL

Dear Mr. Linero:

Thank you for sending the preliminary determination and draft prevention of significant deterioration (PSD) permit for the Granite Power Partners II - Hardee County Generating Facility dated April 14, 2000. The draft PSD permit is for the proposed construction and operation of three simple cycle combustion turbines (CTs) with a total nominal generating capacity of 540 megawatts (MW). One of the following four types of turbines is being considered for installation at the Granite Power facility: GE 7FA, Siemens Westinghouse 501F, Siemens Westinghouse 501D5A, and ABB GT-24. The CTs will combust pipeline quality natural gas as the primary fuel and distillate fuel oil as a backup fuel (for GE or ABB turbines only). As proposed, all CTs will be allowed to operate 3,000 hours per year, and for certain CTs, fuel oil can be fired up to 500 hours of the 3,000 hours per year. Total emissions from the proposed project are above the thresholds requiring PSD review for nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), volatile organic compounds (VOC) and particulate matter (PM/PM<sub>10</sub>).

Based on our review of the preliminary determination and draft PSD permit for Granite Power, we have the following comments. These comments supplement our letter dated April 12, 2000, containing comments on the PSD permit application.

1. It is our understanding that the applicant will be submitting additional information regarding the potential to emit and regulatory analysis of hazardous air pollutants to FDEP, which will then be forwarded onto the Environmental Protection Agency (EPA) Region 4.
2. Section III, condition 13, states that no single combustion turbine shall operate more than 4,000 hours in a single year and on average each unit will operate 3,000 hours per calendar year. The economic analyses for SCR and catalytic oxidation are based on 3,000 hours of operation per year. In order for the cost evaluations to remain valid, each combustion turbine should be limited to no more than 3,000 hours per year.

3. As indicated in Condition 26 and 27 of the draft permit, FDEP is proposing to allow excess emissions due to startup, shutdown or malfunction for up to 2 hours in any 24-hour period. It is the EPA's policy that BACT applies during all normal operations and that automatic exemptions should not be granted for excess emissions. Startup and shutdown of process equipment are part of the normal operation of a source and should be accounted for in the planning, design, and implementation of operating procedures for the process and control equipment. Accordingly, it is reasonable to expect that careful and prudent planning and design will eliminate violations of emission limitations during such periods.

Thank you for the opportunity to comment on the preliminary determination and draft PSD permit for the Granite Power Partners II facility in Hardee County, FL. If you have any questions regarding these comments, please direct them to either Katy Forney at 404-562-9130 or Jim Little at 404-562-9118.

Sincerely,



R. Douglas Neeley  
Chief  
Air and Radiation Technology Branch  
Air, Pesticides and Toxics  
Management Division

cc: SWD  
T. Grant  
M. Vost, Grant  
NPS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

MAY 16 2000

RECEIVED

MAY 24 2000

4APT-ARB

BUREAU OF AIR REGULATION

A. A. Linero, P.E.  
Administrator  
New Source Review Section  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

SUBJECT: Custom Fuel Monitoring Schedule Proposed for Granite Power Partners II -  
Hardee Generating Station located in Hardee County, Florida

Dear Mr. Linero:

This letter is in response to your April 14, 2000, request for approval of a custom fuel monitoring schedule for Granite Power Partners II - Hardee Generating Station. Granite Power will operate three natural gas and oil fired simple cycle combustion turbines subject to 40 C.F.R. Part 60, Subpart GG - Standards of Performance for Stationary Gas Turbines. As requested, Specific Conditions 41, 42, 43, 45 and 46 have been reviewed. Region 4 has concluded that the use of acid rain nitrogen oxides (NO<sub>x</sub>) continuous emission monitoring system (CEMS) for demonstrating compliance, as described in Specific Conditions 41, 42 and 43, is acceptable. Region 4 has also concluded that the natural gas custom fuel monitoring schedule proposed in Specific Condition 45 and the fuel oil monitoring schedule described in Specific Condition 46 are both acceptable.

According to 40 C.F.R. 60.334(b)(2), owners and operators of stationary gas turbines subject to Subpart GG are required to monitor fuel nitrogen and sulfur content on a daily basis if a company does not have intermediate bulk storage for its fuel. 40 C.F.R. 60.334(b)(2) also contains provisions allowing owners and operators of turbines that do not have intermediate bulk storage for their fuel to request approval of custom fuel monitoring schedules that require less frequent monitoring of fuel nitrogen and sulfur content.

Region 4 reviewed Specific Condition 45 which allows SO<sub>2</sub> emissions to be quantified using procedures in 40 C.F.R. 75 Appendix D in lieu of daily sampling as required by 40 C.F.R. 60.334(b). Since the specific limitations listed in the permit condition are consistent with previous determinations, we have concluded that the use of this custom fuel monitoring schedule is acceptable.

Specific Conditions 42 and 43 involve the method used to monitor NO<sub>x</sub> excess emissions. Under the provisions for 40 C.F.R. 60.334(c)(1), the operating parameters used to identify NO<sub>x</sub>

excess emissions for Subpart GG turbines are water-to-fuel injection rates and fuel nitrogen content. As an alternative to monitoring NO<sub>x</sub> excess emissions using these parameters, Granite Power is proposing to use a NO<sub>x</sub> CEMS that is certified for measuring NO<sub>x</sub> emissions under 40 C.F.R. Part 75. Based upon a determination issued by EPA on March 12, 1993, NO<sub>x</sub> CEMS can be used to monitor excess emissions from Subpart GG turbines if a number of conditions specified in the determination are met and included in the permit condition.

Specific Condition 41 addresses the potential for correcting results to ISO standard day conditions. The basis for this requirement is that, under the provisions of 40 C.F.R. 60.335(c), NO<sub>x</sub> results from performance tests must be converted to ISO standard day conditions. As an alternative to continuously correcting results to ISO standard day conditions, Granite Power plans to keep records of the data needed to make this conversion, so that NO<sub>x</sub> results could be calculated on an ISO standard day condition basis anytime at the request of EPA or the Florida DEP. This approach is acceptable, since the construction permit contains NO<sub>x</sub> limits that are more stringent than those in Subpart GG, and compliance with Subpart GG for these units would be a concern only in cases when a turbine is in violation of the NO<sub>x</sub> limits in its permit.

Finally, Specific Condition 46 addresses the monitoring schedule for fuel oil. According to 40 C.F.R. 60.334(b)(1), the nitrogen and sulfur content of the fuel oil must be monitored each time a new shipment of fuel oil is transferred to bulk storage. Granite Power is proposing to use the fuel analysis provided by the fuel vendor instead of sampling each shipment directly. Provided that all the oil received at the plant complies with the applicable sulfur content limit of 0.8 weight percent, this approach is acceptable, since the specific condition states that the fuel vendor's analyses will comply with the test method requirements of 40 C.F.R. 60.335(d).

If you have any questions about the determination provided in this letter, please contact Katy Forney of my staff at 404-562-9130.

Sincerely,



R. Douglas Neeley  
Chief

Air and Radiation Technology Branch  
Air, Pesticides and Toxics  
Management Division

cc: SWD  
NPS

FAX

Date: 5-23-00

Number of Pages Including Cover Sheet 2

To: Al Limer

From: Nancy Grant

Phone # 850-488-0114

Phone # 863-494-9696

Fax # 850-922-6979

Fax # 863-993-3700

Remarks: forward request for meeting

May 22, 2000

Department of Environmental Protection  
Bureau of Air Regulation  
111 S. Magnolia Drive, Suite 4  
Tallahassee, Florida 32301  
Telephone: 850/488-0114  
Fax: 850/922-6979

Nancy Grant  
P.O.Box 573  
Arcadia, Florida  
Telephone: 863/494-9696  
Fax: 863/993-3700

Concerning:

DEP File No. 0490044-001 AC (PSD-FL-281)  
Granite Power Partners II, L.P.  
Hardee County Generation Station- Units 1-3  
Hardee County

This is a request for a public meeting concerning a proposed power plant in Hardee County. The date of publication of the Public Notice of Intent to Issue Air Permit was April 27th, 2000.

My request is within the thirty days of the issuance of this notice.

Thankyou,

*Nancy Grant*  
Nancy Grant





Florida  
Department of  
Environmental Protection

Jeb Bush  
Governor

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

David Struhs  
Secretary

F A X T R A N S M I

Post-it® Fax Note	7671	Date	5/15	# of pages	5
To	Michael Vogt	From	de lineo		
Co./Dept.	Granite PP	Co.	DEP-DARM		
Phone #		Phone #	850-921-9523		
Fax #		Fax #			

DATE: 5-10-00

TO: MARIJANE MOWATT

PHONE: 921-9720

FAX: \_\_\_\_\_

FROM: MIKE ALVIN, BAR/NSR

PHONE: 921-9530

Division of Air Resources Management

FAX: 850.922.6979

RE: \_\_\_\_\_

CC: \_\_\_\_\_

Total number of pages including cover sheet: 5

Message

THIS PETITION FOR AN ADM. HEARING  
CAME TO OUR FAX MACHINE. CAN YOU PLEASE  
SEE THAT IT ENDS UP AT THE RIGHT PLACE?

Thanks

Mike Alvin

If there are any problems with this fax transmittal, please call the above phone number.

"Protect, Conserve, and Manage Florida's Environmental and Natural Resources"

FAX

Date: 5-10-00

Number of Pages Including Cover Sheet 4

To:

Mike Halpin

From:

Nancy Grant

Phone # 850-488-0114

Phone # 863-494-9696

Fax # 850-922-6979

Fax # 863-993-3700

Remarks:

April 27 - May 10

This is the 14th day.

May 10, 2000

Petition for Administrative Proceeding  
under sections 120.569 and 120.57 of the Florida Statutes

DEP File No. 0490044-001-AC (PSD-FL-281)  
Granite Power Partners II, L.P.  
Hardee County Generation Station-Units 1-3

(a) Agency effected:

Department of Environmental Protection  
Bureau of Air Regulation  
111 S. Magnolia Drive, Suite 4  
Tallahassee, Florida 32301  
Telephone: 850/488-0114  
Fax: 850/488-6967

(b) Petitioner:

Nancy Grant  
P.O. Box 573  
Arcadia, Florida 34265  
Telephone: 863/494-9696  
Fax: 863/993-3700

(b) how the petitioner's substantial interests will be  
affected by the agency determination:

As you have heard from petitions throughout the State of Florida the substantial interests remain the same. The health, well being, and quality of my life as well as yours, my grandchildren and yours will be directly felt by the decisions that you make. Contaminating the air we breath and using the state guidelines for excuses will be met with deadly results.

(c) statement of how petitioner received notice of agency  
action or proposed action:

I followed the trail from the leads of John  
Ellis's.(I.P.S. Powers, Avon Park Corporation) and  
from the notice of intent from the Hardee paper.

Petition: page 2

(d) statement of all disputed issues of material fact:

Our utilities, FPL has stated, would not build plants such as proposed outside our towns. These plants are not for any other purpose than lining the applicants wallet. Excess pollution for this purpose is wrong.

This is a violation of our God given rights under the Constitution of the United States for clean air, pure water and sunshine.

The Clean Air Act of the United States has set standards that should ensure we as a people do not become ill or suffer disease because of the air we breathe from polluting, unnecessary, money making, plants that benefit no one except the narrow minded, money hungry, monsters that don't care about even the planet they live on. They would destroy even their own family to make that money. When is enough enough.

There are a lot of material facts that will stand up in court and that is where this is going. Did any of you pay any attention at all to the Earth Day Rally in Washington DC just recently?

(e) statement of ultimate facts alleged and facts that warrant reversal:

The obvious fact is that you cannot permit unlimited polluting factories in an already polluted environment. The accumulated effect of all of these plants is going to have a destructive effect on Hardee County as well as the surrounding area. The taxes from these plants are what Little Backwoods Commissioners look at, that is what the Phosphate Industry calls them. This is a wake-up petition.

The entire Florida Statutes need to be updated to meet our desperate environmental needs before we have destroyed completely our home, planet Earth. Our elected officials will now be held accountable for their neglect. They haven't kept up with the times.

Petition: page 3

- (f) a statement of the specific rules or statutes the petitioner contends require reversal or modification

That is putting it mildly, these so called rules are dated 1977. They need to be updated as previously stated. The hand writing is on the wall. They don't address the problem that is facing this state, this nation AT ALL!

- (g) statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take:

Do not permit any more merchant plants. It doesn't take a whole lot of common sense to see the problem. We as a nation are like a flock of sheep following these rules to our destruction. Permit all these plants that come your way and I'm afraid you are going to be held responsible for the damage they cause, the lives they take.

I am also requesting the Administrative hearing be held in Hardee County.

*Nancy Grant*

*May 10, 2000*



**LS POWER, LLC**

655 Craig Road, Suite 336  
St. Louis, Missouri 63141  
(314) 993-2700 • Fax: (314) 993-2790

**RECEIVED**  
MAY 08 2000  
BUREAU OF AIR REGULATION

**Michael F. Vogt**  
*Project Manager*

May 4, 2000

A.A. Linero  
Dept. of Environmental Protection  
Division of Air Resources Management  
Twin Towers Office Building, Mail Station 5505  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Re: DEP File No. 0490044-001-AC (PSD-FL-281)

Dear Mr. Linero:

Per your request, the proof of publication and the affidavit of publication in the Wauchula, Florida Herald-Advocate are enclosed. If you have any further questions, please contact me. Thank you.

Sincerely,

Mike Vogt

cc: File  
EPA  
NPS  
SWD

**AFFIDAVIT OF PUBLICATION**  
**The Herald-Advocate**  
Published Weekly at Wauchula, Florida

STATE OF FLORIDA,  
COUNTY OF HARDEE

Before the undersigned authority personally appeared Jim Kelly who on oath says he is the editor of The Herald-Advocate, a newspaper published at Wauchula, in Hardee County, Florida, that the attached copy of advertisement, being a Notice of intent to issue in the matter of DEP File No. 0490044-001-AC in the \_\_\_\_\_ Court, was published in said newspaper in the issues of April 27, 2000

Affiant further says that the said Herald-Advocate is a newspaper published at Wauchula, in said Hardee County, Florida, and that the said newspaper has heretofore been continuously published in said Hardee County, Florida, each week and has been entered as second class mail matter at the post office in Wauchula, in said Hardee County, Florida, for a period of one year next preceding the publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Jim Kelly

Sworn to and subscribed before me this 27 day of April  
A. D. 2000

Theresa V. Cimmino  
Notary Public

My Commission Expires June 15 2002

NOTARY PUBLIC  
STATE OF FLORIDA  
Theresa V. Cimmino  
Commission # CC 739052  
Expires June 15, 2002  
BONDED THRU  
ATLANTIC BONDING CO., INC.

**NEW ALL**  
**W 2001 OLDSMOB**  
\$1,705 cash due at lease signing; includes security dep  
**\$17,999** OR  
DIA DISCOUNT/REBATE.....\$2,286  
PRICE.....\$20,285  
FACTURER'S

**SAVE UP TO \$2783**  
**NEW 2000 BUICK**  
Cash Due At Lease Signing minus \$400 College Grad/Rebate, \$1,208 Cash due at lease signing  
**\$17,999** OR  
DIA DISCOUNT/COLLEGE GRAD.....\$1,788  
PRICE.....\$19,787  
FACTURER'S

FM Stereo  
Cassette  
Power  
Wheel  
er Windows  
er Door Locks  
se Control

**\$1,000 UNDER INVOICE**

**PUBLIC NOTICE OF INTENT TO  
ISSUE AIR CONSTRUCTION PERMIT**

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL  
PROTECTION

DEP File No. 0490044-001-AC  
(PSD-FL-281)

Granite Power Partners II, L.P.  
Hardee County Generation Station —  
Units 1-3  
Hardee County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit under the requirements for the Prevention of Significant Deterioration (PSD) of Air Quality to Granite Power Partners II, L. P. The permit is to construct: three nominal 120-180 megawatt (MW) natural gas and distillate fuel oil-fired combustion turbine-electrical generators; three 100-foot stacks; a 10 million Btu per hour natural gas-fired heater; and one 1.5 million gallon fuel oil storage tank for the proposed Hardee County Generation Station West of Wauchula in Hardee County. A Best Available Control Technology (BACT) determination was required for sulfur dioxide (SO<sub>2</sub>), particulate matter (PM/PM<sub>10</sub>), nitrogen oxides (NO<sub>x</sub>), sulfuric acid mist (SAM), and carbon monoxide (CO) pursuant to Rule 62-212.400, F.A.C. The applicant's name and address are Granite Power Partners II, L. P., 655 Craig Road, Suite 336, St. Louis Missouri 63025.

The gas turbine manufacturer and model have not been selected. The options are: General Electric Model 7FA (170 MW); Westinghouse Model 501D5A (120 MW); Westinghouse Model 501F (170 MW); or ABB Alstom Model GT-24 (180 MW). The units will operate in simple cycle mode and intermittent duty. The units will operate primarily on natural gas and will be permitted to operate 3,000 hours per year. Within the 3000 hours per year and depending on the model, fuel oil firing will be permitted for 0-500 hours per year.

NO<sub>x</sub> emissions will be controlled by Dry Low NO<sub>x</sub> combustors or selective catalytic reduction (SCR). The emission limits proposed for gas firing are between 5 and 15 parts per million by volume at 15 percent oxygen (ppm) and depend on the manufacturer, control technology, and use of backup fuel oil. NO<sub>x</sub> will be controlled to 42 ppm by wet injection or to 10 ppm by SCR when firing backup fuel oil. Sulfuric acid mist, SO<sub>2</sub>, and PM/PM<sub>10</sub> will be limited by use of clean fuels. Emissions of VOC and CO will be controlled by good combustion practices.

The maximum emissions from the combustion turbines and the natural gas heater in tons per year based on the original application are summarized below. There will be minor emissions of VOC from the fuel oil storage tank.

*Harold Associate  
4/27/00*

*Hardee Co.  
News Article*

Pollutant
PM/PM <sub>10</sub>
CO
NO <sub>x</sub>
VOC
SO <sub>2</sub>
Sulfuric Acid Mist

**Maximum Potential Emissions**

126  
518  
950  
74  
108  
14

**PSD Significant Emission Rate**

25/15  
100  
40  
40  
40  
7

Air quality and regional haze impact analyses were conducted. Maximum predicted impacts due to proposed emissions from the project are less than the applicable PSD Class I and Class II significant impact levels. There will be insignificant impacts on visibility in the Class I Chassahowitzka National Wildlife Area. Based on the required analyses, the Department has reasonable assurance that the proposed project will not cause or significantly contribute to a violation of any AAQS or PSD increment.

The Department will issue the FINAL Permit, in accordance with the conditions of the DRAFT Permit, unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments and requests for public meetings concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments and requests for public meetings should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.



A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties list-

ed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department'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 how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (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; and (g) A statement of the relief sought by the petitioner, stating precisely the action 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 Department'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.

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

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays at:

Department of Environmental Protection  
Bureau of Air Regulation  
111 S. Magnolia Drive, Suite 4  
Tallahassee, Florida 32301  
Telephone: 850/488-0114  
Fax: 850/922-6979

Department Environmental Protection  
Southwest District Office  
3804 Coconut Palm Drive  
Tampa, Florida 33619-8218  
Telephone: 813/744-6100  
Fax: 813/744-6084

The complete project file includes the application, technical evaluations, Draft Permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information. The Department's technical evaluations and Draft Permit can be viewed at [www.dep.state.fl.us/air/permitting.htm](http://www.dep.state.fl.us/air/permitting.htm) by clicking on Construction Permits.

4:27c



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

APR 12 2000

RECEIVED

APR 17 2000

BUREAU OF AIR REGULATION

4APT-ARB

A. A. Linero, P.E.  
Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

SUBJ: PSD Permit Application for Granite Power Partners II  
Hardee County Generating Facility located near Wauchula, FL

Dear Mr. Linero:

Thank you for sending the prevention of significant deterioration (PSD) permit application for the Granite Power Partners II - Hardee County Generating Facility dated January 19, 2000. The PSD permit application is for the proposed construction and operation of three simple cycle combustion turbines (CTs) with a total nominal generating capacity of 540 megawatts (MW). One of following four types of turbines is being considered for installation at the Granite Power facility: GE 7FA, Siemens Westinghouse 501F, Siemens Westinghouse 501D5A, and ABB GT-24. The CTs will combust pipeline quality natural gas as the primary fuel and distillate fuel oil as a backup fuel. As proposed, the CTs will be allowed to operate 3,000 hours per year with up to 500 hours per year firing fuel oil. Total emissions from the proposed project are above the thresholds requiring PSD review for nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), volatile organic compounds (VOC) and particulate matter (PM/PM<sub>10</sub>).

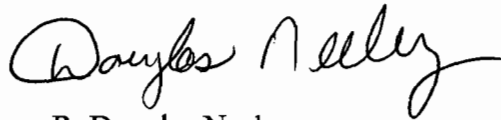
Based on our review of the PSD permit application for Granite Power, we have the following comments:

1. The applicant proposed a best available control technology (BACT) NO<sub>x</sub> emission limit of 25 ppmvd (15% oxygen) for natural gas firing if the ABB GT-24 turbines are installed. BACT NO<sub>x</sub> emission limits for most recent simple cycle projects in Region 4 and elsewhere are well below 25 ppmvd while firing natural gas. Our conclusion is that the NO<sub>x</sub> BACT emission rate should be much less than 25 ppmvd regardless of the turbine model selected by the applicant.
2. In Appendix D of the PSD permit application, the formaldehyde emission factor seems to originate from Chapter 1 of AP-42 Supplement D. Chapter 1 discusses external combustion sources, while Chapter 3 discusses stationary internal combustion sources (including CTs) and is more appropriate for estimating emissions from combustion turbines.

3. In the economic analyses, the cost of SCR and catalytic oxidation are evaluated based on 3,000 hours of operation per year. This operational limit needs to be included in the draft PSD permit as the maximum number of hours/year a single CT can operate for these analyses to remain valid.
4. The proposed BACT for particulate matter ( $PM_{10}$ ) is between 10 and 20% opacity for visible emissions (depending on which turbine manufacturer is chosen). This visible emissions opacity limit is proposed as a surrogate for a BACT particulate matter emissions rate limit. It is acceptable to use the 10 - 20% opacity limit as a surrogate for monitoring and recordkeeping; however, the permit conditions should also list the corresponding emission rate for particulate matter (i.e., 9.9 lb/hr for natural gas, 18.7 lb/hr for fuel oil.)

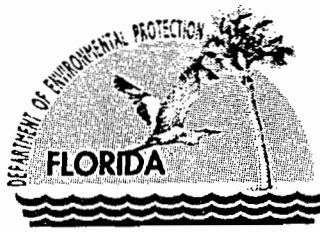
Thank you for the opportunity to comment on the PSD permit application for the Granite Power Partners II facility in Hardee County, FL. If you have any questions regarding these comments, please direct them to either Katy Forney at 404-562-9130 or Jim Little at 404-562-9118.

Sincerely,



R. Douglas Neeley  
Chief

Air and Radiation Technology Branch  
Air, Pesticides and Toxics  
Management Division



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

April 14, 2000

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Gregg Worley, Chief  
Preconstruction/HAP Section  
Air, Radiation Technology Branch  
US EPA Region IV  
61 Forsyth Street  
Atlanta, GA 30303

Re: PSD Review and Custom Fuel Monitoring Schedule  
Hardee Generation Station  
PSD-FL-281

Dear Mr. Worley:

Enclosed are two copies of the Department's Intent to Issue package for the Granite Power Partners II Hardee Generation Station in Hardee County. It will be a natural gas and oil-fired simple cycle facility consisting of three nominal 120-180 megawatt (MW) simple cycle combustion turbine-electrical generators. The project is not subject to the Florida's Power Plant Siting procedure because it will generate no electricity from steam.

We received your comments on the application by fax on April 12. We made at least a couple of changes as result of those comments but were not able to incorporate all of them into the draft permit which was already under review by our management. We will address all comments in our final action. In the meantime, please provide any additional comments on the Draft BACT determination and Draft Permit.

Please send your written comments on or approval of the applicant's proposed custom fuel monitoring schedule. The plan is based on the letter dated January 16, 1996 from Region V to Dayton Power and Light. The Subpart GG limit on SO<sub>2</sub> emissions is 150 ppmvd @ 15% O<sub>2</sub> or a fuel sulfur limit of 0.8% sulfur. Neither of these limits could conceivably be violated by the use of pipeline quality natural gas with a sulfur limit of 1 grain per 100 standard cubic feet or by back-up fuel oil with a 0.05% sulfur content. The requirements have been incorporated into the enclosed draft permit as Specific Conditions 45 and 46 and read as follows:

45. Natural Gas Monitoring Schedule: A custom fuel monitoring schedule pursuant to 40 CFR 75 Appendix D for natural gas may be used in lieu of the daily sampling requirements of 40 CFR 60.334 (b)(2) provided the following requirements are met:

- The permittee shall apply for an Acid Rain permit within the deadlines specified in 40 CFR 72.30.

"More Protection, Less Process"

Printed on recycled paper.

- The permittee shall submit a monitoring plan, certified by signature of the Designated Representative, that commits to using a primary fuel of pipeline supplied natural gas (sulfur content less than 20 gr/100 scf pursuant to 40 CFR 75.11(d)(2)).
- Each unit shall be monitored for SO<sub>2</sub> emissions using methods consistent with the requirements of 40 CFR 75 and certified by the USEPA.
- This custom fuel monitoring schedule will only be valid when pipeline natural gas is used as a primary fuel. If the primary fuel for these units is changed to a higher sulfur fuel, SO<sub>2</sub> emissions must be accounted for as required pursuant to 40 CFR 75.11(d).

46. Fuel Oil Monitoring Schedule: The following monitoring schedule for No. 2 or superior grade fuel oil shall be followed: For all bulk shipments of No. 2 fuel oil received at this facility an analysis which reports the sulfur content and nitrogen content of the fuel shall be provided by the fuel vendor. The analysis shall also specify the methods by which the analyses were conducted and shall comply with the requirements of 40 CFR 60.335(d).

Please comment on Specific Conditions 41 and 42 which allow the use of the acid rain NO<sub>x</sub> CEMS for demonstrating compliance as well as reporting excess emissions, as well as Specific Condition 43 which allows the use of CEMS in lieu of measuring the water to fuel ratio. Typically NO<sub>x</sub> emissions will be less than 9 ppmvd @15% O<sub>2</sub> (natural gas) which is less than one-tenth of the applicable Subpart GG limit based on the efficiency of the unit. A CEMS requirement is stricter and more accurate than any Subpart GG requirement for determining excess emissions.

The Department recommends your approval of the custom fuel monitoring schedule and these NO<sub>x</sub> monitoring provisions. If you have any questions on these matters please contact me at 850/921-9523.

Sincerely,



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

AAL/al

Enclosures



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Scruhs  
Secretary

April 14, 2000

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Michael F. Vogt  
Granite Power Partners II, L.P.  
655 Craig Road, Suite 336  
St. Louis, Missouri ~~63025~~ 63141

Re: DEP File No. 0490044-001-AC (PSD-FL-281)  
Hardee County Generation Facility  
Three Simple Cycle Combustion Turbines

Dear Mr. Vogt:

Enclosed is one copy of the Draft Permit, Technical Evaluation and Preliminary Determination, and Draft BACT Determination, for the Hardee County Generation Facility to be located near Wauchula in Hardee County. The Department's Intent to Issue Air construction Permit and the "Public Notice of Intent to Issue Air Construction Permit" are also included.

The Public Notice must be published one time only as soon as possible in a newspaper of general circulation in the area affected, pursuant to Chapter 50, Florida Statutes. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the Department's proposed action to A. A. Linero, P.E., Administrator, New Source Review Section at the above letterhead address or contact him at 850/921-9523.

Sincerely,

C. H. Fancy, P.E., Chief,  
Bureau of Air Regulation

CHF/al

Enclosures

"More Protection; Less Process"

Printed on recycled paper.

Z 031 391 947

US Postal Service  
**Receipt for Certified Mail**

No Insurance Coverage Provided.  
Do not use for International Mail (See reverse)

PS Form 3800, April 1995

Sent to <i>Mr. Michael F. Vogt</i>	
Street & Number <i>Granite Power Partners</i>	
Post Office, State, & ZIP Code <i>St. Louis, Mo.</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date <i>0490044-001-AL</i>	<i>4-17-00</i>
<i>PSD-FL-281</i>	

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Michael F. Vogt  
Granite Power Partners II, L.P.  
655 Craig Road, Suite 336  
St. Louis, Missouri ~~63025~~

*63141*

2. Article Number (Copy from service label)

*Z 031 391 947*

PS Form 3811, July 1999

**COMPLETE THIS SECTION ON DELIVERY**

- A. Received by (Please Print Clearly) *CINDY Schulte* B. Date of Delivery *4-24-00*
- C. Signature *Cindy Schulte*  Agent  Addressee
- D. Is delivery address different from item 1?  Yes  No  
If YES, enter delivery address below:

3. Service Type

- Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes

Domestic Return Receipt

102595-99-M-1789

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No. 0490044-001-AC (PSD-FL-281)

Granite Power Partners II, L.P.  
Hardee County Generation Station – Units 1-3  
Hardee County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit under the requirements for the Prevention of Significant Deterioration (PSD) of Air Quality to Granite Power Partners II, L.P. The permit is to construct: three nominal 120-180 megawatt (MW) natural gas and distillate fuel oil-fired combustion turbine-electrical generators; three 100-foot stacks; a 10 million Btu per hour natural gas-fired heater; and one 1.5 million gallon fuel oil storage tank for the proposed Hardee County Generation Station West of Wauchula in Hardee County. A Best Available Control Technology (BACT) determination was required for sulfur dioxide (SO<sub>2</sub>), particulate matter (PM/PM<sub>10</sub>), nitrogen oxides (NO<sub>x</sub>), sulfuric acid mist (SAM), and carbon monoxide (CO) pursuant to Rule 62-212.400, F.A.C. The applicant's name and address are Granite Power Partners II, L.P., 655 Craig Road, Suite 336, St. Louis Missouri 63025.

The gas turbine manufacturer and model have not been selected. The options are: General Electric Model 7FA (170 MW); Westinghouse Model 501D5A (120 MW); Westinghouse Model 501F (170 MW); or ABB Alstom Model GT-24 (180 MW). The units will operate in simple cycle mode and intermittent duty. The units will operate primarily on natural gas and will be permitted to operate 3,000 hours per year. Within the 3000 hours per year and depending on the model, fuel oil firing will be permitted for 0-500 hours per year.

NO<sub>x</sub> emissions will be controlled by Dry Low NO<sub>x</sub> combustors or selective catalytic reduction (SCR). The emission limits proposed for gas firing are between 5 and 15 parts per million by volume at 15 percent oxygen (ppm) and depend on the manufacturer, control technology, and use of backup fuel oil. NO<sub>x</sub> will be controlled to 42 ppm by wet injection or to 10 ppm by SCR when firing backup fuel oil. Sulfuric acid mist, SO<sub>2</sub>, and PM/PM<sub>10</sub> will be limited by use of clean fuels. Emissions of VOC and CO will be controlled by good combustion practices.

The maximum emissions from the combustion turbines and the natural gas heater in tons per year based on the original application are summarized below. There will be minor emissions of VOC from the fuel oil storage tank.

<u>Pollutant</u>	<u>Maximum Potential Emissions</u>	<u>PSD Significant Emission Rate</u>
PM/PM <sub>10</sub>	126	25/15
CO	518	100
NO <sub>x</sub>	950	40
VOC	74	40
SO <sub>2</sub>	108	40
Sulfuric Acid Mist	14	7

Air quality and regional haze impact analyses were conducted. Maximum predicted impacts due to proposed emissions from the project are less than the applicable PSD Class I and Class II significant impact levels. There will be insignificant impacts on visibility in the Class I Chassahowitzka National Wildlife Area. Based on the required analyses, the Department has reasonable assurance that the proposed project will not cause or significantly contribute to a violation of any AAQS or PSD increment.

The Department will issue the FINAL Permit, in accordance with the conditions of the DRAFT Permit, unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments and requests for public meetings concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments and requests for public meetings should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.



The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department'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 how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (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; and (g) A statement of the relief sought by the petitioner, stating precisely the action 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 Department'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

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

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection  
Bureau of Air Regulation  
111 S. Magnolia Drive, Suite 4  
Tallahassee, Florida 32301  
Telephone: 850/488-0114  
Fax: 850/922-6979

Department Environmental Protection  
Southwest District Office  
3804 Coconut Palm Drive  
Tampa, Florida 33619-8218  
Telephone: 813/744-6100  
Fax: 813/744-6084

The complete project file includes the application, technical evaluations, Draft Permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information. The Department's technical evaluations and Draft Permit can be viewed at [www.dep.state.fl.us/air/permitting.htm](http://www.dep.state.fl.us/air/permitting.htm) by clicking on Construction Permits.

In the Matter of an  
Application for Permit by:

Mr. Michael F. Vogt  
655 Craig Road, Suite 336  
St. Louis, Missouri 63025

DEP File No. 0490044-001-AC (PSD-281)  
Hardee County Generation Facility, Units 1 - 3  
Hardee County

---

### INTENT TO ISSUE AIR CONSTRUCTION PERMIT

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit (copy of DRAFT Permit attached) for the proposed project, detailed in the application specified above and the attached Technical Evaluation and Preliminary Determination, for the reasons stated below.

The applicant, Granite Power Partners II, L.P. applied on January 18, 2000 to the Department for an air construction permit to construct three combustion turbine-electrical generators with 100-foot stacks, a natural gas fired heater, and one 1.5 million gallon fuel oil storage tank for the Hardee County Generation Facility to be located near Wauchula in Hardee County.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-212. The above actions are not exempt from permitting procedures. The Department has determined that an air construction permit under the provisions for the Prevention of Significant Deterioration (PSD) of Air Quality is required for the proposed work.

The Department intends to issue this air construction permit based on the belief that reasonable assurances have been provided to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1., F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Construction Permit. The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C., requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting 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 Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114; Fax 850/ 922-6979). You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in section 50.051, F.S. to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rules 62-110.106(9) & (11), F.A.C.

The Department will issue the final permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments and requests for public meetings concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of Public Notice of Intent to Issue Air Permit. Written comments and requests for public meetings should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department'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 how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (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; and (g) A statement of the relief sought by the petitioner, stating precisely the action 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 Department'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.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above. Mediation is not available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542 F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The

name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2) F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Executed in Tallahassee, Florida.



C. H. Fancy, P.E., Chief  
Bureau of Air Regulation


**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE AIR CONSTRUCTION PERMIT (including the PUBLIC NOTICE, Technical Evaluation and Preliminary Determination, Draft BACT Determination, and the DRAFT permit) was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 4/17/00 to the person(s) listed:

Michael Vogt, GPP-II, L.P.\*  
Gregg Worley, EPA  
John Bunyak, NPS  
Bill Thomas, DEP SWD  
Chair, Hardee County BCC  
Tom Davis, P.E., ECT

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

 4/17/00  
(Clerk) (Date)

TECHNICAL EVALUATION  
AND  
PRELIMINARY DETERMINATION

GPP Hardee County Generation Facility Units 1 - 3

Three Combustion Turbines  
One 1.5-Million Gallon Fuel Oil Storage Tank  
Hardee County

DEP File No. 049044-001-AC (PSD-FL-281)

Department of Environmental Protection  
Division of Air Resources Management  
Bureau of Air Regulation

April 14, 2000

# TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

## 1. APPLICATION INFORMATION

### 1.1 Applicant Name and Address

Granite Power Partners II, L.P.  
655 Craig Road, Suite 336  
St. Louis, Missouri 63025

Authorized Representative: *Mr. Michael F. Vogt*

### 1.2 Reviewing and Process Schedule

01-18-00: Date of Receipt of Application  
03-27-00: Additional Modeling received, Application Complete  
04-14-00: Intent Issued

## 2. FACILITY INFORMATION

### 2.1 Facility Location

Refer to Figures 1 and 2 below. The Granite Power Partners II (GPP) Hardee County Generation Facility will be located near Vandolah and Fort Green Ona Roads, approximately 5 miles West of Wauchula, Hardee County. This site is approximately 138 kilometers South-Southeast of the Chassahowitzka Class I National Wilderness Area. UTM coordinates for this facility are Zone 17; 408.49 km E; 3045.73 km N.



Figure 1 – Project Location



Figure 2 – Vandolah, Hardee County

### 2.2 Standard Industrial Classification Codes (SIC)

Industry Group No.	49	Electric, Gas, and Sanitary Services
Industry No.	4911	Electric Services

# TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

## 2.3 Facility Category

This proposed facility will generate between 360 and 540 megawatts (nominal MW) of electrical power. The facility is classified as a Major or Title V Source of air pollution because emissions of at least one regulated air pollutant, such as particulate matter (PM/PM<sub>10</sub>), sulfur dioxide (SO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), or volatile organic compounds (VOC) exceeds 100 TPY.

This facility is not within an industry included in the list of the 28 Major Facility Categories per Table 62-212.400-1, F.A.C. Because emissions are greater than 250 TPY for at least one criteria pollutant, the facility is also a major facility with respect to Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD), and a Best Available control Technology determination is required. Given that emissions of at least one single criteria pollutant will exceed 250 TPY, PSD Review and a BACT determination are required for each pollutant emitted in excess of the Significant Emission Rates listed in Table 62-212.400-2, F.A.C. These values are: 40 TPY for NO<sub>x</sub>, SO<sub>2</sub>, and VOC; 25/15 TPY of PM/PM<sub>10</sub>; 7 TPY of Sulfuric Acid Mist (SAM); and 100 TPY of CO.

## 3. PROJECT DESCRIPTION

This permit addresses the following emissions units:

EMISSION UNIT	SYSTEM	Emission Unit Description
001	Power Generation	One nominal 120-180 Megawatt Gas Combustion Turbine-Electrical Generator
002	Power Generation	One nominal 120-180 Megawatt Gas Combustion Turbine-Electrical Generator
003	Power Generation	One nominal 120-180 Megawatt Gas Combustion Turbine-Electrical Generator
004	Fuel Storage	One 1.5-Million Gallon Fuel Oil Storage Tank
005	Fuel Heating	One 10 million Btu/hr gas heater

GPP proposes to construct three nominal 120-180 MW simple cycle, intermittent duty combustion turbine-electrical-generators with 60-foot stacks and one 1.5-million gallon fuel oil storage tank at the planned Hardee County Generation Facility (HCGF).

According to the application, the facility will emit approximately 950 tons per year (TPY) of Nitrogen oxides (NO<sub>x</sub>), 518 TPY of carbon monoxide (CO), 126 TPY of Particulate matter (PM/PM<sub>10</sub>), 108 TPY of sulfur dioxide (SO<sub>2</sub>), 74 TPY of volatile organic compounds (VOC), and 14 TPY of sulfuric acid mist (SAM).

Significant emission rate increases per Table 212.400-2, F.A.C. will occur for CO, SO<sub>2</sub>, SAM, PM/PM<sub>10</sub> and NO<sub>x</sub>. A BACT determination is required for each of these pollutants. An air quality impact review is also required for CO, PM/PM<sub>10</sub>, nitrogen dioxide (NO<sub>2</sub>), and SO<sub>2</sub>.

GPP has not selected a turbine manufacturer. The company is considering the following units manufactured by General Electric (GE), Siemens-Westinghouse (WH) or ABB Alstom:

# TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Unit	GE 7FA	WH 501F	WH 501 D5A	ABB GT-24
Rating (MW)	170	170	120	180
Heat Input (mmBtu/hr) (LHV, 59°F, gas)	1,596	1,791	1,282	1,812

The main fuel will be natural gas and the units are proposed by GPP to operate up to 3,000 hours per year per unit of which 500 hours per year per unit may be on maximum 0.05 percent sulfur distillate fuel oil. Each turbine will be equipped with a version of Dry Low NO<sub>x</sub> (DLN) technology for the control of NO<sub>x</sub> emissions to the range of 10.5 to 25 ppmvd at 15% O<sub>2</sub> when firing natural gas and wet injection to 42 ppmvd when firing fuel oil.

## 4. PROCESS DESCRIPTION

Much of the following discussion is from a 1993 EPA document on Alternative Control Techniques for NO<sub>x</sub> Emissions from Stationary Gas turbines. Project specific information is interspersed where appropriate.

A gas turbine is an internal combustion engine that operates with rotary rather than reciprocating motion. Ambient air is drawn into the multi-stage compressor where it is compressed by a pressure ratio between 10 and 30 times atmospheric pressure. The compressed air is then directed to the combustor section, where fuel is introduced, ignited, and burned. The key components of an earlier design GE 7FA unit are identified in Figure 3. Views of a typical "501" and an ABB GT24 are shown in Figures 4 and 5 respectively.

Flame temperatures in a typical combustor section can reach 3600 degrees Fahrenheit (°F). Units such as those under consideration by GPP operate at lower flame temperatures, which minimize NO<sub>x</sub> formation. The hot combustion gases are then diluted with additional cool air and directed to the turbine section at temperatures between 2000 and 2500 °F. Energy is recovered in the turbine section in the form of shaft horsepower, of which typically more than 50 percent is required to drive the internal compressor section. The balance of recovered shaft energy is available to drive the external load unit such as an electrical generator.

In the GPP HCGF Project, the units will operate as peaking units in the simple cycle mode. Cycle efficiency, defined as a percentage of useful shaft energy output to fuel energy input, is approximately 32 to 38 percent for combustion turbines in the simple cycle mode. In addition to shaft energy output, 1 to 2 percent of fuel input energy can be attributed to mechanical losses. The balance is exhausted from the turbine in the form of heat.

In combined cycle projects, the gas turbine drives an electric generator while the exhausted gases are used to raise additional steam in a heat recovery steam generator. The steam, in-turn, drives another electrical generator producing an additional 60-90 MW. In combined cycle mode, the thermal efficiency of the units under consideration would be between 52 and 58 percent.

At high ambient temperature, the units cannot generate as much power because of lower compressor inlet density. To compensate for the loss of output (which can be on the order of 20 MW compared to referenced temperatures), an evaporative inlet cooler (fogger) can be installed ahead of the combustion turbine inlet. At an ambient temperature of 95 °F, roughly 7-14 MW of power can be regained per unit by using the foggers.

Additional process information related to the combustor design, and control measures to minimize pollutant emissions are given in the draft BACT determination distributed with this evaluation.



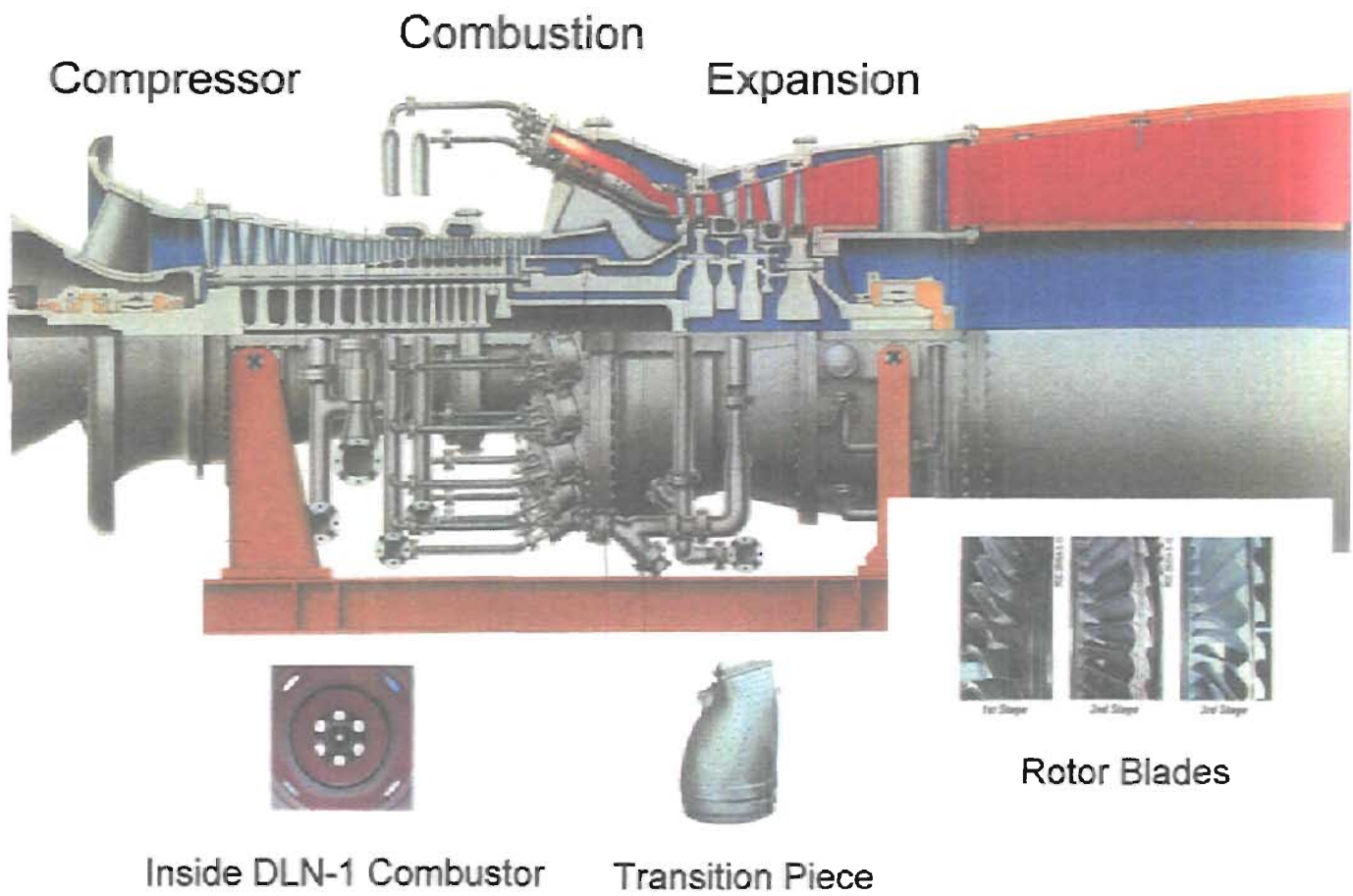
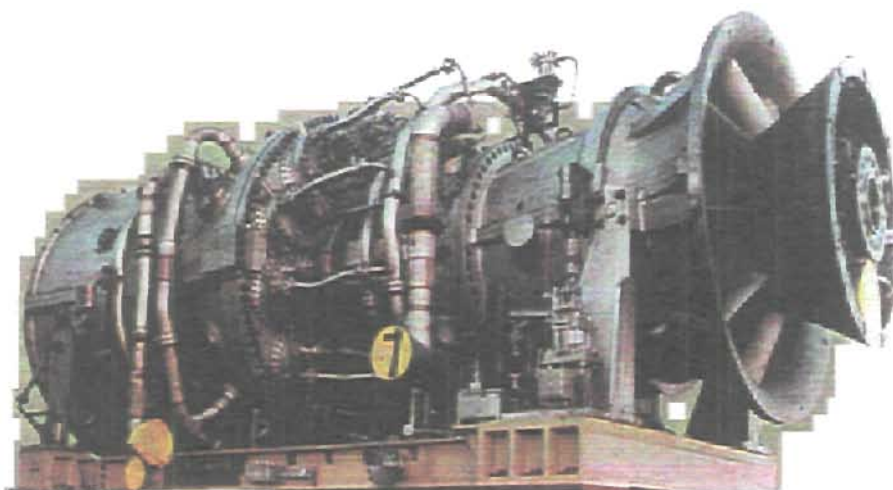


Figure 3 - Internal and External Views of GE MS7001FA



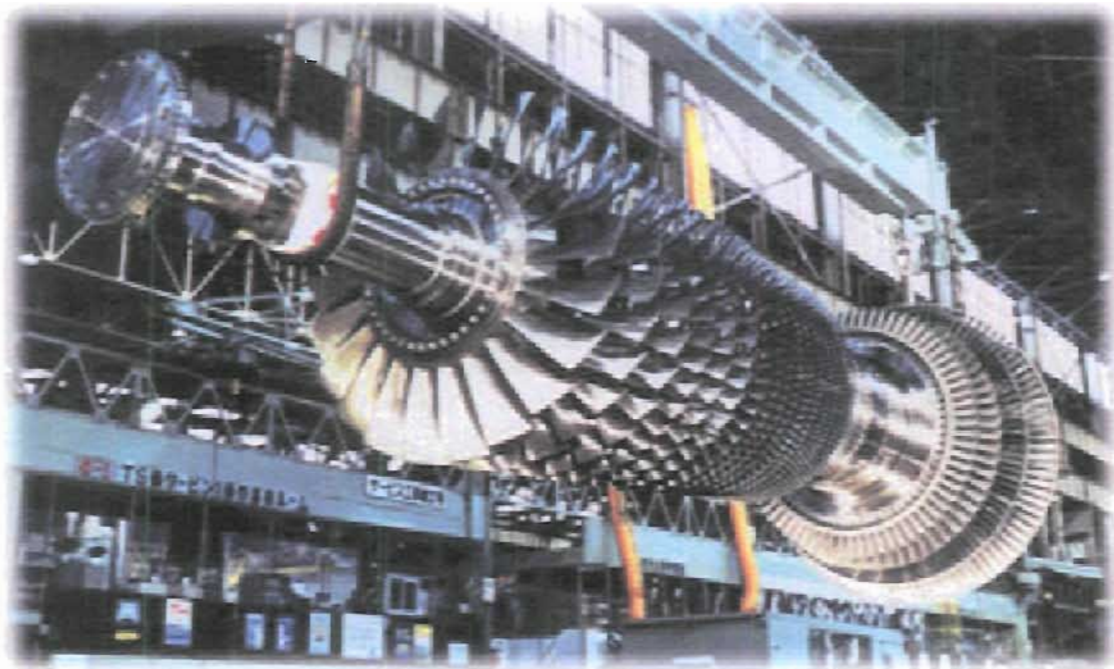
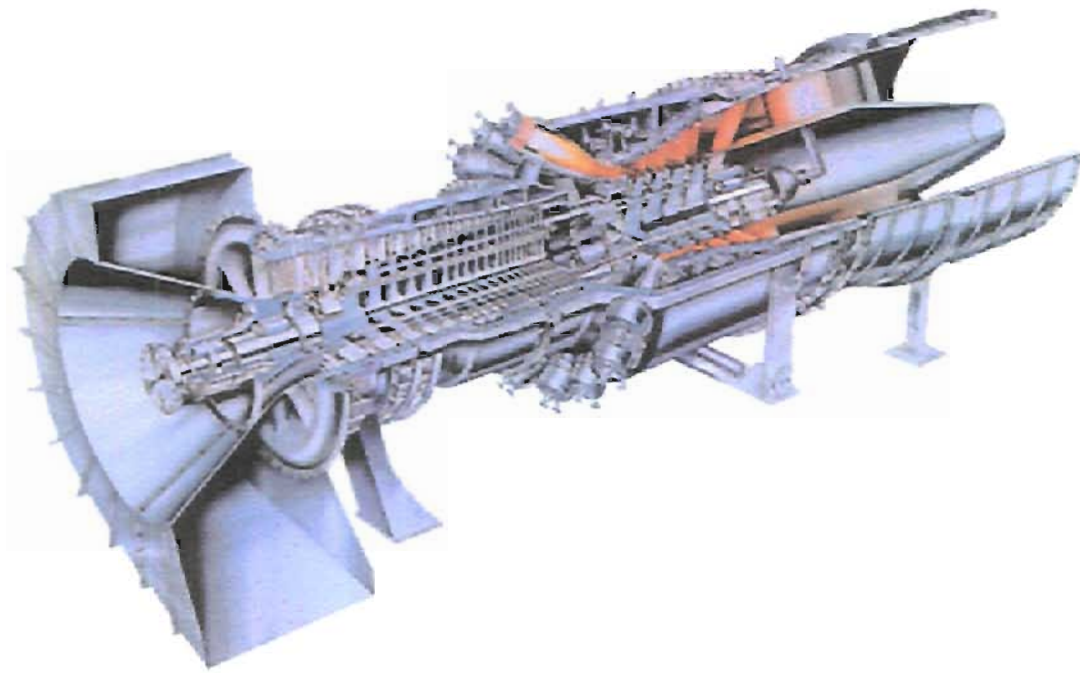


Figure 4 – Artist Rendition of the internal View of a Westinghouse Advanced Combustion Turbine and Photograph of Internal Components of a Mitsubishi 501F (MHI Website)

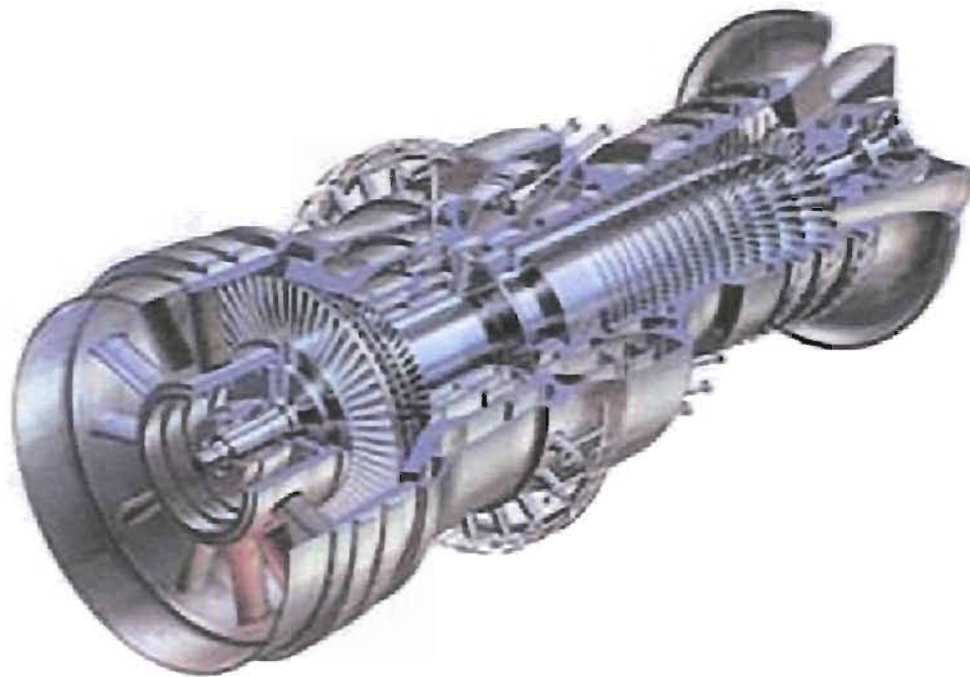


Figure 5 – Artist Rendition of Internal View and a Photograph of the ABB GT24 Combustion Turbine (ABB Website)

# TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

## 5. RULE APPLICABILITY

The proposed project is subject to preconstruction review requirements under the provisions of Chapter 403, Florida Statutes, and Chapters 62-4, 62-204, 62-210, 62-212, 62-214, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.).

This facility will be located in Hardee County, an area designated as attainment for all criteria pollutants in accordance with Rule 62-204.360, F.A.C. The proposed project is subject to review under Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD) for the reasons given in Section 2.3, Facility Category, above.

This PSD review consists of an evaluation of resulting ambient air pollutant concentrations, and increases with respect to the National Ambient Air Quality Standards and Increments as well as a determination of Best Available Control Technology (BACT) for PM/PM<sub>10</sub>, CO, VOC, SAM and NO<sub>x</sub>. An analysis of the air quality impact from proposed project upon soils, vegetation and visibility is required along with air quality impacts resulting from associated commercial, residential, and industrial growth

The emission units affected by this air construction permit shall comply with all applicable provisions of the Florida Administrative Code (including applicable portions of the Code of Federal Regulations incorporated therein) and, specifically, the following Chapters and Rules:

### 5.1 State Regulations

Chapter 62-4	Permits.
Rule 62-204.220	Ambient Air Quality Protection
Rule 62-204.240	Ambient Air Quality Standards
Rule 62-204.260	Prevention of Significant Deterioration Increments
Rule 62-204.800	Federal Regulations Adopted by Reference
Rule 62-210.300	Permits Required
Rule 62-210.350	Public Notice and Comments
Rule 62-210.370	Reports
Rule 62-210.550	Stack Height Policy
Rule 62-210.650	Circumvention
Rule 62-210.700	Excess Emissions
Rule 62-210.900	Forms and Instructions
Rule 62-212.300	General Preconstruction Review Requirements
Rule 62-212.400	Prevention of Significant Deterioration
Rule 62-213	Operation Permits for Major Sources of Air Pollution
Rule 62-214	Requirements For Sources Subject To The Federal Acid Rain Program
Rule 62-296.320	General Pollutant Emission Limiting Standards
Rule 62-297.310	General Test Requirements
Rule 62-297.401	Compliance Test Methods
Rule 62-297.520	EPA Continuous Monitor Performance Specifications

### 5.2 Federal Rules

40 CFR 60	Applicable sections of Subpart A, General Requirements, NSPS Subparts GG and Kb
40 CFR 72	Acid Rain Permits (applicable sections)
40 CFR 73	Allowances (applicable sections)
40 CFR 75	Monitoring (applicable sections including applicable appendices)
40 CFR 77	Acid Rain Program-Excess Emissions (future applicable requirements)

# TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

## 6. SOURCE IMPACT ANALYSIS

### 6.1 Emission Limitations

The proposed Units 1-3 will emit the following PSD pollutants (Table 212.400-2, F.A.C.): PM/PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, VOC, SAM, and negligible quantities of fluorides (F), mercury (Hg) and lead (Pb). The applicant's proposed annual emissions are summarized in the Table below and form the basis of the source impact review. The Department's proposed permitted allowable emissions for Units 1-3 are summarized in the Draft BACT document and Specific Condition Nos. 18-23 of Draft Permit PSD-FL-280.

### 6.2 Emission Summary

The annual emissions increases for all PSD pollutants as a result of the project are presented below:

#### PROJECT EMISSIONS (TPY) AND PSD APPLICABILITY

Pollutant	Emissions <sup>1</sup>	PSD Significance	PSD REVIEW?
PM/PM <sub>10</sub>	125	25	Yes
SO <sub>2</sub>	108	40	Yes
NO <sub>x</sub>	950	40	Yes
CO	518	100	Yes
Ozone(VOC)	73	40	No
Sulfuric Acid Mist	14	7	Yes
Total Fluorides	0.09	3	No
Mercury	0.0011	0.1	No
Lead	0.03	0.6	No

1. Worst case for highest emitting option. Based on 3,000 hours of gas firing per year per unit of which 500 are on fuel oil. Maximum of 500 hours at low load. Includes natural gas heater. Reference ambient temperature is 59 °F.

### 6.3 Control Technology

The PSD regulations require new major stationary sources to undergo a control technology review for each pollutant that may be potentially emitted above significant amounts. The control technology review requirements of the PSD regulations are applicable to emissions of NO<sub>x</sub>, SO<sub>2</sub>, CO, VOC, SAM, and PM/PM<sub>10</sub>. Emissions control will be accomplished primarily by good combustion of clean natural gas and the limited use of low sulfur (0.05 percent) distillate fuel oil. The combustors will operate in lean pre-mixed mode to minimize the flame temperature and nitrogen oxides formation potential. A full discussion is given in the Draft Best Available Control Technology (BACT) Determination (see Permit Appendix BD). The Draft BACT is incorporated into this evaluation by reference.

### 6.4 Air Quality Analysis

#### 6.4.1 Introduction

The proposed project will increase emissions of five pollutants at levels in excess of PSD significant amounts: PM/PM<sub>10</sub>, CO, NO<sub>x</sub>, SO<sub>2</sub>, and VOC. PM<sub>10</sub>, SO<sub>2</sub> and NO<sub>x</sub> are criteria

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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pollutants and have national and state ambient air quality standards (AAQS), PSD increments, and significant impact levels defined for them. CO is a criteria pollutant and has only AAQS and significant impact levels defined for it.

Potential emissions for VOC are above the 40 TPY significance threshold for the pollutant ozone. The applicant presented the potential increases to the Department and the U.S. EPA, and discussed options available to predict potential impacts associated with the emissions and formation of ozone. Based on the available information, the Department has determined that the use of regional models which incorporate the complex chemical mechanisms for predicting ozone formation are not feasible for this project.

The applicant's initial PM<sub>10</sub>, CO, NO<sub>x</sub>, and SO<sub>2</sub> air quality impact analyses for this project predicted no significant impacts; therefore, further applicable AAQS and PSD increment impact analyses for these pollutants were not required. Based on the preceding discussion the air quality analyses required by the PSD regulations for this project are the following:

- A significant impact analysis for PM<sub>10</sub>, CO, SO<sub>2</sub>, and NO<sub>x</sub>;
- An analysis of impacts on soils, vegetation, visibility, and of growth-related air quality modeling impacts.

Based on these required analyses, the Department has reasonable assurance that the proposed project, as described in this report and subject to the conditions of approval proposed herein, will not cause or significantly contribute to a violation of any AAQS or PSD increment. However, the following EPA-directed stack height language is included: "In approving this permit, the Department has determined that the application complies with the applicable provisions of the stack height regulations as revised by EPA on July 8, 1985 (50 FR 27892). Portions of the regulations have been remanded by a panel of the U.S. Court of Appeals for the D.C. Circuit in NRDC v. Thomas, 838 F. 2d 1224 (D.C. Cir. 1988). Consequently, this permit may be subject to modification if and when EPA revises the regulation in response to the court decision. This may result in revised emission limitations or may affect other actions taken by the source owners or operators." A more detailed discussion of the required analyses follows.

### 6.4.2 Models and Meteorological Data Used in the Significant Impact Analysis

The EPA-approved Industrial Source Complex Short-Term (ISCST3) dispersion model was used to evaluate the pollutant emissions from the proposed project. This model determines ground-level concentrations of inert gases or small particles emitted into the atmosphere by point, area, and volume sources. It incorporates elements for plume rise, transport by the mean wind, Gaussian dispersion, and pollutant removal mechanisms such as deposition. The ISCST3 model allows for the separation of sources, building wake downwash, and various other input and output features. A series of specific model features, recommended by the EPA, are referred to as the regulatory options. The applicant used the EPA recommended regulatory options. Direction-specific downwash parameters were used for all sources for which downwash was considered. The stacks associated with this project all satisfy the good engineering practice (GEP) stack height criteria.

Meteorological data used in the ISCST3 model consisted of a concurrent 5-year period of hourly surface weather observations and twice-daily upper air soundings from the National Weather Service (NWS) stations at St. Petersburg/Clearwater, Florida (surface data) and Ruskin, Florida (upper air data). The 5-year period of meteorological data was from 1992 through 1996. These NWS stations were selected for use in the study because they are the closest primary weather stations to the study area and are most representative of the project site. The surface observations included wind direction, wind speed, temperature, cloud cover, and cloud ceiling.

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

For determining the project's significant impact area in the vicinity of the facility and if there are significant impacts from the project on any PSD Class I area, the highest predicted short-term concentrations and highest predicted annual averages were compared to their respective significant impact levels.

### 6.4.3 Significant Impact Analysis

Initially, the applicant conducts modeling using only the proposed project's emissions at worst load conditions. In order to determine worst-case load conditions the SCREEN3 model was used to evaluate dispersion of emissions from the simple cycle facility for three loads (50%, 75% and 100%) and three seasonal operating conditions (summer, winter and average). Once the worst-case loads are identified, the applicant utilizes the ISCST3 model to evaluate impacts at these loads, and compares the results to the significant impact levels. If this modeling at worst load conditions shows significant impacts, additional multi-facility modeling is required to determine the project's impacts on the existing air quality and any applicable AAQS or PSD increments.

Receptors were placed around the facility, which is located in a PSD Class II area. They were also placed in the Chassahowitzka National Wilderness Area (CNWA), which is the closest PSD Class I area. The CNWA is located approximately 138 km northwest of the project. A combination of fence line, near-field, mid-field, and far-field receptors were utilized for predicting maximum concentrations in the vicinity of the project. The fence line and near-field receptors consisted of discrete Cartesian receptors spaced at 50 meter intervals from the facility fence line out to the first mid-field polar receptor ring. The mid-field and far-field receptors consisted of polar receptor grids with 10 rings and 10° spacing radials. To improve the spatial distribution of the polar receptors, each polar ring was offset by 5°. For predicting impacts at the CNWA, thirteen discrete receptors along the border of the PSD Class I area were used. For each pollutant subject to PSD and also subject to PSD increment and/or AAQS analyses, this modeling compares maximum predicted impacts due to the project with PSD significant impact levels to determine whether significant impacts due to the project are predicted in the vicinity of the facility or in the CNWA. The tables below show the results of the significant impact modeling.

MAXIMUM PROJECT AIR QUALITY IMPACTS FOR COMPARISON TO THE PSD CLASS II SIGNIFICANT IMPACT LEVELS IN THE VICINITY OF THE FACILITY

Pollutant	Averaging Time	Max Predicted Impact (ug/m <sup>3</sup> )	Significant Impact Level (ug/m <sup>3</sup> )	Significant Impact?
PM <sub>10</sub>	Annual	0.059	1	NO
	24-hour	0.87	5	NO
CO	8-hour	112	500	NO
	1-hour	279	2000	NO
NO <sub>2</sub>	Annual	0.275	1	NO
SO <sub>2</sub>	Annual	0.059	1	NO
	24-hour	0.91	5	NO
	3-hour	4.73	25	NO

# TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

## MAXIMUM PROJECT AIR QUALITY IMPACTS FOR COMPARISON TO THE PSD CLASS I SIGNIFICANT IMPACT LEVELS (CNWA)

Pollutant	Averaging Time	Max. Predicted Impact at Class I Area (ug/m <sup>3</sup> )	Proposed EPA Significant Impact Level (ug/m <sup>3</sup> )	Significant Impact?
PM <sub>10</sub>	Annual	0.001	0.2	NO
	24-hour	0.021	0.3	NO
NO <sub>2</sub>	Annual	0.0042	0.1	NO
SO <sub>2</sub>	Annual	0.0048	0.1	NO
	24-hour	0.090	0.2	NO
	3-hour	0.384	1	NO

The results of the significant impact modeling show that there are no significant impacts predicted from emissions from this project; therefore, no further modeling was required.

### 6.4.4 Impacts Analysis

#### *Impact Analysis Impacts on Soils, Vegetation, and Wildlife*

Very low emissions are expected from this natural gas-fired combustion turbine in comparison with conventional power plant generating equal power. Emissions of acid rain and ozone precursors will be very low. The maximum ground-level concentrations predicted to occur for PM<sub>10</sub>, CO, NO<sub>x</sub>, SO<sub>2</sub> and sulfuric acid mist as a result of the proposed project, including background concentrations and all other nearby sources, will be less than the respective ambient air quality standards (AAQS). The project impacts are less than the significant impact levels which in-turn are less than the applicable allowable increments for each pollutant. Because the AAQS are designed to protect both the public health and welfare and the project impacts are less than significant, it is reasonable to assume the impacts on soils, vegetation, and wildlife will be minimal or insignificant.

#### *Impact On Visibility*

Natural gas and low ash distillate fuel oil are clean fuels and produce little ash. This will minimize smoke formation. The low NO<sub>x</sub> and SO<sub>2</sub> emissions will also minimize plume opacity. Because no add-on control equipment and no reagents are required, there will be no steam plume or tendency to form ammoniated particulate species.

Due to the close proximity of this project to the Chassahowitzka Class I area, a multi-tiered regional haze analysis was performed. The first tier consisted of a regional haze analysis that utilized the CALPUFF modeling system in a screening mode otherwise known as CALPUFF Lite. CALPUFF is recommended by the National Park Service (NPS) for use in regional haze analyses because of its ability to handle atmospheric chemical transformations as well as wet/dry deposition. The results of the CALPUFF Lite modeling analysis indicated a change in visibility greater than the NPS threshold of 5%. As a result, the applicant was instructed by the Department to perform a refined CALPUFF analysis that utilized a meteorological data set created by the CALMET meteorological model.



## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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The results of the refined CALPUFF analysis predicted a change in visibility of 3.66%. This impact is below the NPS threshold of 5%, and it indicates that the proposed project will not have an adverse impact on visibility and regional haze in the Chassahowitzka CNWA.

### *Growth-Related Air Quality Impacts*

There will be short-term increases in the labor force to construct the project. These temporary increases will not result in significant commercial and residential growth in the vicinity of the project. Operation of the additional unit will require few new permanent employees, which will cause no significant impact on the local area.

Over the past few years the Public Service Commission has determined that a number of power projects are needed to help meet the low electrical reserve capacity throughout the State of Florida. The project is a response to state-wide and regional growth and also accommodates more growth. There are no adequate procedures under the PSD rules to fully assess these impacts. However, the type of project proposed has a small overall physical "footprint," low water requirements, and low air emissions per unit of electric power generating capacity for intermittent duty.

### *Hazardous Air Pollutants*

Based on the application, the project is not a major source of hazardous air pollutants (HAPs) and is not subject to any specific industry or HAP control requirements pursuant to Section 112 of the Clean Air Act. The applicant has been requested to recalculate emissions of formaldehyde in response to a review of the application by EPA.

## 8. CONCLUSION

Based on the foregoing technical evaluation of the application and additional information submitted by the applicant, the Department has made a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations, provided the Department's BACT determination is implemented.

A. A. Linero, P.E., Administrator  
Chris Carlson, Meteorologist

**PERMITTEE:**

Granite Power Partners II, LP  
655 Craig Road, Suite 336  
St. Louis, Missouri 63025

Permit No.	PSD-FL-281
File No.	0490044-001-AC
SIC No.	4911
Expires:	December 31, 2001

*Authorized Representative:*

Michael F. Vogt

**PROJECT AND LOCATION:**

Air Construction Permit pursuant to the requirements for the Prevention of Significant Deterioration of Air Quality Permit for: three nominal 120-180 megawatt (MW) combustion turbine-electrical generators; three 100-foot stacks; a 10 million Btu per-hour natural gas-fired heater; and one 1.5 million gallon fuel oil storage tank. The units will operate in simple cycle mode and intermittent duty.

The project will be located near Vandolah and Fort Green Roads, approximately 5 miles West of Wauchula, Hardee County. This site is approximately 138 kilometers South/Southeast of the Chassahowitzka Class I National Wilderness Area. UTM coordinates for this facility are Zone 17; 408.49 km E; 3045.73 km N.

**STATEMENT OF BASIS:**

This Air 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 above named permittee is authorized to modify the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

Attached Appendices and Tables made a part of this permit:

- Appendix BD                      BACT Determination
- Appendix GC                      Construction Permit General Conditions

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Howard L. Rhodes, Director  
Division of Air Resources  
Management

# AIR CONSTRUCTION PERMIT PSD-FL-281 (0490044-001-AC)

## SECTION I. FACILITY INFORMATION

### FACILITY DESCRIPTION

This facility is a new site. This project is subject to the requirements for the Prevention of Significant Deterioration of Air Quality for: three nominal 120-180 megawatt (MW) combustion turbine-electrical generators; three 100-foot stacks; a 10 million Btu per hour natural gas-fired heater; and one 1.5 million gallon fuel oil storage tank. The units will operate in simple cycle mode and intermittent duty. Inherently clean fuels and good combustion practices will be employed to control all pollutants.

### EMISSION UNITS

This permit addresses the following emission units:

ARMS EMISSIONS UNIT	SYSTEM	EMISSION UNIT DESCRIPTION
001	Power Generation	One nominal 120 - 180 Megawatt Simple Cycle Gas Combustion Turbine-Electrical Generator
002	Power Generation	One nominal 120 - 180 Megawatt Simple Cycle Gas Combustion Turbine-Electrical Generator
003	Power Generation	One nominal 120 - 180 Megawatt Simple Cycle Gas Combustion Turbine-Electrical Generator
004	Fuel Storage	One 1.5 Million Gallon Fuel Oil Storage Tank
005	Fuel Heating	One 10 million Btu/hr gas heater

### REGULATORY CLASSIFICATION

The facility is classified as a Major or Title V Source of air pollution because emissions of at least one regulated air pollutant, such as particulate matter (PM/PM<sub>10</sub>), sulfur dioxide (SO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), or volatile organic compounds (VOC) exceeds 100 tons per year (TPY).

This facility is not within an industry included in the list of the 28 Major Facility Categories per Table 212.400-1, F.A.C. Because emissions are greater than 250 TPY for at least one criteria pollutant, the facility is also a Major Facility with respect to Rule 62-212.400, Prevention of Significant Deterioration (PSD). Pursuant to Table 62-212.400-2, modifications at this facility resulting in emissions increases greater than any of the following values require review per the PSD rules as well as a determination of Best Available Control Technology (BACT): 40 TPY of NO<sub>x</sub>, SO<sub>2</sub>, or VOC; 25/15 TPY of PM/PM<sub>10</sub>; 100 TPY of CO; or 7 TPY of sulfuric acid mist (SAM). This facility and the project are also subject to applicable provisions of Title IV, Acid Rain, of the Clean Air Act.

**SECTION I. FACILITY INFORMATION**

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**PERMIT SCHEDULE**

- xx/yy/00 Notice of Intent published in The Tampa tribune
- 04/14/00 Distributed Intent to Issue Permit
- 03/27/00 Application deemed complete
- 01/18/00 Received Application

**RELEVANT DOCUMENTS:**

The documents listed below are the basis of the permit. They are specifically related to this permitting action, but not all are incorporated into this permit. These documents are on file with the Department.

- Application received on January 18, 2000
- Department letters dated dated January 20 and February 16, 2000
- Air Quality Impact Analysis from ECT received March 27, 2000
- EPA Region 4 letter dated April 12, 2000
- Department's Intent to Issue and Public Notice Package dated April 14, 2000
- Department's Final Determination and Best Available Control Technology Determination issued concurrently with this permit.

## AIR CONSTRUCTION PERMIT PSD-FL-281 (0490044-001-AC)

### SECTION II. ADMINISTRATIVE REQUIREMENTS

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1. Regulating Agencies: All documents related to applications for permits to construct, operate or modify an emissions unit should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection (FDEP), at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 and phone number (850) 488-0114. All documents related to reports, tests, and notifications should be submitted to the DEP Southwest District office, 3804 Coconut Palm Drive, Tampa, Florida 33619-8218 and phone number 813/744-6100.
2. General Conditions: The owner and operator is subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in Appendix GC of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]
3. Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.
4. Forms and Application Procedures: The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. [Rule 62-210.900, F.A.C.]
5. Modifications: The permittee shall give written notification to the Department when there is any modification to this facility. This notice shall be submitted sufficiently in advance of any critical date involved to allow sufficient time for review, discussion, and revision of plans, if necessary. Such notice shall include, but not be limited to, information describing the precise nature of the change; modifications to any emission control system; production capacity of the facility before and after the change; and the anticipated completion date of the change. [Chapters 62-210 and 62-212]
6. Expiration: Approval to construct shall become invalid if construction is not commenced within 18 months after receipt of such approval, or if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. The Department may extend the 18-month period upon a satisfactory showing that an extension is justified. [40 CFR 52.21(r)(2)].
7. BACT Determination: In accordance with Rule 62-212.400(6)(b), F.A.C. (and 40 CFR 51.166(j)(4)), the Best Available Control Technology (BACT) determination shall be reviewed and modified as appropriate in the event of a plant conversion. This paragraph states: "For phased construction project, the determination of best available control technology shall be reviewed and modified as appropriate at the latest reasonable time which occurs no later than 18 months prior to commencement of construction of each independent phase of the project. At such time, the owner or operator of the applicable stationary source may be required to demonstrate the adequacy of any previous determination of best available control technology for the source." This reassessment will also be conducted for this project if there are any increases in heat input limits, hours of operation, oil firing, low or baseload operation (e.g. conversion to combined-cycle operation) short-term or annual emission limits, annual fuel heat input limits or similar changes. [40 CFR 51.166(j)(4) and Rule 62-212.400(6)(b), F.A.C.]

AIR CONSTRUCTION PERMIT PSD-FL-281 (0490044-001-AC)

**SECTION II. ADMINISTRATIVE REQUIREMENTS**

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8. Final Selection of Manufacturer: The Applicant shall provide the Department with the final model, characteristics, and performance/emissions guarantees upon making a final selection of combustion turbines to be installed. The Department may review the adequacy of the BACT determination as described in Condition 7. above.
9. Application for Title V Permit: An application for a Title V operating permit, pursuant to Chapter 62-213, F.A.C., must be submitted to the DEP's Bureau of Air Regulation, and a copy to the Department's Southwest District office. [Chapter 62-213, F.A.C.]
10. New or Additional Conditions: Pursuant to Rule 62-4.080, F.A.C., 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.]
11. Annual Reports: Pursuant to Rule 62-210.370(2), F.A.C., Annual Operation Reports, the permittee is required to submit annual reports on the actual operating rates and emissions from this facility. Annual operating reports shall be sent to the DEP's Southwest District office by March 1st of each year. [Rule 62-210.370(2), F.A.C.]
12. Stack Testing Facilities: Stack sampling facilities shall be installed in accordance with Rule 62-297.310(6), F.A.C.
13. Permit Extension: The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit [Rule 62-4.080, F.A.C.]
14. Quarterly Reports: Quarterly excess emission reports, in accordance with 40 CFR 60.7 (a)(7) (c) (1998 version), shall be submitted to the DEP's Southwest District office. Each excess emission report shall include the information required in 40 CFR 60.7(c) and 60.334.

**SECTION III. EMISSION UNITS SPECIFIC CONDITIONS**

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**APPLICABLE STANDARDS AND REGULATIONS:**

1. Unless otherwise indicated in this permit, the construction and operation of the subject emission unit(s) 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 Florida Administrative Code Chapters 62-4, 62-103, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296, 62-297; and the applicable requirements of the Code of Federal Regulations Section 40, Parts 60, 72, 73, and 75.
2. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations. [Rule 62-210.300, F.A.C.]
3. These emission units shall comply with all applicable requirements of 40CFR60, Subpart A, General Provisions including:
  - 40CFR60.7, Notification and Recordkeeping
  - 40CFR60.8, Performance Tests
  - 40CFR60.11, Compliance with Standards and Maintenance Requirements
  - 40CFR60.12, Circumvention
  - 40CFR60.13, Monitoring Requirements
  - 40CFR60.19, General Notification and Reporting requirements
4. ARMS Emission Units 001-003, Power Generation, consisting of three 120-180 megawatt combustion turbines shall comply with all applicable provisions of 40CFR60, Subpart GG, Standards of performance for Stationary Gas Turbines, adopted by reference in Rule 62-204.800(7)(b), F.A.C. The Subpart GG requirement to correct test data to ISO conditions applies. However, such correction is not used for compliance determinations with the BACT standard(s). [Rule 62-204.800(7)(b), F.A.C.]
5. ARMS Emission Unit 004, Fuel Storage, consisting of one 1.5 million gallon distillate fuel oil storage tank shall comply with all applicable provisions of 40CFR60, Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels, adopted by reference in Rule 62-204.800, F.A.C. [Rule 62-204.800(7)(b), F.A.C.]
6. All notifications and reports required by the above specific conditions shall be submitted to the DEP's Southwest District.

**GENERAL OPERATION REQUIREMENTS**

7. Fuels: Only pipeline natural gas or maximum 0.05 percent sulfur fuel oil No. 2 or superior grade of distillate fuel oil shall be fired in these units. [Applicant Request, Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)] {Note: The limitation of this specific condition is more stringent than the NSPS sulfur dioxide limitation and thus assures compliance with 40 CFR 60.333 and 60.334}

SECTION III. EMISSION UNITS SPECIFIC CONDITIONS

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8. Capacity:

- General Electric 7FA: The maximum heat input rates, based on the lower heating value (LHV) of each fuel to each Unit (1-3) at ambient conditions of 59°F temperature, 60% relative humidity, 100% load, and 14.7 psi pressure shall not exceed 1,596 million Btu per hour (mmBtu/hr) when firing natural gas and shall not exceed 1,795 mmBtu/hr when firing No. 2 or superior grade of distillate fuel oil.
- Westinghouse 501F: The maximum heat input rates, based on the lower heating value (LHV) to each Siemens-Westinghouse 501F combustion turbine at ambient conditions of 59°F temperature, 60% relative humidity, 100% load, and 14.7 psi pressure shall not exceed 1,660 million Btu per hour (mmBtu/hr).
- Westinghouse 501D5A: The maximum heat input rates, based on the lower heating value (LHV) to each Siemens-Westinghouse 501D5A combustion turbine at ambient conditions of 59°F temperature, 60% relative humidity, 100% load, and 14.7 psi pressure shall not exceed 1,188 million Btu per hour (mmBtu/hr).
- ABB GT-24: The maximum heat input rates, based on the lower heating value (LHV) of each fuel to each ABB GT-24 combustion turbine at ambient conditions of 59°F temperature, 60% relative humidity, 100% load, and 14.7 psi pressure shall not exceed 1,644 million Btu per hour (mmBtu/hr) when firing natural gas and shall not exceed 1,812 mmBtu/hr when firing No. 2 or superior grade of distillate fuel oil.

These maximum heat input rates will vary depending upon ambient conditions and the combustion turbine characteristics. Manufacturer's curves corrected for site conditions or equations for correction to other ambient conditions shall be provided to the Department of Environmental Protection (DEP) within 45 days of completing the initial compliance testing. [Design, Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)]

9. 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.]
10. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the owner or operator shall notify the DEP Southwest District as soon as possible, but at least within (1) working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; the steps being taken to correct the problem and prevent future recurrence; and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit and the regulations. [Rule 62-4.130, F.A.C.]



**SECTION III. EMISSION UNITS SPECIFIC CONDITIONS**

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11. Operating Procedures: Operating procedures shall include good operating practices and proper training of all operators and supervisors. The good operating practices shall meet the guidelines and procedures as established by the equipment manufacturers. All operators (including supervisors) of air pollution control devices shall be properly trained in plant specific equipment. [Rule 62-4.070(3), F.A.C.]
12. Circumvention: The owner or operator shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rules 62-210.650, F.A.C.]
13. Maximum allowable hours: The stationary gas turbines shall only operate up to 3,000 hours on average per unit during any calendar year. Within the 3,000 hours, up to 500 hours may be on fuel oil for the GE 7FA or the ABB GT-24 only. No single combustion turbine shall operate more than 4,000 hours in a single year. [Applicant Request, Rule 62-210.200, F.A.C. (Definitions - Potential Emissions), Rule 62-212.400, F.A.C. (BACT)]
14. Fuel oil usage: The amount of back-up fuel (fuel oil) burned at the site (in BTU's) shall not exceed the amount of natural gas (primary fuel) burned at the site (in BTU's) during any consecutive 12-month period [Rule 62-210.200, F.A.C. (BACT)]

**Control Technology**

15. General Electric: Dry Low NO<sub>x</sub> (DLN) combustors shall be installed on the stationary combustion turbines to control nitrogen oxides (NO<sub>x</sub>) emissions while firing natural gas. A wet injection system shall be installed for use when firing No. 2 or superior grade distillate fuel oil for control of NO<sub>x</sub> emissions. [Design, Rules 62-4.070 and 62-212.400, F.A.C. (BACT)]
16. Westinghouse 501F or D5A: DLN combustors shall be installed on the stationary combustion turbines to control nitrogen oxides (NO<sub>x</sub>) emissions while firing natural gas. [Design, Rules 62-4.070 and 62-212.400, F.A.C. (BACT)]
17. ABB GT-24: The permittee shall install selective catalytic reduction system. A wet injection system shall be installed for use when firing No. 2 or superior grade distillate fuel oil. [Design, Rules 62-4.070 and 62-212.400, F.A.C. (BACT)]
18. The permittee shall provide manufacturer's emissions performance versus load diagrams for the DLN and wet injection systems prior to their installation. DLN systems shall each be tuned upon initial operation to optimize emissions reductions consistent with normal operation and maintenance practices and shall be maintained to minimize NO<sub>x</sub> emissions and CO emissions, consistent with normal operation and maintenance practices. Operation of the DLN systems in the diffusion-firing mode shall be minimized when firing natural gas. [Rule 62-4.070 and 62-210.650 F.A.C.]

SECTION III. EMISSION UNITS SPECIFIC CONDITIONS

EMISSION LIMITS AND STANDARDS

19. Following is a summary of the emission limits and required technology. Values for NO<sub>x</sub> are corrected to 15 % O<sub>2</sub> on a dry basis. These limits or their equivalent in terms of lb/hr or NSPS units, as well as the applicable averaging times, are followed by the applicable specific conditions [Rules 62-212.400, 62-204.800(7)(b) (Subpart GG), 62-210.200 (Definitions-Potential Emissions) F.A.C.]

POLLUTANT	CONTROL TECHNOLOGY	EMISSION LIMIT
PM/PM <sub>10</sub> , VE	Pipeline Natural Gas, Low Sulfur Fuel Oil	10/17 lb/hr (Gas/Fuel Oil) 5/10% Opacity (Gas/Fuel Oil)
VOC	As Above	3.0 ppmvd (Gas) 7.5 ppmvw (Fuel Oil)
CO	As Above	16 ppmvd (Gas) 20 ppmvd (Fuel Oil)
SO <sub>2</sub> and Acid Mist	As Above	2 gr S/100 ft <sup>3</sup> (in Gas) 0.05% S (in Fuel Oil)
NO <sub>x</sub> (GE 7FA)	Dry Low NO <sub>x</sub> for Natural Gas Wet Injection and limited Fuel Oil usage	10.5 ppmvd (Gas) 42 ppmvd (Fuel Oil) – 500 hours
NO <sub>x</sub> (WH 501F)	Dry Low NO <sub>x</sub> , Natural Gas Only	15 ppmvd
NO <sub>x</sub> (WH 501D5A)	Dry Low NO <sub>x</sub> , Natural Gas Only	15 ppmvd
NO <sub>x</sub> (ABB GT-24)	Selective Catalytic Reduction (Gas) Wet Injection (Fuel Oil) Selective Catalytic Reduction (Fuel Oil)	5 ppmvd (Gas) 42 ppmvd (Fuel Oil – first 250 hours) 10 ppmvd (Fuel Oil – next 250 hours)

20. Nitrogen Oxides (NO<sub>x</sub>) Emissions:

- General Electric 7FA: While firing natural gas, the emission rate of NO<sub>x</sub> in the exhaust gas shall not exceed 10.5 ppmvd @15% O<sub>2</sub> on a 24 hr block average (of valid hours during which the unit is operated only) as measured by the continuous emission monitoring system (CEMS). Refer to Condition 30 for valid hours contributing to the block average. In addition, NO<sub>x</sub> emissions calculated as NO<sub>2</sub> shall not exceed 75.7 pounds per hour (at ISO conditions) and 9 ppmvd @15% O<sub>2</sub> to be demonstrated by the initial “new and clean” GE performance stack test. [Rule 62-212.400, F.A.C.]

While firing fuel oil, the concentration of NO<sub>x</sub> in the exhaust gas shall not exceed 42 ppmvd at 15% O<sub>2</sub> on the basis of a 3-hr average (of valid hour hours during which the unit is actually operated only) as measured by the continuous emission monitoring system (CEMS). In addition, NO<sub>x</sub> emissions calculated as NO<sub>2</sub> shall not exceed 351 lb/hr (at ISO conditions) and 42 ppmvd @15% O<sub>2</sub> to be demonstrated by stack test. [Rule 62-212.400, F.A.C.]

SECTION III. EMISSION UNITS SPECIFIC CONDITIONS

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- Westinghouse 501F: The emission rate of NO<sub>x</sub> in the exhaust gas shall not exceed 15 ppmvd @15% O<sub>2</sub> on a 24 hr block average (of valid hours during which the unit is operated only) as measured by the continuous emission monitoring system (CEMS). Refer to Condition 30 for valid hours contributing to the block average. In addition, NO<sub>x</sub> emissions calculated as NO<sub>2</sub> shall not exceed 117 pounds per hour (at ISO conditions) and 15 ppmvd @15% O<sub>2</sub> to be demonstrated by the initial stack test. [Rule 62-212.400, F.A.C.]
- Westinghouse 501D5A: The emission rate of NO<sub>x</sub> in the exhaust gas shall not exceed 15 ppmvd @15% O<sub>2</sub> on a 24 hr block average (of valid hours during which the unit is operated only) as measured by the continuous emission monitoring system (CEMS). Refer to Condition 30 for valid hours contributing to the block average. In addition, NO<sub>x</sub> emissions calculated as NO<sub>2</sub> shall not exceed 80.6 pounds per hour (at ISO conditions) and 15 ppmvd @15% O<sub>2</sub> to be demonstrated by the initial stack test. [Rule 62-212.400, F.A.C.]
- ABB GT-24: While firing natural gas, the emission rate of NO<sub>x</sub> in the exhaust gas shall not exceed 5 ppmvd @15% O<sub>2</sub> on a 3 hr block average (of valid hours during which the unit is operated only) as measured by the continuous emission monitoring system (CEMS). Refer to Condition 30 for valid hours contributing to the block average. In addition, NO<sub>x</sub> emissions calculated as NO<sub>2</sub> shall not exceed 36.7 pounds per hour (at ISO conditions) and 5 ppmvd @15% O<sub>2</sub> to be demonstrated by the initial stack test. [Rule 62-212.400, F.A.C.]

During the first 250 hours of fuel oil firing during any calendar year, the emission rate of NO<sub>x</sub> in the exhaust gas shall not exceed 42 ppmvd @15% O<sub>2</sub> on a 3 hr block average (of valid hours during which the unit is operated only) as measured by the continuous emission monitoring system (CEMS). Refer to Condition 30 for valid hours contributing to the block average. In addition, NO<sub>x</sub> emissions calculated as NO<sub>2</sub> shall not exceed 343 lb/hr hour (at ISO conditions) and 42 ppmvd @15% O<sub>2</sub> to be demonstrated by the initial stack test. [Rule 62-212.400, F.A.C.]

After the first 250 hours of fuel oil firing during any calendar year, the emission rate of NO<sub>x</sub> in the exhaust gas shall not exceed 10 ppmvd @15% O<sub>2</sub> on a 3 hr block average (of valid hours during which the unit is operated only) as measured by the continuous emission monitoring system (CEMS). Refer to Condition 30 for valid hours contributing to the block average. In addition, NO<sub>x</sub> emissions calculated as NO<sub>2</sub> shall not exceed 81.7 pounds per hour (at ISO conditions) and 10 ppmvd @15% O<sub>2</sub> to be demonstrated by the initial stack test. [Rule 62-212.400, F.A.C.]

21. Carbon Monoxide (CO) Emissions: The concentration of CO in the stack exhaust gas shall not exceed 16 ppmvd @15% O<sub>2</sub>, and shall not exceed 20 ppmvd @15% O<sub>2</sub> while firing fuel oil, where applicable, on a 24 hr block average (of valid hours during which the unit is operated only) as measured by the continuous emission monitoring system (CEMS). In addition, emissions shall not exceed the limits specified below. The permittee shall demonstrate

**SECTION III. EMISSION UNITS SPECIFIC CONDITIONS**

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compliance with the following limits by stack test using EPA Method 10. [Rule 62-212.400, F.A.C.]

- General Electric 7FA: Emissions of CO shall not exceed 57 lb/hr while firing natural gas and shall not exceed 71 lb/hr while firing fuel oil (at ISO conditions). [Rule 62-212.400, F.A.C.]
- Westinghouse 501F: Emissions of CO shall not exceed 57 lb/hr (at ISO conditions). [Rule 62-212.400, F.A.C.]
- Westinghouse 501D5A: Emissions of CO shall not exceed 42 lb/hr (at ISO conditions). [Rule 62-212.400, F.A.C.]
- ABB GT-24: Emissions of CO shall not exceed 57 lb/hr while firing natural gas and shall not exceed 71 lb/hr while firing fuel oil (at ISO conditions). [Rule 62-212.400, F.A.C.]

22. Volatile Organic Compounds (VOC) Emissions: The concentration of VOC in the stack exhaust gas with the combustion turbine operating on natural gas shall not exceed 3.0 ppmvd while firing natural gas and shall not exceed 7.5 ppmvw while firing fuel oil (ISO conditions). In addition, emissions shall not exceed the limits specified below. The permittee shall demonstrate compliance with these limits by initial stack test using EPA Method 18, 25 or 25A. [Rule 62-212.400, F.A.C.]

- General Electric 7FA: Emissions of VOC shall not exceed 7.8 lb/hr while firing natural gas and shall not exceed 71.4 lb/hr while firing fuel oil (at ISO conditions). [Rule 62-212.400, F.A.C.]
- Westinghouse 501F: Emissions of VOC shall not exceed 7.8 lb/hr (at ISO conditions). [Rule 62-212.400, F.A.C.]
- Westinghouse 501D5A: Emissions of VOC shall not exceed 5.4 lb/hr (at ISO conditions). [Rule 62-212.400, F.A.C.]
- ABB GT-24: Emissions of VOC shall not exceed 7.8 lb/hr while firing natural gas and shall not exceed 71.4 lb/hr while firing fuel oil (at ISO conditions). [Rule 62-212.400, F.A.C.]

23. Sulfur Dioxide (SO<sub>2</sub>) and Sulfuric Acid Mist Emissions (SAM): SO<sub>2</sub> and SAM emissions shall be limited by firing pipeline natural gas (sulfur content less than 2 grain per 100 standard cubic foot) or by firing No. 2 or superior grade distillate fuel oil with a maximum 0.05 percent sulfur. [40CFR60 Subpart GG and Rules 62-4.070, 62-212.400, and 62-204.800(7), F.A.C.]

[Note: Emissions of SO<sub>2</sub> and SAM will be limited by this condition to 9.2 lb/hr and 1.1 lb/hr respectively while firing natural gas, and 98.1 lb/hr and 11.3 respectively.]

24. Particulate Matter (PM/PM<sub>10</sub>) PM/PM<sub>10</sub> emissions shall not exceed 10 lb/hr when operating on natural gas and shall not exceed 17 lb/hr when operating on fuel oil. [Rule 62-212.400, F.A.C.]

**SECTION III. EMISSION UNITS SPECIFIC CONDITIONS**

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25. Visible Emissions (VE): VE emissions shall serve as a surrogate for PM/PM<sub>10</sub> emissions and shall not exceed 5% opacity while operating on natural gas and 10% opacity while operating on fuel oil. [Rules 62-4.070, 62-212.400, and 62-204.800(7), F.A.C.]

**EXCESS EMISSIONS**

26. Excess emissions resulting from startup, shutdown, or malfunction shall be permitted provided that best operational practices are adhered to and the duration of excess emissions shall be minimized. Excess emissions occurrences shall in no case exceed two hours in any 24-hour period for other reasons unless specifically authorized by DEP for longer duration. Operation below 50% output shall be limited to two hours in any 24-hour period, regardless of unit cycles (breaker closed to breaker open).
27. Excess emissions entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction, shall be prohibited pursuant to Rule 62-210.700, F.A.C. These emissions shall be included in the 24-hr average for NO<sub>x</sub>.

28. Excess Emissions Report: If excess emissions occur due to malfunction, the owner or operator shall notify DEP's Southwest District within (1) working day of: the nature, extent, and duration of the excess emissions; the cause of the excess emissions; and the actions taken to correct the problem. In addition, the Department may request a written summary report of the incident. Following the NSPS format, 40 CFR 60.7 Subpart A, periods of startup, shutdown, malfunction, shall be monitored, recorded, and reported as excess emissions when emission levels exceed the permitted standards listed in Specific Condition Nos. 19, 20 and 21. [Rules 62-4.130, 62-204.800, 62-210.700(6), F.A.C., and 40 CFR 60.7 (1998 version)].

**COMPLIANCE DETERMINATION**

29. Compliance with the allowable emission limiting standards shall be determined within 60 days after achieving the maximum production rate, but not later than 180 days of initial operation of the unit, and annually thereafter as indicated in this permit, by using the following reference methods as described in 40 CFR 60, Appendix A (1998 version), and adopted by reference in Chapter 62-204.800, F.A.C.
30. Initial (I) performance tests (for both fuels, where applicable) shall be performed on each unit while firing natural gas as well as while firing oil. Initial tests shall also be conducted after any modifications (and shake down period not to exceed 100 days after re-starting the CT) of air pollution control equipment such as change or tuning of combustors. Annual (A) compliance tests shall be performed during every federal fiscal year (October 1 - September 30) pursuant to Rule 62-297.310(7), F.A.C., on each unit as indicated. The following reference methods shall be used. No other test methods may be used for compliance testing unless prior DEP approval is received in writing. Where initial tests only are indicated, these tests shall be repeated prior to renewal of each operation permit.

SECTION III. EMISSION UNITS SPECIFIC CONDITIONS

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- EPA Reference Method 5 or 17, "Determination of Particulate Emissions from Stationary Sources" (I).
  - EPA Reference Method 9, "Visual Determination of the Opacity of Emissions from Stationary Sources" (I, A).
  - EPA Reference Method 10, "Determination of Carbon Monoxide Emissions from Stationary Sources" or RATA test data may be used to demonstrate compliance for annual test requirements (I, A).
  - EPA Reference Method 20, "Determination of Oxides of Nitrogen Oxide, Sulfur Dioxide and Diluent Emissions from Stationary Gas Turbines." Initial test only for compliance with 40CFR60 Subpart GG and (I, A) short-term NO<sub>x</sub> BACT limits (EPA reference Method 7E, "Determination of Nitrogen Oxides Emissions from Stationary Sources" or RATA test data may be used to demonstrate compliance for annual test requirements).
  - EPA Reference Method 18, 25 and/or 25A, "Determination of Volatile Organic Concentrations." Initial test only.
31. Continuous compliance with the NO<sub>x</sub> emission limits: Continuous compliance with the NO<sub>x</sub> emission limits shall be demonstrated with the CEM system based on the applicable averaging time of 24-hr block average (DLN) and 3-hr block average (SCR or WI). Based on CEMS data, a separate compliance determination is conducted at the end of each operating day and a new average emission rate is calculated from the arithmetic average of all valid hourly emission rates from the previous operating day. A valid hourly emission rate shall be calculated for each hour in which at least two NO<sub>x</sub> concentrations are obtained at least 15 minutes apart. Valid hourly emission rates shall not include periods of start up, shutdown, or malfunction unless prohibited by 62-210.700 F.A.C. These excess emissions periods shall be reported as required in Condition 28. [Rules 62-4.070 F.A.C., 62-210.700, F.A.C., 40 CFR 75 and BACT]
- All continuous monitoring systems (CEMS) shall be in continuous operation except for breakdowns, repairs, calibration checks, and zero and span adjustments. These CEMS shall meet minimum frequency of operation requirements: one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period. Data recorded during periods of continuous monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments shall not be included in the data average. [40CFR60.13]
32. Test Methods for Natural Gas Sulfur Content: For the purposes of demonstrating compliance with the 40 CFR 60.333 SO<sub>2</sub> standard, ASTM methods D4084-82 or D3246-81 (or equivalent) for sulfur content of gaseous fuel shall be utilized in accordance with the EPA-approved custom fuel monitoring schedule or natural gas supplier data may be submitted or the natural gas sulfur content referenced in 40 CFR 75 Appendix D may be utilized. However, the applicant is responsible for ensuring that the procedures in 40 CFR60.335 or 40 CFR75 are used when determination of fuel sulfur content is made. Analysis may be performed by the owner or

**SECTION III. EMISSION UNITS SPECIFIC CONDITIONS**

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operator, a service contractor retained by the owner or operator, the fuel vendor, or any other qualified agency pursuant to 40 CFR 60.335(e) (1998 version).

33. Compliance with CO emission limit: An initial test for CO shall be conducted concurrently with the initial NO<sub>x</sub> test, as required. The initial NO<sub>x</sub> and CO test results shall be the average of three valid one-hour runs. Annual compliance testing for CO may be conducted at less than capacity when compliance testing is conducted concurrent with the annual RATA testing for the NO<sub>x</sub> CEMS required pursuant to 40 CFR 75.
34. Compliance with the VOC emission limit: An initial test is required to demonstrate compliance with the VOC emission limit. Thereafter, the CO emission limit and periodic tuning data will be employed as surrogate and no annual testing is required.
35. Testing procedures: Testing of emissions shall be conducted with the combustion turbine operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum heat input rate allowed by the permit, corrected for the average ambient air temperature during the test (with 100 percent represented by a curve depicting heat input vs. ambient temperature). If it is impracticable to test at permitted capacity, the source may be tested at less than permitted capacity. In this case, subsequent operation is limited by adjusting the entire heat input vs. ambient temperature curve downward by an increment equal to the difference between the maximum permitted heat input (corrected for ambient temperature) and 110 percent of the value reached during the test 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 purposes of additional compliance testing to regain the permitted capacity. Procedures for these tests shall meet all applicable requirements (i.e., testing time frequency, minimum compliance duration, etc.) of Chapters 62-204 and 62-297, F.A.C.
36. Test Notification: The DEP's Southwest District shall be notified, in writing, at least 30 days prior to the initial performance tests and at least 15 days before annual compliance test(s).
37. Special Compliance Tests: The DEP may request a special compliance test pursuant to Rule 62-297.310(7), F.A.C., when, after investigation (such as complaints, increased visible emissions, or questionable maintenance of control equipment), there is reason to believe that any applicable emission standard is being violated.
38. Test Results: Compliance test results shall be submitted to the DEP's Southwest District no later than 45 days after completion of the last test run. [Rule 62-297.310(8), F.A.C.]

**NOTIFICATION, REPORTING, AND RECORDKEEPING**

39. Records: All measurements, records, and other data required to be maintained by IPSAPC shall be recorded in a permanent form and retained for at least five (5) years following the date on which such measurements, records, or data are recorded. These records shall be made available to DEP representatives upon request.

**SECTION III. EMISSION UNITS SPECIFIC CONDITIONS**

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40. Compliance Test Reports: A test report indicating the results of the required compliance tests shall be filed as per Condition No. 38 above. The test report shall provide sufficient detail on the tested emission unit and the procedures used to allow the Department to determine if the test was properly conducted and if the test results were properly computed. At a minimum, the test report shall provide the applicable information listed in Rule 62-297.310(8), F.A.C.

**MONITORING REQUIREMENTS**

41. Continuous Monitoring System: The permittee shall install, calibrate, maintain, and operate a continuous emission monitor in the stack to measure and record the nitrogen oxides and carbon monoxide emissions from these units. Upon request from EPA or DEP, the CEMS emission rates for NO<sub>x</sub> on these Units shall be corrected to ISO conditions to demonstrate compliance with the NO<sub>x</sub> standard established in 40 CFR 60.332. [Rules 62-204.800, 62-210.700, 62-4.130, 62-4.160(8), F.A.C., 40 CFR 75 and 40 CFR 60.7 (1998 version)].
42. CEMS for reporting excess emissions: Excess Emissions and Monitoring System Performance Reports shall be submitted as specified in 40 CFR 60.7(c). CEM monitor downtime shall be calculated and reported according to the requirements of 40 CFR 60.7(c)(3) and 40 CFR 60.7(d)(2). Periods when NO<sub>x</sub> and CO emissions (ppmvd @ 15% oxygen) are above the BACT standards, listed in Specific Conditions No 19, 20 and 21, shall be reported to the DEP Southwest District as required by Specific Condition 28.
43. CEMS in lieu of Water to Fuel Ratio: The NO<sub>x</sub> CEMS shall be used in lieu of the water/fuel monitoring system for reporting excess emissions in accordance with 40 CFR 60.334(c)(1), Subpart GG (1998 version). The calibration of the water/fuel monitoring device required in 40 CFR 60.335 (c)(2) (1998 version) will be replaced by the 40 CFR 75 certification tests of the NO<sub>x</sub> CEMS.
44. Continuous Monitoring Certification and Quality Assurance Requirements: The monitoring devices shall comply with the certification and quality assurance, and any other applicable requirements of Rule 62-297.520, F.A.C., 40 CFR 60.13, including certification of each device in accordance with 40 CFR 60, Appendix B, Performance Specifications and 40 CFR 60.7(a)(5) or 40 CFR Part 75. Quality assurance procedures must conform to all applicable sections of 40 CFR 60, Appendix F or 40 CFR 75. The monitoring plan, consisting of data on CEM equipment specifications, manufacturer, type, calibration and maintenance needs, and its proposed location shall be provided to the DEP Emissions Monitoring Section Administrator and EPA for review no later than 45 days prior to the first scheduled certification test pursuant to 40 CFR 75.62.
45. Natural Gas Monitoring Schedule: A custom fuel monitoring schedule pursuant to 40 CFR 75 Appendix D for natural gas may be used in lieu of the daily sampling requirements of 40 CFR 60.334 (b)(2) provided the following requirements are met:
- The permittee shall apply for an Acid Rain permit within the deadlines specified in 40 CFR 72.30.



**SECTION III. EMISSION UNITS SPECIFIC CONDITIONS**

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- The permittee shall submit a monitoring plan, certified by signature of the Designated Representative, that commits to using a primary fuel of pipeline supplied natural gas (sulfur content less than 20 gr/100 scf pursuant to 40 CFR 75.11(d)(2)).
- Each unit shall be monitored for SO<sub>2</sub> emissions using methods consistent with the requirements of 40 CFR 75 and certified by the USEPA.

This custom fuel monitoring schedule will only be valid when pipeline natural gas is used as a primary fuel. If the primary fuel for these units is changed to a higher sulfur fuel, SO<sub>2</sub> emissions must be accounted for as required pursuant to 40 CFR 75.11(d).

46. Fuel Oil Monitoring Schedule: The following monitoring schedule for No. 2 or superior grade fuel oil shall be followed: For all bulk shipments of No. 2 fuel oil received at this facility an analysis which reports the sulfur content and nitrogen content of the fuel shall be provided by the fuel vendor. The analysis shall also specify the methods by which the analyses were conducted and shall comply with the requirements of 40 CFR 60.335(d).

47. Determination of Process Variables:

- The permittee shall operate and maintain equipment and/or instruments necessary to determine process variables, such as process weight input or heat input, when such data is needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
- Equipment and/or instruments used to directly or indirectly determine such process variables, including devices such as belt scales, weigh 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]

**APPENDIX BD**  
**BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)**

**Granite Hardee County Generation Facility**  
**PSD-FL-281 and 049044-001-AC**  
**Hardee County, Florida**

**BACKGROUND**

The applicant, Granite Power Partners II (GPP or Granite) proposes to install three nominal 120 to 180-megawatt (MW) combustion turbine-electrical generators at the planned Hardee County Generation Facility (HCGF), near Wauchula, Hardee County. The new units will operate in simple cycle mode and intermittent duty and exhaust through separate 100-foot stacks. Granite proposes to operate these units up to 3,000 hours per year per unit of which 500 hours per year per unit may be on maximum 0.05 percent sulfur distillate fuel oil.

The proposed project will constitute a New Major Facility per Rule 62-212.400(d)2.a., Florida Administrative Code (F.A.C.) because it will have the potential to emit at least 250 tons per year of a regulated pollutant. It is therefore subject to review for the Prevention of Significant Deterioration (PSD) and a determination of Best Available Control Technology (BACT) per Rule 62-212.400, F.A.C.

The application was received on January 18, 2000 and included a BACT proposal prepared by the applicant's consultant, ECT, Inc. Additional information was received on March 27. According to the application, the maximum emissions from the facility will be approximately 950 tons per year (TPY) of NO<sub>x</sub>, 518 TPY of CO, 125 TPY of PM/PM<sub>10</sub>, 108 TPY of SO<sub>2</sub>, 14 TPY of SAM, and 73 TPY of VOC. Emissions of each pollutant will exceed its "Significant Emission Rate" with respect to Table 212.400-2, (F.A.C.) thus requiring a BACT Determination. Descriptions of the process, project, air quality effects, and rule applicability are given in the Technical Evaluation and Preliminary Determination dated April 14, 2000, accompanying the Department's Intent to Issue.

**BACT DETERMINATION REQUESTED BY THE APPLICANT:**

Following are the ranges of values proposed by the applicant as BACT for each pollutant. The ranges reflect the four combustion turbine options under consideration by Granite. A breakdown of these options is provided in subsequent sections.

POLLUTANT	CONTROL TECHNOLOGY	PROPOSED BACT LIMIT
Nitrogen Oxides	Dry Low NO <sub>x</sub> Combusts Water Injection (Oil)	10.5 to 25 ppmvd @ 15% O <sub>2</sub> (gas) 42 ppmvd @ 15% O <sub>2</sub> (oil)
Particulate Matter	Pipeline Natural Gas No. 2 Distillate Oil (500 hr/yr) Combustion Controls	10 to 20 percent opacity
Carbon Monoxide	As Above	6 to 16 ppmvd (gas, baseload) 20 to 25 ppmvd (oil baseload)
Volatile Organic Compounds	As Above	1.2 to 3 ppmvd (gas, baseload) 7 to 10 ppmvw (oil baseload)
Sulfur Dioxide and Sulfuric Acid Mist	As Above	2 grain S/100 std cubic feet (gas) 0.05 percent sulfur (oil)

**APPENDIX BD**  
**BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)**

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**BACT DETERMINATION PROCEDURE:**

In accordance with Rule 62-212.400, F.A.C., this BACT determination is based on the maximum degree of reduction of each pollutant emitted which the Department of Environmental Protection (Department), on a case by case basis, taking into account energy, environmental and economic impacts, and other costs, determines is achievable through application of production processes and available methods, systems, and techniques. In addition, the regulations state that, in making the BACT determination, the Department shall give consideration to:

- Any Environmental Protection Agency determination of BACT pursuant to Section 169, and any emission limitation contained in 40 CFR Part 60 - Standards of Performance for New Stationary Sources or 40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants.
- All scientific, engineering, and technical material and other information available to the Department.
- The emission limiting standards or BACT determination of any other state.
- The social and economic impact of the application of such technology.

The EPA currently stresses that BACT should be determined using the "top-down" approach. The first step in this approach is to determine, for the emission unit in question, the most stringent control available for a similar or identical emission unit or emission unit category. If it is shown that this level of control is technically or economically unfeasible for the emission unit in question, then the next most stringent level of control is determined and similarly evaluated. This process continues until the BACT level under consideration cannot be eliminated by any substantial or unique technical, environmental, or economic objections.

**STANDARDS OF PERFORMANCE FOR NEW STATIONARY SOURCES:**

The minimum basis for a BACT determination is 40 CFR 60, Subpart GG, Standards of Performance for Stationary Gas Turbines (NSPS). The Department adopted subpart GG by reference in Rule 62-204.800, F.A.C. The key emission limits required by Subpart GG are 75 ppmvd NO<sub>x</sub> @ 15% O<sub>2</sub> (assuming 25 percent efficiency) and 150 ppmvd SO<sub>2</sub> @ 15% O<sub>2</sub> (or <0.8% sulfur in fuel). The BACT proposed by Granite is within the NSPS limit, which allows NO<sub>x</sub> emissions in the range of 100-110 ppmvd for the high efficiency units to be purchased for the Hardee County Generation Facility.

No National Emission Standard for Hazardous Air Pollutants exists for stationary gas turbines.

**DETERMINATIONS BY EPA AND STATES:**

The following tables include some recently permitted intermittent-duty simple cycle turbines. Two continuous-duty project (Lakeland and PREPA) are also included. The BACT applications for the four options proposed for the Granite project are included to facilitate comparison. Two intermittent duty projects (Carson and McClellan) with Lowest Achievable Emission Rate (LAER) determinations are included as the Top technology. A combined cycle project based on the Westinghouse 501 D5A is included for comparison as the only information available on this model.

**APPENDIX BD**  
**BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)**

Project Location	Power Output (MW)	NO <sub>x</sub> Limit ppmvd @ 15% O <sub>2</sub> and Fuel <sup>2</sup>	Technology	Comments
Granite Hardee, FL	510	10.5 - NG 42 - No. 2 FO	DLN WI	3x170 MW GE 7FA CTs 500 hrs on oil
Granite Hardee, FL	510	15 - NG 42 - No. 2 FO	DLN WI	3x170 MW WH 501F CTs 500 hrs on oil
Granite Hardee, FL	360	15 - NG 42 - No. 2 FO	DLN WI	3x170 MW WH 501D5A CTs 500 hrs on oil
Granite Hardee, FL	540	25 - NG 42 - No. 2 FO	DLN WI	3x180 MW ABB GT-24 CTs 500 hrs on oil
Shady Hills Pasco, FL	510	9 - NG 42 - No. 2 FO	DLN WI	3x170 MW GE PG7241FA CTs Issued 01/00. 1000 hrs on oil
DeSoto Arcadia, FL	510	9 - NG 42 - No. 2 FO	DLN WI	3x170 MW GE PG7241FA CTs Draft 03/00. 1000 hrs on oil
Vandolah Hardee, FL	680	9 - NG 42 - No. 2 FO	DLN WI	4x170 MW GE 7FA CTs Issued 11/99. 1000 hrs on oil
Oleander Brevard, FL	850	9 - NG 42 - No. 2 FO	DLN WI	5x170 MW GE 7FA CTs Issued 11/99. 1000 hrs on oil
JEA Baldwin, FL	510	10.5 - NG 42 - No. 2 FO	DLN WI	3x170 MW GE 7FA CTs Issued 10/99. 750 hrs on oil
Reliant Osceola, FL	510	10.5 - NG 42 - No. 2 FO	DLN WI	3x170 MW GE 7FA CTs Draft 11/99. 750 hrs on oil
TEC Polk Power, FL	330	10.5 - NG 42 - No. 2 F.O.	DLN WI	2x165 MW GE 7FA CTs Issued 10/99. 750 hrs on oil
Dynegy, FL	510	15 - NG	DLN	3x170 MW WH 501F CTs Draft 03/00. Gas only
Dynegy Heard, GA	510	15 - NG	DLN	3x170 MW WH 501F CTs Issued 1999. Gas only
Tenaska Heard, GA	960	15 - NG 42 - No. 2 FO	DLN WI	6x170 MW GE 7FA CTs Issued 12/98. 720 hrs on oil
Calvert City, KY	340	25 - NG	WI	2x170 MW GE 7FA CTs Draft 1999. ?? hrs on oil
Mid-GA Cogen	308	9 NG 20 - FO	DLN & SCR	2x119 MW WH 501D5A CT's Achieves 15 ppmvd by DLN alone
Dynegy Reidsville, NC	900	15 - NG (by 2002) 42 - No. 2 FO	DLN WI	5x180 MW WH 501F CTs Initially 25 ppm NO <sub>x</sub> limit on gas Draft 5/98. 1000 hrs on oil.
Lyondell Harris, TX	160	25 - NG	DLN	1x160 MW WH 501F CTs Issued 11/99. Gas only
Southern Energy, WI	525	15/12 - NG 42 - No. 2 FO	DLN WI	3x175 MW GE 7FA CTs 15/12 ppm are on 1/24 hr basis Issued 1/99. 800 hrs on oil
RockGen Cristiana, WI	525	15/12 - NG 42 - No. 2 FO	DLN WI	3x175 MW GE 7FA CTs 15/12 ppm are on 1/24 hr basis Issued 1/99. 800 hrs on oil
Carson Energy, CA	42	5 - NG (LAER)	Hot SCR	42 MW LM6000PA. Startup 1995. Ammonia limit is 20 ppmvd
McClelland AFB, CA	85	5 - NG (LAER)	Hot SCR	85 MW GE 7EA. Applied 1999 Ammonia proposal 10 ppmvd
Lakeland, FL	250 CON	9/9 - NG (by 2002) 42/15 - No. 2 FO	DLN/HSCR WI/HSCR	250 MW WH 501G CT Initially 25 ppm NO <sub>x</sub> limit on gas Issued 7/98. 250 hrs on oil.
PREPA, PR	248 CON	10 - No. 2 FO	WI & HSCR	3x83 MW ABB GT11N CTs Issued 12/95.

CON = Continuous  
 SC = Simple Cycle  
 INT = Intermittent

DLN = Dry Low NO<sub>x</sub> Combustion  
 SCR = Selective Catalytic Reduction  
 HSCR = Hot SCR

FO = Fuel Oil  
 NG = Natural Gas  
 WI = Water or Steam Injection

GE = General Electric  
 WH = Westinghouse  
 ABB = Asea Brown Boveri

GPP Hardee County Generation Facility  
 Three Combustion Turbines and One Storage Tank

Permit No. PSD-FL-281  
 Facility I.D. No. 0490044

**APPENDIX BD**  
**BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)**

Project Location	CO – ppm (or as indicated)	VOC – ppm (or as indicated)	PM – lb/hr (or as indicated)	Technology and Comments
Granite Hardee, FL GE	12 – NG 23 – FO	1.2 – NG 2.8 – FO	10% Opacity	Clean Fuels Good Combustion
Granite Hardee, FL 501F	16 – NG 20 – FO	3 – NG 10 – FO	10% Opacity	Clean Fuels Good Combustion
Granite Hardee, FL D5A	10 – NG 28 – FO	3 – NG 10 – FO	10% Opacity	Clean Fuels Good Combustion
Granite Hardee, FL ABB	6 – NG 25 – FO	1.5 – NG 7.5 – FO	10% Opacity	Clean Fuels Good Combustion
Shady Hills Pasco, FL	12 – NG 20 – FO	1.4 – NG 7 – FO	10 lb/hr – NG 17 lb/hr – FO	Clean Fuels Good Combustion
Vandolah Hardee, FL	12 – NG 20 – FO	1.4 – NG 7 – FO	10 lb/hr – NG 17 lb/hr – FO	Clean Fuels Good Combustion
Oleander Brevard, FL	12 – NG 20 – FO	3 – NG 6 – FO	10% Opacity	Clean Fuels Good Combustion
JEA Baldwin, FL	12 – NG 20 – FO	1.4 – NG/FO Not PSD	9/17 lb/hr – NG/FO 10% Opacity	Clean Fuels Good Combustion
Reliant Osceola, FL	10.5 – NG 20 – FO	2.8 lb/hr – NG 7.5 lb/hr – FO	9 lb/hr – NG 17 lb/hr – FO	Clean Fuels Good Combustion
TEC Polk Power, FL	15 – NG 33 – FO	7 – NG 7 – FO	10% Opacity	Clean Fuels Good Combustion
Dynergy, FL	25 – NG		8.2 lb/hr – NG 10% Opacity	Clean Fuels Good Combustion
Dynergy Heard Co., GA	25 – NG	? - NG	0.005 lb/mmBtu – NG 10% Opacity	Clean Fuels Good Combustion
Tenaska Heard Co., GA	15 – NG 20 – FO	? – NG ? – FO	? – NG ? lb/hr – FO	Clean Fuels Good Combustion
Calvert City, KY	30 – NG (full load) 90 – NG (other loads)	? - NG	? - NG	Clean Fuels Good Combustion
Mid-GA Cogen	10 – NG 30 – FO	6 – NG 30 – FO	18 – NG 55 lb/hr – FO	Clean Fuels Good Combustion
Dynergy Reidsville, NC	25 – NG 50 – FO	6 lb/hr – NG 8 lb/hr – FO	6 lb/hr – NG 23 lb/hr – FO	Clean Fuels Good Combustion
Lyondell Harris, TX	25 – NG			Clean Fuels Good Combustion
RockGen Cristiana, WI	12@>50% load – NG 15@>75% 24@<75% - FO	2 – NG 5 – FO	18 lb/hr – NG 44 lb/hr – FO	Clean Fuels Good Combustion
RockGen Cristiana, WI	12@>50% load – NG 15@>75% 24@<75% - FO	2 – NG 5 – FO	18 lb/hr – NG 44 lb/hr – FO	Clean Fuels Good Combustion
Carson Energy, CA	6 – NG			Oxidation Catalyst
McClelland AFB, CA	23 – NG	3.9 - NG	7 lb/hr	Clean Fuels Good Combustion
Lakeland, FL	25 - NG or 10 by Ox Cat 75 - FO @ 15% O <sub>2</sub>	4 – NG 10 – FO	10% Opacity	Clean Fuels Good Combustion
PREPA, PR	9 – FO @15% O <sub>2</sub>	11 – FO @15% O <sub>2</sub>	0.0171 gr/dscf	Clean Fuels Good Combustion

**REVIEW OF NITROGEN OXIDES CONTROL TECHNOLOGIES:**

Some of the discussion in this section is based on a 1993 EPA document on Alternative Control Techniques for NO<sub>x</sub> Emissions from Stationary Gas Turbines. Project-specific information is included where applicable.

## APPENDIX BD

### BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

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#### Nitrogen Oxides Formation

Nitrogen oxides form in the gas turbine combustion process as a result of the dissociation of molecular nitrogen and oxygen to their atomic forms and subsequent recombination into seven different oxides of nitrogen. Thermal  $\text{NO}_x$  forms in the high temperature area of the gas turbine combustor. Thermal  $\text{NO}_x$  increases exponentially with increases in flame temperature and linearly with increases in residence time. Flame temperature is dependent upon the ratio of fuel burned in a flame to the amount of fuel that consumes all of the available oxygen.

In all but the most recent gas turbine combustor designs, the high temperature combustion gases are cooled to an acceptable temperature with dilution air prior to entering the turbine (expansion) section. The sooner this cooling occurs, the lower the thermal  $\text{NO}_x$  formation. Cooling is also required to protect the first stage nozzle. When this is accomplished by air cooling, the air is injected into the component and is ejected into the combustion gas stream, causing a further drop in combustion gas temperature. This, in turn, lowers achievable thermal efficiency for the unit.

The relationship between flame temperature, firing temperature, unit efficiency, and  $\text{NO}_x$  formation can be appreciated from Figure 1 which is from a General Electric discussion on these principles.

By maintaining a low fuel ratio (lean combustion), the flame temperature will be lower, thus reducing the potential for  $\text{NO}_x$  formation. Prompt  $\text{NO}_x$  is formed in the proximity of the flame front as intermediate combustion products. The contribution of Prompt to overall  $\text{NO}_x$  is relatively small in near-stoichiometric combustors and increases for leaner fuel mixtures. This provides a practical limit for  $\text{NO}_x$  control by lean combustion.

Fuel  $\text{NO}_x$  is formed when fuels containing bound nitrogen are burned. This phenomenon is not important when combusting natural gas. It is not a significant issue for the Granite project because these units will not be continuously operated, but rather will be "peakers". Also, low sulfur fuel oil (which has more fuel-bound nitrogen than natural gas) is proposed to be used for no more than 500 hours per year (per CT).

Uncontrolled emissions range from about 100 to over 600 parts per million by volume, dry, corrected to 15 percent oxygen (ppmvd @15%  $\text{O}_2$ ). The Department estimates uncontrolled emissions at approximately 200 ppmvd @15%  $\text{O}_2$  for each turbine of the Granite Project. The proposed  $\text{NO}_x$  controls will reduce these emissions significantly.

#### $\text{NO}_x$ Control Techniques

##### Wet Injection

Injection of either water or steam directly into the combustor lowers the flame temperature and thereby reduces thermal  $\text{NO}_x$  formation. Typical emissions achieved by wet injection are in the range of 15–25 ppmvd when firing gas and 42 ppmvd when firing fuel oil in large combustion turbines. These values often form the basis, particularly in combined cycle turbines, for further reduction to BACT limits by other techniques. Carbon monoxide (CO) and hydrocarbon (HC) emissions are relatively low for most gas turbines. However steam and (more so) water injection may increase emissions of both of these pollutants.

# Gas Turbine - Hot Gas Path Parts

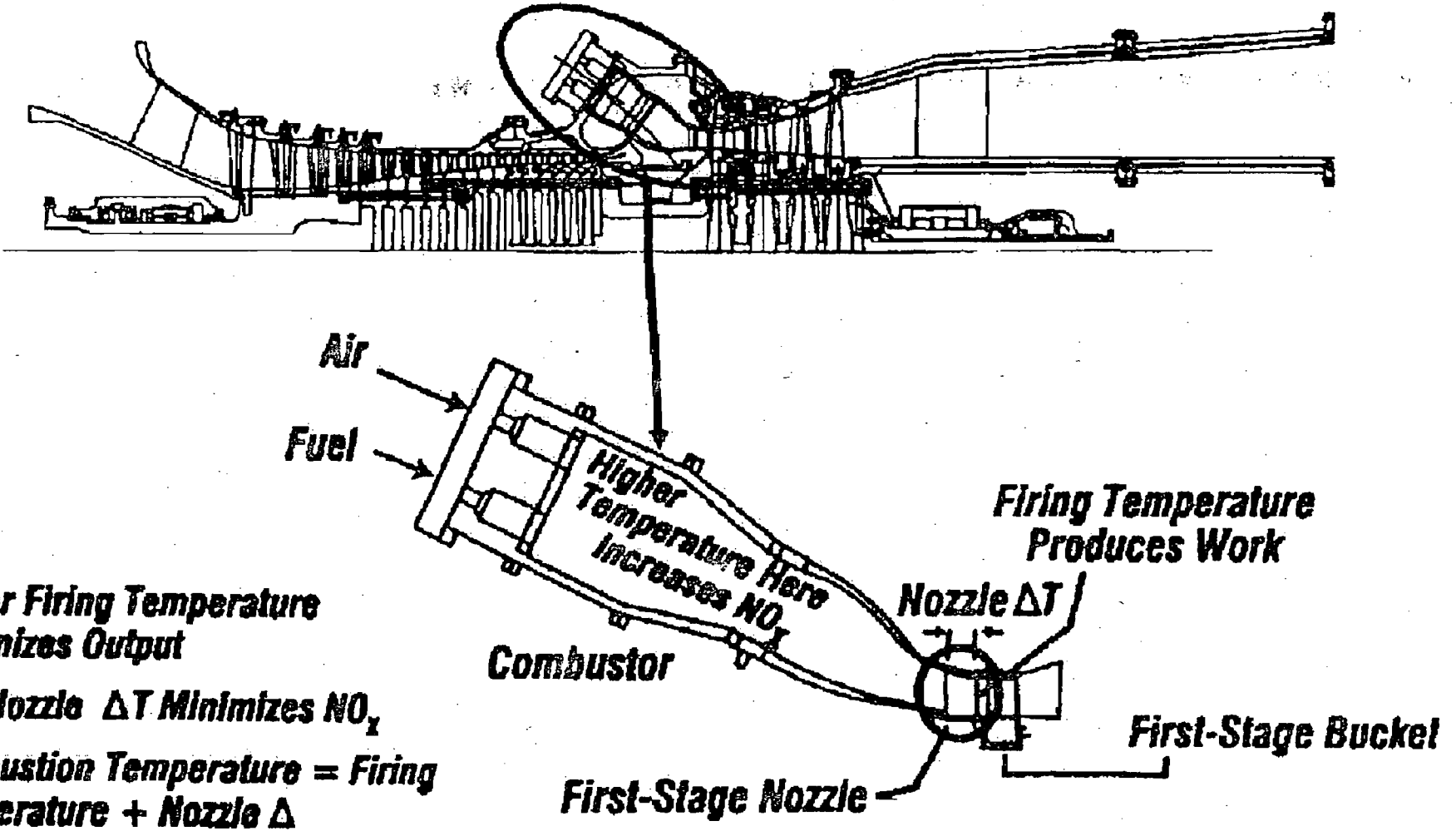


Figure 1 – Relation Between Flame Temperature and Firing Temperature

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Combustion Controls

The excess air in lean combustion cools the flame and reduces the rate of thermal NO<sub>x</sub> formation. Lean premixing of fuel and air prior to combustion can further reduce NO<sub>x</sub> emissions. This is accomplished by minimizing localized fuel-rich pockets (and high temperatures) that can occur when trying to achieve lean mixing within the combustion zones.

The above principle is depicted in Figure 2 for a can-annular combustor operating on gas. For ignition, warm-up, and acceleration to approximately 20 percent load, the first stage serves as the complete combustor. Flame is present only in the first stage, which is operated as lean stable combustion will permit. With increasing load, fuel is introduced into the secondary stage, and combustion takes place in both stages. When the load reaches approximately 40 percent, fuel is cut off to the first stage and the flame in this stage is extinguished. The venturi ensures the flame in the second stage cannot propagate upstream to the first stage. When the fuel in the first-stage flame is extinguished (as verified by internal flame detectors), fuel is again introduced into the first stage, which becomes a premixing zone to deliver a lean, unburned, uniform mixture to the second stage. The second stage acts as the complete combustor in this configuration.

To further reduce NO<sub>x</sub> emissions, GE developed the DLN-2.0 (cross section shown in Figure 2) wherein air usage (other than for premixing) was minimized. The venturi and the centerbody assembly were eliminated and each combustor has a single burning zone. So-called "quaternary fuel" is introduced through pegs located on the circumference of the outward combustion casing.

GE has made further improvements in the DLN design. The most recent version is the DLN-2.6. The combustor is similar to the DLN-2 with the addition of a sixth (center) fuel nozzle. The emission characteristics of the DLN-2.6 combustor while firing natural gas are given in Figure 3 for a unit tuned to meet a 15 ppmvd NO<sub>x</sub> limit (by volume, dry corrected to at 15 percent oxygen) at JEA's Kennedy Station.

NO<sub>x</sub> concentrations are higher in the exhaust at lower loads because the combustor does not operate in the lean pre-mix mode. Therefore such a combustor emits NO<sub>x</sub> at concentrations of 15 ppmvd at loads between 50 and 100 percent of capacity, but concentrations as high as 100 ppmvd at less than 50 percent of capacity. Note that VOC comprises a very small amount of the "unburned hydrocarbons" which in turn is mostly non-VOC methane.

The combustor can be tuned differently to achieve emissions as low as 9 ppm of NO<sub>x</sub> and 9 ppm of CO. Emissions characteristics by wet injection NO<sub>x</sub> control while firing oil are expected to be similar for the DLN-2.6 as they are for those of the DLN-2.0 shown in Figure 4. Simplified cross sectional views of the totally premixed (while firing natural gas) DLN-2.6 combustor (a candidate for the GPP Hardee project) are shown in Figure 5.

Figure 6 shows some of the burners typically used in Westinghouse products including the 501F and 501D5A turbines proposed as options for this project. These combustors incorporate lean premixed fuel mixing zones surrounding a central pilot.<sup>1</sup> The central pilot provides stability but limits the ability to achieve very low NO<sub>x</sub> generation. The characteristics of the gas-only burners to be installed on a Westinghouse 501F at a project in Florida are shown in Figure 7.



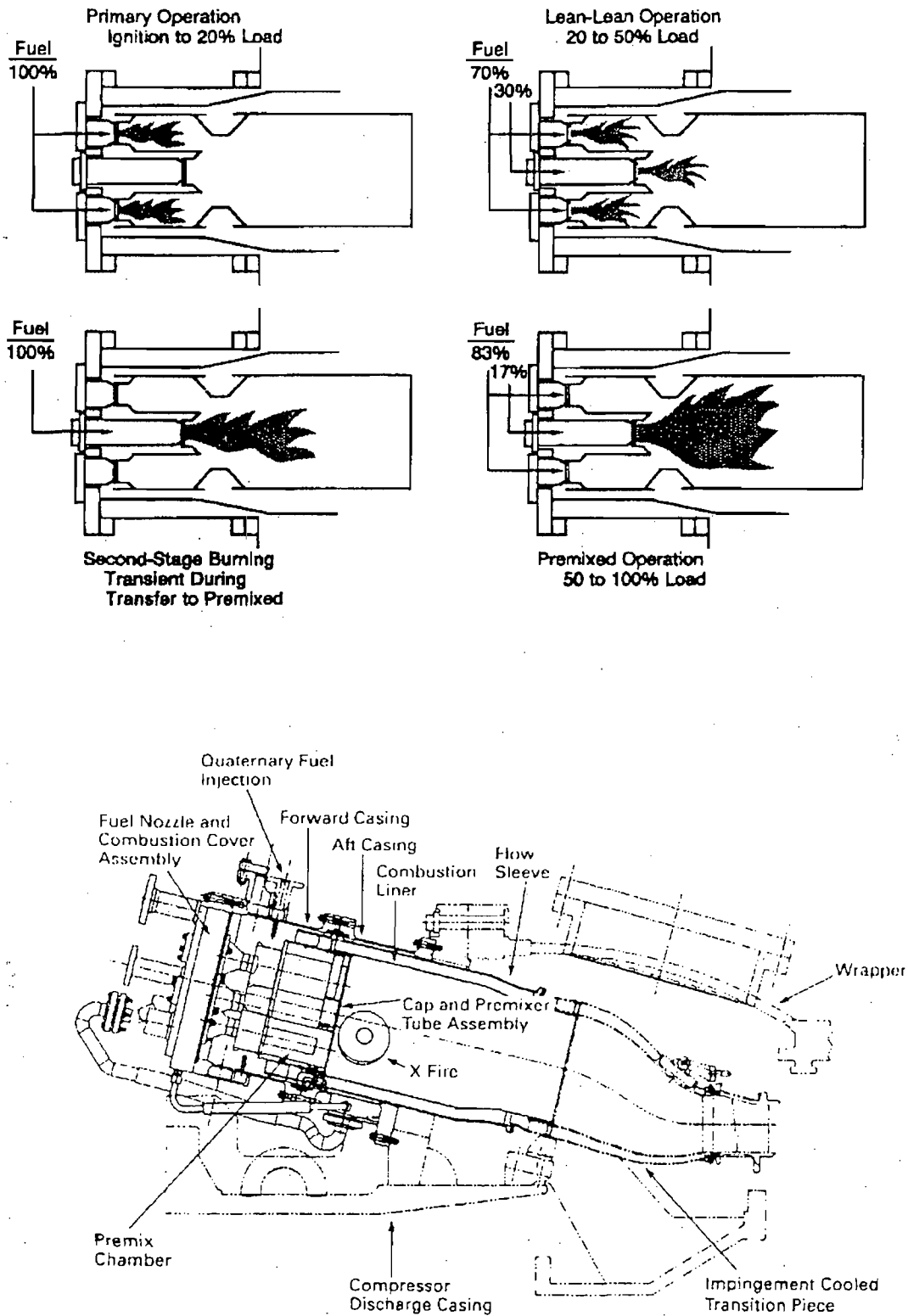


Figure 2 – Dry Low NO<sub>x</sub> Operating Modes – DLN-1  
 Cross Section of GE DLN-2

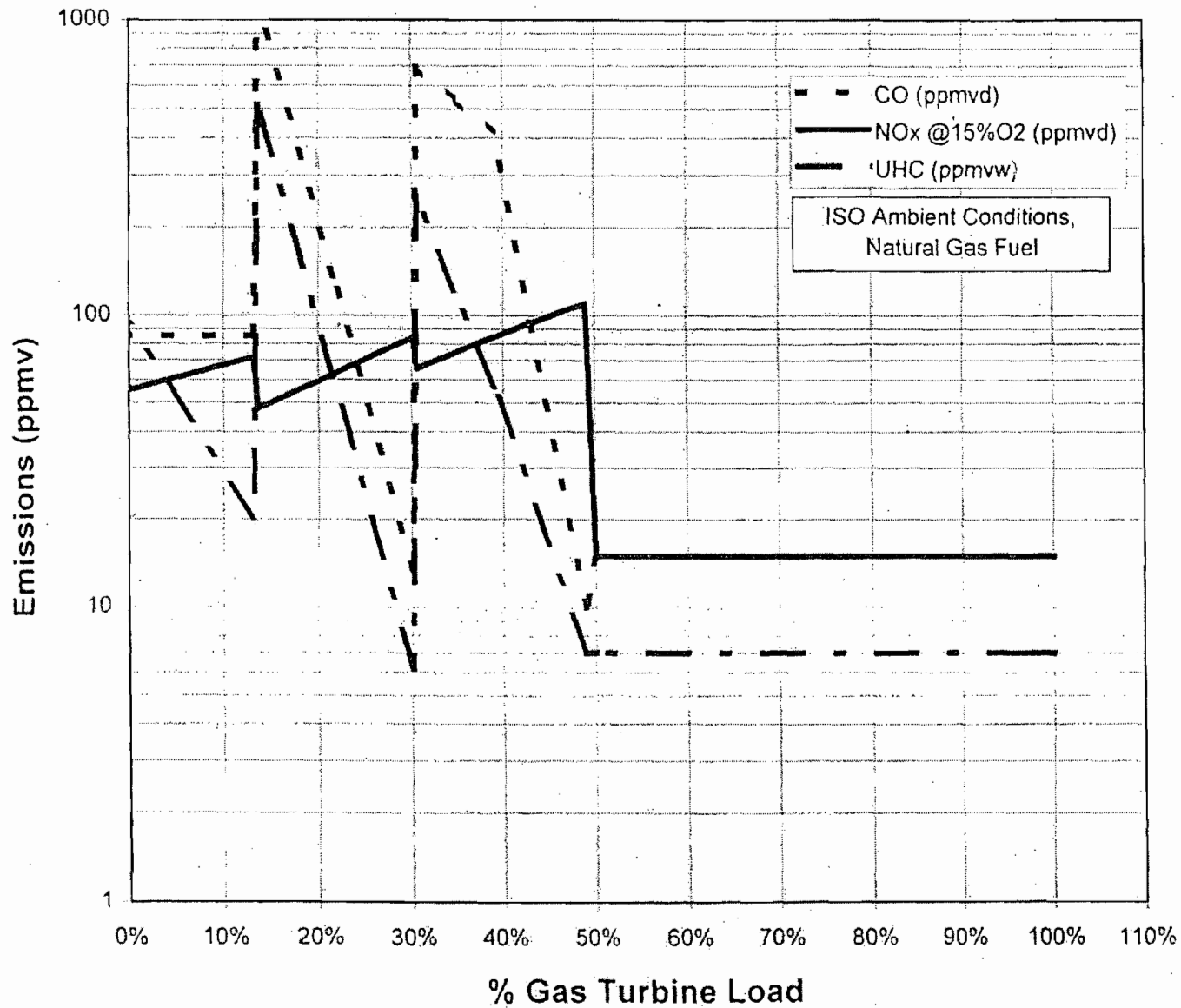


Figure 3 – Emissions Performance Curves for GE DLN-2.6 Combustor  
Firing Natural Gas in a Dual Fuel GE 7FA Combustion Turbine  
(Simple Cycle Intermittent Duty – If Tuned to 15 ppmvd NO<sub>x</sub>)

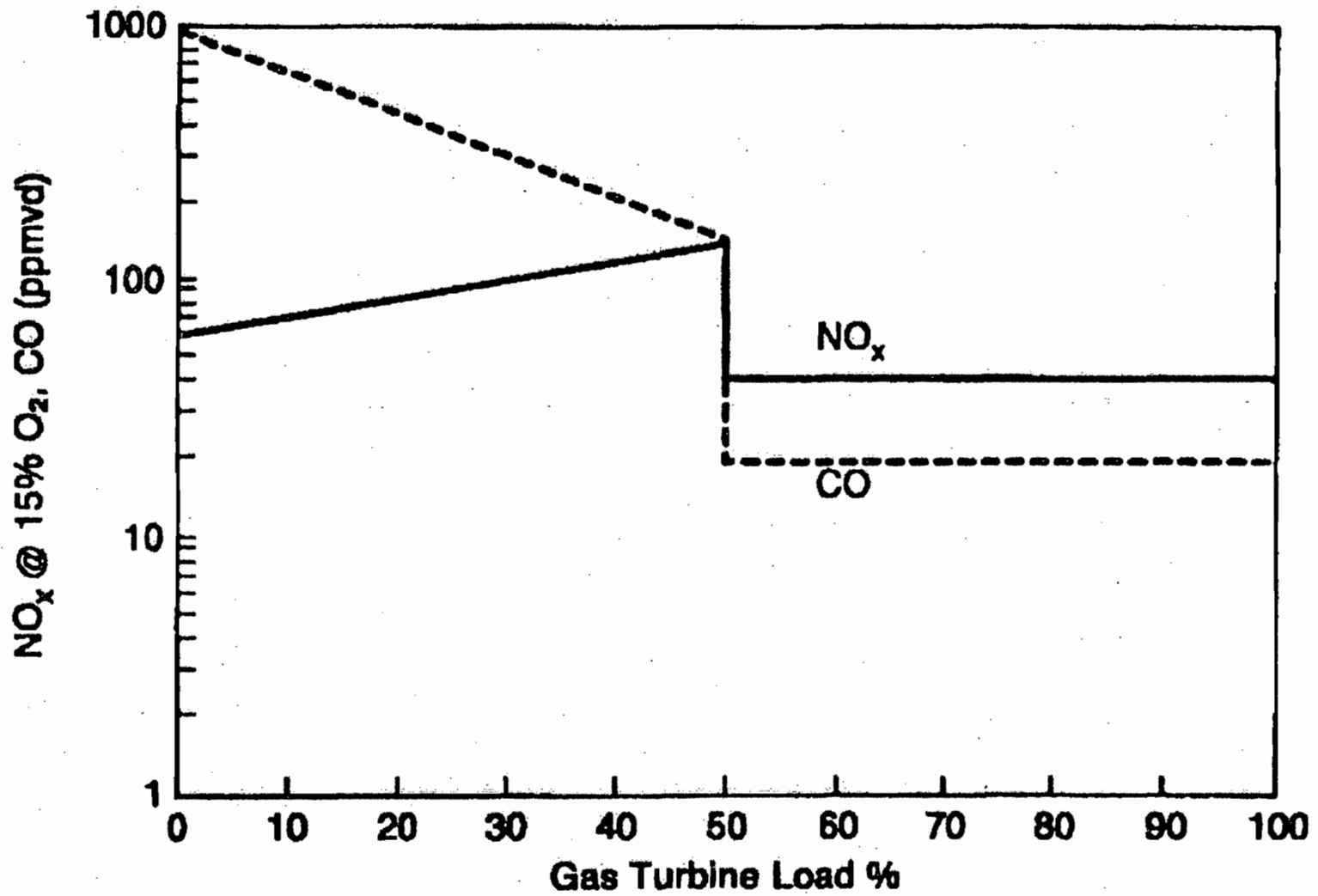


Figure 4 – Emissions Performance for DLN-2 Combustors Firing Fuel Oil in Dual Fuel GE 7FA Turbine

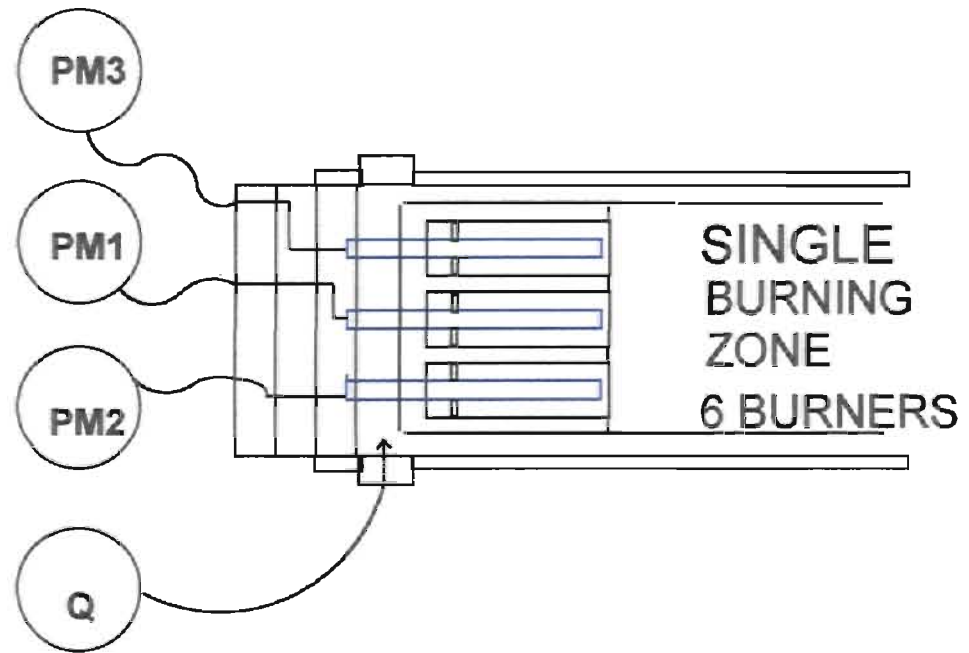
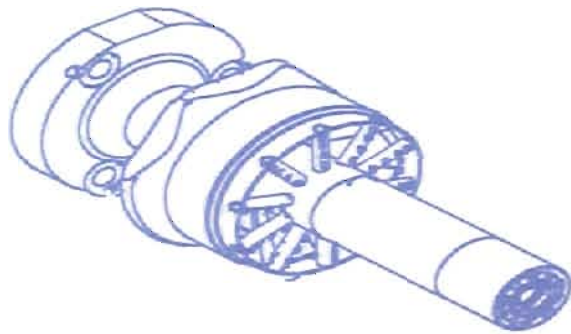
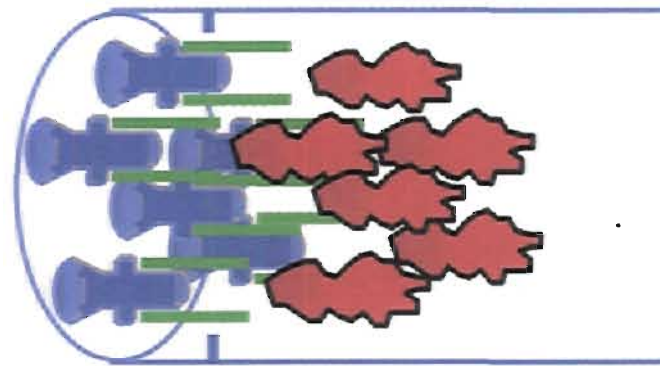
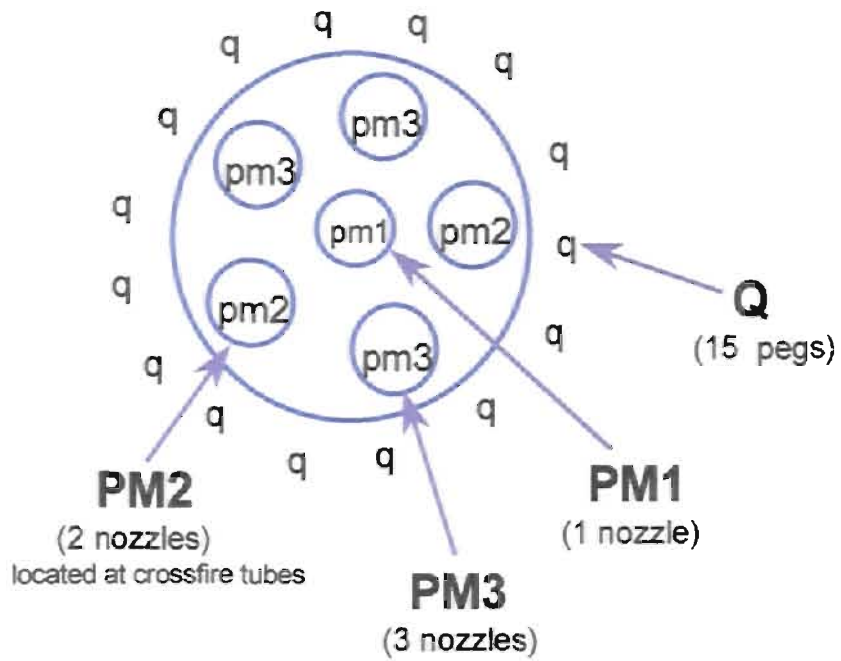
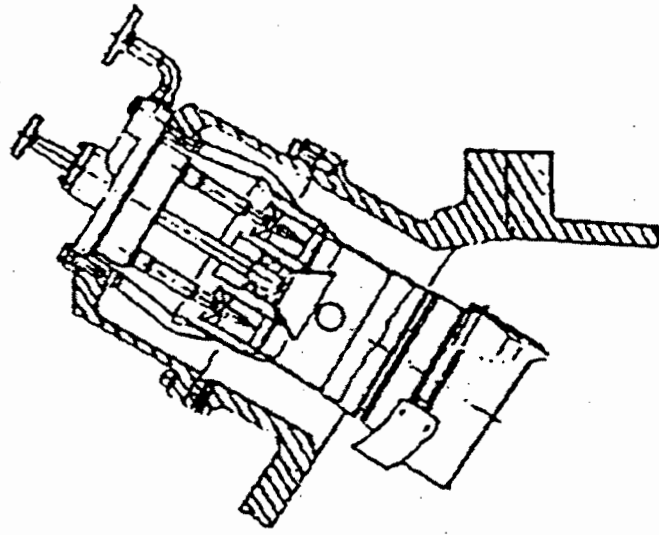
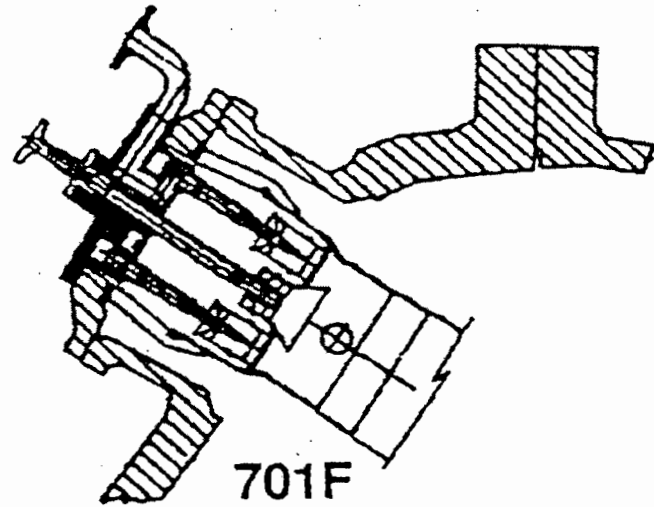


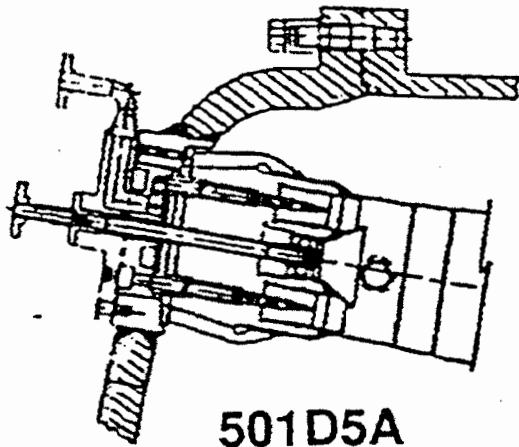
Figure 5 - DLN2.6 Fuel Nozzle Arrangement



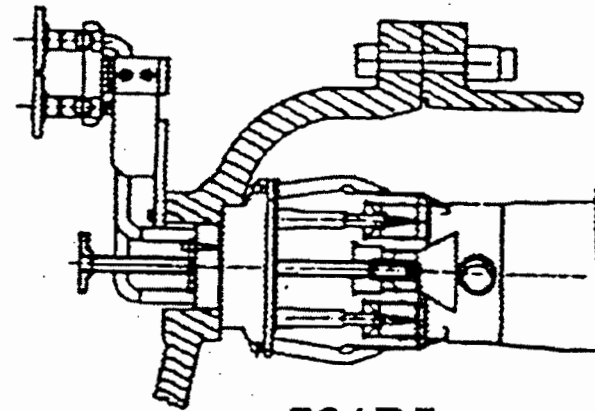
501F



701F



501D5A



501D5

Figure 6 – Typical Westinghouse DLN Combustors

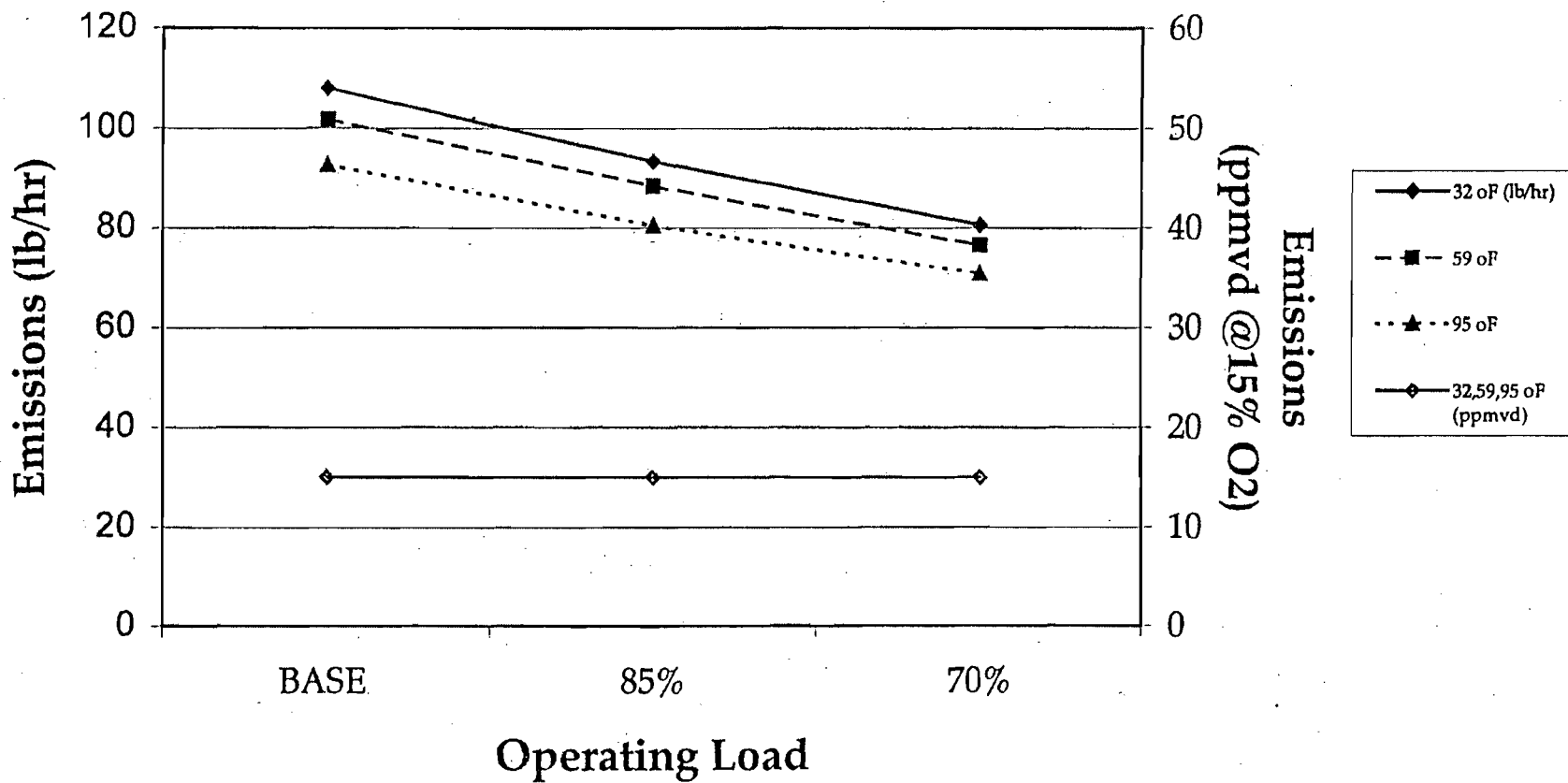


Figure 7 – Emissions Performance for WH501 Combustors  
 Firing Natural Gas Only (Source: Dynegy Palmetto Power Project)

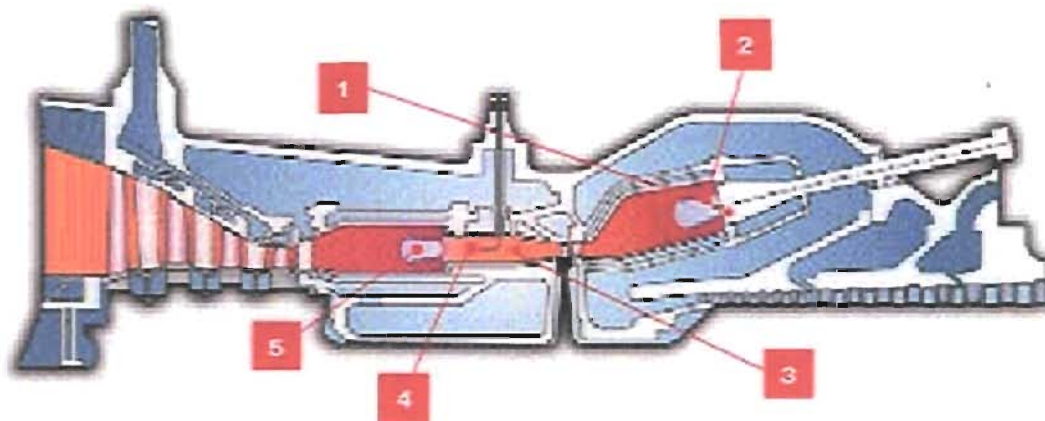
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Westinghouse is evaluating and testing fully pre-mixed systems as well as a partial catalytic combustion system.<sup>2</sup> The latter will use the premixed fuel mixing zones, but will replace the central pilot with a flameless catalytic component (see catalytic combustion below).

The ABB GT24 takes an approach known as Sequential Combustion. There are two annular combustion chambers which utilize so-called EV (Environmental) and SEV (Sequential EV) burners, respectively. Sequential combustion means that fuel is injected simultaneously in both chambers, in a manner that provides higher specific output and efficiency. The precise sequence is described by ABB as follows<sup>3</sup>:



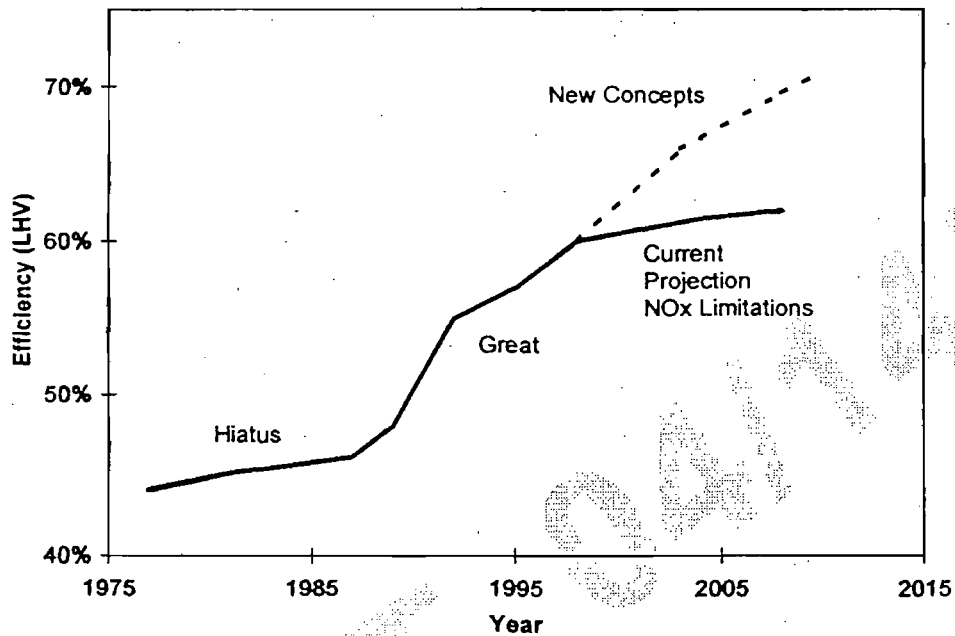
**Figure 8 – ABB GT24/26 Sequential Combustion**

1. Compressed air is fed into the double-cone EV burner, creating a homogeneous, lean fuel/air mixture. The vortex flow, induced by the shape of the burner, breaks down at the EV burner exit into the combustion zone, forming a recirculation zone.
2. The mixture ignites into a single, low temperature flame ring. The recirculation zone stabilizes the flame in free space within the combustion zone, avoiding contact with the combustor wall.
3. The hot exhaust gas exits this first combustor, moving through the high pressure turbine stage before entering the SEV combustor.
4. Vortex generators in the SEV combustor enhance the SEV mixing process, while carrier air, injected with the fuel at the fuel lance, delays spontaneous ignition until outside of the SEV combustor.
5. Ignition occurs when the fuel reaches self-ignition temperature in the free space of the SEV combustion zone. The hot gas then continues its path into the low pressure turbine.

The Department does not have emissions characteristics for the ABB GT24 product. Granite proposes a NO<sub>x</sub> limit of 25 ppmvd for this option.

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An important consideration is that power and efficiency are sacrificed in the effort to achieve low NO<sub>x</sub> by combustion technology. This limitation is seen in Figure 9 from an EPRI report.<sup>4</sup> Basically developments such as single crystal blading, aircraft compressor design, high technology blade cooling have helped to greatly increase efficiency and lower capital costs. Further improvements are more difficult in large part because of the competing demands for air to support lean premix combustion and to provide blade cooling. New concepts are under development by all of the manufacturers to meet the challenges implicit in Figure 9.



**Figure 9 – Efficiency Increases in Combustion Turbines**

Further NO<sub>x</sub> reductions related to flame temperature control are possible such as closed loop steam cooling. This feature is available only in larger units (G or H Class technology) than the ones under consideration by Granite. It is more feasible for a combined cycle unit with a heat recovery steam generator (HRSG). In simple cycle, a once-through steam generator would be required. Steam is circulated through the internal portion of the nozzle component, the transition piece between the combustor and the nozzle, or certain turbine blades. The difference between flame temperature and firing temperature into the first stage is minimized and higher efficiency is attained. Flame temperatures and NO<sub>x</sub> emissions can therefore be maintained at comparatively low levels even at high firing temperatures (refer back to figure 1). At the same time, thermal efficiency should be greater when employing steam cooling instead of air cooling.

At the present time, emissions achieved by combustion controls are as low as 9 ppmvd from large simple cycle gas turbines. Specialized dual fuel DLN burners were installed in a project in Israel<sup>5</sup>, but their performance on fuel oil is not known to the Department. Mitsubishi (who also make a 501F) is also developing a dual-fuel DLN. Optimization of premix fuel-air nozzle and performance was verified in high-pressure combustion tests. Commissioning tests on gas and oil burning were completed at an undesignated site.<sup>6</sup> The details are not available in English.



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Catalytic Combustion

Catalytic combustion involves using a catalytic bed to oxidize a lean air and fuel mixture within a combustor instead of burning with a flame as described above. In a catalytic combustor the air and fuel mixture oxidizes at lower temperatures, producing less NO<sub>x</sub>.<sup>7</sup> In the past, the technology was not reliable because the catalyst would not last long enough to make the combustor economical.

There has been increased interest in catalytic combustion as a result of technological improvements and incentives to reduce NO<sub>x</sub> emissions without the use of add-on control equipment and reagents. As previously mentioned, Westinghouse is working to replace the central pilot in its DLN technology with a catalytic pilot in a project with Precision Combustion Inc.

Catalytica has developed a system know as XONON™, which works by partially burning fuel in a low temperature pre-combustor and completing the combustion in a catalytic combustor. The overall result is low temperature partial combustion (and thus lower NO<sub>x</sub> combustion) followed by flameless catalytic combustion to further attenuate NO<sub>x</sub> formation.

In 1998, Catalytica announced the startup of a 1.5 MW Kawasaki gas turbine equipped with XONON™.<sup>8</sup> The turbine is owned by Catalytica and is located at the Gianera Generating Station of Silicon Valley Power, a municipally owned utility serving the City of Santa Clara, California. Previously, this turbine and XONON™ system had successfully completed over 1,200 hours of extensive full-scale tests at a project development facility in Oklahoma which documented XONON's ability to limit emissions of NO<sub>x</sub> to less than 3 ppmvd.

Recently, Catalytica and GE announced that the XONON™ combustion system has been specified as the preferred emissions control system with GE 7FA turbines that have been ordered for Enron's proposed 750 MW Pastoria Energy Facility.<sup>9</sup> The project will enter commercial operation by the summer of 2001.

In principle, XONON™ will work on a simple cycle project. However, the Department does not have information regarding the status of the technology to for fuel oil firing and cycling operations.

Selective Catalytic Combustion

Selective catalytic reduction (SCR) is an add-on NO<sub>x</sub> control technology that is employed in the exhaust stream following the gas turbine. SCR reduces NO<sub>x</sub> emissions by injecting ammonia into the flue gas in the presence of a catalyst. Ammonia reacts with NO<sub>x</sub> in the presence of a catalyst and excess oxygen yielding molecular nitrogen and water. The catalysts used in combined cycle, low temperature applications (conventional SCR), are usually vanadium or titanium oxide and account for almost all installations. For high temperature applications (Hot SCR up to 1100 °F), such as simple cycle turbines, zeolite catalysts are available but used in few applications to-date. SCR units are typically used in combination with wet injection or DLN combustion controls.

In the past, sulfur was found to poison the catalyst material. Sulfur-resistant catalyst materials are now becoming more available. Catalyst formulation improvements have proven effective in resisting sulfur-induced performance degradation with fuel oil in Europe and Japan, where conventional SCR catalyst life in excess of 4 to 6 years has been achieved, while 8 to 10 years catalyst life has been reported with natural gas.

Excessive ammonia use tends to increase emissions of CO, ammonia (slip) and particulate matter (when sulfur-bearing fuels are used).

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As of early 1992, over 100 gas turbine installations already used SCR in the United States. Only one combustion turbine project in Florida (FPC Hines Power Block 1) employs SCR. The equipment was installed on a temporary basis because Westinghouse had not yet demonstrated emissions as low as 12 ppmvd by DLN technology at the time the units were to start up in 1998. Seminole Electric will install SCR on a previously permitted 501F unit at the Hardee Unit 3 (Paynes Creek) project. The reasons are similar to those for the FPC Hines Power Block I.

Permit limits as low as 2.0 to 3.5 ppmvd NO<sub>x</sub> have been specified using SCR on combined cycle F Class projects throughout the country. The recently permitted Kissimmee Cane Island Unit 3 project is one example.<sup>10</sup>

Selective Non-Catalytic Combustion

Selective non-catalytic reduction (SNCR) reduction works on the same principle as SCR. The differences are that it is applicable to hotter streams than conventional or hot SCR, no catalyst is required, and urea can be used as a source of ammonia. No applications have been identified wherein SNCR was applied to a gas turbine because the exhaust temperature of 1100 °F is too low to support the NO<sub>x</sub> removal mechanism.

The Department did, however, specify SNCR as one of the available options for the combined cycle Santa Rosa Energy Center. The project will incorporate a large 600 MMBtu/hr duct burner in the heat recovery steam generator (HRSG) and can provide the acceptable temperatures (between 1400 and 2000 °F) and residence times to support the reactions.

SCONO<sub>x</sub><sup>TM</sup>

SCONO<sub>x</sub><sup>TM</sup> is a catalytic add-on technology that achieves NO<sub>x</sub> control by oxidizing and then absorbing the pollutant onto a honeycomb structure coated with potassium carbonate. The pollutant is then released as molecular nitrogen during a regeneration cycle that requires dilute hydrogen gas. The technology has been demonstrated on small units in California and has been purchased for a small source in Massachusetts.<sup>11</sup>

California regulators and industry sources have stated that the first 250 MW block to install SCONO<sub>x</sub><sup>TM</sup> will be at PG&E's La-Paloma Plant near Bakersfield.<sup>12</sup> The overall project includes several more 250 MW blocks with SCR for control.<sup>13</sup> USEPA has identified an "achieved in practice" BACT value of 2.0 ppmvd over a three-hour rolling average based upon the recent performance of a Vernon, California natural gas-fired 32 MW combined cycle turbine equipped with SCONO<sub>x</sub><sup>TM</sup>.

SCONO<sub>x</sub><sup>TM</sup> technology (at 2.0 ppmvd) is considered to represent LAER in non-attainment areas where cost is not a factor in setting an emission limit. It competes with less-expensive SCR in those areas, but has the advantages that it does not cause ammonia emissions in exchange for NO<sub>x</sub> reduction. Advantages of the SCONO<sub>x</sub><sup>TM</sup> process include in addition to the reduction of NO<sub>x</sub>, the elimination of ammonia and the control of VOC and CO emissions. SCONO<sub>x</sub><sup>TM</sup> has not been applied on any major sources in ozone attainment areas.

Recently EPA Region IX acknowledged that SCONO<sub>x</sub><sup>TM</sup> was demonstrated in practice to achieve 2.0 ppmv NO<sub>x</sub>.<sup>14</sup> Permitting authorities planning to issue permits for future combined cycle gas turbine systems firing exclusively on natural gas, and subject to LAER must recognize this limit which, in most cases, would result in a LAER determination of 2.0 ppmv.

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According to a recent press release, the Environmental Segment of ABB Alstom Power offers the technology (with performance guarantees) to "all owners and operators of natural gas-fired combined cycle combustion turbines, regardless of size."<sup>15</sup>

SCONO<sub>x</sub> requires a much lower temperature regime that is not available in simple cycle units and is therefore not feasible for this project. Therefore the SCONO<sub>x</sub> system cannot be considered as achievable or demonstrated in practice for this application.

**REVIEW OF SULFUR DIOXIDE (SO<sub>2</sub>) AND SULFURIC ACID MIST (SAM)**

SO<sub>2</sub> control processes can be classified into five categories: fuel/material sulfur content limitation, absorption by a solution, adsorption on a solid bed, direct conversion to sulfur, or direct conversion to sulfuric acid. A review of the BACT determinations for combustion turbines contained in the BACT Clearinghouse shows that the exclusive use of low sulfur fuels constitutes the top control option for SO<sub>2</sub>.

For this project, the applicant has proposed as BACT the use of 0.05% sulfur oil and pipeline natural gas. The applicant estimated total emissions for the project at 108 TPY of SO<sub>2</sub> and 14 TPY of SAM. The Department expects the emissions to be lower because of the limited oil consumption and the typical natural gas in Florida that contains less than 2 grain of sulfur per 100 standard cubic feet (gr S/100scf). This value is well below the "default" maximum value of 20 gr. S/100 scf, but high enough to require a BACT determination.

**REVIEW OF PARTICULATE MATTER (PM/PM<sub>10</sub>) CONTROL TECHNOLOGIES:**

Particulate matter is generated by various physical and chemical processes during combustion and will be affected by the design and operation of the NO<sub>x</sub> controls. The particulate matter emitted from this unit will mainly be less than 10 microns in diameter (PM<sub>10</sub>).

Natural gas and 0.05 percent sulfur No. 2 (or superior grade) distillate fuel oil will be the only fuels fired and are efficiently combusted in gas turbines. Such fuels are necessary to avoid damaging turbine blades and other components already exposed to very high temperature and pressure. Natural gas is an inherently clean fuel and contains no ash. The fuel oil to be combusted contains a minimal amount of ash and its use is proposed for only 500 hours per year making any conceivable add-on control technique for PM/PM<sub>10</sub> either unnecessary or impractical.

A technology review indicated that the top control option for PM/PM<sub>10</sub> is a combination of good combustion practices, fuel quality, and filtration of inlet air. Total annual emissions of PM<sub>10</sub> for the project are expected to be approximately 125 tons per year.

**REVIEW OF CARBON MONOXIDE (CO) CONTROL TECHNOLOGIES**

CO is emitted from combustion turbines due to incomplete fuel combustion. Combustion design and catalytic oxidation are the control alternatives that are viable for the project. The most stringent control technology for CO emissions is the use of an oxidation catalyst.

All combustion turbines using catalytic oxidation appear to be combined cycle units. Among the most recently permitted ones are the 500 MW Wyandotte Energy project in Michigan, the El Dorado project in Nevada, Ironwood in Pennsylvania, Millenium in Massachusetts, and Sutter Calpine in California. The permitted CO values of these units are between 3 and 5 ppm. Catalytic

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oxidation was recently installed at a cogeneration plant at Reedy Creek (Walt Disney World), Florida to avoid PSD review which would have been required due to increased operation at low load. Seminole Electric recently proposed catalytic oxidation in order to meet the permitted CO limit at its planned 244 MW Westinghouse 501FD combined cycle unit in Hardee County, Florida.<sup>16</sup>

Most combustion turbines incorporate good combustion to minimize emissions of CO. So far this appears to be the only technology proposed at simple cycle turbine projects. These installations are typically permitted between 10 and 25 ppmvd at full load while firing gas. The ranges of 6-16 and 20-25 ppm for gas and oil respectively at baseload proposed in Granite's original application are within the range of recent determinations for simple cycle CO BACT determinations.

There is a great deal of uncertainty regarding actual CO emissions from installed units. Despite the relatively high BACT limits typically proposed, much lower emissions have actually been reported from several facilities without use of oxidation catalyst. For example, although Westinghouse does not offer a single digit CO guarantee on the 501F, the units installed at the FPC Hines Energy Complex achieved CO emissions in the range of 1-3 ppmvd on both gas and fuel oil.<sup>17</sup> GE 7FA units achieved similar results when firing gas at the FPL Martin Power Plant.<sup>18</sup>

**REVIEW OF VOLATILE ORGANIC COMPOUND (VOC) CONTROL TECHNOLOGIES**

Volatile organic compound (VOC) emissions, like CO emissions, are formed due to incomplete combustion of fuel. There are no viable add-on control techniques, particularly for simple cycle combustion turbines. The high flame temperature is very efficient at destroying VOC. The applicant has proposed good combustion practices to control VOC. The ranges of 1.2 to 3 ppmvw (gas) and 7 to 10 ppmvw (oil) at baseload proposed in Granite's original application are roughly within the range of recent determinations for simple cycle CO BACT determinations.

**BACKGROUND ON PROPOSED GAS TURBINES**

GPP plans the purchase of three simple cycle gas turbines. They have not yet determined from which manufacturer they will purchase the units. The most obvious difference between the units under consideration is their performance with respect to NO<sub>x</sub> emissions.

Typically, companies obtain a guarantee from GE to achieve 9 ppmvd during a test on a "new and clean unit." The test must be conducted at a steady-state load of 50 to 100 percent and completed within the first 100 fired hours of operation. With the frequent start-ups and shutdowns of the units, some applicants are concerned about the ability to maintain the low NO<sub>x</sub> values for long periods of time. As a result, some of them agreed to a "new and clean" limit of 9 ppmvd but requested a continuing BACT limit of 10.5 ppmvd.

As detailed in the table above, the Department has issued quite a number of permits for simple cycle GE 7FA requiring achievement of 9-10.5 ppmvd without the requirement of any additional control equipment. The ones with limits of 9 ppmvd are allowed to operate for as many as 1000 hours per year on back-up fuel oil whereas the ones permitted at 10.5 ppmvd are allowed only 750 hours per year of fuel oil. A smaller GE unit known as the 7EA can routinely achieve 9 ppmvd NO<sub>x</sub> or lower based on numerous installations in Florida and elsewhere. The 7EA has a lower flame temperature, compression ratio, and power rating (85 MW versus 170) than the 7FA.

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The ability to meet a NO<sub>x</sub> emission limit of 9 ppmvd by DLN technology involves a substantial efficiency and energy penalty as previously discussed. For example, the 7FA is characterized by a 15.5:1 compression ratio, a 2400 °F firing temperature, 56 percent efficiency, and produces 263 MW in combined cycle. On the other hand, GE offers more efficient F-Class model known as the 7FB, but guarantees a NO<sub>x</sub> limit of 25 ppmvd by DLN.

The 7FB is characterized by an 18.5:1 compression ratio, a 2500 °F firing temperature, 57.3 percent efficiency, and produces 280 MW in combined cycle. The clear implication is that the power penalty to reduce NO<sub>x</sub> from 25 to 9 ppmvd by DLN technology alone is on the order of 20 MW for a combined cycle (roughly 13 MW on a simple cycle unit).<sup>19</sup>

Granite proposes to meet 15 ppmvd at startup for Westinghouse 501F option for this project. However the Department is not aware of any Westinghouse 501F installations where 15 ppmvd is actually achieved (or even proposed at startup) when burning gas in a dual-fuel burner. The Department is aware that this type of unit was proposed for the Calvert City Project in Kentucky. The proposed limit was to be accomplished by wet injection. EPA objected to the issuance of the PSD and Title V Operation Permit for this facility and requires achievement of 15 ppmvd or lower.<sup>20</sup>

FPC recently requested that the Department provide until October, 2001 to install dual fuel combustors capable of meeting 12 ppmvd when burning gas at the existing Hines Energy Complex. The existing 501F units are controlled to that level with SCR technology.<sup>21</sup> The Department is reviewing a separate application from Dynegy, who have proposed a gas-only project based on the Westinghouse 501F combustion turbine. Dynegy requested a limit for NO<sub>x</sub> of 15 ppmvd.

According to the application, the Westinghouse 501F and the GE7FA have similar characteristics (e.g. 9,150 versus 9,370 mmBtu/KWh and 170 MW nominal ratings at 59°F). In order to achieve 9 ppmvd NO<sub>x</sub>, Westinghouse needs time and a breakthrough that allows the central pilot flame to operate in fully, but stable, pre-mixed mode or in catalytic combustion.

Granite proposes to meet 15 ppmvd at startup for the 501D5A option for this project. The 501D5A units at Mid-Georgia Cogen can possibly achieve less than 15 ppmvd NO<sub>x</sub> while burning gas in a dual fuel burner.<sup>22</sup> This is logical based on the lower firing temperature, compression ratio and power rating of the 501D5A compared with the 501F. The Department does not have reasonable assurance, such as a manufacturer guarantee or actual test results to support a lower limit.

For the ABB GT24 option, GPP proposes to meet a limit of 25 ppmvd by DLN technology while firing gas. According to one reference, the Berkshire Power combined cycle ABB GT-24 at Agawam, Connecticut "is being fitted with a catalyst to bring the NO<sub>x</sub> level from 15 to 3.5 ppmvd."<sup>23</sup> This implies that the unit might achieve 15 ppmvd in simple cycle operation. However conversations with ABB Environmental suggest that a 15 ppmvd guarantee is not yet available.<sup>24</sup>

The ABB GT24 is characterized by a 30:1 compression ratio and 58 percent efficiency in combined cycle. It is not surprising that some compromises were made which resulted in greater power, higher efficiency but slowed progress toward single-digit NO<sub>x</sub> emissions. According to ABB, "rather than just concentrating on ever lower NO<sub>x</sub> levels, ABB has chosen a total solution that limits pollutants and at the same time increases energy efficiency."<sup>25</sup> A lower compression, lower efficiency version of the ABB GT24 might not have the difficulty achieving 15 or even 9 ppmvd by DLN technology alone.

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**DEPARTMENT BACT DETERMINATION**

Following are the BACT limits determined for the GPP Hardee project assuming full load. Values for NO<sub>x</sub> are corrected to 15% O<sub>2</sub> on a dry volume basis. The emission limits or their equivalents in terms of pounds per hour and NSPS units, as well as the applicable averaging times, are given in the permit Specific Conditions Nos. 20 through 25 of the air construction permit.

Turbine Model	NO <sub>x</sub> ppmvd	CO ppmvd	VOC ppmvw	PM - lb/hr opacity	SO <sub>2</sub> /SAM Fuel Sulfur	Comments
GE 7FA	10.5 - NG 42 - FO	16 - NG 20 - FO	3 - NG 7.5 - FO	10/17 lb/hr - NG/FO 10% Opacity	.02 gr/dscf 0.05 % S	500 hrs on fuel oil
WH 501F	15 - NG	16 - NG 20 - FO	3 - NG	10 lb/hr - NG 10% Opacity		No fuel oil firing
WH 501D5A	15 - NG	16 - NG 20 - FO	3 - NG	10 lb/hr - NG 10% Opacity		No fuel oil firing
ABB GT-24	5 - NG 10/42 - FO	16 - NG 20 - FO	3 - NG 7.5 - FO	10/17 lb/hr - NG/FO 10% Opacity	.02 gr/dscf 0.05 % S	First 250 hrs on FO at 42 ppmvd Additional 250 hrs at 10 ppmvd

**RATIONALE FOR DEPARTMENT'S DETERMINATION**

- The Top technology and Lowest Achievable Emission Rate (LAER) for simple cycle combustion turbines are Hot SCR and an emission limit of 5 ppmvd NO<sub>x</sub>.
- It is possible that catalytic combustion technology such as XONON™ can be applied to this project, but only for the GE 7FA option in the foreseeable future. Theoretically XONON can achieve the 5 ppmvd NO<sub>x</sub> value and would equate to the top technology.
- An example of the top technology is the Carson Plant in Sacramento, California where there is a Hot SCR system on a simple cycle LM6000PA combustion turbine with a limit of 5 ppmvd.
- Hot SCR is proposed as LAER for the Sacramento Municipal Utilities District simple cycle GE 7EA project at McClellan Air Force Base to achieve 5 ppmvd by Hot SCR.
- The levelized costs of NO<sub>x</sub> removal by Hot SCR for the worst case option (ABB GT-24) were estimated in Granite's application as \$9,394 per ton. This assumes: 2,500 hours of operation on natural gas; 500 hours on fuel oil; reduction from 25 to 3.5 ppmvd on gas; and reduction from 42 to 10 ppmvd on fuel oil. The capital costs were estimated at \$28,344,000. Annualized costs were estimated at \$7,405,000.
- In the face of a real requirement to install Hot SCR, a system could be engineered to cool the gases and use the heat in a recuperator of some kind. Additionally a once-through steam generator could accomplish the same end with the generated steam used for steam augmentation. This could increase revenues to defray some of the additional equipment and possibly reduce the cost-effectiveness values.
- While the capital and annualized costs of Hot SCR for the GE and Westinghouse products will be less compared to the ABB product, the levelized costs will be greater. The Department already determined that Hot SCR is not cost-effective for several simple cycle GE 7FA projects that will achieve 9 to 10.5 ppmvd NO<sub>x</sub> without a Hot SCR system.

**APPENDIX BD**  
**BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)**

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- The proposed emission limit of 25 ppmvd NO<sub>x</sub> for the ABB GT-24 option is too high compared with the 10.5 limit for the similar class GE product. The added power and efficiency characteristics of the ABB GT-24 do not justify a BACT for NO<sub>x</sub> more than twice that of the GE product.
- The Department is aware of technical difficulties encountered with Hot SCR at the PREPA project where smaller ABB GT-11 gas turbines were used. The chief problem at PREPA relates to the exclusive use of 0.15 percent sulfur fuel oil. The Department believes that such problems will be minimized for the Granite project by use of natural gas and only occasional use of 0.05 percent sulfur backup fuel oil.
- BACT for the ABB option is determined to be 5 ppmvd by Hot SCR while firing natural gas. Up to 250 hours of fuel oil operation are permitted with the Hot SCR system off (NO<sub>x</sub> equal to 42 ppmvd) and another 250 hours are permitted with the Hot SCR system in operation (NO<sub>x</sub> equal to 10 ppmvd).
- The proposed emission limit of 15 ppmvd for the Westinghouse 501 D5A option is higher than the 10.5 limit for the GE 7FA product. The Department is aware of a Westinghouse 501D5A dual-fuel burner (Mid-Georgia Cogen) that can probably achieve 15 ppmvd of NO<sub>x</sub> when firing gas. BACT for the Granite Westinghouse 501 D5A option is determined to be 15 ppmvd and exclusive use of natural gas. No fuel oil operation is permitted.
- The proposed emission limit of 15 ppmvd for the Westinghouse 501 F option is higher than the 10.5 limit for the similar class GE 7FA product. The Department is not aware of a Westinghouse 501F dual-fuel burner that can achieve 15 ppmvd of NO<sub>x</sub> when firing gas. Region IV has advised the State of Kentucky that a limit of 15 ppmvd (or lower) is required for the Calvert City project which is based on the Westinghouse 501F. BACT for Granite's Westinghouse 501F option is determined to be 15 ppmvd and exclusive use of natural gas. No fuel oil firing is authorized.
- The units will be operated in intermittent duty and simple cycle mode. Therefore control options, which are feasible only for combined cycle units, are not applicable. This rules out Low Temperature (conventional) SCR, which achieves 3.5 ppmvd NO<sub>x</sub> or lower. It also rules out the possibility of SCONO<sub>x</sub>.
- The Department is aware that ABB offers a DLN technology for fuel oil firing applicable to at least certain smaller combustion turbines (ABB-GTX). GE and Mitsubishi are experimenting with DLN technologies on 7FA and 501F units. It is doubtful that this technology would be cost-effective except when fuel oil is the main fuel and where water resources are scarce. The Department will continue to monitor developments in this field.
- It is possible that the NO<sub>x</sub> emissions while firing oil from may be reduced from 42 ppmvd by increasing the water injection rate. In order to address this possibility, a specific condition will be added to conduct appropriate testing and prepare an engineering report. The report will be submitted for the Department's review to ensure that the lowest reliable NO<sub>x</sub> emission rates while firing oil have been achieved.

## APPENDIX BD

### BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

- VOC emissions will initially be set at 3 ppmvd while firing gas and 7.5 while firing fuel oil. The Department will finalize BACT for VOC after Granite advises the Department which specific unit it has selected for the project.
- Granite evaluated the use of an oxidation catalyst to control CO for the project. The oxidation catalyst control system was estimated to increase the capital cost of the project by \$5,839,000 with an annualized cost of \$1,534,000 and a levelized cost of \$3,312 per ton of CO removed. The Department does not necessarily adopt this estimate, but would agree that even lower estimates would not be cost-effective for removal of CO.
- The Department will initially set CO limits achievable by good combustion at full load as 16 ppm (gas) and 20 ppm (oil). The GE, Westinghouse 501 F and ABB-GT-24 models should be capable of easily meeting these values based on the high firing temperatures. The Westinghouse 501D5A should also meet these values based on the experience of the Mid-Georgia Cogen facility. The Department will finalize BACT for CO after Granite advises the Department which specific unit it has selected and after assessing the possible effects on NO<sub>x</sub> control.
- BACT for PM<sub>10</sub> was determined to be good combustion practices consisting of: inlet air filtering; use of pipeline natural gas; use of clean, low ash, low sulfur fuels, and operation of the unit in accordance with the manufacturer-provided manuals. The emission limits for PM<sub>10</sub> will be set at 10 pounds per hour during gas operation and 17 pounds per hour while operating on fuel oil.
- The Department will set a Visible Emission standard of 5 and 10 percent opacity as BACT for natural gas and fuel oil firing, respectively, consistent with the definition of BACT.

POLLUTANT	COMPLIANCE PROCEDURE
PM <sub>10</sub>	Method 5 or 17
Visible Emissions	Method 9
Carbon Monoxide	Annual Method 10 (can use RATA)
NO <sub>x</sub> (performance)	Annual Method 20 (can use RATA if at capacity)
NO <sub>x</sub> (gas - 24-hr block average) (oil - 3-hr block average) CO (24-hr block average)	NO <sub>x</sub> and CO CEMS, O <sub>2</sub> or CO <sub>2</sub> diluent monitor, and flow device as needed. During gas operation, a separate compliance determination is conducted at the end of each operating day and a new average emission rate is calculated from the arithmetic average of all valid hourly emission rates from the previous operating day. A valid hourly emission rate shall be calculated for each hour in which at least two NO <sub>x</sub> or CO concentrations are obtained at least 15 minutes apart. Valid hourly emission rates shall not include periods of start up, shutdown, or malfunction unless prohibited by 62-210.700 F.A.C.
SO <sub>2</sub> and SAM	Custom Fuel Monitoring Schedule



**APPENDIX BD**  
**BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)**

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**DETAILS OF THE ANALYSIS MAY BE OBTAINED BY CONTACTING:**

A. A. Linero, P.E. Administrator \_\_\_\_\_  
New Source Review Section  
Department of Environmental Protection  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Recommended By:

Approved By:

\_\_\_\_\_  
C. H. Fancy, P.E., Chief  
Bureau of Air Regulation

\_\_\_\_\_  
Howard L. Rhodes, Director  
Division of Air Resources Management

\_\_\_\_\_  
Date:

\_\_\_\_\_  
Date:

**APPENDIX BD**  
**BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)**

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**REFERENCES**

- <sup>1</sup> Westinghouse. "Technology Update - Westinghouse Family of Combustion Turbines." March 1998.
- <sup>2</sup> Presentation. Siemens-Westinghouse at EPA Region IV office. Informational Presentation. May 12, 1999.
- <sup>3</sup> ABB Combined Cycle Website. Combustion Turbines. GT24/26 Sequential Combustion. www.abccpp.com.
- <sup>4</sup> Paper. Cohn, A. and Scheibel, J., EPRI. Current Gas Turbine Developments and Future Projects. October 1997.
- <sup>5</sup> Telecom. Linero, A.A., FDEP and Chalfin, J., GE. NO<sub>x</sub> control technology for fuel oil.
- <sup>6</sup> Paper. Mandai, S., et. al., MHI. "Development of Low NO<sub>x</sub> Combustor for Firing Dual Fuel." Mitsubishi Juko Giho, Vol.36 No.1 (1999).
- <sup>7</sup> Compliance Manual. California EPA, CARB Compliance Division. Gas Turbines. June 1996.
- <sup>8</sup> News Release. Catalytica. First Gas Turbine with Catalytica's XONON installed to Produce Electricity at a Utility. October 8, 1998.
- <sup>9</sup> News Release. Catalytica. XONON™ Specified With GE 7FA Gas Turbines For Enron Power Project. December 15, 1999.
- <sup>10</sup> Permit. Florida DEP. KUA Cane Island Unit 3. File PSD-FL-254. November, 1999.
- <sup>11</sup> News Release. Goaline. Genetics Institute Buys SCONOX Clean Air System. August 20, 1999.
- <sup>12</sup> Publication "Control Maker Strives to Sway Utility Skeptics." Air Daily. Volume 5, No. 199. October 14, 1998.
- <sup>13</sup> Telecom. Linero, A.A., FDEP, and Beckham, D., U.S. Generating. Circa November 1998.
- <sup>14</sup> Letter. Haber, M., EPA Region IX to Danziger, R., GLET. SCONOX at Federal Cogeneration. March 23, 1998.
- <sup>15</sup> News Release. ABB Alstom Power, Environmental Segment. ABB Alstom Power to Supply Groundbreaking SCONOX™ Technology. December 1, 1999.
- <sup>16</sup> Letter. Opalinski, M.P., SECI to Linero, A.A., FDEP. Turbines and Related Equipment at Hardee Unit 3. December 9, 1998.
- <sup>17</sup> Reports. Cubix Corporation. "Initial Compliance Reports – Power Block I." February and May, 1999.
- <sup>18</sup> Report. Florida Power & Light. "Final Dry Low NO<sub>x</sub> Verification Testing at Martin Combine Cycle Plant." August 7, 1995.
- <sup>19</sup> Information Release. General Electric Power Systems. MS7001FB Gas Turbine. Power-Gen, November 1999.
- <sup>20</sup> Letter. Smith, W.A., EPA Region IV to Hornback, J.E., Kentucky DEP. Draft PSD/Title V Permit for Calvert City Power I Facility. August 23, 2000.
- <sup>21</sup> Letter. W. Jeffrey Pardue, FPC to Sheplak, S., FDEP. Draft Title V Permit – Hines Energy Complex. February
- <sup>22</sup> Telecom. Linero, A.A., FDEP, and Mid-Georgia Cogen personnel. D5A Combustors. February 7, 2000.
- <sup>23</sup> Article. Jeffs, E., European Editor. "ABB Alstom Takes New England Market by Storm." Turbomachinery. November/December, 1999.
- <sup>24</sup> Telecom. Linero, A.A., FDEP, and Windham, E., ABB Environmental. SCONOX and GT Line of Combustion Turbines. February 28, 2000.
- <sup>25</sup> ABB Combined Cycle Website. Combustion Turbines. Environmental Burner. www.abccpp.com.

Florida Department of  
Environmental Protection

Memorandum

TO: Clair Fancy

FROM: Al Linero *aal* 4/12

DATE: April 12, 2000

SUBJECT: Hardee County Generation Facility  
Three 120-180 MW Combustion Turbines  
DEP File No. 0490044-001-AC (PSD-FL-281)

Attached is the public notice package for construction of three dual-fuel, intermittent duty, simple cycle, 120-180 MW combustion turbines and one 1.5 million gallon fuel oil storage tank at the planned Hardee Generation Facility.

The applicant presented four scenarios (turbine models) each of which consists of three combustion turbines. The possible models are 170 MW GE 7FA, 120 MW Westinghouse 501D5A, 170 MW Westinghouse 501F, 170 MW GE 7FA, and 180 MW ABB GT-24. Because the capabilities of these machines vary greatly, the BACT determinations are different.

Nitrogen Oxides (NO<sub>x</sub>) emissions from the GE 7FA units will be controlled by Dry Low NO<sub>x</sub> (DLN-2.6). The applicant proposed an NO<sub>x</sub> emission limit of 10.5 ppmvd @15% O<sub>2</sub>. We are requiring compliance on a continuous (24-hour average) basis. The use of fuel oil will be allowed up to 500 hours per year per unit in recognition of the low simple cycle NO<sub>x</sub> limit on gas. NO<sub>x</sub> from the Westinghouse 501D5A and 501F units will be controlled by DLN to 15 ppmvd. No fuel oil will be allowed. NO<sub>x</sub> from the ABB GT-24 unit will be controlled by Hot SCR to 5 ppmvd. Fuel oil will be allowed for 500 hours per year as requested.

The NO<sub>x</sub> limits and fuel oil usage proposed for the GE and Westinghouse units are consistent with our recent determinations. For example, the Dynegy Palmetto Project permit allows no fuel oil use but allows 15 ppmvd NO<sub>x</sub>. We have issued several permits for GE 7FA units with limits at 10.5 and less than 1000 hours of fuel oil use. There is no remedy but to install SCR on the ABB GT-24 unit because (like the Lakeland 501G simple cycle project) it can achieve only 25 ppmvd without add-on control.

Although different values were requested for CO, PM, and VOC for the different models, we propose the same values for all machines. They are tight enough to be recognized as BACT, but (in my opinion) are achievable by all of the proposed units.

I recommend your approval of the attached Intent to Issue.

AAL/al  
Attachments

*Note: This permit application is at ~Day 16 as of 4/12/00.*  
*aal*



# Department of Environmental Protection

Jeb Bush  
Governor

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

David B. Struhs  
Secretary

## P.E. Certification Statement

**Permittee:**

DEP File No. 0490044-001-AC (PSD-FL-281)

Granite Power Partners II, L.P.  
Hardee County Generation Facility  
Hardee County

**Project type:**

Project is construction of three gas and oil-fired simple cycle combustion turbine-electrical generators with 100-foot stacks, a natural gas-fired heater, and one 1.5-million gallon storage tank. The manufacturer and model of the units have not yet been selected. The options are General Electric 7FA (170 MW), Westinghouse 501D5A (120 MW), Westinghouse 501F (170 MW) or ABB Alstom GT-24 (180 MW). The combustion turbines operate a maximum of 3,000 hours per year per unit of which 0-500 hours (depending on the manufacturer and model) per year per unit may be on No. 2 distillate fuel oil.

Depending on the manufacturer, model, and the control equipment, the units must meet a limit of 5 to 15 parts per million by volume, dry, at 15% oxygen (ppmvd) while burning natural gas. The units must meet 42 ppmvd by wet injection (or 10 ppmvd by selective catalytic reduction) when burning fuel oil. Other pollutants, including particulate matter (PM/PM<sub>10</sub>), carbon monoxide, volatile organic compounds, sulfur dioxide, and sulfuric acid mist will be controlled by good combustion and use of clean fuels.

Projected impacts from the proposed project emissions are all less than the applicable significant impact limits corresponding to the nearest PSD Class I (Chassahowitzka National Wilderness Area) and Class II areas.

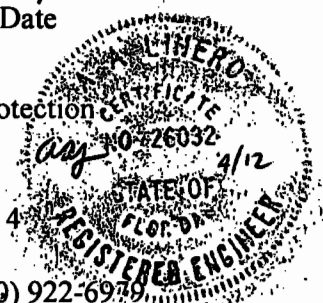
***I HEREBY CERTIFY*** that the engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204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

4/12/00  
Date

A. A. Linero, P.E.  
Registration Number: 26032

Department of Environmental Protection  
Bureau of Air Regulation  
New Source Review Section  
111 South Magnolia Drive, Suite 4  
Tallahassee, Florida 32301

Phone: (850) 921-9523, Fax: (850) 922-6979





# FAX Cover Sheet

USEPA - Region 4  
61 Forsyth St., SW  
Atlanta, Georgia 30303

TO: ~~AL Limero~~  
FDEP

FAX #: 850-922-6979

RE: Granite Power Partners II

FAX To: Granite/  
Mike Vogt L.S. Power  
314/993-2790  
  
& Tom Davis ECT  
314/332-6722

Mr. Vogt  
(Please develop responses during comment period. We will evaluate EPA's comments later since the Draft is about ready & we already deemed the application as complete)  
Al Lim

FROM: Katy Forney  
Air Permits Section, Region 4 USEPA

Phone #: 404-562-9130

Date: 4-12-00

# of Pages (including cover): 3

### COMMENTS:

Sorry for the Delay, Katy

If this FAX is poorly received, please call  
Katy Forney: 404-562-9130



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

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

APR 12 2000

4APT-ARB

A. A. Linero, P.E.  
Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

SUBJ: PSD Permit Application for Granite Power Partners II  
Hardee County Generating Facility located near Wauchula, FL

Dear Mr. Linero:

Thank you for sending the prevention of significant deterioration (PSD) permit application for the Granite Power Partners II - Hardee County Generating Facility dated January 19, 2000. The PSD permit application is for the proposed construction and operation of three simple cycle combustion turbines (CTs) with a total nominal generating capacity of 540 megawatts (MW). One of following four types of turbines is being considered for installation at the Granite Power facility: GE 7FA, Siemens Westinghouse 501F, Siemens Westinghouse 501D5A, and ABB GT-24. The CTs will combust pipeline quality natural gas as the primary fuel and distillate fuel oil as a backup fuel. As proposed, the CTs will be allowed to operate 3,000 hours per year with up to 500 hours per year firing fuel oil. Total emissions from the proposed project are above the thresholds requiring PSD review for nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), volatile organic compounds (VOC) and particulate matter (PM/PM<sub>10</sub>).

Based on our review of the PSD permit application for Granite Power, we have the following comments:

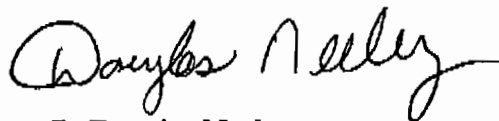
1. The applicant proposed a best available control technology (BACT) NO<sub>x</sub> emission limit of 25 ppmvd (15% oxygen) for natural gas firing if the ABB GT-24 turbines are installed. BACT NO<sub>x</sub> emission limits for most recent simple cycle projects in Region 4 and elsewhere are well below 25 ppmvd while firing natural gas. Our conclusion is that the NO<sub>x</sub> BACT emission rate should be much less than 25 ppmvd regardless of the turbine model selected by the applicant.
2. In Appendix D of the PSD permit application, the formaldehyde emission factor seems to originate from Chapter 1 of AP-42 Supplement D. Chapter 1 discusses external combustion sources, while Chapter 3 discusses stationary internal combustion sources (including CTs) and is more appropriate for estimating emissions from combustion turbines.

2

3. In the economic analyses, the cost of SCR and catalytic oxidation are evaluated based on 3,000 hours of operation per year. This operational limit needs to be included in the draft PSD permit as the maximum number of hours/year a single CT can operate for these analyses to remain valid.
4. The proposed BACT for particulate matter (PM<sub>10</sub>) is between 10 and 20% opacity for visible emissions (depending on which turbine manufacturer is chosen). This visible emissions opacity limit is proposed as a surrogate for a BACT particulate matter emissions rate limit. It is acceptable to use the 10 - 20% opacity limit as a surrogate for monitoring and recordkeeping; however, the permit conditions should also list the corresponding emission rate for particulate matter (i.e., 9.9 lb/hr for natural gas, 18.7 lb/hr for fuel oil.)

Thank you for the opportunity to comment on the PSD permit application for the Granite Power Partners II facility in Hardee County, FL. If you have any questions regarding these comments, please direct them to either Katy Forney at 404-562-9130 or Jim Little at 404-562-9118.

Sincerely,



R. Douglas Neeley  
Chief  
Air and Radiation Technology Branch  
Air, Pesticides and Toxics  
Management Division



Environmental Consulting & Technology, Inc.

RECEIVED

March 24, 2000  
ECT No. 990869-0100

MAR 27 2000

SENT BY OVERNIGHT MAIL ON 3/24/00

BUREAU OF AIR REGULATION

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

notebook  
on shelf

Re: DEP File No. 0490044-001-AC (PSD-FL-281)  
Hardee County Generation Facility  
Three Simple Cycle Combustion Turbines

Dear Mr. Linero:

On behalf of Granite Power Partners II, L.P. and in response to your February 16, 2000 letter, please find enclosed four copies of an analysis of air quality impacts at the Chassahowitzka National Wildlife Refuge for the proposed Hardee County Generation Facility (HCGF).

Your continued expeditious processing of the HCGF project will be appreciated. Please contact me at 352/332-6230, Ext.351, if there are any further questions.

Sincerely,

ENVIRONMENTAL CONSULTING & TECHNOLOGY, INC.

Thomas W. Davis, P.E.  
Principal Engineer

Enclosures

cc: Mr. Michael F. Vogt, GPP

HARDEE County  
Generation Facility  
0490044-001-AC  
PSD-FL-281

3 simple cycle  
combustion turbines  
3/24/00

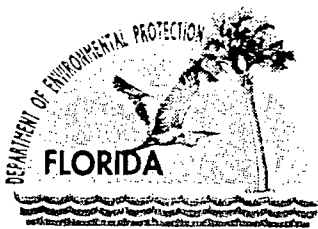
ECT 990869-0100

3701 Northwest  
98th Street  
Gainesville, FL  
32606

(352)  
332-0444

FAX (352)  
332-6722





Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

February 16, 2000

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Mr. Michael F. Vogt, Project Manager  
Granite Power Partners II, LP  
655 Craig Road, Suite 336  
St. Louis, Missouri 63025

Re: DEP File No. 0490044-001-AC (PSD-FL-281)  
Three Simple Cycle Combustion Turbines, Hardee County  
Receipt of Application

Dear Mr. Vogt:

On January 20, 2000, the Department advised you that the referenced application is incomplete. It is still incomplete. We requested certain specific information regarding the performance characteristics of the ABB and Siemens-Westinghouse units under consideration for this project. We believed we had sufficient information regarding the General Electric product.

The following modeling requirements are also needed to process this application. These were discussed with Mr. Tom Davis on February 4. Granite needs to conduct regional haze, increment, and deposition analyses, utilizing the CALPUFF dispersion model, to determine impacts at the Chassahowitzka NWR. These analyses should follow the guidelines recommended in the EPA document entitled, Interagency Workgroup on Air Quality Modeling (IWAQM) Phase 2 Summary and Recommendation for Modeling Long Range Transport Impacts.

Once we receive these analyses from you, we intend to process the application with whatever combustion turbine information we have at that time. If we issue an Intent with a draft permit and a draft Best Available Control Technology determination based on the information we have, you will still have an opportunity to comment and provide additional details should you disagree with our determination. Please advise if you disagree with this approach.

Attached is the communication we received from the Fish and Wildlife Service. They may provide a more detailed review. We will forward it to you when received.

The meteorologist reviewing the modeling is Chris Carlson. He can be reached at 850/921-9537. If you have any other questions regarding this matter, please call me at 850/921-9523.

Sincerely

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

CC: Gregg Worley, EPA  
John Bunyak, NPS  
Bill Thomas, DEP SWD  
Tom Davis, ECT

Z 031 391 865

US Postal Service  
**Receipt for Certified Mail**

No Insurance Coverage Provided.  
Do not use for International Mail (See reverse)

Sent by <i>Michael Vogt</i>	
Street & Number <i>Granite Power P</i>	
Post Office, State & ZIP Code <i>St. Louis, MO</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date <i>2-17-00</i>	
<i>0490044-001-AC</i>	
<i>PSD-FI-281</i>	

PS Form 3800, April 1995

Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- 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.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:  
*Mr. Michael Vogt, P. Mgr.*  
*Granite Power Partners*  
*655 Craig Rd Ste 336*  
*St. Louis, MO 63035*

4a. Article Number  
*Z 031 391 865*

4b. Service Type

Registered  Certified

Express Mail  Insured

Return Receipt for Merchandise  COD

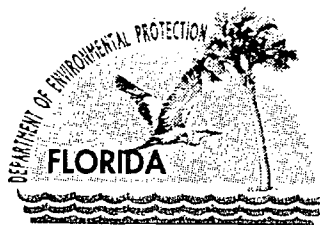
7. Date of Delivery  
*2-22-00*

5. Received By: (Print Name)  
*Crystal Abernathy*

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

6. Signature: (Addressee or Agent)  
*X [Signature]*

Thank you for using Return Receipt Service.



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

January 20, 2000

## CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Michael F. Vogt, Project Manager  
Granite Power Partners II, LP  
655 Craig Road, Suite 336  
St. Louis, Missouri 63025

Re: DEP File No. 0490044-001-AC (PSD-FL-281)  
Three Simple Cycle Combustion Turbines, Hardee County  
Receipt of Application

Dear Mr. Vogt:

On January 18, 2000, the Department received your application with sufficient fee for an air construction permit for three simple cycle combustion turbines to be located in Hardee County, Florida. We are reviewing the application for completeness and forwarded copies to EPA Region IV in Atlanta, the Fish and Wildlife Service Air Quality Branch, and our District office in Tampa for comments. We will provide you with a request for additional information (if such is needed) by February 16.

We have identified some key issues that will need to be resolved prior to issuance of a permit. The main one is that we do not have sufficient information in the application (or in our files) regarding the performance of the ABB and Siemens Westinghouse combustion turbines to establish reasonable assurance consistent with Rule 62-4.070, F.A.C., Standards for Issuing or Denying Permit. The vendor information in the application for these products appears to be from combined cycle applications. If they are also applicable to simple cycle units, please note that they suggest that values as low as 9 ppmvd of NO<sub>x</sub> are possible with the ABB product and that values between 6 and 9 ppmvd are available from Siemens Westinghouse for the 501F product.

Recently EPA Region IV, (who will also review this application) objected to issuance of a joint PSD-Title V permit for the Calvert City Power I Simple Cycle Project in Kentucky. A limit of 25 ppmvd was proposed for NO<sub>x</sub> when using the Siemens Westinghouse 501F product. A similar challenge can be expected if this Department were to issue a similar permit with such limits for the ABB product.


It is our understanding that Westinghouse can probably achieve 15 ppmvd NO<sub>x</sub> on a unit that burns only gas. Several permit applications have been submitted on that premise (Dynergy in Georgia and in Florida). However we still lack reasonable assurance that this is possible within the time frame suggested by your application. We will need to discuss this matter with your consultant and manufacturer's representatives.

Michael F. Vogt  
January 20, 2000  
Page 2

It is possible that hot SCR will be required for the Siemens Westinghouse or ABB options. If the gas temperatures are considered to be too high (even for hot SCR), a design will need to be developed to reduce the gas temperatures somewhat. Some of the heat removed can probably be used to pre-heat incoming fuel or in some other manner to "recuperate" some energy, thus resulting in greater efficiency.

We look forward to receiving the requested information soon so that processing is not delayed due to incompleteness on these issues. The meteorologist reviewing the modeling is Chris Carlson. He can be reached at 850/921-9537. I am reviewing the technical portions of the application. If you have any questions regarding this matter, please call me at 850/921-9523.

Sincerely



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

CC: Gregg Worley, EPA  
John Bunyak, NPS  
Bill Thomas, DEP SWD

Z 031 391 920

US Postal Service  
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Michael Vost	
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St. Louis MO	
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PS Form 3800 April 1995

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 Granite Power Partners  
 655 Craig Rd - Suite 336  
 St. Louis, MO  
 63025

4a. Article Number  
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 Jerry Carlson

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**LS POWER, LLC**

655 Craig Road, Suite 336  
St. Louis, Missouri 63141  
(314) 993-2700 • Fax: (314) 993-2790

**Michael F. Vogt**  
Project Manager

**RECEIVED**

JAN 18 2000

BUREAU OF AIR REGULATION

January 13, 2000

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

Re: Hardee County Generating Facility  
Simple-Cycle Combustion Turbine Power Project  
Air Construction Permit Application

0490044-001-AC  
PSD-FI-281

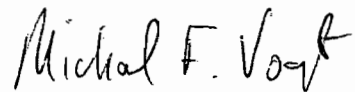
Dear Mr. Linero:

Granite Power Partners II, L.P. (GPP) is planning to construct and operate three simple-cycle combustion turbine generators (CTGs) at a site located in Hardee County, Florida. The proposed power plant, called the Hardee County Generation Facility (HCGF), will be situated approximately 5 miles west of Wachula near the intersection of Vandolah Road and Fort Green Ona Road, adjacent to the existing Vandoalah Substation. Selection of the particular CTGs that will be installed at the HCGF has not been finalized. The specific CTGs under consideration, and for which permit approval is requested, include nominal 170-megawatt (MW) General Electric 7FA units, nominal 170-MW Siemens Westinghouse 501F units, nominal 120-MW Siemens Westinghouse 501D5A units, and nominal 180-MW ABB Power Generation GT 24 units. The HCGF simple-cycle CTGs will be fired primarily with pipeline quality natural gas. Low-sulfur distillate fuel oil will serve as a back-up fuel source.

Four copies of an Application for Air Permit – Title V Source, together with a check in the amount of \$7,500 as payment of the required permit processing fee, are enclosed. Your expeditious processing of the Hardee County Generation Facility air permit application will be appreciated.

Should you have any questions, please do not hesitate to contact me at (314) 993-2700

Sincerely,

A handwritten signature in black ink that reads "Michael F. Vogt". The signature is written in a cursive style with a large, stylized 'V'.

Michael F. Vogt

Enclosures

cc: NPS  
EPA  
SWD

1894

**GRANITE POWER PARTNERS II LP**

TWO TOWER CENTER, 20TH FLOOR  
EAST BRUNSWICK, NJ 08816

PNC BANK, N.A.  
NEW JERSEY 060  
55-760-312

Jan 6, 2000

\*\*\*\*\*\$7,500.00\*

Memo:

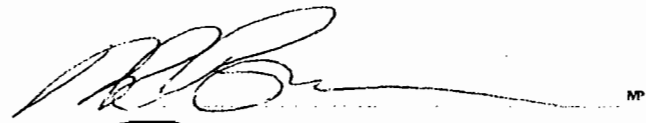
PAY Seven Thousand Five Hundred and 0/100 Dollars

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OF:



080931/02-97

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FLORIDA DEP

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Check Number: 1894

Check Date: Jan 6, 2000

Check Amount: \$7,500.00

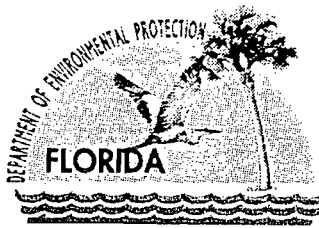
Discount Taken      Amount Paid

Item to be Paid - Description

PSD Air  
Permit

7,500.00





# Department of Environmental Protection

Jeb Bush  
Governor

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

David B. Struhs  
Secretary

January 19, 2000

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

Re: Granite Power Partners II  
Hardee County Generating Facility - Simple Cycle Project  
DEP File No. 0490044-001-AC (PSD-FL-281)

Dear Mr. Bunyak:

Enclosed for your review and comment is an application for the proposed Granite Power Partners II (GPP) facility in Hardee County. This facility will be comprised of three simple cycle combustion turbines generating up to 540 nominal megawatts. The project also includes a 1.5 million gallon fuel oil storage tank and ancillary equipment. GPP proposes 3,000 hours of operation per unit and requests up to 500 hours of 0.05 percent sulfur No. 2 distillate fuel oil use per unit within the 3,000 hours. GPP requests a permit allowing them to use one of four possible equipment manufacturers.

The site is approximately 138 kilometers southeast of the Chassahowitzka National Wildlife Area. The applicant proposes NO<sub>x</sub> emissions at between 10.5 and 25 ppmvd (depending on manufacturer) on natural gas and 42 ppmvd on fuel oil. Maximum annual emissions are presented below and are based on the combustion turbine supplier with the highest emission characteristics.

Pollutant	Proposed Facility Emissions (tons per year)
NO <sub>x</sub>	950
SO <sub>2</sub>	108
CO	518
PM/PM <sub>10</sub>	126
VOC	74
Sulfuric Acid Mist	14

We would especially appreciate receiving your comments during the application review period rather than during the review of the draft permit. Your comments can be forwarded to my attention at the letterhead address or faxed to me at (850) 922-6979. If you have any questions, please contact me at (850) 921-9523.

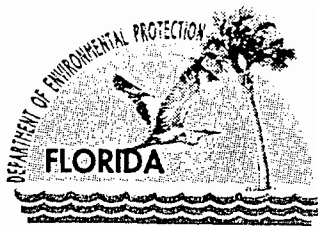
Sincerely,

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

AAL/kt

Enclosure

*"Protect, Conserve and Manage Florida's Environment and Natural Resources"*



# Department of Environmental Protection

Jeb Bush  
Governor

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

David B. Struhs  
Secretary

January 19, 2000

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

Re: Granite Power Partners II  
Hardee County Generating Facility - Simple Cycle Project  
DEP File No. 0490044-001-AC (PSD-FL-281)

Dear Mr. Worley:

Enclosed for your review and comment is an application for the proposed Granite Power Partners II (GPP) facility in Hardee County. This facility will be comprised of three simple cycle combustion turbines generating up to 540 nominal megawatts. The project also includes a 1.5 million gallon fuel oil storage tank and ancillary equipment. GPP proposes 3,000 hours of operation per unit and requests up to 500 hours of 0.05 percent sulfur No. 2 distillate fuel oil use per unit within the 3,000 hours. GPP requests a permit allowing them to use one of four possible equipment manufacturers.

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Sincerely,

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

AAL/kt

Enclosure

*"Protect, Conserve and Manage Florida's Environment and Natural Resources"*

File Copy

**HARDEE COUNTY GENERATION FACILITY  
AIR CONSTRUCTION  
PERMIT APPLICATION**

**RECEIVED**

JAN 18 2000

BUREAU OF AIR REGULATION

**Prepared for:**

**GRANITE POWER PARTNERS II, L.P.  
St. Louis, Missouri**

**Prepared by:**

***ECT***

***Environmental Consulting & Technology, Inc.***  
3701 Northwest 98<sup>th</sup> Street  
Gainesville, Florida 32606

**ECT No. 990869-0100**

**January 2000**

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## 1.0 INTRODUCTION AND SUMMARY

### 1.1 INTRODUCTION

Granite Power Partners II, L.P. (GPP), is planning to construct and operate three simple-cycle combustion turbine generators (CTGs) at a site located in Hardee County, Florida. The proposed power plant, called the Hardee County Generation Facility (HCGF), will be situated approximately 5 miles west of Wachula near the intersection of Vandolah Road and Fort Green Ona Road, adjacent to the existing Vandolah Substation. Selection of the particular CTGs that will be installed at the HCGF has not been finalized. The specific CTGs under consideration, and for which permit approval is requested, include nominal 170-megawatt (MW) General Electric (GE) 7FA units, nominal 170-MW Siemens Westinghouse 501F units, nominal 120-MW Siemens Westinghouse 501D5A units, and nominal 180-MW ABB Power Generation GT-24 units. The HCGF simple-cycle CTGs will be fired primarily with pipeline quality natural gas. Low-sulfur distillate fuel oil will serve as a back-up fuel source.

Compared to baseload operations, CTG air exhaust emission levels can increase at low-load conditions. HCGF emissions associated with low-load operation will be mitigated by operating the CTGs at loads no lower than 50 percent, excluding periods of startups, shutdowns, and malfunctions. The simple-cycle CTGs will each operate a total of 3,000 hours per year (hr/yr) at baseload operation for natural gas and oil firing, with a maximum of 500 hr/yr for oil firing. Part load operation will be conducted for the Siemens Westinghouse and ABB Power Generation units at partial loads as low as 50 percent for no greater than 500 hr/yr while natural gas firing.

Operation of the proposed project will result in airborne emissions. Therefore, a permit is required prior to the beginning of facility construction, per Rule 62-212.300(1)(a), Florida Administrative Code (F.A.C.). This report, including the required permit application forms and supporting documentation included in the appendices, constitutes GPP's application for authorization to commence construction in accordance with the Florida Department of Environmental Protection (FDEP) permitting rules contained in Chapter 62-212, *et seq.*, F.A.C.

The HCGF will be located in an area classified as attainment for all criteria pollutants and will have potential emissions of a regulated pollutant in excess of 250 tons per year (tpy). Accordingly, the HCGF is classified as a new major source and is subject to the prevention of significant deterioration (PSD) new source review (NSR) requirements of Section 62-212.400, F.A.C. Therefore, this report and application are also submitted to satisfy the permitting requirements contained in the FDEP PSD rules and regulations.

This report is organized as follows:

- Section 1.2 provides an overview and summary of the key regulatory determinations.
- Section 2.0 describes the proposed facility and associated air emissions.
- Section 3.0 describes national and state air quality standards and discusses applicability of NSR procedures to the proposed project.
- Section 4.0 describes the PSD NSR review procedures.
- Section 5.0 provides an analysis of best available control technology (BACT).
- Sections 6.0 (Dispersion Modeling Methodology) and 7.0 (Dispersion Modeling Results) address ambient air quality impacts.
- Section 8.0 discusses current ambient air quality in the vicinity of the HCGF and preconstruction ambient air quality monitoring.
- Section 9.0 addresses other potential air quality impact analyses.
- Section 10.0 lists the references used in preparing the report.

Appendices A through D provide the FDEP Application for Air Permit—Long Form, CTG vendor emissions data, control system vendor quote, and emission rate calculations, respectively. All dispersion modeling input and output files for the ambient impact analysis are provided in diskette format in Appendix E.

## 1.2 SUMMARY

The HCGF will consist of three simple-cycle CTGs. The CTGs will be fired primarily with pipeline-quality natural gas containing no more than 2.0 grains of total sulfur per 100 standard cubic feet (gr S/100 scf). Low sulfur (containing no more than 0.05 weight percent sulfur [wt%S]) will serve as a back-up fuel source.

The planned construction start date for the HCGF is 4<sup>th</sup> quarter 2000. The projected date for the facility to begin commercial operation is 4<sup>th</sup> quarter 2001, following initial equipment start-up and completion of required performance testing.

Based on an evaluation of anticipated worst-case annual operating scenarios for all CTGs under consideration, the HCGF will have the potential to emit 946 tpy of nitrogen oxides (NO<sub>x</sub>), 515 tpy of carbon monoxide (CO), 125 tpy of particulate matter/particulate matter less than or equal to 10 micrometers (PM/PM<sub>10</sub>), 108 tpy of sulfur dioxide (SO<sub>2</sub>), and 73 tpy of volatile organic compounds (VOCs). Regarding noncriteria pollutants, the HCGF will potentially emit 14.0 tpy of sulfuric acid (H<sub>2</sub>SO<sub>4</sub>) mist and trace amounts of heavy metals and organic compounds associated with distillate fuel oil combustion. Based on these annual emission rate potentials, NO<sub>x</sub>, CO, PM/PM<sub>10</sub>, SO<sub>2</sub>, VOCs, and H<sub>2</sub>SO<sub>4</sub> mist emissions are subject to PSD review.

As presented in this report, the analyses required for this permit application resulted in the following conclusions:

- The use of good combustion practices and clean fuels is considered to be BACT for PM/PM<sub>10</sub>. The CTGs will use the latest commercially proven burner technologies to maximize combustion efficiency and minimize PM/PM<sub>10</sub> emission rates and will be fired with pipeline-quality natural gas and low-sulfur, low-ash distillate fuel oil.
- Advanced burner design and good operating practices to minimize incomplete combustion are proposed as BACT for CO. At baseload operation during natural gas and distillate fuel oil firing, the CT CO exhaust concentrations are projected to be 12 and 23 parts per million by dry volume (ppmvd), respectively, for the GE 7FA units. For the Siemens Westing-

house 501F units, CT CO exhaust concentrations are projected to be 16 and 20 ppmvd, respectively, during natural gas and distillate fuel oil firing at baseload operations. For the Siemens Westinghouse 501D5A units, CT CO exhaust concentrations are projected to be 10 and 28 ppmvd, respectively, during natural gas and distillate fuel oil firing at baseload operations. At baseload operation during natural gas and distillate fuel oil firing, CT CO exhaust concentrations are projected to be 6 and 25 ppmvd, respectively, for the ABB GT-24 units. These concentrations are consistent with prior FDEP BACT determinations for CTGs. The cost effectiveness of CO oxidation catalyst control systems was determined to be \$3,312 per ton of CO controlled. Because this cost exceeds levels previously determined by FDEP to be cost effective, installation of a CO oxidation catalyst control system is considered economically unreasonable.

- BACT for SO<sub>2</sub> and H<sub>2</sub>SO<sub>4</sub> mist will be achieved through the use of low-sulfur, pipeline-quality natural gas containing no more than 2.0 gr S/100 scf and distillate fuel oil containing no more than 0.05 wt%S.
- Dry low-NO<sub>x</sub> (DLN) burner technology is proposed as BACT for NO<sub>x</sub> for the HCGF CTGs during natural gas firing. For all normal operating loads, the CT NO<sub>x</sub> exhaust concentration will not exceed 10.5 ppmvd, corrected to 15-percent oxygen for the GE 7FA units. For the Siemens Westinghouse 501F and 501D5A units, the CT NO<sub>x</sub> exhaust concentration will not exceed 15 ppmvd, corrected to 15-percent oxygen for all normal operating loads. For all normal operating loads, the CT NO<sub>x</sub> exhaust concentration will not exceed 25 ppmvd, corrected to 15-percent oxygen for the ABB GT-24 units. These concentrations are consistent with prior FDEP BACT determinations for simple cycle CTGs fired with natural gas.
- During distillate fuel oil firing, wet injection will be employed to reduce the CT NO<sub>x</sub> exhaust concentration to 42 ppmvd, corrected to 15-percent oxygen, for all CTGs under consideration. This concentration is consistent with prior FDEP BACT determinations for simple-cycle CTGs fired with distillate fuel oil.



- The cost effectiveness of high temperature selective catalytic reduction (SCR) control systems was determined to be \$9,394 per ton of NO<sub>x</sub> controlled. Because this cost exceeds levels previously determined by FDEP to be cost effective, installation of high temperature SCR control systems is considered economically unreasonable.
- The HCGF is projected to emit NO<sub>x</sub>, CO, PM/PM<sub>10</sub>, SO<sub>2</sub>, VOC, and H<sub>2</sub>SO<sub>4</sub> mist in greater than significant amounts. The ambient impact analysis demonstrates that project impacts will be below the PSD *de minimis* monitoring significance levels for these pollutants. Accordingly, the HCGF qualifies for the Section 62-212.400, Table 212.400-3, F.A.C., exemption from PSD pre-construction ambient air quality monitoring requirements for all PSD pollutants.
- The ambient impact analysis demonstrates that project impacts for the pollutants emitted in significant amounts will be below the PSD significant impact levels defined in Rule 62-210.200(260), F.A.C. Accordingly, a multi-source interactive assessment of national ambient air quality standards (NAAQS) attainment and PSD Class I and II increment consumption was not required.
- Based on refined dispersion modeling, the HCGF will not cause nor contribute to a violation of any NAAQS, Florida ambient air quality standards (AAQS), or PSD increment for Class I or Class II areas.
- The ambient impact analysis also demonstrates that project impacts will be well below levels that are detrimental to soils and vegetation and will not impair visibility.
- The nearest PSD Class I area (Chassahowitzka National Wildlife Refuge [NWR]) is located approximately 138 kilometers (km) northwest of the project site. Air quality and visibility impacts on this Class I area will be negligible.

## 2.0 DESCRIPTION OF THE PROPOSED FACILITY

### 2.1 PROJECT DESCRIPTION, AREA MAP, AND PLOT PLAN

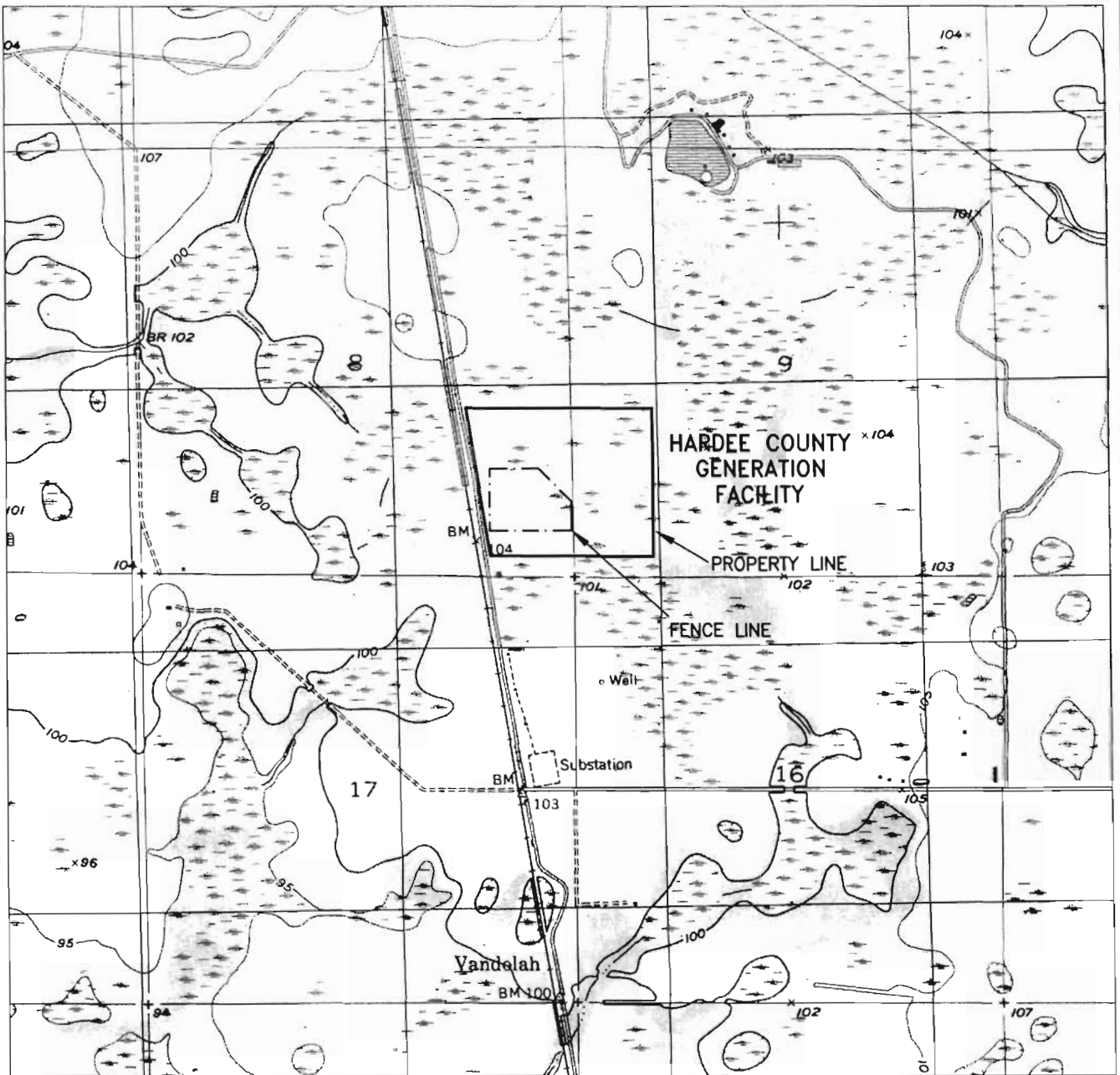
The HCGF is situated approximately 5 miles west of Wauchula in northwestern Hardee County, Florida. Figure 2-1 provides portions of a U.S. Geological Survey (USGS) topographical map showing the HCGF site location, property boundaries, and nearby prominent geographical features.

The proposed Project consists of three, simple-cycle CTGs capable of producing a net nominal generating capacity of 540 MW of electricity. The CTGs will be fired primarily with pipeline quality natural gas. Low-sulfur distillate fuel oil will serve as a back-up fuel source. Ancillary equipment includes one 10 million British thermal units per hour (MMBtu/hr) natural gas-fired heater and a 1.5-million-gallon No. 2 fuel oil storage tank.

The simple-cycle CTGs will operate a total of 3,000 hr/yr at baseload operation for natural gas and oil firing, with a maximum of 500 hr/yr for oil firing. Part load operation will be conducted for the Siemens Westinghouse and ABB Power Generation units at partial loads as low as 50 percent for no greater than 500 hr/yr while natural gas firing. Compared to baseload operations, CTG air contaminant exhaust concentrations can increase at low-load conditions. HCGF emissions associated with low-load operation will be mitigated by operating the CTGs at loads no lower than 50 percent, excluding periods of startups, shutdowns, and malfunctions.

Combustion of natural gas and distillate fuel oil in the CTGs will result in emissions of PM/PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, VOCs, and H<sub>2</sub>SO<sub>4</sub> mist. Emission control systems proposed for the simple-cycle CTGs include the use of DLN combustors (natural gas firing) and water injection (distillate fuel oil firing) for control of NO<sub>x</sub>; good combustion practices for abatement of CO and VOCs; and use of clean, low-sulfur, low-ash natural gas and distillate fuel oil to minimize PM/PM<sub>10</sub>, SO<sub>2</sub>, and H<sub>2</sub>SO<sub>4</sub> mist emissions.

A site plan showing the existing CTGs, major process equipment and structures, and the emission points are provided in Figure 2-2. Primary access to the HCGF is from Fort



SOURCE: USGS Quad: FT Green, FL, 1987.

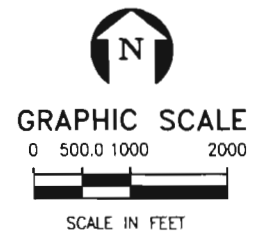


FIGURE 2-1.  
HARDEE COUNTY GENERATION FACILITY

Source: USGS Quad: Fort Green, FL, 1987.

**ECT**  
Environmental Consulting & Technology, Inc.

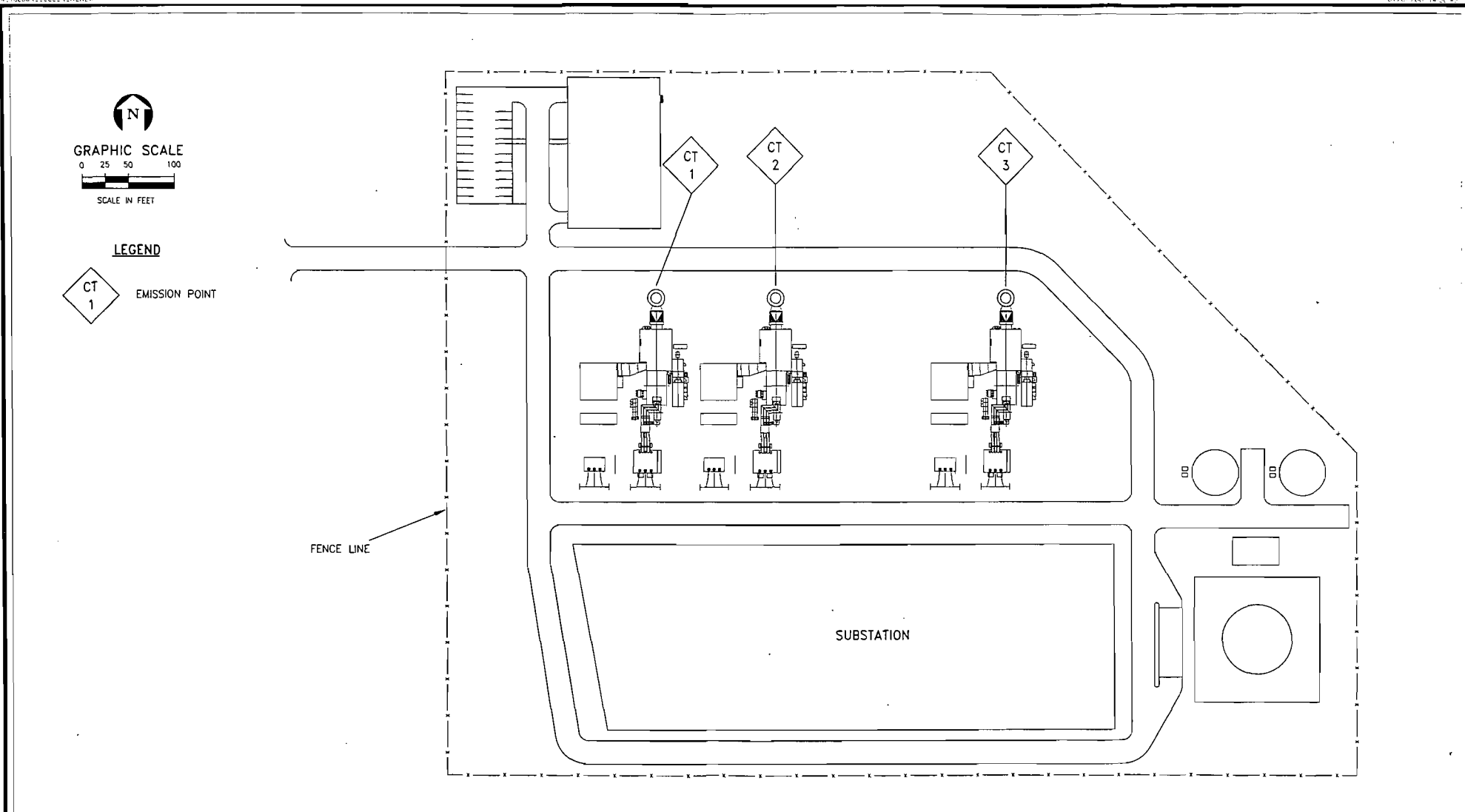


FIGURE 2-2.  
HARDEE COUNTY GENERATION FACILITY SITE PLAN

Source: ECT, 1999.

Green Ona Road on the west side of the site. The HCGF entrance will have security to control site access.

## **2.2 PROCESS DESCRIPTION AND PROCESS FLOW DIAGRAM**

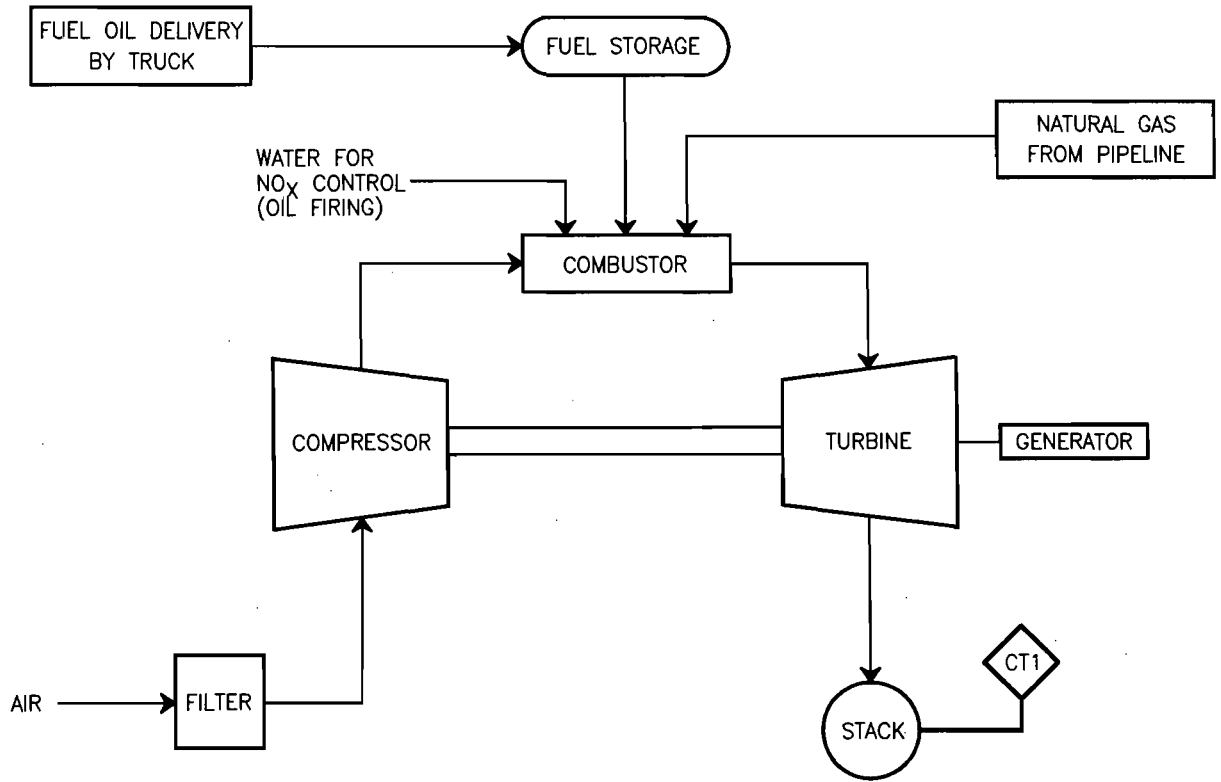
The proposed Project will include three nominal 170-MW GE 7FA or Siemens Westinghouse 501F, nominal 120-MW Siemens Westinghouse 501D5A, or nominal 180-MW ABB Power Generation GT-24 simple-cycle CTGs. Figure 2-3 presents a process flow diagram of the Project.

CTGs are heat engines that convert latent fuel energy into work using compressed hot gas as the working medium. CTGs deliver mechanical output by means of a rotating shaft used to drive an electrical generator, thereby converting a portion of the engine's mechanical output to electrical energy. Ambient air is first filtered and then compressed by the CTGs' compressors. The CTGs' compressors increase the pressure of the combustion air stream and also raises its temperature. The compressed combustion air is then combined with natural gas fuel or distillate fuel oil and burned in the CTGs' high-pressure combustors to produce hot exhaust gases. These high-pressure, hot gases next expand and turn the CTGs' turbines to produce rotary shaft power, which is used to drive an electric generator as well as the CTGs combustion air compressor.

Normal operation is expected to consist of the CTGs operating at baseload. HCGF emissions associated with low-load operation will be mitigated by operating the CTGs at loads no lower than 50 percent, excluding periods of startups, shutdowns, and malfunctions.

Rule 62-210.700(1), F.A.C., allows for excess emissions due to start-up, shut-down, or malfunction for no more than 2 hours in any 24-hour period unless specifically authorized by FDEP for a longer duration.

The CTGs will utilize DLN combustion technology and water injection to control NO<sub>x</sub> air emissions. The use of low-sulfur natural gas and distillate fuel oil in the CTGs will



SIMPLE CYCLE COMBUSTION TURBINE

FIGURE 2-3.  
HARDEE COUNTY GENERATION FACILITY  
PROCESS FLOW DIAGRAM

Source: ECT, 1999.



minimize PM/PM<sub>10</sub>, SO<sub>2</sub>, and H<sub>2</sub>SO<sub>4</sub> mist air emissions. High efficiency combustion practices will be employed to control CO and VOC emissions.

### **2.3 EMISSION AND STACK PARAMETERS**

Tables 2-1, 2-2, 2-5, 2-6, 2-9, 2-10, 2-13, and 2-14 provide maximum hourly criteria pollutant CTG emission rates for natural gas and distillate fuel oil firing, respectively. Maximum hourly H<sub>2</sub>SO<sub>4</sub> mist emission rates for natural gas and distillate fuel oil firing are summarized in Table 2-17. Maximum hourly noncriteria pollutant rates for natural gas and distillate fuel oil firing are provided in Tables 2-3, 2-4, 2-7, 2-8, 2-11, 2-12, 2-15, and 2-16, respectively. The highest hourly emission rates for each pollutant are prescribed, taking into account load and ambient temperature to develop maximum hourly emission estimates for each CTG. Noncriteria pollutants consist primarily of trace amounts of organic and inorganic compounds associated with the combustion of distillate fuel oil.

Maximum hourly emission rates for all pollutants, in units of pounds per hour (lb/hr), are projected to occur for CTG operations at low ambient temperature (i.e., 32 degrees Fahrenheit [°F]), baseload, and fuel oil firing. The bases for these emission rates are provided in Appendix D. Table 2-18 presents projected maximum annualized criteria and noncriteria emissions for the Project. The maximum annualized rates were conservatively estimated assuming baseload operation for 2,500 hr/yr (natural gas firing), baseload operation for 500 hr/yr (fuel oil firing), and an ambient temperature of 59°F.

Maximum annualized rates were also evaluated for the Siemens Westinghouse and ABB Power Generation units at a partial load of 50 percent for 500 hr/yr while natural gas firing.

Stack parameters for the simple-cycle CTGs are provided in Tables 2-19 and 2-26 for natural gas and distillate fuel oil firing, respectively.

Table 2-1. Maximum Criteria Pollutant Emission Rates for Three Unit Loads and Three Temperatures—Natural Gas GE 7241 FA CT (Per CT)

Unit Load (%)	Ambient Temperature (°F)	PM/PM <sub>10</sub> *		SO <sub>2</sub>		NO <sub>x</sub>		CO		VOC		Pb	
		lb/hr.	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s
100	20	9.9	1.25	9.8	1.24	80.9	10.19	56.1	7.07	3.3	0.42	Neg.	Neg.
	59	9.9	1.25	9.2	1.16	75.7	9.54	52.8	6.65	3.1	0.39	Neg.	Neg.
	90†	9.9	1.25	8.5	1.07	69.3	8.73	47.3	5.96	2.9	0.36	Neg.	Neg.
75	20	9.9	1.25	7.9	0.99	64.2	8.09	45.1	5.68	2.6	0.33	Neg.	Neg.
	59	9.9	1.25	7.5	0.94	60.3	7.60	42.9	5.41	2.4	0.30	Neg.	Neg.
	90†	9.9	1.25	6.9	0.87	56.5	7.11	39.6	4.99	2.4	0.30	Neg.	Neg.
50	20	9.9	1.25	6.3	0.79	50.1	6.31	37.4	4.71	2.2	0.28	Neg.	Neg.
	59	9.9	1.25	6.0	0.75	47.5	5.98	35.2	4.44	2.0	0.25	Neg.	Neg.
	90†	9.9	1.25	5.6	0.71	44.9	5.66	33.0	4.16	2.0	0.25	Neg.	Neg.

Note: g/s = gram per second.  
 lb/hr = pound per hour.  
 Neg. = negligible

\*As measured by EPA Reference Method 5B or 17.

†Emission rates reflect the use of evaporative cooler at ambient temperatures above 65°F.

Sources: ECT, 2000.  
 GE, 1998.



Table 2-2. Maximum Criteria Pollutant Emission Rates for Three Unit Loads and Three Temperatures—Distillate Fuel Oil GE 7241 FA CT (Per CT)

Unit Load (%)	Ambient Temperature (°F)	PM/PM <sub>10</sub> *		SO <sub>2</sub>		NO <sub>x</sub>		CO		VOC		Pb	
		lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s
100	20	18.7	2.36	104.1	13.12	371.8	46.85	124.3	15.66	8.3	1.04	Neg.	Neg.
	59	18.7	2.36	98.1	12.36	350.9	44.21	116.6	14.69	7.7	0.97	Neg.	Neg.
	90†	18.7	2.36	89.2	11.24	319.0	40.19	106.7	13.44	7.2	0.90	Neg.	Neg.
75	20	18.7	2.36	84.5	10.64	299.2	37.70	92.4	11.64	6.1	0.76	Neg.	Neg.
	59	18.7	2.36	79.7	10.05	282.7	35.62	89.1	11.23	6.1	0.76	Neg.	Neg.
	90†	18.7	2.36	73.1	9.20	258.5	32.57	84.7	10.67	6.1	0.76	Neg.	Neg.
50	20	18.7	2.36	65.9	8.30	231.0	29.11	78.1	9.84	5.5	0.69	Neg.	Neg.
	59	18.7	2.36	62.7	7.90	220.0	27.72	77.0	9.70	5.0	0.62	Neg.	Neg.
	90†	18.7	2.36	57.8	7.28	202.4	25.50	73.7	9.29	5.0	0.62	Neg.	Neg.

\*As measured by EPA Reference Method 5B or 17.

†Emission rates reflect the use of evaporative cooler at ambient temperatures above 65°F.

Sources: ECT, 2000.  
GE, 1998.

Table 2-3. Maximum Hazardous Air Pollutant Emission Rates for Three Unit Loads and Three Temperatures—Natural Gas GE 7241 FA CT (Per CT)

Unit Load (%)	Ambient Temp. (°F)	Arsenic		Benzene		Beryllium		Cadmium		Chromium		Cobalt	
		lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s
100	20	3.70E-04	4.66E-05	3.88E-03	4.89E-04	2.22E-05	2.80E-06	2.03E-03	2.56E-04	2.59E-03	3.26E-04	1.55E-04	1.95E-05
	59	3.46E-04	4.36E-05	3.63E-03	4.57E-04	2.07E-05	2.61E-06	1.90E-03	2.39E-04	2.42E-03	3.05E-04	1.45E-04	1.83E-05
	90†	3.18E-04	4.01E-05	3.34E-03	4.21E-04	1.91E-05	2.41E-06	1.75E-03	2.21E-04	2.23E-03	2.81E-04	1.34E-04	1.69E-05

Unit Load (%)	Ambient Temp. (°F)	Dichlorobenzene		Formaldehyde		Lead		Manganese		Mercury		Naphthalene	
		lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s
100	20	2.22E-03	2.81E-04	1.39E-01	1.75E-02	9.24E-04	1.16E-04	7.02E-04	8.85E-05	4.81E-04	6.06E-05	1.13E-03	1.42E-04
	59	2.07E-03	2.61E-04	1.30E-01	1.64E-02	8.65E-04	1.09E-04	6.57E-04	8.28E-05	4.50E-04	5.67E-05	1.05E-03	1.32E-04
	90†	1.91E-03	2.41E-04	1.19E-01	1.50E-02	7.96E-04	1.00E-04	6.05E-04	7.62E-05	4.14E-04	5.22E-05	9.71E-04	1.22E-04

Unit Load (%)	Ambient Temp. (°F)	Nickel		Polycyclic Organic Matter		Selenium		Toluene	
		lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s
100	20	3.88E-03	4.89E-04	1.63E-04	2.05E-05	4.44E-05	5.59E-06	6.28E-03	7.91E-04
	59	3.63E-03	4.57E-04	1.53E-04	1.93E-05	4.15E-05	5.23E-06	5.88E-03	7.41E-04
	90†	3.34E-03	4.21E-04	1.40E-04	1.76E-05	3.82E-05	4.81E-06	5.41E-03	6.82E-04

†Emission rates reflect the use of evaporative cooler at ambient temperatures above 65°F.

Source: ECT, 2000.

Table 2-4. Maximum Hazardous Air Pollutant Emission Rates for Three Unit Loads and Three Temperatures—Distillate Fuel Oil GE 7241 FA CT (Per CT)

Unit Load (%)	Ambient Temp. (°F)	Antimony		Arsenic		Beryllium		Cadmium		Chromium		Cobalt	
		lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s
100	20	4.19E-02	5.28E-03	9.34E-03	1.18E-04	6.29E-04	7.93E-05	8.00E-03	1.01E-03	8.96E-02	1.13E-03	1.73E-02	2.18E-03
	59	3.95E-02	4.98E-03	8.80E-03	1.11E-04	5.92E-04	7.46E-05	7.54E-03	9.50E-04	8.44E-02	1.06E-03	1.63E-02	2.05E-03
	90†	3.59E-02	4.52E-03	8.00E-03	1.01E-04	5.39E-04	6.79E-05	6.86E-03	8.64E-04	7.67E-02	9.66E-04	1.49E-02	1.88E-03

Unit Load (%)	Ambient Temp. (°F)	Lead		Manganese		Mercury		Nickel		Phosphorus		Selenium	
		lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s
100	20	1.11E-01	1.40E-02	6.48E-01	8.16E-02	1.73E-03	2.18E-04	2.29E-00	2.89E-01	5.72E-01	7.21E-02	1.01E-02	1.27E-03
	59	1.04E-01	1.31E-02	6.10E-01	7.69E-02	1.63E-03	2.05E-04	2.15E-00	2.71E-01	5.39E-01	6.79E-02	9.51E-03	1.20E-03
	90†	9.47E-02	1.19E-02	5.55E-01	6.99E-02	1.49E-03	1.88E-04	1.96E-00	2.47E-01	4.90E-01	6.17E-02	8.65E-03	1.09E-03

†Emission rates reflect the use of evaporative cooler at ambient temperatures above 65°F.

Source: ECT, 2000.

Table 2-5. Maximum Criteria Pollutant Emission Rates for Three Unit Loads and Three Temperatures—Natural Gas Westinghouse 501F CT (Per CT)

Unit Load (%)	Ambient Temperature (°F)	PM/PM <sub>10</sub> *		SO <sub>2</sub>		NO <sub>x</sub>		CO		VOC		Pb	
		lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s
100	32	9.5	1.19	9.9	1.25	125.1	15.77	80.3	10.12	8.8	1.11	Neg.	Neg.
	59	9.5	1.19	9.3	1.17	116.9	14.73	75.9	9.56	8.8	1.11	Neg.	Neg.
	95†	9.5	1.19	8.5	1.08	107.3	13.51	68.2	8.59	7.7	0.97	Neg.	Neg.
70	32	9.5	1.19	7.6	0.96	94.9	11.95	61.6	7.76	6.6	0.83	Neg.	Neg.
	59	9.5	1.19	7.2	0.91	89.4	11.26	58.3	7.35	6.6	0.83	Neg.	Neg.
	95†	9.5	1.19	6.7	0.84	82.5	10.40	55.0	6.93	6.6	0.83	Neg.	Neg.
50	32	9.5	1.19	5.9	0.75	74.3	9.36	245.3	30.91	34.1	4.30	Neg.	Neg.
	59	9.5	1.19	5.6	0.71	70.1	8.84	234.3	29.52	33.0	4.16	Neg.	Neg.
	95†	9.5	1.19	5.3	0.66	64.6	8.14	217.8	27.44	29.7	3.74	Neg.	Neg.

\*As measured by EPA Reference Method 5B or 17.

†Emission rates reflect the use of evaporative cooler at ambient temperatures above 65°F.

Sources: ECT, 2000.  
Westinghouse, 1998.

Table 2-6. Maximum Criteria Pollutant Emission Rates for Three Unit Loads and Three Temperatures—Distillate Fuel Oil Westinghouse 501F (Per CT)

Unit Load (%)	Ambient Temperature (°F)	PM/PM <sub>10</sub> *		SO <sub>2</sub>		NO <sub>x</sub>		CO		VOC		Pb	
		lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s
100	32	21.0	2.65	95.2	11.99	352.0	44.35	101.2	12.75	29.7	3.74	Neg.	Neg.
	59	19.8	2.49	89.1	11.23	328.9	41.44	95.7	12.06	28.6	3.60	Neg.	Neg.
	95†	17.7	2.23	81.7	10.29	302.5	38.12	85.8	10.81	25.3	3.19	Neg.	Neg.
70	32	26.3	3.31	70.7	8.9	257.4	32.43	95.7	12.06	66.0	8.32	Neg.	Neg.
	59	24.9	3.13	66.8	8.41	236.5	29.80	89.1	11.23	60.5	7.62	Neg.	Neg.
	95†	22.3	2.81	62.0	7.81	225.5	28.41	81.4	10.26	56.1	7.07	Neg.	Neg.
50	32	30.0	3.78	49.9	6.29	344.3	43.38	258.5	32.57	185.9	23.42	Neg.	Neg.
	59	28.6	3.60	53.6	6.75	328.9	41.44	246.4	31.05	177.1	22.31	Neg.	Neg.
	95†	26.1	3.28	49.9	6.29	299.2	37.70	224.4	28.27	161.7	20.37	Neg.	Neg.

\*As measured by EPA Reference Method 5B or 17.

†Emission rates reflect the use of evaporative cooler at ambient temperatures above 65°F.

Sources: ECT, 2000.  
Westinghouse, 1998.

Table 2-7. Maximum Hazardous Air Pollutant Emission Rates for Three Unit Loads and Three Temperatures—Natural Gas Westinghouse 501F (Per CT)

Unit Load (%)	Ambient Temp. (°F)	Arsenic		Benzene		Beryllium		Cadmium		Chromium		Cobalt	
		lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s
100	32	3.83E-04	4.83E-05	4.02E-03	5.07E-04	2.30E-05	2.90E-06	2.11E-03	2.70E-04	2.68E-03	3.40E-04	1.61E-04	2.03E-05
	59	3.58E-04	4.51E-05	3.76E-03	4.74E-04	2.15E-05	2.71E-06	1.97E-03	2.50E-04	2.51E-03	3.20E-04	1.50E-04	1.90E-05
	95†	3.29E-04	4.15E-05	3.45E-03	4.35E-04	1.97E-05	2.50E-06	1.81E-03	2.30E-04	2.30E-03	2.90E-04	1.38E-04	1.74E-05

Unit Load (%)	Ambient Temp. (°F)	Dichlorobenzene		Formaldehyde		Lead		Manganese		Mercury		Naphthalene	
		lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s
100	32	2.30E-03	2.90E-04	1.44E-01	1.81E-02	9.57E-04	1.21E-04	7.27E-04	9.20E-05	4.98E-04	6.30E-05	1.17E-03	1.50E-04
	59	2.15E-03	2.71E-04	1.34E-01	1.70E-02	8.96E-04	1.13E-04	6.81E-04	8.60E-05	4.66E-04	5.90E-05	1.09E-03	1.40E-04
	95†	1.97E-03	2.50E-04	1.23E-01	1.60E-02	8.22E-04	1.04E-04	6.25E-04	7.90E-05	4.28E-04	5.40E-05	1.00E-03	1.30E-04

Unit Load (%)	Ambient Temp. (°F)	Nickel		Polycyclic Organic Matter		Selenium		Toluene	
		lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s
100	32	4.02E-03	5.10E-04	1.69E-04	2.13E-05	4.59E-05	5.80E-06	6.51E-03	8.20E-04
	59	3.76E-03	4.74E-04	1.58E-04	2.00E-05	4.30E-05	5.42E-06	6.09E-03	7.70E-04
	95†	3.45E-03	4.35E-04	1.45E-04	1.83E-05	3.95E-05	5.00E-06	5.59E-03	7.04E-04

†Emission rates reflect the use of evaporative cooler at ambient temperatures above 65°F.

Source: ECT, 2000.

Table 2-8. Maximum Hazardous Air Pollutant Emission Rates for Three Unit Loads and Three Temperatures—Distillate Fuel Oil Westinghouse 501F (Per CT)

Unit Load (%)	Ambient Temp. (°F)	Antimony		Arsenic		Beryllium		Cadmium		Chromium		Cobalt	
		lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s
100	32	3.89E-02	4.90E-03	8.67E-03	1.09E-03	5.84E-04	7.40E-05	7.43E-03	9.36E-04	8.31E-02	1.05E-02	1.61E-02	2.03E-03
	59	3.64E-02	4.60E-03	8.11E-03	1.02E-03	5.46E-04	6.90E-05	6.96E-03	8.77E-04	7.78E-02	9.80E-03	1.51E-02	1.90E-03
	95†	3.34E-02	4.20E-03	7.44E-03	9.37E-04	5.01E-04	6.31E-05	6.37E-03	8.03E-04	7.13E-02	8.98E-03	1.38E-02	1.74E-03

Unit Load (%)	Ambient Temp. (°F)	Lead		Manganese		Mercury		Nickel		Phosphorus		Selenium	
		lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s
100	32	1.03E-01	1.30E-02	6.01E-01	7.57E-02	1.61E-03	2.03E-04	2.12E+0	2.70E-01	5.31E-01	6.70E-02	9.38E-03	1.18E-03
	59	9.60E-02	1.21E-02	5.63E-01	7.10E-02	1.51E-03	1.90E-04	1.99E+0	2.51E-01	4.97E-01	6.30E-02	8.78E-03	1.11E-03
	95†	8.80E-02	1.11E-02	5.16E-01	6.50E-02	1.38E-03	1.74E-04	1.82E+0	2.30E-01	4.55E-01	5.73E-02	8.04E-03	1.01E-03

†Emission rates reflect the use of evaporative cooler at ambient temperatures above 65°F.

Source: ECT, 2000.

Table 2-9. Maximum Criteria Pollutant Emission Rates for Three Unit Loads and Three Temperatures—Natural Gas WH 501D5A (Per CT)

Unit Load (%)	Ambient Temperature (°F)	PM/PM <sub>10</sub> *		SO <sub>2</sub>		NO <sub>x</sub>		CO		VOC		Pb	
		lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s
100	20	9.6	1.21	7.2	0.91	86.9	10.95	34.1	4.3	5.9	0.75	Neg.	Neg.
	59	8.8	1.10	6.7	0.84	80.6	10.16	31.8	4.0	5.4	0.68		
	95†	8.0	1.01	6.1	0.77	74.8	9.42	29.7	3.7	5.0	0.62	Neg.	Neg.
75	20	8.5	1.07	5.6	0.71	82.5	10.40	68.2	8.6	5.3	0.67	Neg.	Neg.
	59	7.7	0.97	5.3	0.67	77.4	9.75	61.9	7.8	4.8	0.61		
	95†	7.0	0.89	5.0	0.63	72.6	9.15	56.1	7.1	4.4	0.55	Neg.	Neg.
50	20	6.8	0.86	4.4	0.55	157.3	19.82	495.0	62.4	24.1	3.04	Neg.	Neg.
	59	6.4	0.81	4.1	0.52	148.7	18.74	463.0	58.3	23.1	2.91		
	95†	6.0	0.76	3.9	0.49	140.8	17.74	433.4	54.6	22.2	2.80	Neg.	Neg.

\*As measured by EPA Reference Method 5B or 17.

†Emission rates reflect the use of evaporative cooler at ambient temperatures above 65°F.

Sources: ECT, 2000.  
Westinghouse, 1998.



Table 2-10. Maximum Criteria Pollutant Emission Rates for Three Unit Loads and Three Temperatures—Distillate Fuel Oil WH 501D5A CT (Per CT)

Unit Load (%)	Ambient Temperature (°F)	PM/PM <sub>10</sub> *		SO <sub>2</sub>		NO <sub>x</sub>		CO		VOC		Pb	
		lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s
100	20	35.9	4.52	72.4	9.13	260.7	32.85	104.5	13.2	22.0	2.77	Neg.	Neg.
	59	32.9	4.15	66.9	8.43	240.7	30.33	95.9	12.1	20.2	2.55	Neg.	Neg.
	95†	30.3	3.81	61.8	7.78	222.2	28.00	88.0	11.1	18.6	2.34	Neg.	Neg.
75	20	45.2	5.70	56.7	7.14	201.3	25.36	217.8	27.4	49.8	6.28	Neg.	Neg.
	59	41.2	5.19	53.1	6.69	188.7	23.78	198.4	25.0	47.0	5.93	Neg.	Neg.
	95†	37.5	4.72	49.7	6.27	177.1	22.31	180.4	22.7	44.4	5.60	Neg.	Neg.
50	20	54.1	6.81	38.8	4.88	235.4	29.66	2708.2	341.2	82.1	10.34	Neg.	Neg.
	59	50.0	6.30	38.8	4.88	222.8	28.07	2508.0	316.0	77.4	9.75	Neg.	Neg.
	95†	46.3	5.84	38.8	4.88	211.2	26.61	2323.2	292.7	73.0	9.20	Neg.	Neg.

\*As measured by EPA Reference Method 5B or 17.

†Emission rates reflect the use of evaporative cooler at ambient temperatures above 65°F.

Sources: ECT, 2000.  
Westinghouse, 1998.

Table 2-11. Maximum Hazardous Air Pollutant Emission Rates for Three Unit Loads and Three Temperatures—Natural Gas WH 501D5A CT (Per CT)

Unit Load (%)	Ambient Temp. (°F)	Arsenic		Benzene		Beryllium		Cadmium		Chromium		Cobalt	
		lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s
100	32	2.78E-04	3.50E-05	2.92E-03	3.68E-04	1.67E-05	2.10E-06	1.53E-03	1.93E-04	1.94E-03	2.44E-04	1.17E-04	1.50E-05
	59	2.56E-04	3.23E-05	2.69E-03	3.00E-04	1.54E-05	1.94E-06	1.41E-03	2.00E-04	1.79E-03	2.00E-04	1.08E-04	1.36E-05
	95†	2.37E-04	2.99E-05	2.48E-03	3.13E-04	1.42E-05	1.79E-06	1.30E-03	1.64E-04	1.66E-03	2.10E-04	9.94E-05	1.30E-05

Unit Load (%)	Ambient Temp. (°F)	Dichlorobenzene		Formaldehyde		Lead		Manganese		Mercury		Naphthalene	
		lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s
100	32	1.67E-03	2.10E-04	1.04E-01	1.31E-02	9.64E-04	1.21E-04	5.28E-04	6.65E-05	3.61E-04	4.55E-05	8.47E-04	1.07E-05
	59	1.54E-03	2.00E-04	9.61E-02	1.21E-02	6.41E-04	1.00E-04	4.87E-04	6.14E-05	3.33E-04	4.20E-05	7.82E-04	9.85E-05
	95†	1.42E-03	1.79E-04	8.87E-02	1.12E-02	5.92E-04	7.46E-05	4.50E-04	5.70E-05	3.08E-04	3.88E-05	7.22E-04	9.10E-05

Unit Load (%)	Ambient Temp. (°F)	Nickel		Polycyclic Organic Matter		Selenium		Toluene	
		lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s
100	32	2.92E-03	3.68E-04	1.22E-04	1.54E-05	3.33E-05	4.20E-06	4.72E-03	5.95E-04
	59	2.69E-03	3.39E-04	1.13E-04	1.42E-04	3.08E-05	3.88E-06	4.36E-03	5.49E-04
	95†	2.48E-03	3.13E-04	1.04E-04	1.31E-05	2.84E-05	3.60E-06	4.02E-03	5.07E-04

†Emission rates reflect the use of evaporative cooler at ambient temperatures above 65°F.

Source: ECT, 2000.

Table 2-12. Maximum Hazardous Air Pollutant Emission Rates for Three Unit Loads and Three Temperatures—Distillate Fuel Oil WH 501D5A CT (Per CT)

Unit Load (%)	Ambient Temp. (°F)	Antimony		Arsenic		Beryllium		Cadmium		Chromium		Cobalt	
		lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s
100	32	2.94E-02	3.70E-03	6.55E-03	8.30E-04	4.41E-04	5.60E-05	5.61E-03	7.07E-04	6.28E-02	7.91E-03	1.22E-02	1.54E-03
	59	2.72E-02	3.43E-03	6.05E-03	7.62E-04	4.07E-04	5.13E-05	5.18E-03	6.53E-04	5.80E-02	7.31E-03	1.12E-02	1.41E-03
	95†	2.51E-02	3.16E-03	5.58E-03	7.03E-04	3.76E-04	4.74E-05	4.79E-03	6.04E-04	5.36E-02	6.75E-03	1.04E-02	1.31E-03

Unit Load (%)	Ambient Temp. (°F)	Lead		Manganese		Mercury		Nickel		Phosphorus		Selenium	
		lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s
100	32	7.75E-02	9.77E-03	4.54E-01	5.72E-02	1.22E-03	1.54E-04	1.60E+0	2.02E-01	4.01E-01	5.05E-02	7.08E-03	8.92E-04
	59	7.16E-02	9.02E-03	4.20E-01	5.29E-02	1.12E-03	1.41E-04	1.48E+0	1.86E-01	3.70E-01	4.66E-02	6.54E-03	8.24E-04
	95†	6.61E-02	8.33E-03	3.87E-01	4.88E-02	1.04E-03	1.31E-04	1.37E+0	1.73E-01	3.42E-01	4.31E-02	6.04E-03	7.61E-04

†Emission rates reflect the use of evaporative cooler at ambient temperatures above 65°F.

Sources: ECT, 2000.

Table 2-13. Maximum Criteria Pollutant Emission Rates for Three Unit Loads and Three Temperatures—Natural Gas ABB GT-24 CT (Per CT)

Unit Load (%)	Ambient Temperature (°F)	PM/PM <sub>10</sub> *		SO <sub>2</sub>		NO <sub>x</sub>		CO		VOC		Pb	
		lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s
100	0	41.8	5.27	10.2	1.28	203.5	25.64	31.9	4.0	4.2	0.53	Neg.	Neg.
	60	24.2	3.05	9.2	1.16	183.7	23.15	23.1	2.9	2.9	0.36	Neg.	Neg.
	98†	23.1	2.91	8.5	1.07	172.7	21.76	20.9	2.6	2.6	0.33	Neg.	Neg.
75	0	37.4	4.71	8.1	1.03	162.8	20.51	75.9	9.6	3.6	0.46	Neg.	Neg.
	60	19.8	2.49	7.4	0.93	148.5	18.71	55.0	6.9	2.3	0.29	Neg.	Neg.
	98†	18.7	2.36	6.8	0.86	137.5	17.33	50.6	6.4	2.1	0.26	Neg.	Neg.
60	0	28.6	3.60	6.2	0.78	124.3	15.66	394.9	49.8	4.8	0.61	Neg.	Neg.
	60	17.6	2.22	6.4	0.80	122.2	15.40	149.6	18.8	1.9	0.24	Neg.	Neg.
	98†	16.5	2.08	5.9	0.74	113.1	14.25	138.6	17.5	1.8	0.22	Neg.	Neg.

\*As measured by EPA Reference Method 5B or 17.

†Emission rates reflect the use of evaporative cooler at ambient temperatures above 65°F.

Sources: ECT, 2000.  
ABB, 1998.

Table 2-14. Maximum Criteria Pollutant Emission Rates for Three Unit Loads and Three Temperatures—Distillate Fuel Oil ABB GT-24 CT (Per CT)

Unit Load (%)	Ambient Temperature (°F)	PM/PM <sub>10</sub> *		SO <sub>2</sub>		NO <sub>x</sub>		CO		VOC		Pb	
		lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s
100	0	83.0	10.46	111.8	14.08	393.8	49.62	141.9	17.9	24.5	3.09	Neg.	Neg.
	60	46.2	5.82	97.5	12.28	342.5	43.15	126.6	16.0	22.7	2.86	Neg.	Neg.
	98†	22.9	2.88	84.3	10.63	314.6	39.64	113.6	14.3	20.1	2.53	Neg.	Neg.
75	0	78.0	9.83	86.7	10.93	305.8	38.53	56.1	7.1	19.0	2.40	Neg.	Neg.
	60	46.2	5.82	77.6	9.77	259.4	32.68	48.8	6.1	16.1	2.03	Neg.	Neg.
	98†	26.1	3.28	69.1	8.70	247.7	31.22	44.5	5.6	14.9	1.88	Neg.	Neg.
60	0	78.0	9.83	51.7	6.52	231.0	29.11	419.1	52.8	21.6	2.72	Neg.	Neg.
	60	37.4	4.71	58.1	7.32	196.8	24.79	380.5	47.9	19.6	2.46	Neg.	Neg.
	98†	11.7	1.47	51.7	6.52	165.4	20.84	346.7	43.7	17.9	2.25	Neg.	Neg.

\*As measured by EPA Reference Method 5B or 17.

†Emission rates reflect the use of evaporative cooler at ambient temperatures above 65°F.

Sources: ECT, 2000.  
ABB, 1998.

Table 2-15. Maximum Hazardous Air Pollutant Emission Rates for Three Unit Loads and Three Temperatures—Natural Gas ABB GT-24 CT (Per CT)

Unit Load (%)	Ambient Temp. (°F)	Arsenic		Benzene		Beryllium		Cadmium		Chromium		Cobalt	
		lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s
100	0	3.93E-04	4.95E-05	4.13E-03	5.20E-04	2.36E-05	2.97E-06	2.16E-03	2.72E-04	2.75E-03	3.50E-04	1.65E-04	2.08E-05
	60	3.55E-04	4.47E-05	3.73E-03	4.70E-04	2.13E-05	2.68E-06	1.95E-03	2.50E-04	2.48E-03	3.13E-04	1.49E-04	1.88E-05
	98†	3.29E-04	4.15E-05	3.45E-03	4.35E-04	1.97E-05	2.50E-06	1.81E-03	2.28E-04	2.30E-03	2.90E-04	1.38E-04	1.74E-05

Unit Load (%)	Ambient Temp. (°F)	Dichlorobenzene		Formaldehyde		Lead		Manganese		Mercury		Naphthalene	
		lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s
100	0	2.36E-03	2.97E-04	1.47E-01	1.85E-02	9.83E-04	1.24E-04	7.47E-04	9.41E-05	5.11E-04	6.44E-05	1.20E-03	1.51E-04
	60	2.13E-03	2.68E-04	1.33E-01	1.68E-02	8.87E-04	1.12E-04	6.74E-04	8.49E-05	4.61E-04	5.81E-05	1.08E-03	1.36E-04
	98†	1.97E-03	2.48E-04	1.23E-01	1.60E-02	8.21E-04	1.03E-04	6.24E-04	7.86E-05	4.27E-04	5.38E-05	1.00E-03	1.26E-04

Unit Load (%)	Ambient Temp. (°F)	Nickel		Polycyclic Organic Matter		Selenium		Toluene	
		lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s
100	0	4.13E-03	5.20E-04	1.73E-04	2.18E-05	4.72E-05	5.95E-06	6.68E-03	8.42E-04
	60	3.73E-03	4.70E-04	1.56E-04	1.97E-05	4.26E-05	5.37E-06	6.03E-03	7.60E-04
	98†	3.45E-03	4.35E-04	1.45E-04	1.83E-05	3.94E-05	4.96E-06	5.59E-03	7.04E-04

†Emission rates reflect the use of evaporative cooler at ambient temperatures above 65°F.

Source: ECT, 2000.

Table 2-16. Maximum Hazardous Air Pollutant Emission Rates for Three Unit Loads and Three Temperatures—Distillate Fuel Oil ABB GT-24CT (Per CT)

Unit Load (%)	Ambient Temp. (°F)	Antimony		Arsenic		Beryllium		Cadmium		Chromium		Cobalt	
		lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s
100	0	4.57E-02	5.76E-03	1.02E-02	1.29E-03	6.86E-04	8.64E-05	8.73E-03	1.10E-03	9.76E-02	1.23E-02	1.89E-02	2.38E-03
	60	3.99E-02	5.03E-03	8.88E-03	1.12E-03	5.98E-04	7.53E-05	7.61E-03	9.59E-04	8.51E-02	1.07E-02	1.65E-02	2.08E-03
	98†	3.45E-02	4.35E-03	7.68E-03	9.68E-04	5.17E-04	6.51E-05	6.59E-03	8.30E-04	7.37E-02	9.29E-03	1.43E-02	1.80E-03

Unit Load (%)	Ambient Temp. (°F)	Lead		Manganese		Mercury		Nickel		Phosphorus		Selenium	
		lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s	lb/hr	g/s
100	0	1.20E-01	1.51E-02	7.06E-01	8.90E-02	1.89E-03	2.38E-04	2.49E+0	3.14E-01	6.23E-01	7.85E-02	1.10E-02	1.39E-03
	60	1.05E-01	1.32E-02	6.16E-01	7.76E-02	1.65E-03	2.08E-04	2.17E+0	2.73E-01	5.43E-01	6.84E-02	9.60E-03	1.21E-03
	98†	9.10E-02	1.15E-02	5.33E-01	6.72E-02	1.43E-03	1.80E-04	1.88E+0	2.37E-01	4.70E-01	5.92E-02	8.31E-03	1.05E-03

†Emission rates reflect the use of evaporative cooler at ambient temperatures above 65°F.

Sources: ECT, 2000.

Table 2-17. Maximum H<sub>2</sub>SO<sub>4</sub> Mist Pollutant Emission Rates for Three Loads and Three Ambient Temperatures

Unit Load (%)	Natural Gas H <sub>2</sub> SO <sub>4</sub> mist		Distillate Fuel Oil H <sub>2</sub> SO <sub>4</sub> mist	
	lb/hr	g/s	lb/hr	g/s
100	1.17	0.148	12.8	1.62
75	0.9	0.118	10.0	1.25
50	0.7	0.092	7.6	0.95

Sources: GPP, 1999.  
ECT, 2000.



Table 2-18. Maximum Annualized Emission Rates (tpy)

Pollutant	Three Simple-Cycle CTGs	Natural Gas Heater	Fuel Oil Tank	Project Total
NO <sub>x</sub>	945.7	4.4		950.1
CO	514.6	3.7		518.3
PM/PM <sub>10</sub> *	125.4	0.1		125.5
SO <sub>2</sub>	108.1	0.03		108.1
VOC	73.2	0.2	0.36	73.8
H <sub>2</sub> SO <sub>4</sub> mist	14.0	Neg.		14.0
Arsenic	2.75E-03	Neg.		2.75E-03
Antimony	9.96E-03	Neg.		9.96E-03
Benzene	5.64E-03	Neg.		5.64E-03
Beryllium	1.81E-04	Neg.		1.81E-04
Cadmium	4.83E-03	Neg.		4.83E-03
Chromium	2.5E-02	Neg.		2.5E-02
Cobalt	4.35E-03	Neg.		4.35E-03
Dichlorobenzene	3.22E-03	Neg.		3.22E-03
Formaldehyde	2.02E-01	Neg.		2.02E-01
Lead	2.76E-02	Neg.		2.76E-02
Manganese	1.55E-01	Neg.		1.55E-01
Mercury	1.10E-03	Neg.		1.10E-03
Naphthalene	1.64E-03	Neg.		1.64E-03
Nickel	5.49E-01	Neg.		5.49E-01
Phosphorus	1.36E-01	Neg.		1.36E-01
Polycyclic Organic Matter	2.37E-04	Neg.		2.37E-04
Selenium	2.46E-03	Neg.		2.46E-03
Toluene	9.14E-03	Neg.		9.14E-03

\*Excludes H<sub>2</sub>SO<sub>4</sub> mist.

Sources: GPP, 1999.  
ECT, 2000.

Table 2-19. Stack Parameters for Three Unit Loads and Three Ambient Temperatures—GE 7241 FA CT (Per CT), Natural Gas

Unit Load (%)	Ambient Temperature (°F)	Stack Height		Stack Exit Temperature		Stack Exit Velocity		Stack Diameter	
		ft	m	°F	K	ft/sec	m/sec	ft	m
100	20	100	30.5	1,081	856	162.8	49.6	18.0	5.49
	59	100	30.5	1,117	876	155.7	47.5	18.0	5.49
	90	100	30.5	1,141	889	148.1	45.1	18.0	5.49
75	20	100	30.5	1,111	873	132.2	40.3	18.0	5.49
	59	100	30.5	1,139	888	129.0	39.3	18.0	5.49
	90	100	30.5	1,166	903	124.2	37.9	18.0	5.49
50	20	100	30.5	1,160	900	112.0	34.1	18.0	5.49
	59	100	30.5	1,184	913	109.9	33.5	18.0	5.49
	90	100	30.5	1,200	922	106.4	32.4	18.0	5.49

Note: m = meter.  
 K = Kelvin.  
 m/sec = meter per second.

Sources: GPP, 1999.  
 ECT, 2000.

Table 2-20. Stack Parameters for Three Unit Loads and Three Ambient Temperatures—GE 7241 FA CT (Per CT), Distillate Fuel Oil

Unit Load (%)	Ambient Temperature (°F)	Stack Height		Stack Exit Temperature		Stack Exit Velocity		Stack Diameter	
		ft	m	°F	K	ft/sec	m/sec	ft	m
100	20	100	30.5	1,067	848	166.7	50.8	18.0	5.49
	59	100	30.5	1,098	865	160.4	48.9	18.0	5.49
	90	100	30.5	1,130	883	151.8	46.3	18.0	5.49
75	20	100	30.5	1,184	913	134.3	40.9	18.0	5.49
	59	100	30.5	1,195	919	130.8	39.9	18.0	5.49
	90	100	30.5	1,200	922	126.3	38.5	18.0	5.49
50	20	100	30.5	1,200	922	112.7	34.4	18.0	5.49
	59	100	30.5	1,200	922	111.3	33.9	18.0	5.49
	90	100	30.5	1,200	922	108.3	33.0	18.0	5.49

Sources: GPP, 1999.  
ECT, 2000.

Table 2-21. Stack Parameters for Three Unit Loads and Three Ambient Temperatures—Westinghouse 501F, Natural Gas

Unit Load (%)	Ambient Temperature (°F)	Stack Height		Stack Exit Temperature		Stack Exit Velocity		Stack Diameter	
		ft	m	°F	K	ft/sec	m/sec	ft	M
100	32	100	30.5	1,085	858	164.5	50.2	18.0	5.49
	59	100	30.5	1,099	866	157.7	48.1	18.0	5.49
	95	100	30.5	1,123	879	148.3	45.2	18.0	5.49
70	32	100	30.5	1,026	825	120.6	36.8	18.0	5.49
	59	100	30.5	1,041	834	117.5	35.8	18.0	5.49
	95	100	30.5	1,064	846	114.8	35.0	18.0	5.49
50	32	100	30.5	1,165	903	126.1	38.4	18.0	5.49
	59	100	30.5	1,166	903	121.5	37.0	18.0	5.49
	95	100	30.5	1,200	922	118.1	36.0	18.0	5.49

Sources: GPP, 1999.  
ECT, 2000.

Table 2-22. Stack Parameters for Three Unit Loads and Three Ambient Temperatures—Westinghouse 501F, Distillate Fuel Oil

Unit Load (%)	Ambient Temperature (°F)	Stack Height		Stack Exit Temperature		Stack Exit Velocity		Stack Diameter	
		ft	m	°F	K	ft/sec	m/sec	ft	m
100	32	100	30.5	1,071	850	162.5	49.5	18.0	5.49
	59	100	30.5	1,080	855	155.5	47.4	18.0	5.49
	95	100	30.5	1,112	873	147.0	44.8	18.0	5.49
70	32	100	30.5	1,099	866	153.9	46.9	18.0	5.49
	59	100	30.5	1,097	865	146.5	44.6	18.0	5.49
	95	100	30.5	1,200	922	145.3	44.3	18.0	5.49
50	32	100	30.5	1,200	922	137.0	41.7	18.0	5.49
	59	100	30.5	1,200	922	131.5	40.1	18.0	5.49
	95	100	30.5	1,200	922	124.3	37.9	18.0	5.49

Sources: GPP, 1999.  
ECT, 2000.

Table 2-23. Stack Parameters for Three Unit Loads and Three Ambient Temperatures—WH 501D5A (Per CT), Natural Gas

Unit Load (%)	Ambient Temperature (°F)	Stack Height		Stack Exit Temperature		Stack Exit Velocity		Stack Diameter	
		ft	m	°F	K	ft/sec	m/sec	ft	m
100	20	100	30.5	972	795	131.6	40.1	18.0	5.49
	59	100	30.5	997	810	125.2	38.2	18.0	5.49
	95	100	30.5	1,021	823	119.0	36.3	18.0	5.49
75	20	100	30.5	884	746	109.0	33.2	18.0	5.49
	59	100	30.5	941	778	105.4	32.1	18.0	5.49
	95	100	30.5	993	807	101.4	30.9	18.0	5.49
50	20	100	30.5	905	758	88.9	27.1	18.0	5.49
	59	100	30.5	948	782	87.1	26.5	18.0	5.49
	95	100	30.5	987	804	85.2	26.0	18.0	5.49

Sources: GPP, 1999.  
ECT, 2000.

Table 2-24. Stack Parameters for Three Unit Loads and Three Ambient Temperatures—WH 501D5A CT (Per CT), Distillate Fuel Oil

Unit Load (%)	Ambient Temperature (°F)	Stack Height		Stack Exit Temperature		Stack Exit Velocity		Stack Diameter	
		ft	m	°F	K	ft/sec	m/sec	ft	m
100	20	100	30.5	975	797	132.1	40.3	18.0	5.49
	59	100	30.5	1,000	811	125.7	38.3	18.0	5.49
	95	100	30.5	1,023	824	119.4	36.4	18.0	5.49
75	20	100	30.5	831	717	112.5	34.3	18.0	5.49
	59	100	30.5	885	747	108.6	33.1	18.0	5.49
	95	100	30.5	935	775	104.2	31.8	18.0	5.49
50	20	100	30.5	841	723	90.9	27.7	18.0	5.49
	59	100	30.5	890	750	88.9	27.1	18.0	5.49
	95	100	30.5	939	775	86.6	26.4	18.0	5.49

Sources: GPP, 1999.  
ECT, 2000.

Table 2-25. Stack Parameters for Three Unit Loads and Three Ambient Temperatures—ABB GT-24 CT (Per CT), Natural Gas

Unit Load (%)	Ambient Temperature (°F)	Stack Height		Stack Exit Temperature		Stack Exit Velocity		Stack Diameter	
		ft	m	°F	K	ft/sec	m/sec	ft	m
100	0	100	30.5	1,000	811	138.5	42.2	18.0	5.49
	60	100	30.5	1,000	811	125.4	38.2	18.0	5.49
	98	100	30.5	1,000	811	117.9	35.9	18.0	5.49
75	0	100	30.5	1,000	811	112.2	34.2	18.0	5.49
	60	100	30.5	1,000	811	105.8	32.2	18.0	5.49
	98	100	30.5	1,000	811	101.7	31.0	18.0	5.49
60	0	100	30.5	1,000	811	91.7	27.9	18.0	5.49
	60	100	30.5	1,000	811	94.4	28.8	18.0	5.49
	98	100	30.5	1,000	811	90.8	27.7	18.0	5.49

Sources: GPP, 1999.  
ECT, 2000.



Table 2-26. Stack Parameters for Three Unit Loads and Three Ambient Temperatures—ABB GT-24 CT (Per CT), Distillate Fuel Oil

Unit Load (%)	Ambient Temperature (°F)	Stack Height		Stack Exit Temperature		Stack Exit Velocity		Stack Diameter	
		ft	m	°F	K	ft/sec	m/sec	ft	m
100	0	100	30.5	1,000	811	140.4	42.8	18.0	5.49
	60	100	30.5	1,000	811	120.5	36.7	18.0	5.49
	98	100	30.5	1,000	811	105.8	32.3	18.0	5.49
75	0	100	30.5	1,000	811	113.9	34.7	18.0	5.49
	60	100	30.5	1,000	811	96.5	29.4	18.0	5.49
	98	100	30.5	1,000	811	83.6	25.5	18.0	5.49
60	0	100	30.5	1,000	811	92.4	28.2	18.0	5.49
	60	100	30.5	1,000	811	80.0	24.4	18.0	5.49
	98	100	30.5	1,000	811	71.1	21.7	18.0	5.49

Sources: GPP, 1999.  
ECT, 2000.

### **3.0 AIR QUALITY STANDARDS AND NEW SOURCE REVIEW APPLICABILITY**

#### **3.1 NATIONAL AND STATE AAQS**

As a result of the 1977 Clean Air Act (CAA) Amendments, the U.S. Environmental Protection Agency (EPA) enacted primary and secondary NAAQS for six air pollutants (40 CFR 50). Primary NAAQS are intended to protect the public health, and secondary NAAQS are intended to protect the public welfare from any known or anticipated adverse effects associated with the presence of pollutants in the ambient air. Florida has also adopted AAQS; reference Section 62-204.240, F.A.C. Table 3-1 presents the current national and Florida AAQS.

Areas of the country in violation of NAAQS are designated as nonattainment areas, and new sources to be located in or near these areas may be subject to more stringent air permitting requirements. The HCGF is located in Hardee County approximately 8 km west of Wauchula. Hardee County is presently designated in 40 CFR §81.310 as better than national standards (for total suspended particulates [TSPs] and SO<sub>2</sub>), unclassifiable/attainment (for CO), unclassifiable or better than national standards (for nitrogen dioxide [NO<sub>2</sub>]), and not designated (for lead). 40 CFR §81.310 also indicates that the 1-hour ozone standard is not applicable. Hardee County is designated attainment (for ozone, SO<sub>2</sub>, CO, and NO<sub>2</sub>) and unclassifiable (for PM<sub>10</sub> and lead) by Section 62-204.340, F.A.C.

#### **3.2 NONATTAINMENT NSR APPLICABILITY**

The Project will be located in Hardee County. As noted above, Hardee County is presently designated as either better than national standards or unclassifiable/attainment for all criteria pollutants. Accordingly, the Project is not subject to the nonattainment NSR requirements of Section 62-212.500, F.A.C.

Table 3-1. National and Florida Air Quality Standards (micrograms per cubic meter [ $\mu\text{g}/\text{m}^3$ ] unless otherwise stated)

Pollutant (units)	Averaging Periods	National Standards		Florida Standards
		Primary	Secondary	
SO <sub>2</sub> (ppmv)	3-hour <sup>1</sup>		0.5	0.5
	24-hour <sup>1</sup>	0.14		0.1
	Annual <sup>2</sup>	0.030		0.02
SO <sub>2</sub>	3-hour <sup>1</sup>			1,300
	24-hour <sup>1</sup>			260
	Annual <sup>2</sup>			60
PM <sub>10</sub> <sup>13</sup>	24-hour <sup>3</sup>	150	150	
	Annual <sup>4</sup>	50	50	
PM <sub>10</sub>	24-hour <sup>5</sup>			150
	Annual <sup>6</sup>			50
PM <sub>2.5</sub> <sup>11,12</sup>	24-hour <sup>7</sup>	65	65	
	Annual <sup>8</sup>	15	15	
CO (ppmv)	1-hour <sup>1</sup>	35		35
	8-hour <sup>1</sup>	9		9
CO	1-hour <sup>1</sup>			40,000
	8-hour <sup>1</sup>			10,000
Ozone (ppmv)	1-hour <sup>9</sup>			0.12
	8-hour <sup>10,11</sup>	0.08	0.08	
NO <sub>2</sub> (ppmv)	Annual <sup>2</sup>	0.053	0.053	0.05
	Annual <sup>2</sup>			100
Lead	Calendar Quarter Arithmetic Mean	1.5	1.5	1.5

<sup>1</sup> Not to be exceeded more than once per calendar year.

<sup>2</sup> Arithmetic mean.

<sup>3</sup> Standard attained when the 99<sup>th</sup> percentile is less than or equal to the standard, as determined by 40 CFR 50, Appendix N.

<sup>4</sup> Arithmetic mean, as determined by 40 CFR 50, Appendix N.

<sup>5</sup> Not to be exceeded more than once per year, as determined by 40 CFR 50, Appendix K.

<sup>6</sup> Standard attained when the expected annual arithmetic mean is less than or equal to the standard, as determined by 40 CFR 50, Appendix K.

<sup>7</sup> Standard attained when the 98<sup>th</sup> percentile is less than or equal to the standard, as determined by 40 CFR 50, Appendix N.

<sup>8</sup> Arithmetic mean, as determined by 40 CFR 50, Appendix N.

<sup>9</sup> Standard attained when the expected number of days per calendar year with maximum hourly average concentrations above the standard is equal to or less than 1, as determined by 40 CFR 50, Appendix H.

<sup>10</sup> Standard attained when the average of the annual 4<sup>th</sup> highest daily maximum 8-hour average concentration is less than or equal to the standard, as determined by 40 CFR 50, Appendix I.

<sup>11</sup> The U.S. Court of Appeals for the District of Columbia Circuit (Circuit Court) held that these standards are not enforceable. American Trucking Association v. U.S.E.P.A., 1999 WL300618 (Circuit Court).

<sup>12</sup> The Circuit Court may vacate standards following briefing. *Id.*

<sup>13</sup> The Circuit Court held PM<sub>10</sub> standards vacated upon promulgation of effective PM<sub>2.5</sub> standards.

Sources: 40 CFR 50.  
Section 62-204.240, F.A.C.

### **3.3 PSD NSR APPLICABILITY**

The proposed new simple-cycle CTGs will have potential emissions in excess of the significant emission rate thresholds. Therefore, the Project is subject to the PSD NSR requirements of Section 62-212.400, F.A.C., for those pollutants that are emitted at or above the specified PSD significant emission rate levels. Comparisons of estimated potential annual emission rates for the Project and the PSD significant emission rate thresholds are provided in Table 3-2. As shown in this table, potential emissions of NO<sub>x</sub>, CO, PM/PM<sub>10</sub>, H<sub>2</sub>SO<sub>4</sub>, and SO<sub>2</sub> are each projected to exceed the applicable PSD significant emission rate level. These pollutants are, therefore, subject to the PSD NSR requirements of Section 62-212.400, F.A.C. Appendix D provides detailed emission rate estimates for the Project.

Table 3-2. Projected Emissions Compared to PSD Significant Emission Rates

Pollutant	Projected Maximum Annual Emissions (tpy)	PSD Significant Emission Rate (tpy)	PSD Applicability
NO <sub>x</sub>	950.1	40	Yes
CO	518.3	100	Yes
PM	125.5	25	Yes
PM <sub>10</sub>	125.5	15	Yes
SO <sub>2</sub>	108.1	40	Yes
Ozone/VOC	73.8	40	Yes
Lead	Negligible	0.6	No
Mercury	Negligible	0.1	No
Total fluorides	Not Present	3	No
H <sub>2</sub> SO <sub>4</sub> mist	14.0	7	No
Total reduced sulfur (including hydrogen sulfide)	Not Present	10	No
Reduced sulfur compounds (including hydrogen sulfide)	Not Present	10	No
Municipal waste combustor acid gases (measured as SO <sub>2</sub> and hydrogen chloride)	Not Present	40	No
Municipal waste combustor metals (measured as PM)	Not Present	15	No
Municipal waste combustor organics (measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans)	Not Present	3.5 H 10 <sup>-6</sup>	No

Sources: Section 62-212.400, Table 212.400-2, F.A.C. ECT, 1999.

## 4.0 PSD NSR REQUIREMENTS

### 4.1 CONTROL TECHNOLOGY REVIEW

Pursuant to Rule 62-212.400(5)(c), F.A.C., an analysis of BACT is required for each pollutant which is emitted by the proposed Project in amounts equal to or greater than the PSD significant emission rate levels. As defined by Rule 62-210.200(42), F.A.C., BACT is:

“an emission limitation, including a visible emission standard, based on the maximum degree of reduction of each pollutant emitted which the Department, on a case by case basis, taking into account energy, environmental, and economic impacts, and other costs, determines is achievable through application of production processes and available methods, systems and techniques (including fuel cleaning or treatment or innovative fuel combustion techniques) for control of each such pollutant. If the Department determines that technological or economic limitations on the application of measurement methodology to a particular part of an emissions unit or facility would make the imposition of an emission standard infeasible, a design, equipment, work practice, operational standard or combination thereof, may be prescribed instead to satisfy the requirement for the application of BACT. Such standard shall, to the degree possible, set forth the emissions reductions achievable by implementation of such design, equipment, work practice or operation. Each BACT determination shall include applicable test methods or shall provide for determining compliance with the standard(s) by means which achieve equivalent results.”

BACT determinations are made on a case-by-case basis as part of the FDEP NSR process and apply to each pollutant which exceeds the PSD significant emission rate thresholds shown in Table 3-2. All emission units involved in a major modification or a new major source that emit or increase emissions of the applicable pollutants must undergo BACT analysis. Because each applicable pollutant must be analyzed, particular emission units may undergo BACT analysis for more than one pollutant.

BACT is defined in terms of a numerical emissions limit unless determined to be infeasible. This numerical emissions limit can be based on the application of air pollution control equipment; specific production processes, methods, systems, or techniques; fuel cleaning; or combustion techniques. BACT limitations may not exceed any applicable

federal new source performance standard (NSPS) or national emission standard for hazardous air pollutants (NESHAPs), or any other emission limitation established by state regulations.

BACT analyses are conducted using the *top-down* analysis approach, which was outlined in a December 1, 1987, memorandum from Craig Potter, EPA Assistant Administrator, to EPA Regional Administrators on the subject of "Improving New Source Review (NSR) Implementation." Using the top-down methodology, available control technology alternatives are identified based on knowledge of the particular industry of the applicant and previous control technology permitting decisions for other identical or similar sources. These alternatives are rank ordered by stringency into a control technology hierarchy. The hierarchy is evaluated starting with the *top*, or most stringent alternative, to determine economic, environmental, and energy impacts, and to assess the feasibility or appropriateness of each alternative as BACT based on site-specific factors. If the top control alternative is not applicable, or is technically or economically infeasible, it is rejected as BACT, and the next most stringent alternative is then considered. This evaluation process continues until an applicable control alternative is determined to be both technologically and economically feasible, thereby defining the emission level corresponding to BACT for the pollutant in question emitted from the particular facility under consideration.

#### **4.2 AMBIENT AIR QUALITY MONITORING**

In accordance with the PSD requirements of Rule 62-212.400(5)(f), F.A.C., any application for a PSD permit must contain, for each pollutant subject to review, an analysis of ambient air quality data in the area affected by the proposed major stationary source or major modification. The affected pollutants are those that the source would potentially emit in significant amounts; i.e., those that exceed the PSD significant emission rate thresholds shown in Table 3-2.

Preconstruction ambient air monitoring for a period of up to 1 year generally is appropriate to complete the PSD requirements. Existing data from the vicinity of the proposed

source may be used if the data meet certain quality assurance (QA) requirements; otherwise, additional data may need to be gathered. Guidance in designing a PSD monitoring network is provided by EPA's *Ambient Monitoring Guidelines for Prevention of Significant Deterioration* (1987).

Rule 62-212.400(2)(e), F.A.C., provides an exemption from pre-construction monitoring requirements that excludes or limits the pollutants for which an air quality monitoring analysis is conducted. This exemption states that a proposed facility shall be exempt from the monitoring requirements of Rule 62-212.400(5)(f) and (g), F.A.C., with respect to a particular pollutant if the emissions increase of the pollution from the source or modification would cause, in any area, air quality impacts less than the PSD *de minimis* ambient impact levels presented in Section 62-212.400, Table 212.400-3, F.A.C. (see Table 4-1). In addition, an exemption may be granted if the air quality impacts due to existing sources in the area of concern are less than the PSD *de minimis* ambient impact levels.

Applicability of the PSD preconstruction ambient monitoring requirements to the proposed Project is discussed in Section 8.0.

#### **4.3 AMBIENT IMPACT ANALYSIS**

An air quality or source impact analysis must be performed for a proposed major source subject to PSD for each pollutant for which the increase in emissions exceeds the significant emission rates (see Table 3-2). The FDEP rules specifically require the use of applicable EPA atmospheric dispersion models in determining estimates of ambient concentrations (refer to Rule 62-204.220[4], F.A.C.). Guidance for the use and application of dispersion models is presented in the EPA *Guideline on Air Quality Models* as published in Appendix W to 40 CFR Part 51. Criteria pollutants may be exempt from the full source impact analysis if the net increase in impacts due to the new source or modification is below the appropriate Rule 62-210.200(259), F.A.C., significant impact level, as presented in Table 4-2.



Table 4-1. PSD *De Minimis* Ambient Impact Levels

Averaging Time	Pollutant	Significance Level ( $\mu\text{g}/\text{m}^3$ )
Annual	NO <sub>2</sub>	14
Quarterly	Lead	0.1
24-Hour	PM <sub>10</sub>	10
	SO <sub>2</sub>	13
	Mercury	0.25
	Fluorides	0.25
8-Hour	CO	575
1-Hour	Hydrogen sulfide	0.2
NA	Ozone	100 tpy of VOC emissions

Source: Section 62-212.400, Table 212.400-3, F.A.C.

Table 4-2. Significant Impact Levels

Pollutant	Averaging Period	Concentration ( $\mu\text{g}/\text{m}^3$ )
SO <sub>2</sub>	Annual	1
	24-Hour	5
	3-Hour	25
PM <sub>10</sub>	Annual	1
	24-Hour	5
NO <sub>2</sub>	Annual	1
CO	8-Hour	500
	1-Hour	2,000
Lead	Quarterly	0.03

Source: Rule 62-210.200(260), F.A.C.

Ozone is one pollutant for which a source impact analysis is not normally required. Ozone is formed in the atmosphere as a result of complex photochemical reactions. Models for ozone generally are applied to entire urban areas.

The ambient impact analysis for the Project is provided in Sections 6.0 (methodology) and 7.0 (results).

#### **4.4 ADDITIONAL IMPACT ANALYSES**

Rule 62-212.400(5)(e), F.A.C., requires additional impact analyses for three areas: (1) associated growth, (2) soils and vegetation impact, and (3) visibility impairment. The level of analysis for each area should be commensurate with the scope of the project under review. A more extensive analysis would be conducted for projects having large emission increases than those that will cause a small increase in emissions.

The growth analysis generally includes:

- A projection of the associated industrial, commercial, and residential growth that will occur in the area.
- An estimate of the air pollution emissions generated by the permanent associated growth.
- An air quality analysis based on the associated growth emission estimates and the emissions expected to be generated directly by the new source or modification.

The soils and vegetation analysis is typically conducted by comparing projected ambient concentrations for the pollutants of concern with applicable susceptibility data from the air pollution literature. For most types of soils and vegetation, ambient air concentrations of criteria pollutants below the NAAQS will not result in harmful effects. Sensitive vegetation and emissions of toxic air pollutants could necessitate a more extensive assessment of potential adverse effects on soils and vegetation.

The visibility impairment analysis pertains particularly to Class I area impacts and other areas where good visibility is of special concern. A quantitative estimate of visibility impairment is conducted, if warranted by the scope of the project under review.

The additional impact analyses for the Project is provided in Section 9.0.

## 5.0 BEST AVAILABLE CONTROL TECHNOLOGY ANALYSIS

### 5.1 METHODOLOGY

BACT analyses were performed in accordance with the EPA top-down method as previously described in Section 4.1. The first step in the top-down BACT procedure is the identification of all available control technologies. Alternatives considered included process designs and operating practices that reduce the formation of emissions, postprocess stack controls that reduce emissions after they are formed, and combinations of these two control categories. Sources of information used to identify control alternatives included:

- EPA reasonably available control technology (RACT)/BACT/lowest achievable emission rate (LAER) Clearinghouse (RBLC) via the RBLC Information System database.
- EPA NSR web site.
- EPA Control Technology Center (CTC) web site.
- Recent FDEP BACT determinations for similar facilities.
- Vendor information.
- Environmental Consulting & Technology, Inc. (ECT), experience for similar projects.

Following the identification of available control technologies, the next step in the analysis is to determine which technologies may be technically infeasible. Technical feasibility was evaluated using the criteria contained in Chapter B of the *EPA NSR Workshop Manual* (EPA, 1990a). The third step in the top-down BACT process is the ranking of the remaining technically feasible control technologies from high to low in order of control effectiveness.

An assessment of energy, environmental, and economic impacts is then performed. The economic analysis employed the procedures found in the Office of Air Quality Planning and Standards (OAQPS) *Control Cost Manual* (EPA, 1996). Table 5-1 summarizes specific factors used in estimating capital and annual operating costs.

Table 5-1. Capital and Annual Operating Cost Factors

Cost Item	Factor
<u>Direct Capital Costs</u>	
Sales tax	0.06 × control system cost
Freight	0.05 × control system cost
Instrumentation	0.10 × control system cost
Foundations and supports	0.08 × purchased equipment cost
Handling and erection	0.14 × purchased equipment cost
Electrical	0.04 × purchased equipment cost
Piping	0.02 × purchased equipment cost
Insulation	0.01 × purchased equipment cost
Painting	0.01 × purchased equipment cost
<u>Indirect Capital Costs</u>	
Engineering	0.10 × purchased equipment cost
Construction and field expenses	0.05 × purchased equipment cost
Contractor fees	0.10 × purchased equipment cost
Start-up	0.02 × purchased equipment cost
Performance testing	0.01 × purchased equipment cost
Contingencies	0.03 × purchased equipment cost
<u>Direct Annual Operating Costs</u>	
Supervisor labor	0.15 × total operator labor cost
Maintenance materials	1.00 × total maintenance labor cost
<u>Indirect Annual Operating Costs</u>	
Overhead	0.60 × total of operating, supervisory, and maintenance labor and maintenance materials
Administrative charges	0.02 × total capital investment
Property taxes	0.01 × total capital investment
Insurance	0.01 × total capital investment

Source: EPA, 1996.

The fifth and final step is the selection of a BACT emission limitation corresponding to the most stringent, technically feasible control technology that was not eliminated based on adverse energy, environmental, or economic grounds.

As indicated in Section 3.3, Table 3-2, projected annual emission rates of NO<sub>x</sub>, CO, VOCs, PM/PM<sub>10</sub>, SO<sub>2</sub>, and H<sub>2</sub>SO<sub>4</sub> mist for the HCGF exceed the PSD significance rates and, therefore, are subject to BACT analysis. Control technology analyses using the five-step top-down BACT method are provided in Sections 5.3, 5.4, and 5.5 for combustion products (PM/PM<sub>10</sub>), products of incomplete combustion (CO and VOCs), and acid gases (NO<sub>x</sub>, SO<sub>2</sub>, and H<sub>2</sub>SO<sub>4</sub> mist), respectively.

## **5.2 FEDERAL AND FLORIDA EMISSION STANDARDS**

Pursuant to Rule 62-212.400(5)(b), F.A.C., BACT emission limitations must be no less stringent than any applicable NSPS (40 CFR 60), NESHAP (40 CFR 61 and 63), and FDEP emission standards (Chapter 62-296, Stationary Sources—Emission Standards, F.A.C.).

On the federal level, emissions from gas turbines are regulated by NSPS Subpart GG. Subpart GG establishes emission limits for gas turbines that were constructed after October 3, 1977, and that meet any of the following criteria:

- Electric utility stationary gas turbines with a heat input at peak load of greater than 100 MMBtu/hr based on the lower heating value (LHV) of the fuel.
- Stationary gas turbines with a heat input at peak load between 10 and 100 MMBtu/hr based on the fuel LHV.
- Stationary gas turbines with a manufacturer's rated baseload at International Standards Organization (ISO) standard day conditions of 30 MW or less.

The electric utility stationary gas turbine NSPS applicability criterion applies to stationary gas turbines that sell more than one-third of their potential electric output to any utility power distribution system. The HCGF CTGs qualify as electric utility stationary gas turbines and, therefore, are subject to the NO<sub>x</sub> and SO<sub>2</sub> emission limitations of NSPS

40 CFR 60, Subpart GG, 60.332(a)(1) and 60.333, respectively. The proposed CTGs have no applicable NESHAP/maximum achievable control technology (MACT) requirements.

FDEP emission standards for stationary sources are contained in Chapters 62-296, Stationary Sources—Emission Standards, F.A.C. Chapter 62-296, F.A.C., contains general emission standards for sources emitting VOCs and PM (Section 62-296.320, F.A.C.) which may be applicable to the HCGF. If deemed necessary by FDEP, vapor emission control devices must be employed during the handling of any VOC as required by Rule 62-296.320(1)(a), F.A.C. Visible emissions are limited to a maximum of 20-percent opacity pursuant to Rule 62-296.320(4)(b), F.A.C. Sections 62-296.401 through 62-296.417, F.A.C., specify emission standards for 17 categories of sources; none of these categories are applicable to CTGs. Emission standards applicable to sources located in nonattainment areas are contained in Sections 62-296.500 (for ozone nonattainment areas) and 62-296.700, F.A.C. (for PM nonattainment areas). Because the HCGF will be located in Hardee County, Florida, and because this county is designated attainment for all criteria pollutants, these emission standards are not applicable. Finally, Section 62-204.800, F.A.C., adopts federal NSPS and NESHAP, respectively, by reference. As noted previously, NSPS Subpart GG, Stationary Gas Turbines, is applicable to the HCGF CTGs. There are no applicable NESHAP requirements.

Tables 5-2 and 5-3 summarize applicable federal and state emission standards, respectively. Detailed calculations of NSPS Subpart GG NO<sub>x</sub> limitations are provided in Appendix D. BACT emission limitations proposed for the HCGF are all more stringent than the applicable federal and state standards cited in these tables.

### **5.3 BACT ANALYSIS FOR PM/PM<sub>10</sub>**

PM/PM<sub>10</sub> emissions resulting from the combustion of natural gas are due to oxidation of ash and sulfur contained in the fuel. Due to their low ash and sulfur contents, natural gas and distillate fuel oil combustion generate inherently low PM/PM<sub>10</sub> emissions.



Table 5-2. Federal Emission Limitations

NSPS Subpart GG, Stationary Gas Turbines

<u>Pollutant</u>	<u>Emission Limitation</u>
NO <sub>x</sub>	STD = 0.0075 × (14.4/Y) + F

where: STD = allowable NO<sub>x</sub> emissions (percent by volume at 15-percent O<sub>2</sub> and on a dry basis).

Y = manufacturer's rated heat rate in kilojoules per watt hour at manufacturer's rated load, or actual measured heat rate based on LHV of fuel as measured at actual peak load. Y cannot exceed 14.4 kilojoules per watt hour.

F = NO<sub>x</sub> emission allowance for fuel-bound nitrogen per:

FBN = fuel bound nitrogen.

<u>FBN</u> <u>(weight percent)</u>	<u>F</u> <u>(NO<sub>x</sub> - volume percent)</u>
N ≤ 0.015	0
0.015 < N ≤ 0.1	0.04 × N
0.1 < N ≤ 0.25	0.004 + 0.0067 × (N-0.1)
N > 0.25	0.005

where: N = nitrogen content of fuel; percent by weight.

SO<sub>2</sub> = 0.015 percent by volume at 15-percent O<sub>2</sub> and on a dry basis; or fuel sulfur content 0.8 weight percent.

Source: 40 CFR 60, Subpart GG.

Table 5-3. Florida Emission Limitations

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Pollutant	Emission Limitation
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General Visible Emissions Standard Rule 62-296.320(4)(b)1., F.A.C.

- Visible emissions <20-percent opacity (averaged over a 6-minute period)

General VOCs or Organic Solvents Standard Rule 62-296.320(1)(a), F.A.C.

- VOC No person shall store, pump, handle, process, load, unload, or use in any process or installation VOCs or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.

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Source: Chapter 62-296, F.A.C.

### 5.3.1 POTENTIAL CONTROL TECHNOLOGIES

Available technologies used for controlling PM/PM<sub>10</sub> include the following:

- Centrifugal collectors.
- Electrostatic precipitators (ESPs).
- Fabric filters or baghouses.
- Wet scrubbers.

Centrifugal (cyclone) separators are primarily used to recover material from an exhaust stream before the stream is ducted to the principal control device since cyclones are effective in removing only large sized (greater than 10 microns) particles. Particles generated from natural gas combustion are typically less than 1.0 micron in size.

ESPs remove particles from a gas stream through the use of electrical forces. Discharge electrodes apply a negative charge to particles passing through a strong electrical field. These charged particles then migrate to a collecting electrode having an opposite, or positive, charge. Collected particles are removed from the collecting electrodes by periodic mechanical rapping of the electrodes. Collection efficiencies are typically 95 percent for particles smaller than 2.5 microns in size.

A fabric filter system consists of a number of filtering elements, bag cleaning system, main shell structure, dust removal system, and fan. PM is filtered from the gas stream by various mechanisms (inertial impaction, impingement, accumulated dust cake sieving, etc.) as the gas passes through the fabric filter. Accumulated dust on the bags is periodically removed using mechanical or pneumatic means. In pulse jet pneumatic cleaning, a sudden pulse of compressed air is injected into the top of the bag. This pulse creates a traveling wave in the fabric that separates the cake from the surface of the fabric. The cleaning normally proceeds by row, all bags in the row being cleaned simultaneously. Typical air-to-cloth ratios range from 2 to 8 cubic feet per minute-square foot (cfm-ft<sup>2</sup>). Collection efficiencies are on the order of 99 percent for particles smaller than 2.5 microns in size.

Wet scrubbers remove PM from gas streams principally by inertial impaction of the particulate onto a water droplet. Particles can be wetted by impingement, diffusion, or condensation mechanisms. To be wetted, PM must either make contact with a spray droplet or impinge upon a wet surface. In a venturi scrubber, the gas stream is constricted in a throat section. The large volume of gas passing through a small constriction gives a high gas velocity and a high pressure drop across the system. As water is introduced into the throat, the gas is forced to move at a higher velocity causing the water to shear into droplets. Particles in the gas stream then impact onto the water droplets produced. The entrained water droplets are subsequently removed from the gas stream by a cyclone separator. Venturi scrubber collection efficiency increases with increasing pressure drops for a given particle size. Collection efficiency will also increase with increasing liquid-to-gas ratios up to the point where flooding of the system occurs. Packed-bed and venturi scrubber collection efficiencies are typically 90 percent for particles smaller than 2.5 microns in size.

While all of these postprocess technologies would be technically feasible for controlling PM/PM<sub>10</sub> emissions from CTGs, none of the previously described control equipment have been applied to CTGs because exhaust gas PM concentrations are inherently low. CTGs operate with a significant amount of excess air, which generates large exhaust gas flow rates. The HCGF CTGs will be fired with natural gas as the primary fuel and distillate fuel oil as the back-up fuel source. Combustion of natural gas and distillate fuel oil will generate low PM emissions in comparison to other fuels due to their low ash and sulfur contents. The minor PM emissions coupled with a large volume of exhaust gas produces extremely low exhaust stream PM concentrations. The estimated maximum PM/PM<sub>10</sub> exhaust concentration from each CTG is approximately 0.004 grains per dry standard cubic foot (gr/dscf). Exhaust stream PM concentrations of such low magnitude are not amenable to control using available technologies because removal efficiencies would be unreasonably low and costs excessive.

### **5.3.2 PROPOSED BACT EMISSION LIMITATIONS**

BACT PM/PM<sub>10</sub> limits obtained from the RBLC database for natural gas- and distillate fuel oil-fired CTGs are provided in Tables 5-4 and 5-5, respectively. All determinations





are based on the use of clean fuels and good combustion practice. Recent Florida BACT determinations for natural gas- and distillate fuel oil-fired CTGs are provided in Tables 5-6 and 5-7, respectively. All determinations are based on the use of clean fuels and good combustion practice.

Because postprocess stack controls for PM/PM<sub>10</sub> are not appropriate for CTGs, the use of good combustion practices and clean fuels is considered to be BACT. The HCGF CTGs will use the latest combustor technology to maximize combustion efficiency and minimize PM/PM<sub>10</sub> emission rates. Combustion efficiency, defined as the percentage of fuel completely oxidized in the combustion process, is projected to be greater than 99 percent. The CTGs will be fired primarily with pipeline quality natural gas. Low-sulfur, low-ash distillate fuel oil will serve as a back-up fuel source. Due to the difficulties associated with stack testing exhaust streams containing very low PM/PM<sub>10</sub> concentrations and consistent with recent FDEP BACT determinations for CTGs, visible emissions limits of 10-percent opacity (for natural gas-firing, all CTGs), 10-percent opacity (for oil-firing, GE 7F CTG), and 20-percent opacity (for oil-firing, Westinghouse and ABB CTGs are proposed as surrogate BACT limits for PM/PM<sub>10</sub>). Table 5-8 summarizes PM/PM<sub>10</sub> BACT emission limits proposed for the HCGF CTGs.

#### **5.4 BACT ANALYSIS FOR CO AND VOC**

CO and VOC emissions results from the incomplete combustion of carbon and organic compounds. Factors affecting CO and VOC emissions include firing temperatures, residence time in the combustion zone, and combustion chamber mixing characteristics. Because higher combustion temperatures will increase oxidation rates, emissions of CO and VOC will generally increase during turbine partial load conditions when combustion temperatures are lower. Decreased combustion zone temperature due to the injection of water or steam for NO<sub>x</sub> control will also result in an increase in CO and VOC emissions. An increase in combustion zone residence time and improved mixing of fuel and combustion air will increase oxidation rates and cause a decrease in CO and VOC emission rates. Emissions of NO<sub>x</sub> and CO/VOC are inversely related (i.e., decreasing NO<sub>x</sub> emissions will result in an increase in CO/VOC emissions).

Table 5-6. Florida BACT PM Emission Limitation Summary—Natural Gas-Fired CTGs

Permit Date	Source Name	Turbine Size		PM Emission Limit		Control Technology
		MW	MMBtu/hr	lb/hr	lb/MMBtu	
08/17/92	Orlando Cogeneration, L.P.	79	857	9.0	0.01	Combustion design and clean fuels
12/17/92	Auburndale Power Partners	104	1,214	10.5	0.0134	Combustion design and clean fuels
04/09/93	Kissimmee Utility Authority	40	367	(9.0)	0.0245	Combustion design and clean fuels
04/09/93	Kissimmee Utility Authority	80	869	7.0	0.0100	Combustion design and clean fuels
05/17/93	Central Florida Power, L.P. (Tiger Bay - Destec)	184	1,615	9.0	(0.0056)	Combustion design and clean fuels
09/28/93	Florida Gas Transmission	N/A	32	0.64	N/A	Combustion design and clean fuels
02/24/94	Tampa Electric Company Polk Power Station	260	1,755	17.0	0.013	Combustion design and clean fuels
02/25/94	Florida Power Corp. Polk County Site	235	1,510	9.0	0.006	Combustion design and clean fuels
03/07/95	Orange Cogeneration, L.P.	39	388	5.0	(0.013)	Combustion design and clean fuels
07/20/94	Pasco Cogen, Limited	42	403	5.0	0.0065	Combustion design and clean fuels
04/11/95	Gainesville Regional Utilities Deerhaven CT3	74	971	7.0	(0.0072)	Combustion design and clean fuels
01/01/96	Seminole Electric Cooperative, Inc., Hardee Unit 3	140		7.0		Combustion design and clean fuels
05/98	City of Tallahassee Purdom Unit 8	160	1,468	—	—	Combustion design and clean fuels
07/10/98	City of Lakeland McIntosh Unit 5	250	2,174	—	—	Combustion design and clean fuels
09/28/98	Florida Power Corp. Hines Energy Complex	165	1,757	15.6	(0.0089)	Combustion design and clean fuels
11/25/98	FP&L Ft. Myers Plant Repowering	170	1,760	—	—	Combustion design and clean fuels
12/04/98	Santa Rosa Energy Center	167	1,780			Combustion design and clean fuels

Note: ( ) = calculated values.

Source: FDEP, 1998.

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Table 5-7. Florida BACT PM Emission Limitation Summary—Distillate Fuel Oil-Fired CTGs

Permit Date	Source Name	Turbine Size		PM Emission Limit		Control Technology
		MW	MMBtu/hr	lb/hr	lb/MMBtu	
08/17/92	Florida Power Corp. Intercession City	93	1,144	15.0	(0.0131)	Combustion design and clean fuels
		186	2,032	17.0	(0.0084)	Combustion design and clean fuels
12/17/92	Auburndale Power Partners	104	1,170	36.8	0.0472	Combustion design and clean fuels
04/09/93	Kissimmee Utility Authority	40	371	10.0	0.0323	Combustion design and clean fuels
04/09/93	Kissimmee Utility Authority	80	928	15.0	0.0162	Combustion design and clean fuels
05/17/93	Central Florida Power, L.P. (Tiger Bay - Destec)	184	1,850	17.0	(0.0092)	Combustion design and clean fuels
02/24/94	Tampa Electric Company Polk Power Station	260	1,765	17.0	0.009	Combustion design and clean fuels
07/20/94	Pasco Cogen, Limited	42	406	20.0	0.026	Combustion design and clean fuels
04/11/95	Gainesville Regional Utilities Deerhaven CT3	74	991	15.0	(0.0151)	Combustion design and clean fuels
01/01/96	Seminole Electric Cooperative, Inc., Hardee Unit 3	140		—	—	Combustion design and clean fuels
05/98	City of Tallahassee Purdom Unit 8	160	1,660	—	—	Combustion design and clean fuels
07/10/98	City of Lakeland McIntosh Unit 5	250	2,236	—	—	Combustion design and clean fuels
09/28/98	Florida Power Corp. Hines Energy Complex	165	1,846	44.8	(0.0243)	Combustion design and clean fuels

Note: ( ) = calculated values.

Source: FDEP, 1998.

Table 5-8. Proposed PM/PM<sub>10</sub> BACT Emission Limit

Emission Source	Proposed PM/PM <sub>10</sub> BACT Emission Limit * (% Opacity)	
	<u>Natural Gas</u>	<u>Oil</u>
GE PG7241 (FA) CTGs (per CT)	10	10
Westinghouse 501F CTGs (per CT)	10	20
Westinghouse 501D5A CTGs (per CT)	10	20
ABB GT-24 CTGs (per CT)	10	20

\*Maximum rate for all operating scenarios.

Source: ECT, 2000.

#### 5.4.1 POTENTIAL CONTROL TECHNOLOGIES

There are two available technologies for controlling CO and VOC from gas turbines: combustion process design and oxidation catalysts.

##### **Combustion Process Design**

Combustion process controls involve combustion chamber designs and operation practices that improve the oxidation process and minimize incomplete combustion. Due to the high combustion efficiency of CTGs, approximately 99 percent, CO and VOC emissions are inherently low.

##### **Oxidation Catalysts**

Noble metal (commonly platinum or palladium) oxidation catalysts are used to promote oxidation of CO and VOC to carbon dioxide (CO<sub>2</sub>) and water at temperatures lower than would be necessary for oxidation without a catalyst. The operating temperature range for oxidation catalysts is between 650 and 1,150°F.

Efficiency of CO and VOC oxidation varies with inlet temperature. Control efficiency will increase with increasing temperature for both CO and VOC up to a temperature of approximately 1,100°F; further temperature increases will have little effect on control efficiency. Significant CO oxidation will occur at any temperature above roughly 500°F; higher temperatures on the order of 900°F are needed to oxidize VOC. Inlet temperature must also be maintained below 1,350 to 1,400°F to prevent thermal aging of the catalyst which will reduce catalyst activity and pollutant removal efficiencies. Removal efficiency will also vary with gas residence time which is a function of catalyst bed depth. Increasing bed depth will increase removal efficiencies but will also cause an increase in pressure drop across the catalyst bed. Oxidation catalyst control systems typically achieve 80 to 90 percent oxidation of CO. VOC removal efficiency will vary with the species of hydrocarbon. In general, unsaturated hydrocarbons such as ethylene are more reactive with oxidation catalysts than saturated species such as ethane. A typical VOC control efficiency using oxidation catalyst is 50 percent.

Oxidation catalysts are susceptible to deactivation due to impurities present in the exhaust gas stream. Arsenic, iron, sodium, phosphorous, and silica will all act as catalyst poisons causing a reduction in catalyst activity and pollutant removal efficiencies.

Oxidation catalysts are nonselective and will oxidize other compounds in addition to CO and VOC. The nonselectivity of oxidation catalysts is important in assessing applicability to exhaust streams containing sulfur compounds. Sulfur compounds that have been oxidized to SO<sub>2</sub> in the combustion process will be further oxidized by the catalyst to sulfur trioxide (SO<sub>3</sub>). SO<sub>3</sub> will, in turn, combine with moisture in the gas stream to form H<sub>2</sub>SO<sub>4</sub> mist. Due to the oxidation of sulfur compounds and excessive formation of H<sub>2</sub>SO<sub>4</sub> mist emissions, oxidation catalysts are not considered to be technically feasible for combustion devices that are fired with fuels containing appreciable amounts of sulfur.

### **Technical Feasibility**

Both CTG combustor design and oxidation catalyst control systems are considered to be technically feasible for the HCGF CTGs. Information regarding energy, environmental, and economic impacts and proposed BACT limits for CO and VOC are provided in the following sections.

### **5.4.2 ENERGY AND ENVIRONMENTAL IMPACTS**

There are no significant adverse energy or environmental impacts associated with the use of good combustor designs and operating practices to minimize CO and VOC emissions.

The use of oxidation catalysts will, as previously noted, result in excessive H<sub>2</sub>SO<sub>4</sub> mist emissions if applied to combustion devices fired with fuels containing an appreciable amount of sulfur. Increased H<sub>2</sub>SO<sub>4</sub> mist emissions will also occur, on a smaller scale, from CTGs fired with natural gas and distillate fuel oil. Because CO and VOC emission rates from CTGs are inherently low, further reductions through the use of oxidation catalysts will result in minimal air quality improvements, e.g., well below the defined PSD significant impact levels for CO. The location of the HCGF (Hardee County, Florida) is classified attainment for all criteria pollutants. From an air quality perspective, the only potential benefit of CO oxidation catalyst is to prevent the possible formation of a localized area with elevated

concentrations of CO. The catalyst does not remove CO but rather simply accelerates the natural atmospheric oxidation of CO to CO<sub>2</sub>. Dispersion modeling of CO emissions from the HCGF indicate maximum CO impacts, without oxidation catalyst, will be insignificant.

The application of oxidation catalyst technology to a gas turbine will result in an increase in back pressure on the CTG due to a pressure drop across the catalyst bed. The increased back pressure will, in turn, constrain turbine output power thereby increasing the unit's heat rate. An oxidation catalyst system for the HCGF CTGs is projected to have a pressure drop across the catalyst bed of approximately 1.5 inch of water (H<sub>2</sub>O). This pressure drop will result in a 0.3-percent energy penalty due to reduced turbine output power. For the Westinghouse 501F CTGs, the reduction in turbine output power (lost power generation) will result in an energy penalty of 2,295,000 kilowatt-hours (kwh) (7,831 million British thermal units [MMBtu]) per year at baseload (170 MW) operation and 3,000 hr/yr operation per CT. This energy penalty is equivalent to the use of 22.4 million cubic feet (ft<sup>3</sup>) of natural gas annually based on a natural gas heating value of 1,050 British thermal units per cubic foot (Btu/ft<sup>3</sup>) for all three CTGs. The lost power generation energy penalty, based on a power cost of \$0.060/kwh, is \$481,951 per year for all three CTGs. The magnitude of the energy penalty will be comparable for the GE 7FA and ABB GT-24 CTGs and somewhat lower for the Westinghouse 501D5A CTGs.

### **5.4.3 ECONOMIC IMPACTS**

An economic evaluation of an oxidation catalyst system was performed using the OAQPS factors previously summarized in Table 5-1 and project-specific economic factors provided in Table 5-9. Tables 5-10 and 5-11 summarize specific capital and annual operating costs for the oxidation catalyst control system. The economic analysis was conducted for the Westinghouse 501D5A CTGs because these units are estimated to have the highest annual HCGF CO emission rate and, therefore, expected to have the lowest control system cost effectiveness. Cost effectiveness of oxidation catalyst control technology for the remaining CTGs under consideration will be comparable to that determined for the Westinghouse 501D5A CTGs.

Table 5-9. Economic Cost Factors

Factor	Units	Value
Interest rate	%	10.0
Control system life	Years	10
Catalyst life	Years	
Oxidation		6*
SCR		6*
Electricity cost	\$/kwh	0.060
Aqueous NH <sub>3</sub> cost	\$/ton	105
Labor costs (base rates)	\$/hour	
Operator		27.00
Maintenance		30.00

\*Control system vendor guarantee is 3 years; 6 years estimated due to low capacity factor.

Sources: GPP, 1999.  
ECT, 2000.

Table 5-10. Capital Costs for Oxidation Catalyst System—Three CTGs

Item	Dollars	OAQPS Factor
<b><u>Direct Costs</u></b>		
Purchased equipment	2,997,327	A
Sales tax	179,840	$0.06 \times A$
Instrumentation	299,733	$0.10 \times A$
Freight	149,866	$0.05 \times A$
<b>Subtotal Purchased Equipment</b>	<b>\$3,626,765</b>	<b>B</b>
<b>Installation</b>		
Foundations and supports	290,141	$0.08 \times B$
Handling and erection	507,747	$0.14 \times B$
Electrical	145,071	$0.04 \times B$
Piping	72,535	$0.02 \times B$
Insulation for ductwork	36,268	$0.01 \times B$
Painting	36,268	$0.01 \times B$
<b>Subtotal Installation Cost</b>	<b>\$1,088,030</b>	
<b>Subtotal Direct Costs</b>	<b>\$4,714,795</b>	
<b><u>Indirect Costs</u></b>		
Engineering	362,677	$0.10 \times B$
Construction and field expenses	181,338	$0.05 \times B$
Contractor fees	362,677	$0.10 \times B$
Start-up	72,535	$0.02 \times B$
Performance test	36,268	$0.01 \times B$
Contingency	108,803	$0.03 \times B$
<b>Subtotal Indirect Costs</b>	<b>\$1,124,247</b>	
<b>TOTAL CAPITAL INVESTMENT</b>	<b>\$5,839,092</b>	(TCI)

Sources: Engelhard, 1999  
ECT, 2000

Table 5-11. Annual Operating Costs for Oxidation Catalyst System—Three CTGs

Item	Dollars	OAQPS Factor
<b><u>Direct Costs</u></b>		
Catalyst costs		
Replacement (materials and labor)	2,486,549	
Credit for used catalyst	(335,631)	
<b>Subtotal Catalyst Costs</b>	<b>\$2,150,918</b>	
<b>Annualized Catalyst Costs</b>	<b>\$493,867</b>	
Energy penalties		
Turbine backpressure	272,160	
<b>Subtotal Direct Costs</b>	<b>\$766,027</b>	(TDC)
<b><u>Indirect Costs</u></b>		
Administrative charges	116,782	0.02 × TCI
Property taxes	58,391	0.01 × TCI
Insurance	58,391	0.01 × TCI
Capital recovery	545,611	
Emission Fee Credit	(11,578)	
<b>Subtotal Indirect Costs</b>	<b>\$767,597</b>	
<b>TOTAL ANNUAL COST</b>	<b>\$1,533,623</b>	

Sources: Engelhard, 1999  
 GPP, 1999.  
 ECT, 2000.



Base case CT exhaust CO concentrations for natural gas and fuel oil firing are 10 and 27 ppmvd, respectively. Control efficiency for the CO oxidation catalyst system, consistent with efficiencies typically required for oxidation catalyst systems located in nonattainment areas, is assumed to be 90 percent. Base case and controlled CO emission rates are summarized in Table 5-12.

The cost effectiveness of oxidation catalyst for CO emissions was determined to be \$3,312 per ton of CO removed. Based on the high control costs, use of oxidation catalyst technology to control CO emissions is not considered economically feasible. Table 5-12 summarizes results of the oxidation catalyst economic analysis.

#### **5.4.4 PROPOSED BACT EMISSION LIMITATIONS**

BACT CO limits obtained from the RBLC database for natural gas- and distillate fuel oil-fired CTGs are provided in Tables 5-13 and 5-14, respectively. Recent Florida BACT determinations for natural gas- and distillate fuel oil-fired CTGs are provided in Tables 5-15 and 5-16, respectively.

The use of oxidation catalyst to control CO from CTGs is typically required only for facilities located in CO nonattainment areas. GPP is not aware of any CO catalyst systems that have been installed in CO attainment areas. FDEP gas turbine CO BACT determinations for natural, gas-fired CTGs for the past 5 years range from 9 to 30 ppmvd with an average CO limit of 26 ppmvd. Of the 15 recent FDEP CO BACT determinations for natural gas-fired CTGs, 13 determinations established a limit of 20 ppmvd or higher.

The use of oxidation catalysts will, as previously noted, result in excessive H<sub>2</sub>SO<sub>4</sub> mist emissions if applied to combustion devices fired with fuels containing appreciable amounts of sulfur. Increased H<sub>2</sub>SO<sub>4</sub> mist emissions will also occur, on a smaller scale, from CTGs fired with natural gas. Because CO and VOC emission rates from CTGs are inherently low, further reductions through the use of oxidation catalysts will result in only minor improvement in air quality (i.e., well below the defined PSD significant impact levels for CO).

Table 5-12. Summary of CO BACT Analysis

Control Option	Emission Impacts		Emission Reduction (tpy)	Economic Impacts			Energy Impacts	Environmental Impacts	
	Emission Rates			Installed Capital Cost (\$)	Total Annualized Cost (\$/yr)	Cost Effectiveness Over Baseline (\$/ton)	Increase Over Baseline (MMBtu/yr)	Toxic Impact (Y/N)	Adverse Envir. Impact (Y/N)
	lb/hr	tpy							
Oxidation catalyst	34.3	51.5	463.1	5,839,092	1,533,623	3,312	5,528	Y	Y
Baseline	343.1	514.6	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Basis: Three Westinghouse 501D5A CTGs, 100-percent load for 2,000 hr/yr gas-firing, 50-percent load for 500 hr/hr gas-firing, and 100-percent load for 500 hr/yr oil-firing.

Sources: Westinghouse, 1998.  
 Engelhard, 1999.  
 GRU, 1999.  
 ECT, 2000.



Table 5-13. RBLC CO Summary for Natural Gas Fired CTs (Page 2 of 2)

RBLC ID	Facility Name	City	Permit Dates	Process Description	Thruput Rate	Emission Limit	Control System Description	Basis	
			Issuance	Update					
NV-0017	NEVADA POWER COMPANY, HARRY ALLEN PEAKING PLANT	LAS VEGAS	9/18/92	3/24/95	COMBUSTION TURBINE ELECTRIC POWER GENERATION	600 MW (8 UNITS 75 EACH)	152.5 TYP (EACH TURBINE)	PRECISION CONTROL FOR THE LOW NOX COMBUSTOR	BACT-PSD
NY-0044	BROOKLYN NAVY YARD COGENERATION PARTNERS L.P.	NEW YORK CITY	6/6/95	6/30/95	TURBINE, NATURAL GAS FIRED	240 MW	4 PPM @ 15% O2		LAER
NY-0044	BROOKLYN NAVY YARD COGENERATION PARTNERS L.P.	NEW YORK CITY	6/6/95	6/30/95	TURBINE, NATURAL GAS FIRED	240 MW	4 PPM @ 15% O2		LAER
NY-0045	SELKIRK COGENERATION PARTNERS, L.P.	SELKIRK	6/18/92	9/13/94	COMBUSTION TURBINES (2) (252 MW)	1173 MMBTU/HR (EACH)	10 PPM	COMBUSTION CONTROLS	BACT-OTHER
NY-0045	SELKIRK COGENERATION PARTNERS, L.P.	SELKIRK	6/18/92	9/13/94	COMBUSTION TURBINE (79 MW)	1173 MMBTU/HR	25 PPM	COMBUSTION CONTROL	BACT-OTHER
NY-0046	SARANAC ENERGY COMPANY	PLATTSBURGH	7/31/92	9/13/94	TURBINES, COMBUSTION (2) (NATURAL GAS)	1123 MMBTU/HR (EACH)	3 PPM	OXIDATION CATALYST	BACT-OTHER
NY-0047	PASNY/HOLTSVILLE COMBINED CYCLE PLANT	HOLTSVILLE	9/1/92	9/13/94	GENERATOR, EMERGENCY (NATURAL GAS)	1.5 MMBTU/HR	6.5 LB/MMBTU	COMBUSTION CONTROL	BACT-OTHER
NY-0050	SITHENDEPENDENCE POWER PARTNERS	OSWEGO	3/29/92	9/13/94	TURBINES, COMBUSTION (4) (NATURAL GAS) (1012 MW)	2133 MMBTU/HR (EACH)	13 PPM	COMBUSTION CONTROLS	BACT-OTHER
NY-0080	PROJECT ORANGE ASSOCIATES	SYRACUSE	12/1/93	3/31/95	GE LM-5000 GAS TURBINE	550 MMBTU/HR	92 LB/HR TEMP > 20F	NO CONTROLS	BACT-OTHER
OH-0218	CNG TRANSMISSION	WASHINGTON COURT HOUSE	8/12/92	4/5/95	TURBINE (NATURAL GAS) (3)	5500 HP (EACH)	0.015 G/HP-HR	FUEL SPEC: USE OF NATURAL GAS	OTHER
OR-0010	PORTLAND GENERAL ELECTRIC CO.	BOARDMAN	5/31/94	8/6/97	TURBINES, NATURAL GAS (2)	1720 MMBTU	15 PPM @ 15% O2	GOOD COMBUSTION PRACTICES	BACT-PSD
OR-0011	HERMISTON GENERATING CO.	HERMISTON	7/7/94	1/27/99	TURBINES, NATURAL GAS (2)	1696 MMBTU/H	15 PPM @ 15% O2	GOOD COMBUSTION PRACTICES	BACT-PSD
PA-0083	NORTHERN CONSOLIDATED POWER	NORTH EAST	5/3/91	7/20/94	TURBINES, GAS, 2	34.6 KW EACH	110 TYR	OXIDATION CATALYST	OTHER
PA-0148	BLUE MOUNTAIN POWER, LP	RICHLAND	7/31/96	1/12/99	COMBUSTION TURBINE WITH HEAT RECOVERY BOILER	153 MW	3.1 PPM @ 15% O2	OXIDATION CATALYST 16 PPM @ 15% O2 WHEN FIRIN	OTHER
PA-0149	BUCKNELL UNIVERSITY	LEWISBURG	11/26/97	11/30/97	NG FIRED TURBINE, SOLAR TAURUS T-73005	5 MW	50 PPMV@15%O2	GOOD COMBUSTION	BACT-OTHER
PR-0004	ECELECTRICAL, L.P.	PENUELAS	10/1/98	5/6/98	TURBINES, COMBINED-CYCLE COGENERATION	461 MW	33 PPMOV	COMBUSTION CONTROLS	BACT-PSD
PR-0004	ECELECTRICAL, L.P.	PENUELAS	10/1/98	5/6/98	TURBINES, COMBINED-CYCLE COGENERATION	461 MW	100 PPMOV AT MIN. LOAD	COMBUSTION CONTROLS	BACT-PSD
RI-0010	NARRAGANSETT ELECTRIC/NEW ENGLAND POWER CO.	PROVIDENCE	4/13/92	5/31/92	TURBINE, GAS AND DUCT BURNER	1360 MMBTU/H EACH	11 PPM @ 15% O2, GAS		BACT-PSD
RI-0012	ALGONQUIN GAS TRANSMISSION CO.	BURRILLVILLE	7/31/91	5/31/92	TURBINE, GAS, 2	49 MMBTU/H	0.114 LB/MMBTU	GOOD COMBUSTION PRACTICES	BACT-OTHER
SC-0029	SC ELECTRIC AND GAS COMPANY - HAGOOD STATION	CHARLESTON	12/11/89	3/24/95	INTERNAL COMBUSTION TURBINE	110 MEGAWATTS	23 LB5/HR	GOOD COMBUSTION PRACTICES	BACT-PSD
TX-0231	WEST CAMPUS COGENERATION COMPANY	COLLEGE STATION	5/2/94	10/31/94	GAS TURBINES	75.3 MW (TOTAL POWER)	300 TYP	INTERNAL COMBUSTION CONTROLS	BACT
VA-0238	COMMONWEALTH CHESAPEAKE CORPORATION	NEW CHURCH	5/2/96	7/21/97	3 COMBUSTION TURBINES (OIL-FIRED)	6000 HRS/YR	96 TYP	GOOD COMBUSTION OPERATING PRACTICES	BACT/SPS
WA-0027	SUMAS ENERGY INC.	SUMAS	6/25/91	8/1/91	TURBINE, NATURAL GAS	88 MW	6 PPM @ 15% O2	CD CATALYST	BACT-PSD
WY-0032	QUESTAR PIPELINE CORP. - RK SPRINGS COMPRESSOR COM	ROCK SPRINGS	9/25/97	2/1/99	TURBINE COMPRESSOR ENGINE, NATURAL GAS FIRED, 2EA	1001 HP	3.5 G/B-HP-H		BACT-PSD
WY-0039	TWO ELK GENERATION PARTNERS, LIMITED PARTNERSHIP	15 MILES SE OF WRIGHT	2/27/98	3/31/99	TURBINE, STATIONARY	33.3 MW	25 PPM @ 15% O2		OTHER

Source: RBLC 1999.



Table 5-14. RBLC CO Summary for Distillate/Multiple Fuel Fired CTGs (Page 2 of 2)

RBLC ID	Facility Name	City	Permit Dates		Fuel Type	Process Description	Thruput Rate	Emission Limit	Control System Description	Basis
			Issuance	Update						
NY-0077	INOECK-YERKES ENERGY SERVICES	TONAWANDA	6/24/92	3/31/95	GAS/OIL	GE FRAME 6 GAS TURBINE (EP #00001)	432.2 MMBTU/HR	10 PPM, 10 LB/HR	NO CONTROLS	BACT-OTHER
NY-0079	LEDEBIL LABORATORIES	PEARL RIVER		4/27/95	GAS/OIL	(2) GAS TURBINES (EP #5 00101 & 102)	110 MMBTU/HR	48 PPM, 12.6 LB/HR		BACT-OTHER
NY-0081	LILCO SHOREHAM	HICKSVILLE	5/10/93	3/30/95	DIESEL	(3) GE FRAME 7 TURBINES (EP #S 00007-9)	850 MMBTU/HR	10 PPM, 19.7 LB/HR	NO CONTROLS	BACT-OTHER
PA-0083	NORTHERN CONSOLIDATED POWER	NORTH EAST	5/3/91	7/20/94	DIESEL	GENERATORS, DIESEL, 2	1135 KW EACH	7.9 LB/H EACH		OTHER
PA-0098	GRAYS FERRY CO. GENERATION PARTNERSHIP	PHILADELPHIA	11/4/92	7/20/94	GAS/OIL	TURBINE (NATURAL GAS & OIL)	1150 MMBTU	0.0055 LB/MMBTU (GAS)*	COMBUSTION	BACT-OTHER
PA-0098	GRAYS FERRY CO. GENERATION PARTNERSHIP	PHILADELPHIA	11/4/92	7/20/94	GAS/OIL	GENERATOR, STEAM	450 MMBTU	0.0055 LB/MMBTU (NAT GAS)*	COMBUSTION	BACT-OTHER
PR-0002	PUERTO RICO ELECTRIC POWER AUTHORITY (PREPA)	ARECIBO	3/4/91	5/6/99	GAS/OIL	COMBUSTION TURBINES (3), 83 MW SIMPLE-CYCLE EACH	248 MW	20 LB/HR	IMPLEMENT GOOD COMBUSTION PRACTICES.	BACT-PSD
PR-0002	PUERTO RICO ELECTRIC POWER AUTHORITY (PREPA)	ARECIBO	7/31/95	5/6/98	GAS/OIL	COMBUSTION TURBINES (3), 83 MW SIMPLE-CYCLE EACH	248 MW	104 LB/HR	IMPLEMENT GOOD COMBUSTION PRACTICES.	BACT-PSD
SC-0021	CAROLINA POWER AND LIGHT CO.	DARLINGTON	9/23/91	3/24/95	GAS/OIL	TURBINE, I.C.	80 MW	60 LB/H		BACT-PSD
SC-0036	CAROLINA POWER AND LIGHT	HARTSVILLE	8/31/94	4/29/98	GAS/OIL	STATIONARY GAS TURBINE	1520 MMBTU/H	702 LB/H	PROPER OPERATION TO ACHIEVE GOOD COMBUSTION	BACT-PSD
SC-0036	CAROLINA POWER AND LIGHT	HARTSVILLE	8/31/94	4/29/98	GAS/OIL	STATIONARY GAS TURBINE	1520 MMBTU/H	414 LB/H	PROPER OPERATION TO ACHIEVE GOOD COMBUSTION	BACT-PSD
SC-0038	GENERAL ELECTRIC GAS TURBINES	GREENVILLE	4/19/98	8/19/98	GAS/OIL	I.C. TURBINE	2700 MMBTU/HR	27189 LB/HR	GOOD COMBUSTION PRACTICES TO MIN. EMISSIONS	BACT-PSD
SD-0001	NORTHERN STATES POWER COMPANY	NEAR SIOUX FALLS, SOUTH I	9/2/92	3/24/95	GAS/OIL	TURBINE, SIMPLE CYCLE, 4 EACH	129 MW	50 PPM FOR GAS	GOOD COMBUSTION TECHNIQUES	BACT-PSD
VA-0189	GORDONSVILLE ENERGY L.P.	FAIRFAX	9/25/92	3/24/95	GAS/OIL	TURBINE FACILITY, GAS	1331.13 X10(7) SCFY NAT GAS	249.9 TOTAL TPY	GOOD COMBUSTION PRACTICES	BACT-PSD
VA-0189	GORDONSVILLE ENERGY L.P.	FAIRFAX	9/25/92	3/24/95	GAS/OIL	TURBINE FACILITY, GAS	7.44 X10(7) GPY FUEL OIL	249.9 TOTAL TPY	GOOD COMBUSTION PRACTICES	BACT-PSD
VA-0189	GORDONSVILLE ENERGY L.P.	FAIRFAX	9/25/92	3/24/95	GAS/OIL	TURBINES (2) EACH WITH A SFJ	1.51 X10(9) BTU/HR N GAS	57 LBS/HR/UNIT	GOOD COMBUSTION PRACTICES	BACT-PSD
VA-0190	BEAR ISLAND PAPER COMPANY, L.P.	ASHLAND	10/30/92	3/24/95	GAS/OIL	TURBINES (2) EACH WITH A SFJ	1.38 X10(9) BTU/HR #2 OIL	88 LBS/HR/UNIT	GOOD COMBUSTION PRACTICES	BACT-PSD
VA-0190	BEAR ISLAND PAPER COMPANY, L.P.	ASHLAND	10/30/92	5/7/97	GAS/OIL	TURBINE, COMBUSTION GAS	474 X10(6) BTU/HR N. GAS	11 LBS/HR	GOOD COMBUSTION	BACT-PSD
VA-0190	BEAR ISLAND PAPER COMPANY, L.P.	ASHLAND	10/30/92	5/7/97	GAS/OIL	TURBINE, COMBUSTION GAS	468 X10(6) BTU/HR #2 DIL	11 LBS/HR	GOOD COMBUSTION	BACT-PSD
VA-0190	BEAR ISLAND PAPER COMPANY, L.P.	ASHLAND	10/30/92	5/7/97	GAS/OIL	TURBINE, COMBUSTION GAS (TOTAL)		48.2 TPY	GOOD COMBUSTION	BACT-PSD
VA-0206	PATOWMACK POWER PARTNERS, LIMITED PARTNERSHIP	LEESBURG	9/15/93	5/7/97	GAS/OIL	TURBINE, COMBUSTION, SIEMENS MODEL V64.2, 3	10.2 X109 SCFY/HR NAT GAS	26 LB/HR	GOOD COMBUSTION OPERATING PRACTICES	BACT-PSD
WA-0280	EEX POWER SYSTEMS, ENCOGEN NW COGENERATION PROJECT	BELLINGHAM	9/28/91	4/18/99	GAS/OIL	TURBINES, COMBINED CYCLE COGEN, GE FRAME 6	123 MW	10 PPM DV @ 15% O2		BACT-PSD
WA-0087	WERCU, PARIS SITE	PARIS	8/29/92	7/20/94	GAS/OIL	TURBINES, COMBUSTION (4)		25 LBS/HR (SEE NOTES)		BACT-PSD

Source: RBLC 1999.

Table 5-15. Florida BACT CO Summary—Natural Gas-Fired CTGs

Permit Date	Source Name	Turbine Size (MW)	CO Emission Limit (ppmvd)	Control Technology
04/09/93	Kissimmee Utility Authority	40	30	Good combustion
04/09/93	Kissimmee Utility Authority	80	20	Good combustion
05/17/93	Central Florida Power, L.P. (Tiger Bay - Destec)	184	15	Good combustion
02/21/94	Polk Power Partners	84	25	Good combustion
02/24/94	Tampa Electric Company Polk Power Station	260	25	Good combustion
07/20/94	Pasco Cogen, Limited	42	28	Good combustion
03/07/95	Orange Cogeneration, L.P.	39	30	Good combustion
06/01/95	Panda-Kathleen	75	25	Good combustion
09/28/95	City of Key West	23	20	Good combustion
01/01/96	Seminole Electric Cooperative, Inc., Hardee Unit 3	140	20	Good combustion
05/98	City of Tallahassee Purdom Unit 8	160	25	Good combustion
07/10/98	City of Lakeland McIntosh Unit 5	250	25	Good combustion
09/28/98	Florida Power Corp. Hines Energy Complex	165	25	Good combustion
11/25/98	Florida Power & Light Fort Myers Repowering	170	12	Good combustion
12/04/98	Santa Rosa Energy Center	167	9	Good combustion
			24 (with duct burner)	Good combustion

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Source: FDEP, 1998.

Table 5-16. Florida BACT CO Summary—Distillate Fuel Oil-Fired CTGs

Permit Date	Source Name	Turbine Size (MW)	CO Emission Limit (ppmvd)	Control Technology
04/09/93	Kissimmee Utility Authority	40	63	Good combustion
04/09/93	Kissimmee Utility Authority	80	20	Good combustion
05/17/93	Central Florida Power, L.P. (Tiger Bay - Destec)	184	30	Good combustion
02/21/94	Polk Power Partners	84	35	Good combustion
02/24/94	Tampa Electric Company Polk Power Station	260	40	Good combustion
07/20/94	Pasco Cogen, Limited	42	18	Good combustion
01/01/96	Seminole Electric Cooperative, Inc., Hardee Unit 3	140	25	Good combustion
05/98	City of Tallahassee Purdom Unit 8	160	90	Good combustion
07/10/98	City of Lakeland McIntosh Unit 5	250	90	Good combustion
09/28/98	Florida Power Corp. Hines Energy Complex	165	30	Good combustion

Source: FDEP, 1998.



The application of DLN combustors for the HCGF CTGs results in a trade-off between NO<sub>x</sub> and CO emission rates. Because ambient CO concentrations in the vicinity of the HCGF would be expected to be well below ambient standards, the reduction in NO<sub>x</sub> emissions is considered to have a greater environmental benefit and would more than compensate for the higher CO emission rates associated with DLN technology.

Use of state-of-the-art combustor design and good operating practices to minimize incomplete combustion are proposed as BACT for CO and VOC. These control techniques have been considered by FDEP to represent BACT for CO and VOC for all simple-cycle CTG projects. Tables 5-17 and 5-18 summarize the CO and VOC BACT emission limits proposed for the HCGF, respectively.

## **5.5 BACT ANALYSIS FOR NO<sub>x</sub>**

NO<sub>x</sub> emissions from combustion sources consist of two components: oxidation of combustion air atmospheric nitrogen (thermal NO<sub>x</sub> and prompt NO<sub>x</sub>) and conversion of chemically bound fuel nitrogen (fuel NO<sub>x</sub>). Essentially all CT NO<sub>x</sub> emissions originate as nitric oxide (NO). NO generated by the CT combustion process is subsequently further oxidized in the CT exhaust system or in the atmosphere to the more stable NO<sub>2</sub> molecule.

Thermal NO<sub>x</sub> results from the oxidation of atmospheric nitrogen under high temperature combustion conditions. The amount of thermal NO<sub>x</sub> formed is primarily a function of combustion temperature and residence time, air/fuel ratio, and, to a lesser extent, combustion pressure. Thermal NO<sub>x</sub> increases exponentially with increases in temperature and linearly with increases in residence time as described by the Zeldovich mechanism. Prompt NO<sub>x</sub> is formed near the combustion flame front from the oxidation of intermediate combustion products such as hydrogen cyanide (HCN), nitrogen (N), and NH. Prompt NO<sub>x</sub> comprises a small portion of total NO<sub>x</sub> in conventional near-stoichiometric CTG combustors but increases under fuel-lean conditions. Prompt NO<sub>x</sub>, therefore, is an important consideration with respect to DLN combustors that use lean fuel mixtures. Fuel NO<sub>x</sub> arises from the oxidation of nonelemental nitrogen contained in the fuel. The conversion of fuel-bound nitrogen (FBN) to NO<sub>x</sub> depends on the bound nitrogen content

Table 5-17. Proposed CO BACT Emission Limits

Emission Source	lb/hr*	ppmvd†
GE PG7241 (FA) CTGs		
(Natural Gas-Fired, Per CTG)	52.8	12
(Distillate Fuel Oil-Fired, Per CTG)	116.6	23
Westinghouse 501F CTGs		
(Natural Gas-Fired, Per CTG)	75.9	16
(Distillate Fuel Oil-Fired, Per CTG)	95.7	20
Westinghouse 501D5A CTGs		
(Natural Gas-Fired, Per CTG)	31.8	10
(Distillate Fuel Oil-Fired, Per CTG)	95.9	28
ABB GT-24 CTGs		
(Natural Gas-Fired, Per CTG)	23.1	6
(Distillate Fuel Oil-Fired, Per CTG)	126.6	25

\*At ISO conditions.

†Maximum at base load conditions.

Sources: GE, 1998.  
 Westinghouse, 1998.  
 ABB, 1998.  
 ECT, 2000.

Table 5-18. Proposed VOC BACT Emission Limits

Emission Source	lb/hr*	ppmvd†
GE PG7241 (FA) CTGs		
(Natural Gas-Fired, Per CTG)	3.1	1.2
(Distillate Fuel Oil-Fired, Per CTG)	7.7	2.8
Westinghouse 501F CTGs		
(Natural Gas-Fired, Per CTG)	8.8	3.0
(Distillate Fuel Oil-Fired, Per CTG)	28.6	10.0
Westinghouse 501D5A CTGs		
(Natural Gas-Fired, Per CTG)	5.4	3.0
(Distillate Fuel Oil-Fired, Per CTG)	20.2	10.0
ABB GT-24 CTGs		
(Natural Gas-Fired, Per CTG)	2.9	1.5
(Distillate Fuel Oil-Fired, Per CTG)	22.7	7.5

\*At ISO conditions.

†Maximum at base load conditions.

Sources: GE, 1998.  
 Westinghouse, 1998.  
 ABB, 1998.  
 ECT, 2000.

of the fuel. In contrast to thermal NO<sub>x</sub>, fuel NO<sub>x</sub> formation does not vary appreciably with combustion variables such as temperature or residence time. Presently, there are no combustion processes or fuel treatment technologies available to control fuel NO<sub>x</sub> emissions. For this reason, the gas turbine NSPS (Subpart GG) contains an allowance for FBN (see Table 5-2). NO<sub>x</sub> emissions from combustion sources fired with fuel oil are higher than those fired with natural gas due to higher combustion flame temperatures and FBN contents. Natural gas may contain molecular nitrogen (N<sub>2</sub>); however, the N<sub>2</sub> found in natural gas does not contribute significantly to fuel NO<sub>x</sub> formation. Typically, natural gas contains a negligible amount of FBN.

### **5.5.1 POTENTIAL CONTROL TECHNOLOGIES**

Available technologies for controlling NO<sub>x</sub> emissions from CTGs include combustion process modifications and postcombustion exhaust gas treatment systems. A listing of available technologies for each of these categories follows:

#### Combustion Process Modifications:

- Water or steam injection and standard combustor design.
- Water or steam injection and advanced combustor design.
- DLN combustor design.

#### Postcombustion Exhaust Gas Treatment Systems:

- Selective non-catalytic reduction (SNCR).
- Non-selective catalytic reduction (NSCR).
- SCR.
- SCONO<sub>x</sub><sup>TM</sup>

A description of each of the listed control technologies is provided in the following sections.

#### **Water or Steam Injection and Standard Combustor Design**

Injection of water or steam into the primary combustion zone of a CTG reduces the formation of thermal NO<sub>x</sub> by decreasing the peak combustion temperature. Water injection decreases the peak flame temperature by diluting the combustion gas stream and acting as

a heat sink by absorbing heat necessary to: (a) vaporize the water (latent heat of vaporization), and (b) raise the vaporized water temperature to the combustion temperature. High purity water must be employed to prevent turbine corrosion and deposition of solids on the turbine blades. Steam injection employs the same mechanisms to reduce the peak flame temperature with the exclusion of heat absorbed due to vaporization since the heat of vaporization has been added to the steam prior to injection. Accordingly, a greater amount of steam, on a mass basis, is required to achieve a specified level of NO<sub>x</sub> reduction in comparison to water injection. Typical injection rates range from 0.3 to 1.0 and 0.5 to 2.0 pounds of water and steam, respectively, per pound of fuel. Water or steam injection will not reduce the formation of fuel NO<sub>x</sub>.

The maximum amount of steam or water that can be injected depends on the CTG combustor design. Excessive rates of injection will cause flame instability, combustor dynamic pressure oscillations, thermal stress (cold-spots), and increased emissions of CO and VOCs due to combustion inefficiency. Accordingly, the efficiency of steam or water injection to reduce NO<sub>x</sub> emissions also depends on turbine combustor design. For a given turbine design, the maximum water-to-fuel ratio (and maximum NO<sub>x</sub> reduction) will occur up to the point where cold-spots and flame instability adversely effect safe, efficient, and reliable operation of the turbine.

The use of water or steam injection and standard turbine combustor design can generally achieve NO<sub>x</sub> exhaust concentrations of 42 and 65 ppmvd for gas and oil firing, respectively.

### **Water or Steam Injection and Advanced Combustor Design**

Water or steam injection functions in the same manner for advanced combustor designs as described previously for standard combustors. Advanced combustors, however, have been designed to generate lower levels of NO<sub>x</sub> and tolerate greater amounts of water or steam injection. The use of water or steam injection and advanced turbine combustor design can typically achieve NO<sub>x</sub> exhaust concentrations of 25 and 42 ppmvd for gas and oil firing, respectively.

### **Dry Low-NO<sub>x</sub> Combustor Design**

A number of turbine vendors have recently developed DLN combustors that premix turbine fuel and air prior to combustion in the primary zone. Use of a premix burner results in a homogeneous air/fuel mixture without an identifiable flame front. For this reason, the peak and average flame temperature are the same, causing a decrease in thermal NO<sub>x</sub> emissions in comparison to a conventional diffusion burner.

Currently, premix burners are limited in application to natural gas and loads above approximately 35 to 40 percent of baseline due to flame stability considerations. During oil firing, wet injection is employed to control NO<sub>x</sub> emissions.

In addition to lean premixed combustion, CTG DLN combustors typically incorporate lean combustion and reduced combustor residence time to reduce the rate of NO<sub>x</sub> formation. All CTGs cool the high-temperature CTG exhaust gas stream with dilution air to lower the exhaust gas to an acceptable temperature prior to entering the CTG turbine. By adding additional dilution air, the hot CTG exhaust gases are rapidly cooled to temperatures below those needed for NO<sub>x</sub> formation. Reduced residence time combustors add the dilution air sooner than do standard combustors. The amount of thermal NO<sub>x</sub> is reduced because the CTG combustion gases are at a higher temperature for a shorter period of time.

Current DLN combustor technology can typically achieve a NO<sub>x</sub> exhaust concentration of 9 to 25 ppmvd or less using natural gas fuel.

### **Selective Non-Catalytic Reduction**

The SNCR process involves the gas phase reaction, in the absence of a catalyst, of NO<sub>x</sub> in the exhaust gas stream with injected ammonia (NH<sub>3</sub>) or urea to yield nitrogen and water vapor.

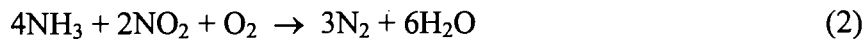
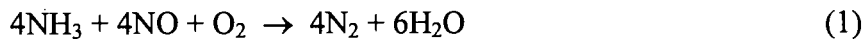
Due to reaction temperature considerations, the SNCR injection system must be located at a point in the exhaust duct where temperatures are consistently between 1,600 and 2,000°F.

### Non-Selective Catalytic Reduction

The NSCR process utilizes a platinum/rhodium catalyst to reduce NO<sub>x</sub> to nitrogen and water vapor under fuel-rich (less than 3 percent O<sub>2</sub>) conditions. NSCR technology has been applied to automobiles and stationary reciprocating engines.

### Selective Catalytic Reduction

In contrast to SNCR, SCR reduces NO<sub>x</sub> emissions by reacting NH<sub>3</sub> with exhaust gas NO<sub>x</sub> to yield nitrogen and water vapor in the presence of a catalyst. NH<sub>3</sub> is injected upstream of the catalyst bed where the following primary reactions take place:



The catalyst serves to lower the activation energy of these reactions, which allows the NO<sub>x</sub> conversions to take place at a lower temperature (i.e., in the range of 600 to 750°F). Typical SCR catalysts include metal oxides (titanium oxide and vanadium), noble metals (combinations of platinum and rhodium), zeolite (alumino-silicates), and ceramics.

Factors affecting SCR performance include space velocity (volume per hour of flue gas divided by the volume of the catalyst bed), NH<sub>3</sub>/NO<sub>x</sub> molar ratio, and catalyst bed temperature. Space velocity is a function of catalyst bed depth. Decreasing the space velocity (increasing catalyst bed depth) will improve NO<sub>x</sub> removal efficiency by increasing residence time but will also cause an increase in catalyst bed pressure drop. The reaction of NO<sub>x</sub> with NH<sub>3</sub> theoretically requires a 1:1 molar ratio. NH<sub>3</sub>/NO<sub>x</sub> molar ratios greater than 1:1 are necessary to achieve high-NO<sub>x</sub> removal efficiencies due to imperfect mixing and other reaction limitations. However, NH<sub>3</sub>/NO<sub>x</sub> molar ratios are typically maintained at 1:1 or lower to prevent excessive unreacted NH<sub>3</sub> (ammonia slip) emissions.

As was the case for SNCR, reaction temperature is critical for proper SCR operation. The optimum temperature range for conventional SCR operation is 600 to 750°F. Below this temperature range, reduction reactions (1) and (2) will not proceed. At temperatures exceeding the optimal range, oxidation of NH<sub>3</sub> will take place resulting in an increase in

NO<sub>x</sub> emissions. Specially formulated high temperature zeolite catalysts have been recently developed that function at exhaust stream temperatures up to a maximum of approximately 1,025°F. The exhaust temperature range for a typical simple cycle unit is 1,067 to 1,200°F. Accordingly, the CTG exhaust temperature would need to be reduced to an acceptable level prior to treatment by a hot SCR control system. NO<sub>x</sub> removal efficiencies for SCR systems typically range from 50 to 90 percent.

SCR catalyst is subject to deactivation by a number of mechanisms. Loss of catalyst activity can occur from thermal degradation if the catalyst is exposed to excessive temperatures over a prolonged period of time. Catalyst deactivation can also occur due to chemical poisoning. Principal poisons include arsenic, sulfur, potassium, sodium, and calcium. Due to the potential for chemical poisoning with fuels other than natural gas, application of SCR to CTGs has been primarily limited to natural gas-fired units.

### **SCONO<sub>x</sub><sup>TM</sup>**

SCONO<sub>x</sub><sup>TM</sup> is a NO<sub>x</sub> and CO catalytic absorption control system exclusively offered by Goal Line Environmental Technologies (GLET).

The SCONO<sub>x</sub><sup>TM</sup> system operates at a temperature range of 300 to 700°F and, therefore, is not applicable to simple-cycle CTGs.

### **Technical Feasibility**

All of the combustion process modification technologies mentioned (water or steam injection and standard combustor design, water or steam injection and advanced combustor, and DLN combustor design) would be feasible for the HCGF CTGs. Of the postcombustion stack gas treatment technologies, SNCR is not feasible because the temperature required for this technology (between 1,600 and 2,000°F) exceeds that found in CT exhaust gas streams (approximately 1,100°F). NSCR was also determined to be technically infeasible because the process must take place in a fuel-rich (less than 3-percent O<sub>2</sub>) environment. Due to high excess air rates, the O<sub>2</sub> content of combustion turbine exhaust gases is typically 13 percent. The SCONO<sub>x</sub><sup>TM</sup> control technology is not technically feasible be-



cause the temperature required for this technology (between 300 to 700°F) is well below the 1,100°F typically occurring for simple-cycle CTG exhaust gas streams.

For natural gas firing, use of advanced DLN combustor technology will achieve NO<sub>x</sub> emission rates comparable to or less than wet injection based on CTG vendor data. Accordingly, the BACT analysis for NO<sub>x</sub> for the HCGF CTGs was confined to advanced DLN combustors (natural gas firing), water injection (distillate fuel oil firing), and the application of postcombustion hot SCR control technologies. Hot SCR is considered potentially feasible with the addition of CTG exhaust stream cooling. However, there are currently no such installations on large, simple-cycle CTGs. The following sections provide information regarding energy, environmental, and economic impacts and proposed BACT limits for NO<sub>x</sub>.

#### **5.5.2 ENERGY AND ENVIRONMENTAL IMPACTS**

The use of advanced DLN combustor technology will not have a significant adverse impact on CTG heat rate.

The installation of hot SCR technology would cause an increase in back pressure on the CTGs due to the pressure drop across the catalyst bed. Additional energy would be needed for the pumping of aqueous NH<sub>3</sub> from storage to the injection nozzles and generation of steam for NH<sub>3</sub> vaporization. For the Westinghouse 501F CTGs, the reduction in turbine output power (lost power generation) will result in an energy penalty of 3,060,000 kilowatt-hours (kwh) (10,441 million British thermal units [MMBtu]) per year at baseload (170 MW) operation and 3,000 hr/yr operation per CT. This energy penalty is equivalent to the use of 29.8 million cubic feet (ft<sup>3</sup>) of natural gas annually based on a natural gas heating value of 1,050 British thermal units per cubic foot (Btu/ft<sup>3</sup>) for all three CTGs. The lost power generation energy penalty, based on a power cost of \$0.060/kwh, is \$481,951 per year for all three CTGs. The magnitude of the energy penalty will be comparable for the GE 7FA and ABB GT-24 CTGs and somewhat lower for the Westinghouse 501D5A CTGs.

There are no significant adverse environmental effects due to the use of advanced DLN combustor technology. In contrast, application of hot SCR technology would result in the following adverse environmental impacts:

- $\text{NH}_3$  emissions due to *ammonia slip*;  $\text{NH}_3$  emissions are estimated to total 134 tpy (at baseload and 59°F ambient temperature) for a SCR design  $\text{NH}_3$  slippage rate of 5 ppmvd for three CTGs. However, ammonia slip can increase significantly during start-ups, upsets or failures of the  $\text{NH}_3$  injection system, or due to catalyst degradation. In instances where such events have occurred,  $\text{NH}_3$  exhaust concentrations of 50 ppmv or greater have been measured. Since the odor threshold of  $\text{NH}_3$  is 20 ppmv, releases of  $\text{NH}_3$  during upsets or malfunctions have the potential to cause ambient odor problems.  $\text{NH}_3$  also acts as an irritant to human tissue. Depending on the concentration and duration of exposure,  $\text{NH}_3$  can cause eye, skin, and mucous membrane irritation. These effects can vary from minor irritation to severe damage. Contact of the skin or mucosa with liquid  $\text{NH}_3$  or a high vapor concentration can result in burns or obstructed breathing.
- Ammonium bisulfate and ammonium sulfate particulate emissions due to the reaction of  $\text{NH}_3$  with  $\text{SO}_3$  present in the exhaust gases; total PM emissions would increase by approximately 50 percent.

### 5.5.3 ECONOMIC IMPACTS

An assessment of economic impacts was performed by comparing control costs between a baseline case of advanced DLN combustor technology and baseline technology with the addition of SCR controls. The economic analysis was conducted for the ABB GT-24 CTGs because these units are estimated to have the highest annual HCGF  $\text{NO}_x$  emission rate and, therefore, expected to have the lowest control system cost effectiveness. Cost effectiveness of SCR control technology for the remaining CTGs under consideration will be comparable to that determined for the ABB GT-24 CTGs. Baseline technology is expected to achieve  $\text{NO}_x$  exhaust concentrations of 25 and 42 ppmvd at 15-percent  $\text{O}_2$  for natural gas and distillate fuel oil firing, respectively. SCR technology was premised to achieve  $\text{NO}_x$  concentrations of 3.5 and 10.0 ppmvd at 15-percent  $\text{O}_2$  for natural gas and distillate fuel oil firing, respectively. The  $\text{NO}_x$  concentration of 3.5 ppmvd is representative of recent LAER determi-

nations made in California for natural gas-fired CTGs equipped with DLN combustor technology and SCR controls.

The cost impact analysis was conducted using the OAQPS factors previously summarized in Table 5-1 and project-specific economic factors provided in Table 5-9. Emission reductions were calculated assuming baseload operation for 2,500 and 500 hr/yr (for natural gas and distillate fuel oil firing, respectively) at an annual average ambient temperature of 59°F. Tables 5-19 and 5-20 summarize specific capital and annual operating costs for the SCR control system, respectively.

Cost effectiveness for the application of SCR technology to the HCGF CTGs was determined to be \$9,394 per ton of NO<sub>x</sub> removed. This control cost is considered economically unreasonable. Table 5-21 summarizes results of the NO<sub>x</sub> BACT analysis.

#### **5.5.4 PROPOSED BACT EMISSION LIMITATIONS**

BACT NO<sub>x</sub> limits obtained from the RBLC database for natural gas- and distillate fuel oil-fired CTGs are provided in Tables 5-22 and 5-23, respectively. Recent Florida BACT determinations for natural gas- and distillate fuel oil-fired CTGs are shown in Tables 5-24 and 5-25.

FDEP natural gas-fired CTG NO<sub>x</sub> BACT determinations for the past 5 years range from 12 to 25 ppmvd at 15-percent oxygen with an average NO<sub>x</sub> limit of 15 ppmvd at 15-percent oxygen. Of the ten most recent FDEP NO<sub>x</sub> BACT determinations for CTGs, seven determinations established a limit of 15 ppmvd or higher.

Table 5-26 summarizes the NO<sub>x</sub> BACT emission limits proposed for the HCGF. NO<sub>x</sub> emission rates proposed as BACT for the HCGF CTGs are consistent with prior FDEP BACT determinations.

Table 5-19. Capital Costs for SCR System – Three CTGs

Item	Dollars	OAQPS Factor
<b>Direct Costs</b>		
Purchased equipment	14,549,733 (A)	
Sales tax	872,984	0.06 × A
Freight	727,487	0.05 × A
Instrumentation	1,454,973	0.10 × A
<b>Subtotal Purchase Equipment</b>	<b>\$17,605,177</b>	<b>B</b>
<b>Installation</b>		
Foundations and supports	1,408,414	0.08 × B
Handling and erection	2,464,725	0.14 × B
Electrical	704,207	0.04 × B
Piping	352,104	0.02 × B
Insulation for ductwork	176,052	0.01 × B
Painting	176,052	0.01 × B
<b>Subtotal Installation Cost</b>	<b>\$5,281,553</b>	
<b>Subtotal Direct Costs</b>	<b>\$22,886,730</b>	
<b>Indirect Costs</b>		
Engineering	1,760,518	0.10 × B
Construction and field expenses	880,259	0.05 × B
Contractor fees	1,760,518	0.10 × B
Start-up	352,104	0.02 × B
Performance test	176,052	0.01 × B
Contingency	528,155	0.15 × B
<b>Subtotal Indirect Costs</b>	<b>\$5,457,605</b>	
<b>TOTAL CAPITAL INVESTMENT</b>	<b>\$28,344,335 (TCI)</b>	

Sources: Engelhard, 1999.  
ECT, 2000.

Table 5-20. Annual Operating Costs for SCR System

Item	Dollars	OAQPS Factor
<b>Direct Costs</b>		
Labor and material costs		
Operator	5,063 (A)	
Supervisor	759	0.15 × A
Maintenance		
Labor	5,625 (B)	
Materials	5,625	1.00 × B
<b>Subtotal Labor, Material,     and Maintenance Costs</b>	<b>\$17,072 (C)</b>	
Catalyst costs		
Replacement (materials and labor)	\$7,639,804	
<b>Annualized Catalyst Costs</b>	<b>\$1,754,155</b>	
Raw materials and utilities		
Electricity	308,094	
Aqueous NH <sub>3</sub>	159,052	
<b>Subtotal Raw Materials and Utilities</b>	<b>\$467,146</b>	
Energy penalties		
Turbine backpressure	583,200	
<b>Subtotal Direct Costs</b>	<b>\$2,821,573 (TDC)</b>	
<b>Indirect Costs</b>		
Overhead	10,243	0.60 × C
Administrative charges	566,887	0.02 × TCI
Property taxes	283,443	0.01 × TCI
Insurance	283,443	0.01 × TCI
Capital recovery	3,445,641	
Emission Fee Credit	(6,570)	
<b>Subtotal Indirect Costs</b>	<b>\$4,583,087</b>	
<b>TOTAL ANNUAL COST</b>	<b>\$7,404,660</b>	

Sources: Engelhard, 1999.  
ECT, 2000.

Table 5-21. Summary of NO<sub>x</sub> BACT Analysis

Control Option	Emission Impacts			Economic Impacts			Energy Impacts	Environmental Impacts	
	Emission Rates		Emission Reduction	Installed Capital Cost	Total Annualized Cost	Cost Effectiveness Over Baseline	Increase Over Baseline	Toxic Impact	Adverse Envir. Impact
	(lb/hr)	(tpy)	(tpy)	(\$)	(\$/yr)	(\$/ton)	(MMBtu/yr)	(Y/N)	(Y/N)
Oxidation catalyst	105.1	157.6	788.2	28,344,335	7,404,660	9,394	33,166	Y	Y
Baseline	430.5	945.8	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Basis: Three ABB GT-24 CTGs, 100-percent load for 2,500 hr/yr gas-firing and 500 hr/yr oil-firing.

Sources: Westinghouse, 1998.  
 Engelhard, 1999.  
 GPP, 1999.  
 ECT, 2000.











Table 5-24. Florida BACT NO<sub>x</sub> Summary—Natural Gas-Fired CTGs

Permit Date	Source Name	Turbine Size (MW)	NO <sub>x</sub> Emission Limit (ppmvd)	Control Technology
08/17/92	Orlando Cogeneration, L.P.	79	15	DLN combustors
08/17/92	Florida Power Corp. University of Florida	43	25	Steam injection
12/17/92	Auburndale Power Partners	104	25	Steam injection
			15	Steam injection
04/09/93	Kissimmee Utility Authority	40	25	Water injection
			15	DLN combustors
04/09/93	Kissimmee Utility Authority	80	25	Water injection
			15	DLN combustors
05/17/93	Central Florida Power, L.P. (Tiger Bay - Destec)	184	25	DLN combustors
		184	15	DLN combustors
02/21/94	Polk Power Partners	84	25	DLN combustors
			15	DLN combustors
02/24/94	Tampa Electric Company Polk Power Station	260	25	Nitrogen diluent injection
07/20/94	Pasco Cogen, Limited	42	25	Wet injection
03/07/95	Orange Cogeneration, L.P.	39	15	DLN combustors
04/11/95	Gainesville Regional Utilities Deerhaven CT3	74	15	DLN combustors
06/01/95	Panda-Kathleen	75	15	DLN combustors
09/28/95	City of Key West (relocated unit)	23	75	Water injection
01/01/96	Seminole Electric Cooperative, Inc., Hardee Unit 3	140	15	DLN combustors
05/98	City of Tallahassee Purdom Unit 8	160	12	DLN combustors
07/10/98	City of Lakeland McIntosh Unit 5	250	25	DLN combustors
07/10/98	City of Lakeland McIntosh Unit 5	250	9	DLN combustors or SCR (effective 05/01/2002)
09/28/98	Florida Power Corp. Hines Energy Complex	165	12	DLN combustors and/or SCR
12/04/98	Santa Rosa Energy Center	167	9	DLN combustors

5-47

Source: FDEP, 1998.

Table 5-25. Florida BACT NO<sub>x</sub> Summary—Distillate Fuel Oil-Fired CTGs

Permit Date	Source Name	Turbine Size (MW)	NO <sub>x</sub> Emission Limit (ppmvd)	Control Technology
08/17/92	Florida Power Corp. University of Florida	43	42	Steam injection
08/17/92	Florida Power Corp. Intercession City	93	42	Wet injection
08/17/92	Florida Power Corp. Intercession City	186	42	Steam injection
12/17/92	Auburndale Power Partners	104	42	Steam injection
04/09/93	Kissimmee Utility Authority	40	42	Water injection
04/09/93	Kissimmee Utility Authority	80	42	Water injection
05/17/93	Central Florida Power, L.P. (Tiger Bay - Destec)	184	42	Wet injection
02/21/94	Polk Power Partners	84	42	Wet injection
02/24/94	Tampa Electric Company Polk Power Station	260	42	Wet injection
07/20/94	Pasco Cogen, Limited	42	42	Wet injection
04/11/95	Gainesville Regional Utilities Deerhaven CT3	74	42	Wet injection
01/01/96	Seminole Electric Cooperative, Inc., Hardee Unit 3	140	—	—
05/98	City of Tallahassee Purdom Unit 8	160	42	Water or steam injection
07/10/98	City of Lakeland McIntosh Unit 5	250	42	Water injection
09/28/98	Florida Power Corp. Hines Energy Complex	165	42	Water injection

Source: FDEP, 1998.

Table 5-26. Proposed NO<sub>x</sub> BACT Emission Limits

Emission Source	lb/hr*	ppmvd†
GE PG7241 (FA) CTGs		
(Natural Gas-Fired, Per CTG)	75.7	10.5
(Distillate Fuel Oil-Fired, Per CTG)	350.9	42
Westinghouse 501F CTGs		
(Natural Gas-Fired, Per CTG)	116.9	15
(Distillate Fuel Oil-Fired, Per CTG)	328.9	42
Westinghouse 501D5A CTGs		
(Natural Gas-Fired, Per CTG)	80.6	15
(Distillate Fuel Oil-Fired, Per CTG)	240.7	42
ABB GT-24 CTGs		
(Natural Gas-Fired, Per CTG)	183.7	25
(Distillate Fuel Oil-Fired, Per CTG)	342.5	42

\*At ISO conditions.

† Corrected to 15-percent O<sub>2</sub>, maximum at base load conditions.

Sources: GE, 1998.  
 Westinghouse, 1998.  
 ABB, 1998.  
 ECT, 2000.

## **5.6 BACT ANALYSIS FOR SO<sub>2</sub> AND H<sub>2</sub>SO<sub>4</sub> MIST**

### **5.6.1 POTENTIAL CONTROL TECHNOLOGIES**

Technologies employed to control SO<sub>2</sub> and H<sub>2</sub>SO<sub>4</sub> mist emissions from combustion sources consist of fuel treatment and postcombustion add-on controls (i.e., flue gas desulfurization (FGD) systems).

#### **Fuel Treatment**

Fuel treatment technologies are applied to gaseous, liquid, and solid fuels to reduce their sulfur contents prior to delivery to end fuel users. For wellhead natural gas and fuel oils containing sulfur compounds (e.g., H<sub>2</sub>S), a variety of technologies are available to remove these sulfur compounds to acceptable levels. Desulfurization of natural gas and fuel oils are performed by the fuel supplier prior to distribution by pipeline.

#### **Flue Gas Desulfurization**

FGD systems remove SO<sub>2</sub> from exhaust streams by using an alkaline reagent to form sulfite and sulfate salts. The reaction of SO<sub>2</sub> with the alkaline chemical can be performed using either a wet- or dry-contact system. FGD wet scrubbers typically employ sodium, calcium, or dual-alkali reagents using packed or spray towers. Wet FGD systems will generate wastewater and wet sludge streams requiring treatment and disposal. In a dry FGD system, an alkaline slurry is injected into the combustion process exhaust stream. The liquid sulfite/sulfate salts that form from the reaction of the alkaline slurry with SO<sub>2</sub> are dried by heat contained in the exhaust stream and subsequently removed by downstream PM control equipment.

#### **Technical Feasibility**

Treatment of natural gas and fuel oils to remove sulfur compounds is conducted by the fuel supplier, when necessary, prior to distribution. Accordingly, additional fuel treatment by end users is considered technically infeasible because the natural gas and distillate fuel oil sulfur contents have already been reduced to very low levels.

There have been no applications of FGD technology to CTGs because low sulfur fuels are typically used. The HCGF CTGs will be fired with natural gas and distillate fuel oil. The sulfur content of natural gas, the primary fuel source, is more than 100 times lower than the fuels (e.g., coal) employed in boilers using FGD systems. In addition, CTGs operate with a significant amount of excess air that generates high exhaust gas flow rates. Because FGD SO<sub>2</sub> removal efficiency decreases with decreasing inlet SO<sub>2</sub> concentration, application of an FGD system to a CTG exhaust stream will result in unreasonably low SO<sub>2</sub> removal efficiencies. Due to low SO<sub>2</sub> exhaust stream concentrations, FGD technology is not considered to be technically feasible for CTGs because removal efficiencies would be unreasonably low.

### **5.6.2 PROPOSED BACT EMISSION LIMITATIONS**

Because postcombustion SO<sub>2</sub> and H<sub>2</sub>SO<sub>4</sub> mist controls are not applicable, use of low sulfur fuel is considered to represent BACT for the HCGF CTGs. Natural gas used at the HCGF will contain no more than 2.0 gr S/100 scf. Distillate fuel oil used for the new CTGs as a back-up fuel source will contain no more than 0.05 wt%S. The proposed BACT limits are based on the use of natural gas containing no more than 2.0 gr S/100 scf and distillate fuel oil containing no more than 0.05 wt%S. Table 5-27 summarizes the SO<sub>2</sub> and H<sub>2</sub>SO<sub>4</sub> mist BACT emission limits proposed for the HCGF.

### **5.7 SUMMARY OF PROPOSED BACT EMISSION LIMITS**

Table 5-28 summarizes control technologies proposed by the applicant as BACT for each pollutant subject. Table 5-29 summarizes specific applicant proposed BACT emission limits for each pollutant.

Table 5-27. Proposed SO<sub>2</sub> and H<sub>2</sub>SO<sub>4</sub> Mist BACT Emission Limits

Emission Source	Pollutant	Proposed BACT Emission Limits*
		Fuel Sulfur Content (wt%S)
Natural Gas firing, All CTGs		
	SO <sub>2</sub>	Pipeline Quality Natural Gas
	H <sub>2</sub> SO <sub>4</sub> mist	Pipeline Quality Natural Gas
Distillate Fuel Oil firing, All CTGs		
	SO <sub>2</sub>	≤0.05
	H <sub>2</sub> SO <sub>4</sub> mist	≤0.05

\*Maximum rates for all operating scenarios.

Sources: GPP, 1999.  
ECT, 1999.



Table 5-28. Summary of BACT Control Technologies

Pollutant	Control Technology
PM/PM <sub>10</sub>	<ul style="list-style-type: none"> <li>• Exclusive use of low-ash and low-sulfur natural gas and distillate fuel oil.</li> <li>• Efficient and complete combustion.</li> </ul>
CO/VOC	<ul style="list-style-type: none"> <li>• Efficient and complete combustion.</li> </ul>
NO <sub>x</sub>	<ul style="list-style-type: none"> <li>• Use of advanced DLN burners (natural gas firing).</li> <li>• Use of wet injection (distillate fuel oil firing).</li> </ul>
SO <sub>2</sub> /H <sub>2</sub> SO <sub>4</sub> mist	<ul style="list-style-type: none"> <li>• Exclusive use of low-ash and low-sulfur natural gas and distillate fuel oil.</li> </ul>

Source: ECT, 2000.

Table 5-29. Summary of Proposed BACT Emission Limits

Emission Source	Pollutant	Proposed BACT Emission Limits	
		ppmvd	lb/hr
All CTGs			
Natural Gas firing, Per CTG			
	PM/PM <sub>10</sub>	10-percent opacity	
	SO <sub>2</sub>	Pipeline Quality Natural Gas	
	H <sub>2</sub> SO <sub>4</sub> mist	Pipeline Quality Natural Gas	
Distillate Fuel Firing, Per CTG			
	PM/PM <sub>10</sub>	10-percent opacity (GE PG7241 [FA] CTG)	
	PM/PM <sub>10</sub>	20-percent opacity	
	SO <sub>2</sub>	Fuel Oil ≤0.05 wt % S	
	H <sub>2</sub> SO <sub>4</sub> mist	Fuel Oil ≤0.05 wt % S	
GE PG7241 (FA) CTGs			
Natural Gas firing, Per CTG			
	CO	12*	52.8†
	NO <sub>x</sub>	10.5*	75.7†
	VOC	1.2*	3.1†
Distillate Fuel Firing, Per CTG			
	CO	23*	116.6†
	NO <sub>x</sub>	42*	350.9†
	VOC	2.8*	7.7†
WESTINGHOUSE 501F CTGs			
Natural Gas firing, Per CTG			
	CO	16*	75.9†
	NO <sub>x</sub>	15*	116.9†
	VOC	3.0*	8.8†
Distillate Fuel Firing, Per CTG			
	CO	20*	95.7†
	NO <sub>x</sub>	42*	328.9†
	VOC	10.0*	28.6†

Table 5-29. Summary of Proposed BACT Emission Limits (Page 2 of 2)

Emission Source	Pollutant	Proposed BACT Emission Limits	
		ppmvd	lb/hr
WESTINGHOUSE 501D5A CTGs			
Natural Gas firing, Per CTG			
	CO	10*	31.8†
	NO <sub>x</sub>	15*	80.6†
	VOC	3.0*	5.4†
Distillate Fuel Firing, Per CTG			
	CO	28*	95.9†
	NO <sub>x</sub>	42*	240.7†
	VOC	10.0*	20.2†
ABB GT-24 CTGs			
Natural Gas firing, Per CTG			
	CO	6*	23.1†
	NO <sub>x</sub>	25*	183.7†
	VOC	1.5*	2.9†
Distillate Fuel Firing, Per CTG			
	CO	25*	126.6†
	NO <sub>x</sub>	42*	342.5†
	VOC	7.5*	22.7†

\* Corrected to 15 percent O<sub>2</sub>, at base load conditions.

† ISO conditions.

Sources: GE, 1998.  
 Westinghouse, 1998.  
 ABB, 1998.  
 ECT, 2000.

### **6.3.1 SCREENING MODELS**

For screening purposes, the SCREEN3 model, Version 96043, is recommended and was used in this analysis. SCREEN3 is a simple model that calculates 1-hour average concentrations over a range of predefined, worst-case meteorological conditions. SCREEN3 is appropriate for use in assessing building wake downwash. SCREEN3 also includes algorithms for analyzing concentrations on simple and complex terrain. Both simple terrain and the rural designation were selected for all SCREEN3 analyses.

The proposed CTGs may operate under a variety of operating scenarios. These scenarios include different loads, ambient air temperatures, and fuel type (i.e., natural gas or distillate fuel oil). Plume dispersion and, therefore, ground-level impacts will be affected by these different operating scenarios since emission rates, exit temperatures, and exhaust gas velocities will change. Each of the operating scenarios was evaluated for each pollutant of concern to identify the scenario that caused the highest impact. These worst-case operating scenarios were then subsequently evaluated using the refined Industrial Source Complex (ISC3) dispersion model. A nominal emission rate of 10.0 grams per second (g/s) was used for all SCREEN3 model runs. The SCREEN3 model results were then adjusted to reflect maximum emission rates for each operating case (i.e., model results were multiplied by the ratio of maximum emission rates [in g/s] to 10.0 g/s). Screening modeling results are summarized in Section 7.0, Tables 7-1 through 7-4. These tables show, for each operating scenario and pollutant evaluated, the SCREEN3 unadjusted 1-hour average maximum impact, emission rate adjustment ratio, and the adjusted SCREEN3 1-hour average maximum impact.

### **6.3.2 REFINED MODELS**

The most recent regulatory version of the ISC3 models (EPA, 1999) is recommended and was used in this analysis for refined modeling. The ISC3 models are steady-state Gaussian plume models that can be used to assess air quality impacts over simple terrain from a wide variety of sources. The ISC3 models are capable of calculating concentrations for averaging times ranging from 1 hour to annual. For this study, the ISC3 short-term (ISCST3) (Version 99155) model was used to calculate short-term ambient impacts with averaging times between 1 and 24 hours as well as long-term annual averages.

Procedures applicable to the ISCST3 dispersion model specified in EPA's *Guideline for Air Quality Models* (GAQM) were followed in conducting the refined dispersion modeling. The GAQM is codified in Appendix W of 40 CFR 51. In particular, the ISCST3 model control pathway MODELOPT keyword parameters DFAULT, CONC, RURAL, and NOCMPL were selected. Selection of the parameter DFAULT, which specifies use of the regulatory default options, is recommended by the GAQM. The CONC, RURAL, and NOCMPL parameters specify calculation of concentrations, use of rural dispersion, and suppression of complex terrain calculations, respectively. As previously mentioned, the ISCST3 model was also used to determine annual average impact predictions, in addition to short-term averages, by using the PERIOD parameter for the AVERTIME keyword. Conservatively, no consideration was given to pollutant exponential decay.

### **6.3.3 NO<sub>2</sub> AMBIENT IMPACT ANALYSIS**

For annual NO<sub>2</sub> impacts, the tiered screening approach described in the GAQM, Section 6.2.3 was used. Tier 1 of this screening procedure assumes complete conversion of NO<sub>x</sub> to NO<sub>2</sub>. Tier 2 applies an empirically derived NO<sub>2</sub>/NO<sub>x</sub> ratio of 0.75 to the Tier 1 results.

### **6.4 DISPERSION OPTION SELECTION**

Area characteristics in the vicinity of proposed emission sources are important in determining model selection and use. One important consideration is whether the area is rural or urban since dispersion rates differ between these two classifications. In general, urban areas cause greater rates of dispersion because of increased turbulent mixing and buoyancy-induced mixing. This is due to the combination of greater surface roughness caused by more buildings and structures and greater amount of heat released from concrete and similar surfaces. EPA guidance provides two procedures to determine whether the character of an area is predominantly urban or rural. One procedure is based on land use typing, and the other is based on population density. The land use typing method uses the work of Auer (Auer, 1978) and is preferred by EPA and FDEP because it is meteorologically oriented. In other words, the land use factors employed in making a rural/urban designation are also factors that have a direct effect on atmospheric dispersion. These

## **6.0 AMBIENT IMPACT ANALYSIS METHODOLOGY**

### **6.1 GENERAL APPROACH**

The approach used to analyze the potential impacts of the proposed facility, as described in detail in the following sections, was developed in accordance with accepted practice. Guidance contained in EPA manuals and user's guides was sought and followed.

### **6.2 POLLUTANTS EVALUATED**

Based on an evaluation of anticipated worst-case annual operating scenarios, the Project will have the potential to emit 950.1 tpy NO<sub>x</sub>, 518.3 tpy of CO, 125.5 tpy of PM/PM<sub>10</sub>, 108.1 tpy of SO<sub>2</sub>, 73.8 tpy of VOCs, and 14.0 tpy of H<sub>2</sub>SO<sub>4</sub> mist. Table 3-2 previously provided a comparison of estimated potential annual emission rates for the Project and the PSD significant emission rate thresholds. As shown in that table, potential emissions of NO<sub>x</sub>, CO, PM/PM<sub>10</sub>, H<sub>2</sub>SO<sub>4</sub>, and SO<sub>2</sub> are each projected to exceed the applicable PSD significant emission rate level. These pollutants are, therefore, subject to the PSD NSR air quality impact analysis requirements of Rule 62-212.400(5)(d), F.A.C.

### **6.3 MODEL SELECTION AND USE**

For this study, air quality models were applied at two levels. The first, or screening, level provided conservative estimates of impacts from the simple-cycle CTGs. The purposes of the screening modeling were to:

- Eliminate the need for more sophisticated analysis in situations with low predicted impacts and no threat to any standard.
- Provide information to guide the more rigorous refined analysis, including the operating mode (load, fuel type, and ambient temperature), which caused the highest ambient impact for each criteria pollutant.

The second, or refined, level encompassed a more detailed treatment of atmospheric processes. Refined modeling required more detailed and precise input data, but is presumed to have provided more accurate estimates of source impacts.

factors include building types, extent of vegetated surface area and water surface area, types of industry and commerce, etc. Auer recommends these land use factors be considered within 3 km of the source to be modeled to determine urban or rural classifications. The Auer land use typing method was used for the ambient impact analysis.

The Auer technique recognizes four primary land use types: industrial (I), commercial (C), residential (R), and agricultural (A). Practically all industrial and commercial areas come under the heading of urban, while the agricultural areas are considered rural. However, those portions of generally industrial and commercial areas that are heavily vegetated can be considered rural in character. In the case of residential areas, the delineation between urban and rural is not as clear. For residential areas, Auer subdivides this land use type into four groupings based on building structures and associated vegetation. Accurate classification of the residential areas into proper groupings is important to determine the most appropriate land use classification for the study area.

USGS 7.5-minute series topographic maps for the area were used to identify the land use types within a 3-km radius area of the proposed site. Based on this analysis, more than 50 percent of the land use surrounding the plant was determined to be rural under the Auer land use classification technique. Therefore, rural dispersion coefficients and mixing heights were used for the ambient impact analysis.

## **6.5 TERRAIN CONSIDERATION**

The GAQM defines *flat terrain* as terrain equal to the elevation of the stack base, *simple terrain* as terrain lower than the height of the stack top, and *complex terrain* as terrain above the height of the plume center line (for screening modeling, complex terrain is terrain above the height of the stack top). Terrain above the height of the stack top but below the height of the plume center line is defined as *intermediate terrain*.

USGS 7.5-minute series topographic maps were examined for terrain features in the vicinity of the HCGF (i.e., within an approximate 10-km radius). Review of the USGS topographic maps indicates nearby terrain would be classified as simple terrain. Due to the minimal amount of terrain elevation differences in the vicinity, assignment of recep-

tor terrain elevations was not conducted (i.e., all receptors were assumed to be at the same elevation as the CTGs stack bases for modeling purposes).

## 6.6 GOOD ENGINEERING PRACTICE STACK HEIGHT/BUILDING WAKE EFFECTS

According to EPA regulations (40 CFR 51), GEP stack height is defined as the highest of 65 meters or a height established by applying the formula:

$$H_g = H + 1.5 L$$

where:  $H_g$  = GEP stack height.

$H$  = height of the structure or nearby structure.

$L$  = lesser dimension (height or projected width) of the nearby structure.

*Nearby* is defined as a distance up to five times the lesser of the height or width dimension of a structure or terrain feature, but not greater than 800 meters. While the GEP stack height regulations require that stack heights used in modeling for determining compliance with NAAQS and PSD increments not exceed GEP stack heights, the actual stack height may be greater. Guidelines for determining GEP stack height have been issued by EPA (1985).

The stack height proposed for the simple-cycle CTGs (100 feet [ft]) is less than the *de minimis* GEP height of 65 meters (213 ft), and, therefore, complies with the EPA promulgated final stack height regulations (40 CFR 51).

While the GEP stack height rules address the maximum stack height that can be employed in a dispersion model analysis, stacks having heights lower than GEP stack height can potentially result in higher downwind concentrations due to building downwash effects. The ISC dispersion models contain two algorithms that assess the effect of building downwash; these algorithms are referred to as the Huber-Snyder and Schulman-Scire methods. The following steps are employed in determining the effects of building downwash:



- A determination is made as to whether a particular stack is located in the area of influence of a building (i.e., within five times the lesser of the building's height or projected width). If the stack is not within this area, it will not be subject to downwash from that building.
- If a stack is within a building's area of influence, a determination is made as to whether it will be subject to downwash based on the heights of the stack and building. If the stack height to building height ratio is equal to or greater than 2.5, the stack will not be subject to downwash from that building.
- If both conditions in the previous two items are satisfied (i.e., a stack is within the area of influence of a building and has a stack height to building height ratio of less than 2.5), the stack will be subject to building downwash. The determination is then made as to whether the Huber-Snyder or Schulman-Scire downwash method applies. If the stack height is less than or equal to the building height plus one-half the lesser of the building height or width, the Schulman-Scire method is used. Conversely, if the stack height is greater than this criterion, the Huber-Snyder method is employed.
- The ISCST3 downwash input data consists of an array of 36 wind direction-specific building heights and projected widths for each stack. LB is defined as the lesser of the height and projected width of the building. For directionally dependent building downwash, wake effects are assumed to occur if a stack is situated within a rectangle composed of two lines perpendicular to the wind direction, one line at 5 LB downwind of the building and the other at 2 LB upwind of the building, and by two lines parallel to the wind, each at 0.5 LB away from the side of the building.

Table 6-1 provides dimensions of the building/structures evaluated for wake effects; the locations of these buildings/structures were previously provided on Figure 2-2. As shown in Table 6-1, there are no structures which would cause downwash of the CTG stacks.

Table 6-1. Building/Structure Dimensions

Building/Structure	Dimensions		
	Width (meters)	Length (meters)	Height (meters)
Maintenance building	9.0	15.2	12.0
Control building	30.5	48.6	12.0
CT air inlet filter	12.2	12.2	12.2

Sources: GPP, 1999.  
ECT, 1999.

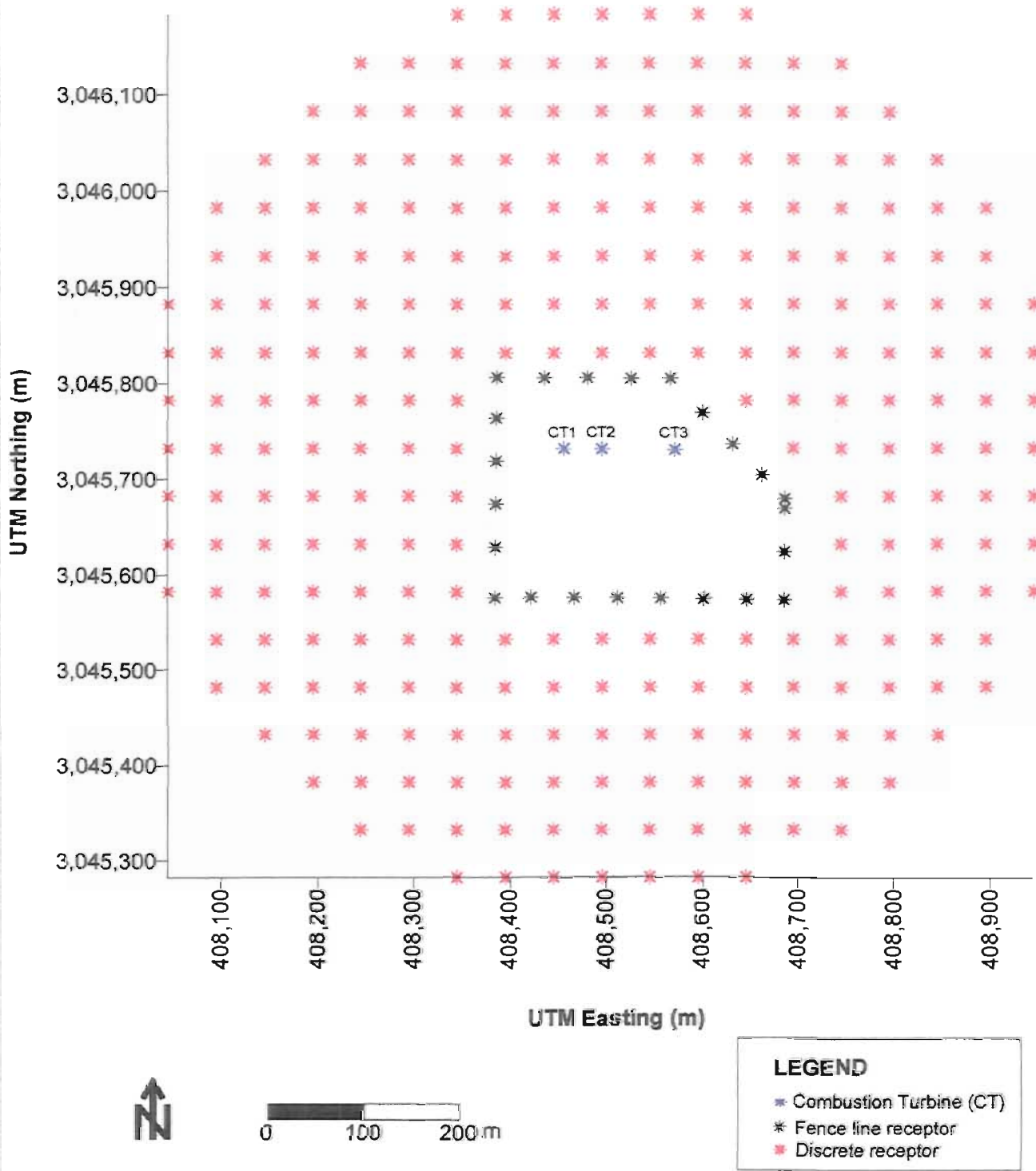
## 6.7 RECEPTOR GRIDS

Receptors were placed at locations considered to be *ambient air*, which is defined as “that portion of the atmosphere, external to buildings, to which the general public has access.” Section 2.0 provided a plot plan showing the site fence lines (see Figure 2-2). As shown in Figure 2-2, the entire perimeter of the plant site is fenced. Therefore, the nearest locations of general public access are at the facility fence lines.

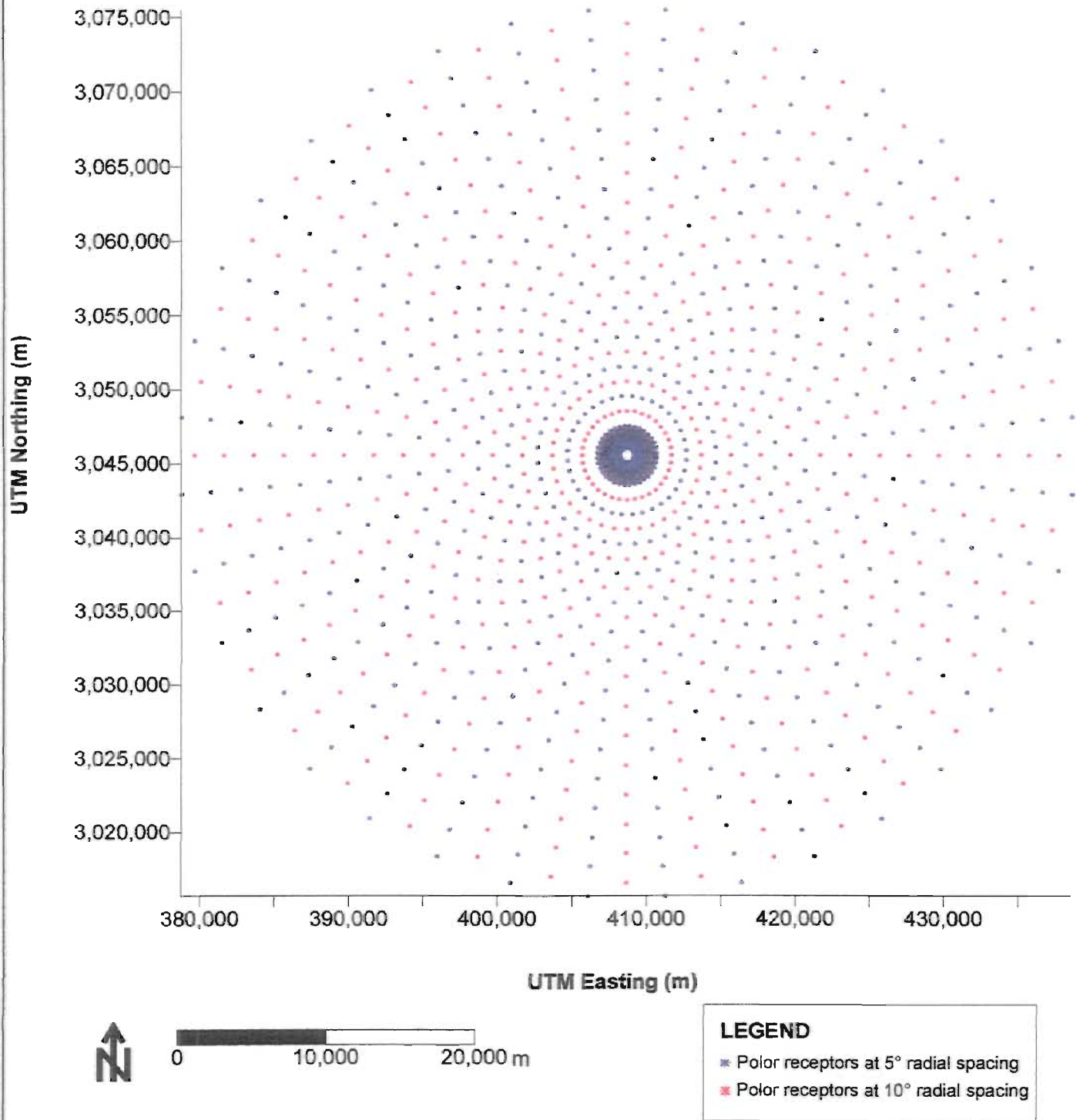
Consistent with GAQM recommendations, the ambient impact analysis used the following receptor grids:

- Fence line Cartesian receptors—Discrete receptors placed on the site fence line at approximately 50-meter intervals.
- Near-field Cartesian receptors—Discrete receptors placed at 50-meter intervals from the site fence line to the first polar receptor ring.
- Near-field polar receptors—Polar receptors consisting of 11 rings of 36 receptors each (36 radials at 10° radial spacings) at 50-meter intervals beginning 500 meters from the receptor grid origin (CT2) to a distance of 1,000 meters.
- Mid-field polar receptors—Polar receptors consisting of 10 rings of 36 receptors each (36 radials at 10° radial spacings) at 100-meter intervals beginning 1,100 meters from the receptor grid origin to a distance of 2,000 meters.
- Far-field Polar receptors—Polar receptors consisting of 28 rings of 36 receptors each (36 radials at 10° radial spacings) at 1,000-meter intervals beginning 3,000 meters from the receptor grid origin to a distance of 30,000 meters.

To improve the spatial distribution of the polar receptors, each polar ring was offset by 5°. Figure 6-1 illustrates a graphical representation of the receptor grids (out to a distance of 500 meters). A depiction of the receptor grids (from 500 meters to 30 km) is shown in Figure 6-2.



**FIGURE 6-1.**  
**RECEPTOR LOCATIONS (WITHIN 500 m)**



**FIGURE 6-2.**  
**RECEPTOR LOCATIONS (From 500m to 30 km)**



## **6.8 METEOROLOGICAL DATA**

Detailed meteorological data are needed for modeling with the ISC3 dispersion models. The ISCST3 model requires a preprocessed data file compiled from hourly surface observations and concurrent twice-daily rawinsonde soundings (i.e., mixing height data).

Consistent with the GAQM and FDEP guidance, modeling should be conducted using the most recent, readily available, 5 years of meteorological data collected at a nearby observation station. In accordance with this guidance, the selected meteorological dataset consisted of St. Petersburg/Clearwater International Airport (SPG), Station ID 72211, surface data and Ruskin (RUS), Station ID 12842, upper air data. These data were obtained from the National Climatic Data Center (NCDC) for the 1992 through 1996 5-year period.

The surface and mixing height data for each of the 5 years were processed using EPA's PCRAMMET meteorological preprocessing program to generate the meteorological data files in the format required by the ISCST3 dispersion model.

## **6.9 MODELED EMISSION INVENTORY**

The modeled on-property emission source consisted of the new, proposed simple-cycle CTGs. As will be discussed in Section 7.0, Ambient Impact Analysis Results, emissions from the new CTG resulted in air quality impacts below the significance impact levels (reference Table 4-2) for all pollutants and all averaging periods. Accordingly, additional, multisource interactive dispersion modeling was not required.

Emission rates and stack parameters for the new, simple-cycle CTGs were previously presented in Tables 2-1 through 2-8.

## 7.0 AMBIENT IMPACT ANALYSIS RESULTS

### 7.1 SCREENING ANALYSIS

The SCREEN3 dispersion model was used to assess each of the nine CTG operating cases (i.e., a matrix of three CTG loads [100-, 75-, and 50-percent]; three ambient temperatures [0°F, 59°F, and 95°F]; and one fuel type [fuel oil] for each pollutant subject to PSD review [NO<sub>2</sub>, SO<sub>2</sub>, PM<sub>10</sub>, and CO]). The worst-case operating modes identified by the SCREEN3 model for each pollutant were then carried forward to the refined modeling for further analysis.

SCREEN3 model runs employed the specific stack exit temperature and exhaust gas velocity appropriate for each operating case. A nominal emission rate of 10.0 g/s was used for each case; model results were then scaled to reflect the maximum emission rates for each pollutant. Because the SCREEN3 model is a single-source model, the scaling procedure was based on maximum emissions from the three simple-cycle CTGs. SCREEN3 model options used include rural dispersion, full meteorology, and automated receptors extending from 48 to 10,000 meters.

Tables 7-1 through 7-4 provide SCREEN3 model maximum 1-hour impacts for NO<sub>2</sub>, SO<sub>2</sub>, CO, and PM<sub>10</sub>, respectively. These tables indicate, for each operating case, the maximum emission rate for three CTGs, SCREEN3 model results based on a nominal 10.0-g/s emission rate, emission rate scaling factor, scaled SCREEN3 model result, and location of maximum impact.

As shown in the SCREEN3 summary tables, the maximum 1-hour impact for NO<sub>2</sub> and CO occurred under Case 9 operating conditions (i.e., 50-percent load, fuel oil firing, and 95°F ambient temperature). For SO<sub>2</sub>, the maximum 1-hour SCREEN3 impact occurred under Case 7 conditions (i.e., 100-percent load, fuel oil firing, and 95°F ambient temperature). For PM<sub>10</sub>, the maximum 1-hour SCREEN3 impact occurred under Case 3 conditions (i.e., 50-percent load, fuel oil firing, and 0°F ambient temperature). These worst-case operating cases were then further analyzed using the refined ISCST3 dispersion model.

Table 7-1. SCREEN3 Model Results - NO<sub>2</sub> Impacts; Three CTGs

Operating Scenarios					One-Hour Impacts (µg/m <sup>3</sup> )			
Case No.	Load (%)	Ambient Temperature (°F)	CT Fuel Type	Emission Rate (g/s)	SCREEN3 Unadjusted Results*	Emission Rate Factor**	SCREEN3 Adjusted Results***	Downwind Distance (m)
1	100	0	Fuel Oil	148.85	2.69	14.89	40.1	1,448
2	75	0	Fuel Oil	115.59	3.28	11.56	38.0	1,363
3	50	0	Fuel Oil	130.14	3.76	13.01	48.9	1,311
4	100	59	Fuel Oil	132.64	3.08	13.26	40.8	1,390
5	75	59	Fuel Oil	106.86	3.76	10.69	40.1	1,311
6	50	59	Fuel Oil	124.32	4.13	12.43	51.4	1,330
7	100	95	Fuel Oil	120.58	3.60	12.06	43.4	1,326
8	75	95	Fuel Oil	97.71	4.05	9.77	39.6	1,338
9	50	95	Fuel Oil	113.10	4.70	11.31	53.2	1,279
<b>Maximum</b>							<b>53.2</b>	

\*Based on 10.0 - g/s emission rate

\*\* Emission rate in (g/s) divided by 10.0 g/s.

\*\*\*SCREEN3 unadjusted results multiplied by emission rate factor.

Source: ECT, 2000.

7-2



Table 7-2. SCREEN3 Model Results - SO<sub>2</sub> Impacts, Three CTGs

Operating Scenarios					One-Hour Impacts (µg/m <sup>3</sup> )			
Case No.	Load (%)	Ambient Temperature (°F)	CT Fuel Type	Emission Rate (g/s)	SCREEN3 Unadjusted Results*	Emission Rate Factor**	SCREEN3 Adjusted Results***	Downwind Distance (m)
1	100	0	Fuel Oil	42.26	2.69	4.23	11.4	1,448
2	75	0	Fuel Oil	32.77	3.28	3.28	10.8	1,363
3	50	0	Fuel Oil	24.91	3.76	2.49	9.4	1,311
4	100	59	Fuel Oil	37.08	3.08	3.71	11.4	1,390
5	75	59	Fuel Oil	30.13	3.76	3.01	11.3	1,311
6	50	59	Fuel Oil	23.70	4.13	2.37	9.8	1,330
7	<b>100</b>	<b>95</b>	<b>Fuel Oil</b>	<b>33.72</b>	<b>3.60</b>	<b>3.37</b>	<b>12.1</b>	<b>1,326</b>
8	75	95	Fuel Oil	27.63	4.05	2.76	11.2	1,338
9	50	95	Fuel Oil	21.85	4.70	2.19	10.3	1,279
<b>Maximum</b>							<b>12.1</b>	

\*Based on 10.0 - g/s emission rate

\*\* Emission rate in (g/s) divided by 10.0 g/s.

\*\*\*SCREEN3 unadjusted results multiplied by emission rate factor.

Source: ECT, 2000.

Table 7-3. SCREEN3 Model Results - PM<sub>10</sub> Impacts; Three CTGs

Operating Scenarios					One-Hour Impacts (µg/m <sup>3</sup> )			
Case No.	Load (%)	Ambient Temperature (°F)	CT Fuel Type	Emission Rate (g/s)	SCREEN3 Unadjusted Results*	Emission Rate Factor**	SCREEN3 Adjusted Results***	Downwind Distance (m)
1	100	0	Fuel Oil	31.37	2.69	3.14	8.4	1,448
2	75	0	Fuel Oil	29.48	3.28	2.95	9.7	1,363
<b>3</b>	<b>50</b>	<b>0</b>	<b>Fuel Oil</b>	<b>29.48</b>	<b>3.76</b>	<b>2.95</b>	<b>11.1</b>	<b>1,311</b>
4	100	59	Fuel Oil	17.46	3.08	1.75	5.4	1,390
5	75	59	Fuel Oil	17.46	3.76	1.75	6.6	1,311
6	50	59	Fuel Oil	18.90	4.13	1.89	7.8	1,330
7	100	95	Fuel Oil	11.45	3.60	1.15	4.1	1,326
8	75	95	Fuel Oil	14.17	4.05	1.42	5.7	1,338
9	50	95	Fuel Oil	17.50	4.70	1.75	8.2	1,279
<b>Maximum</b>							<b>11.1</b>	

\*Based on 10.0 - g/s emission rate

\*\* Emission rate in (g/s) divided by 10.0 g/s.

\*\*\*SCREEN3 unadjusted results multiplied by emission rate factor.

Source: ECT, 2000.

7-4

Table 7-6. ISCST3 Model Results - Annual Average SO<sub>2</sub> Impacts, HCGF

Maximum Annual Impacts	1992	1993	1994	1995	1996
Unadjusted ISCST3 Impact (µg/m <sup>3</sup> )*	0.0348	0.0377	<b>0.0417</b>	0.0371	0.0365
Emission Rate Scaling Factor†	1.409	1.409	<b>1.409</b>	1.409	1.409
Adjusted Impact (µg/m <sup>3</sup> )**	0.049	0.053	<b>0.059</b>	0.052	0.051
PSD Significant Impact (µg/m <sup>3</sup> )	1.0	1.0	<b>1.0</b>	1.0	1.0
Exceed PSD Significant Impact (Y/N)	N	N	<b>N</b>	N	N
Percent of PSD Significant Impact (%)	4.9	5.3	<b>5.9</b>	5.2	5.1
Receptor UTM Easting (m)	419,962.1	418,135.8	<b>394,547.3</b>	398,967.7	398,157.4
Receptor UTM Northing (m)	3,037,702.5	3,034,241.8	<b>3,046,952.8</b>	3,040,232.5	3,041,970.3
Distance From Grid Origin (m)	14,000	15,000	<b>14,000</b>	11,000	11,000
Direction From Grid Origin (Vector °)	125	140	<b>275</b>	240	250

\* Based on modeled emission rate of 10.0 g/s per CT/HRSG unit.

† Ratio of maximum emission rate (g/s) per CT/HRSG unit to modeled 10.0 g/s emission rate.

\*\* Unadjusted ISCST3 impact times emission rate factor.

Source: ECT, 2000.

Emissions Unit Information Section 2 of 4

**Visible Emissions Limitation:** Visible Emissions Limitation 3 of 3

1. Visible Emissions Subtype: <b>VE10</b>	2. Basis for Allowable Opacity: [ <input checked="" type="checkbox"/> ] Rule [ <input type="checkbox"/> ] Other
3. Requested Allowable Opacity: Normal Conditions: % Exceptional Conditions: <b>100 %</b> Maximum Period of Excess Opacity Allowed: <b>60 min/hour</b>	
4. Method of Compliance: <b>EPA Reference Method 9</b>	
5. Visible Emissions Comment (limit to 200 characters):  <b>Excess emissions resulting from startup, shutdown, or malfunction not-to-exceed 2 hours in any 24 hour period unless authorized by FDEP for a longer duration. Rule 62-210.700(1), F.A.C. Limit applicable for natural gas or fuel oil firing.</b>	

**I. CONTINUOUS MONITOR INFORMATION**  
**(Only Regulated Emissions Units Subject to Continuous Monitoring)**

**Continuous Monitoring System:** Continuous Monitor 1 of 2

1. Parameter Code: <b>EM</b>	2. Pollutant(s): <b>NOX</b>
3. CMS Requirement:	[ <input checked="" type="checkbox"/> ] Rule [ <input type="checkbox"/> ] Other
4. Monitor Information: Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):  <b>Required by 40 CFR Part 75 (Acid Rain Program).</b> <b>Specific CEMS information will be provided to FDEP when available.</b>	

**Continuous Monitoring System:** Continuous Monitor 2 of 2

1. Parameter Code: <b>O<sub>2</sub></b>	2. Pollutant(s):
3. CMS Requirement:	[ <input checked="" type="checkbox"/> ] Rule [ <input type="checkbox"/> ] Other
4. Monitor Information: Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):  <b>Required by 40 CFR Part 75 (Acid Rain Program).</b> <b>Specific CEMS information will be provided to FDEP when available.</b>	

Emissions Unit Information Section 1 of 4

Pollutant Detail Information Page 2 of 14

**Allowable Emissions** Allowable Emissions 2 of 2 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>42 ppmvd @ 15% O<sub>2</sub></b>	4. Equivalent Allowable Emissions: <b>350.9 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 20 (initial), NO<sub>x</sub> CEMS</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Unit is also subject to less stringent NO<sub>x</sub> limits of 40 CFR Part 60, Subpart GG (NSPS). Field 4 limit applicable for fuel oil-firing at ISO conditions.</b>	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units -**  
**Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions** (Per CTG)

1. Pollutant Emitted: <b>CO</b>	2. Total Percent Efficiency of Control:
3. Potential Emissions: <b>124.3 lb/hour</b> <b>95.2 tons/year</b>	4. Synthetically Limited? [ <input checked="" type="checkbox"/> ]
5. Range of Estimated Fugitive Emissions: [ ] 1            [ ] 2            [ ] 3            _____ to _____ tons/year	
6. Emission Factor: <b>124.3 lb/hr</b> Reference: <b>GE data</b>	7. Emissions Method Code: <b>5</b>
8. Calculation of Emissions (limit to 600 characters):  <b>Hourly emission rate based on GE data for 100 percent load, 20°F, fuel oil-firing case. Annual emissions based on 52.8 lb/hr (100 percent load, 59°F, natural gas-firing case) for 2,500 hrs/yr and 116.6 lb/hr (100 percent load, 59°F, distillate fuel oil-firing case) for 500 hrs/yr.</b>	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

**Allowable Emissions** Allowable Emissions 1 of 2 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>12.8 ppmvd @ 15% O<sub>2</sub></b>	4. Equivalent Allowable Emissions: <b>52.8 lb/hour</b> <b>N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 10</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 4 limit applicable for natural gas-firing at ISO conditions.</b>	

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**Allowable Emissions** Allowable Emissions 2 of 2 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>25.2 ppmvd @ 15% O<sub>2</sub></b>	4. Equivalent Allowable Emissions: <b>116.6 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 10</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 4 limit applicable for distillate fuel oil-firing at ISO conditions.</b>	



**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION  
(Regulated Emissions Units -  
Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions (Per CTG)**

1. Pollutant Emitted: <b>PM</b>	2. Total Percent Efficiency of Control:
3. Potential Emissions: <b>18.7 lb/hour</b> <b>17.1 tons/year</b>	4. Synthetically Limited? [ <input checked="" type="checkbox"/> ]
5. Range of Estimated Fugitive Emissions: [ ] 1      [ ] 2      [ ] 3      _____ to _____ tons/year	
6. Emission Factor: <b>18.7 lb/hr</b> Reference: <b>GE data</b>	7. Emissions Method Code: <b>5</b>
8. Calculation of Emissions (limit to 600 characters):  <b>Hourly emission rate based on GE data for 100 percent load, 20°F, fuel oil-firing case. Annual emissions based on 9.9 lb/hr (100 percent load, 59°F, natural gas-firing case) for 2,500 hrs/yr and 18.7 lb/hr (100 percent load, 59°F, distillate fuel oil-firing case) for 500 hrs/yr.</b>	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

**Allowable Emissions** Allowable Emissions 1 of 2 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>10% opacity</b>	4. Equivalent Allowable Emissions: <b>9.9 lb/hour</b> <b>N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 9</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 4 limit applicable for natural gas-firing at ISO conditions.</b>	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units -**  
**Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions (Per CTG)**

1. Pollutant Emitted: <b>SAM</b>	2. Total Percent Efficiency of Control:
3. Potential Emissions: <b>12.0 lb/hour</b> <b>4.2 tons/year</b>	4. Synthetically Limited? [ <input checked="" type="checkbox"/> ]
5. Range of Estimated Fugitive Emissions: [ ] 1      [ ] 2      [ ] 3      _____ to _____ tons/year	
6. Emission Factor: <b>12.0 lb/hr</b> Reference: <b>GE data</b>	7. Emissions Method Code: <b>2</b>
8. Calculation of Emissions (limit to 600 characters):  $(104.1 \text{ lb/hr SO}_2) \times (7.5/100) \times (98 \text{ lb H}_2\text{SO}_4/64 \text{ lb SO}_2) = 12.0 \text{ lb/hr H}_2\text{SO}_4$ <p><b>Annual emissions based on 1.1 lb/hr (100 percent load, 59°F, natural gas-firing case) for 2,500 hrs/yr and 11.3 lb/hr (100 percent load, 59°F, distillate fuel oil-firing case) for 500 hrs/yr.</b></p>	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

**Allowable Emissions** Allowable Emissions   1   of   2   (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>2.0 gr S/100 scf</b>	4. Equivalent Allowable Emissions: <b>1.1 lb/hour</b> <b>N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>Fuel analysis for sulfur content</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT)</b> <b>Field 4 limit applicable for natural gas-firing at ISO conditions.</b>	

Emissions Unit Information Section 1 of 4

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Allowable Emissions Allowable Emissions 2 of 2 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>0.05 weight % S</b>	4. Equivalent Allowable Emissions: <b>98.1 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>Fuel analysis for sulfur content</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 4 limit applicable for distillate fuel oil-firing at ISO conditions.</b>	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units -**  
**Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions (Per CTG)**

1. Pollutant Emitted: <b>PM10</b>	2. Total Percent Efficiency of Control:
3. Potential Emissions: <b>18.7 lb/hour</b> <b>17.1 tons/year</b>	4. Synthetically Limited? [ <input checked="" type="checkbox"/> ]
5. Range of Estimated Fugitive Emissions: [ ] 1      [ ] 2      [ ] 3      _____ to _____ tons/year	
6. Emission Factor: <b>18.7 lb/hr</b> Reference: <b>GE data</b>	7. Emissions Method Code: <b>5</b>
8. Calculation of Emissions (limit to 600 characters):  <b>Hourly emission rate based on GE data for 100 percent load, 20°F, fuel oil-firing case. Annual emissions based on 9.9 lb/hr (100 percent load, 59°F, natural gas-firing case) for 2,500 hrs/yr and 18.7 lb/hr (100 percent load, 59°F, distillate fuel oil-firing case) for 500 hrs/yr.</b>	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

**Allowable Emissions** Allowable Emissions   1   of   2  

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>10% opacity</b>	4. Equivalent Allowable Emissions: <b>9.9 lb/hour</b> <b>N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 9</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 4 limit applicable for natural gas-firing at ISO conditions.</b>	

Emissions Unit Information Section 1 of 4

Pollutant Detail Information Page 6 of 14

Allowable Emissions Allowable Emissions 2 of 2 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>10 % opacity</b>	4. Equivalent Allowable Emissions: <b>18.7 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 9</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 4 limit applicable for distillate fuel oil-firing at ISO conditions.</b>	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION  
(Regulated Emissions Units -  
Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions (Per CTG)**

1. Pollutant Emitted: <b>SO2</b>	2. Total Percent Efficiency of Control:
3. Potential Emissions: <b>104.1 lb/hour</b> <b>36.0 tons/year</b>	4. Synthetically Limited? [ <input checked="" type="checkbox"/> ]
5. Range of Estimated Fugitive Emissions: [ ] 1      [ ] 2      [ ] 3      _____ to _____ tons/year	
6. Emission Factor: <b>104.1 lb/hr</b> Reference: <b>GE data</b>	7. Emissions Method Code: <b>2</b>
8. Calculation of Emissions (limit to 600 characters):  <b><math>(0.05 \text{ lb S}/100 \text{ lb oil}) \times (104,120 \text{ lb oil/hr}) \times (2 \text{ lb SO}_2/\text{lb S}) = 104.1 \text{ lb/hr SO}_2</math></b>  <b>Annual emissions based on 9.2 lb/hr (100 percent load, 59°F, natural gas-firing case) for 2,500 hrs/yr and 98.1 lb/hr (100 percent load, 59°F, distillate fuel oil-firing case) for 500 hrs/yr.</b>	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

**Allowable Emissions** Allowable Emissions   1   of   2   (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>2.0 gr S/100 scf</b>	4. Equivalent Allowable Emissions: <b>9.2 lb/hour</b> <b>N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>Fuel analysis for sulfur content</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 4 limit applicable for natural gas-firing at ISO conditions.</b>	

Emissions Unit Information Section 1 of 4

Pollutant Detail Information Page 8 of 14

Allowable Emissions Allowable Emissions 2 of 2 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>10 % opacity</b>	4. Equivalent Allowable Emissions: <b>18.7 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 9</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 4 limit applicable for distillate fuel oil-firing at ISO conditions.</b>	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units -**  
**Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions (Per CTG)**

1. Pollutant Emitted: <b>VOC</b>	2. Total Percent Efficiency of Control:
3. Potential Emissions: <b>8.3 lb/hour</b> <b>5.8 tons/year</b>	4. Synthetically Limited? [ <input checked="" type="checkbox"/> ]
5. Range of Estimated Fugitive Emissions: [ ] 1      [ ] 2      [ ] 3      _____ to _____ tons/year	
6. Emission Factor: <b>8.3 lb/hr</b> Reference: <b>GE data</b>	7. Emissions Method Code: <b>5</b>
8. Calculation of Emissions (limit to 600 characters):  <b>Hourly emission rate based on GE data for 100 percent load, 20°F, fuel oil-firing case. Annual emissions based on 3.1 lb/hr (100 percent load, 59°F, natural gas-firing case) for 2,500 hrs/yr and 7.7 lb/hr (100 percent load, 59°F, distillate fuel oil-firing case) for 500 hrs/yr.</b>	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

**Allowable Emissions** Allowable Emissions   1   of   2   (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>1.3 ppmvd @ 15% O<sub>2</sub></b>	4. Equivalent Allowable Emissions: <b>3.1 lb/hour</b> <b>N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 18 or 25</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT). Field 4 limit applicable for natural gas-firing at ISO conditions.</b>	



**Allowable Emissions** Allowable Emissions 2 of 2 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>0.05 weight % S</b>	4. Equivalent Allowable Emissions: <b>11.3 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>Fuel analysis for sulfur content</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 4 limit applicable for distillate fuel oil-firing at ISO conditions.</b>	

Table 7-12. ISCST3 Model Results - Maximum 8-Hour Average CO Impacts; HCGF

Maximum 8-Hour Impacts	1992	1993	1994	1995	1996
Unadjusted ISCST3 Impact ( $\mu\text{g}/\text{m}^3$ )*	2.153	<b>3.284</b>	2.133	2.959	2.633
Emission Rate Scaling Factor†	34.123	<b>34.123</b>	34.123	34.123	34.123
Adjusted Impact ( $\mu\text{g}/\text{m}^3$ **	73.47	<b>112.05</b>	72.78	100.97	89.83
PSD Significant Impact ( $\mu\text{g}/\text{m}^3$ )	500.0	<b>500.0</b>	500.0	500.0	500.0
Exceed PSD Significant Impact (Y/N)	N	N	N	N	N
Percent of PSD Significant Impact (%)	14.7	<b>22.4</b>	14.6	20.2	18.0
PSD <i>de minimis</i> Ambient Impact Threshold ( $\mu\text{g}/\text{m}^3$ )	575.0	<b>575.0</b>	575.0	575.0	575.0
Exceed PSD <i>de minimis</i> Ambient Impact (Y/N)	N	N	N	N	N
Percent of PSD <i>de minimis</i> Ambient Impact (%)	12.8	<b>19.5</b>	12.7	17.6	15.6
Receptor UTM Easting (m)	408,494.0	<b>425,235.7</b>	395,766.1	393,771.6	395,471.3
Receptor UTM Northing (m)	3,062,732.5	<b>3,042,780.5</b>	3,058,460.5	3,054,232.5	3,056,660.0
Distance From Grid Origin (m)	17,000	<b>17,000</b>	18,000	17,000	17,000
Direction From Grid Origin (Vector °)	360	<b>100</b>	315	300	310
Date of Maximum Impact	10/9/92	<b>3/28/93</b>	5/1/94	11/27/95	9/9/96
Julian Date of Maximum Impact	283	<b>87</b>	121	331	253
Ending Hour of Maximum Impact	0800	<b>0800</b>	0800	0800	0800

\* Based on modeled emission rate of 10.0 g/s per CT/HRSG unit.

† Ratio of maximum emission rate (g/s) per CT/HRSG unit to modeled 10.0 g/s emission rate.

\*\* Unadjusted ISCST3 impact times emission rate factor.

Source: ECT, 2000.

**H. VISIBLE EMISSIONS INFORMATION**  
 (Only Regulated Emissions Units Subject to a VE Limitation)

**Visible Emissions Limitation:** Visible Emissions Limitation 1 of 3

1. Visible Emissions Subtype: <b>VE10</b>	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: <b>10 %</b> Exceptional Conditions:      % Maximum Period of Excess Opacity Allowed:      min/hour	
4. Method of Compliance: <b>EPA Reference Method 9</b>	
5. Visible Emissions Comment (limit to 200 characters):  <b>Rule 62-212.400(5)(c), F.A.C. (BACT).</b> <b>Limit applicable for natural gas firing.</b>	

**Visible Emissions Limitation:** Visible Emissions Limitation 2 of 3

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: <b>20 %</b> Exceptional Conditions:      % Maximum Period of Excess Opacity Allowed:      min/hour	
4. Method of Compliance: <b>EPA Reference Method 9</b>	
5. Visible Emissions Comment (limit to 200 characters):  <b>Rule 62-212.400(5)(c), F.A.C. (BACT).</b> <b>Limit applicable for fuel oil firing.</b>	

**Allowable Emissions** Allowable Emissions 4 of 4 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>31 ppmvd @ 15% O<sub>2</sub></b>	4. Equivalent Allowable Emissions: <b>60.5 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 10</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT)</b> <b>Field 3 limit applicable for 70% load, fuel oil-firing.</b> <b>Field 4 limit applicable for 70% load, fuel oil-firing at ISO conditions.</b>	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units -**  
**Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions (Per CTG)**

1. Pollutant Emitted: <b>VOC</b>	2. Total Percent Efficiency of Control:
3. Potential Emissions: <b>66.0 lb/hour</b> <b>24.2 tons/year</b>	4. Synthetically Limited? [ <input checked="" type="checkbox"/> ]
5. Range of Estimated Fugitive Emissions: [ ] 1      [ ] 2      [ ] 3      _____ to _____ tons/year	
6. Emission Factor: <b>66.0 lb/hr</b> Reference: <b>Westinghouse data</b>	7. Emissions Method Code: <b>5</b>
8. Calculation of Emissions (limit to 600 characters):  <b>Hourly emission rate based on Westinghouse data for 70 percent load, 32°F, oil-firing case. Annual emissions based on 8.8 lb/hr (100 percent load, 59°F, natural gas-firing case) for 2,000 hrs/yr, 33.0 lb/hr (50 percent load, 59°F, natural gas-firing case) for 500 hrs/yr and 28.6 lb/hr (100 percent load, 59°F, distillate fuel oil-firing case) for 500 hrs/yr.</b>	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

**Allowable Emissions** Allowable Emissions 1 of 4 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>3 ppmvd @ 15% O<sub>2</sub></b>	4. Equivalent Allowable Emissions: <b>8.8 lb/hour</b> <b>N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 10</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 3 limit applicable for 100% load, natural gas-firing. Field 4 limit applicable for 100% load, natural gas-firing at ISO conditions.</b>	

Emissions Unit Information Section 2 of 4

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**Allowable Emissions** Allowable Emissions 2 of 4 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>20 ppmvd @ 15% O<sub>2</sub></b>	4. Equivalent Allowable Emissions: <b>33.0 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 10</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 3 limit applicable for 50% load, natural gas-firing. Field 4 limit applicable for 50% load, natural gas-firing at ISO conditions.</b>	

**Allowable Emissions** Allowable Emissions 3 of 4 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>10 ppmvd @ 15% O<sub>2</sub></b>	4. Equivalent Allowable Emissions: <b>28.6 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 10</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 3 limit applicable for 100% load, fuel oil-firing. Field 4 limit applicable for 100% load, fuel oil-firing at ISO conditions.</b>	

Table 7-5. ISCST3 Model Results - Annual Average NO<sub>2</sub> Impacts, HCGF

Maximum Annual Impacts	1992	1993	1994	1995	1996
Unadjusted ISCST3 Impact ( $\mu\text{g}/\text{m}^3$ )*	0.0602	0.0666	<b>0.0739</b>	0.0674	0.0677
Emission Rate Scaling Factor†	4.962	4.962	<b>4.962</b>	4.962	4.962
Tier 1 Impact ( $\mu\text{g}/\text{m}^3$ )**	0.299	0.330	<b>0.367</b>	0.334	0.336
Tier 2 Impact ( $\mu\text{g}/\text{m}^3$ )‡	0.224	0.248	<b>0.275</b>	0.251	0.252
PSD Significant Impact ( $\mu\text{g}/\text{m}^3$ )	1.0	1.0	<b>1.0</b>	1.0	1.0
Exceed PSD Significant Impact (Y/N)	N	N	<b>N</b>	N	N
Percent of PSD Significant Impact (%)	22.4	24.8	<b>27.5</b>	25.1	25.2
PSD <i>de minimis</i> Ambient Impact Threshold ( $\mu\text{g}/\text{m}^3$ )	14.0	14.0	<b>14.0</b>	14.0	14.0
Exceed PSD <i>de minimis</i> Ambient Impact (Y/N)	N	N	<b>N</b>	N	N
Percent of PSD <i>de minimis</i> Ambient Impact (%)	1.6	1.8	<b>2.0</b>	1.8	1.8
Receptor UTM Easting (m)	418,020.3	415,564.7	<b>398,532.1</b>	400,699.8	400,036.8
Receptor UTM Northing (m)	3,040,232.5	3,037,306.0	<b>3,046,604.0</b>	3,041,232.5	3,042,654.3
Distance From Grid Origin (m)	11,000	11,000	<b>10,000</b>	9,000	9,000
Direction From Grid Origin (Vector °)	120	140	<b>275</b>	240	250

\* Based on modeled emission rate of 10.0 g/s per CT/HRSG unit.

† Ratio of maximum emission rate (g/s) per CT/HRSG unit to modeled 10.0 g/s emission rate.

\*\* Unadjusted ISCST3 impact times emission rate factor (Assumed complete conversion of NO<sub>x</sub> to NO<sub>2</sub>; i.e., NO<sub>2</sub>/NO<sub>x</sub> ratio of 1.0).

‡ Tier 1 impact times EPA national default NO<sub>2</sub>/NO<sub>x</sub> ratio of 0.75.

Source: ECT, 2000.

Table 7-4. SCREEN3 Model Results - CO Impacts; Three CTGs

Operating Scenarios					One-Hour Impacts ( $\mu\text{g}/\text{m}^3$ )			
Case No.	Load (%)	Ambient Temperature (°F)	CT Fuel Type	Emission Rate (g/s)	SCREEN3 Unadjusted Results*	Emission Rate Factor**	SCREEN3 Adjusted Results***	Downwind Distance (m)
1	100	0	Fuel Oil	53.64	2.69	5.36	14.4	1,448
2	75	0	Fuel Oil	82.33	3.28	8.23	27.0	1,363
3	50	0	Fuel Oil	1023.68	3.76	102.37	384.9	1,311
4	100	59	Fuel Oil	47.85	3.08	4.79	14.7	1,390
5	75	59	Fuel Oil	74.99	3.76	7.50	28.2	1,311
6	50	59	Fuel Oil	948.00	4.13	94.80	391.8	1,330
7	100	95	Fuel Oil	42.94	3.60	4.29	15.4	1,326
8	75	95	Fuel Oil	68.19	4.05	6.82	27.6	1,338
9	50	95	<b>Fuel Oil</b>	<b>878.15</b>	<b>4.70</b>	<b>87.82</b>	<b>413.0</b>	<b>1,279</b>
<b>Maximum</b>							<b>413.0</b>	

\*Based on 10.0 - g/s emission rate

\*\* Emission rate in (g/s) divided by 10.0 g/s.

\*\*\*SCREEN3 unadjusted results multiplied by emission rate factor.

Source: ECT, 2000.

7-5



Table 7-7. ISCST3 Model Results - Maximum 3-Hour Average SO<sub>2</sub> Impacts; HCGF

Maximum 3-Hour Impacts	1992	1993	1994	1995	1996
Unadjusted ISCST3 Impact ( $\mu\text{g}/\text{m}^3$ )*	2.733	2.993	2.956	<b>3.358</b>	3.065
Emission Rate Scaling Factor†	1.409	1.409	1.409	<b>1.409</b>	1.409
Adjusted Impact ( $\mu\text{g}/\text{m}^3$ )**	3.85	4.22	4.16	<b>4.73</b>	4.32
PSD Significant Impact ( $\mu\text{g}/\text{m}^3$ )	25.0	25.0	25.0	<b>25.0</b>	25.0
Exceed PSD Significant Impact (Y/N)	N	N	N	N	N
Percent of PSD Significant Impact (%)	15.4	16.9	16.7	<b>18.9</b>	17.3
Receptor UTM Easting (m)	419,965.5	405,194.7	398,994.0	<b>410,237.1</b>	394,351.9
Receptor UTM Northing (m)	3,029,349.5	3,064,443.8	3,062,187.0	<b>3,025,808.5</b>	3,059,874.8
Distance From Grid Origin (m)	20,000	19,000	19,000	<b>20,000</b>	20,000
Direction From Grid Origin (Vector °)	145	350	330	<b>175</b>	315
Date of Maximum Impact	12/21/92	7/13/93	8/23/94	<b>11/19/95</b>	9/10/96
Julian Date of Maximum Impact	356	194	235	<b>323</b>	254
Ending Hour of Maximum Impact	2100	0300	0600	<b>2100</b>	0600

\* Based on modeled emission rate of 10.0 g/s per CT/HRSG unit.

† Ratio of maximum emission rate (g/s) per CT/HRSG unit to modeled 10.0 g/s emission rate.

\*\* Unadjusted ISCST3 impact times emission rate factor.

Source: ECT, 2000.

## **7.2 MAXIMUM FACILITY IMPACTS AND SIGNIFICANT IMPACT AREAS**

The refined ISCST3 model was used to model the operating cases identified by the SCREEN3 model to cause maximum impacts. ISCST3 model results for each year of meteorology evaluated (1992 to 1996) are summarized on Table 7-5 (annual NO<sub>2</sub> impacts), Table 7-6 (annual SO<sub>2</sub> impacts), Table 7-7 (3-hour SO<sub>2</sub> impacts), Table 7-8 (24-hour SO<sub>2</sub> impacts), Table 7-9 (annual PM<sub>10</sub> impacts), Table 7-10 (24-hour PM<sub>10</sub> impacts), Table 7-11 (1-hour CO impacts), and Table 7-12 (8-hour CO impacts).

Tables 7-5 through 7-12 demonstrate that Project impacts, for all pollutants and all averaging times, are below the PSD significant impact levels previously shown in Table 4-2. Table 7-13 provides a summary of maximum Project impacts and PSD significant impact levels.

## **7.3 PSD CLASS I IMPACTS**

Maximum impacts at the Chassahowitzka NWR were conservatively estimated using the ISCST3 dispersion model. Table 7-14 provides a summary of maximum Project Class I area impacts and the EPA PSD Class I area significant impact levels.

The Chassahowitzka NWR is located approximately 138 km northwest of the HCGF. Accordingly, use of the ISCST3 dispersion model to predict impacts at this Class I area will yield conservative results (i.e., over-estimate actual impacts). Short-term impacts were developed assuming natural gas firing operating conditions. As stated previously, the new simple cycle CTGs will operate with a fuel oil annual capacity factor of 5.7 percent (i.e., no more 500 hr/yr at base load).

## **7.4 H<sub>2</sub>SO<sub>4</sub> MIST ASSESSMENT**

The maximum 1-hour average SCREEN3 model impact was 12.1 micrograms per cubic meter (µg/m<sup>3</sup>) for SO<sub>2</sub> (oil firing). Because H<sub>2</sub>SO<sub>4</sub> mist emissions are proportional to SO<sub>2</sub> emissions (by a factor of 0.115), and because ambient air quality modeled impacts are directly proportional to emission rates (all other variables remaining the same), the

Table 7-8. ISCST3 Model Results - Maximum 24-Hour Average SO<sub>2</sub> Impacts; HCGF

Maximum 24-Hour Impacts	1992	1993	1994	1995	1996
Unadjusted ISCST3 Impact ( $\mu\text{g}/\text{m}^3$ )*	0.586	0.631	0.647	0.620	0.649
Emission Rate Scaling Factor†	1.409	1.409	1.409	1.409	1.409
Adjusted Impact ( $\mu\text{g}/\text{m}^3$ **	0.82	0.89	0.91	0.87	0.91
PSD Significant Impact ( $\mu\text{g}/\text{m}^3$ )	5.0	5.0	5.0	5.0	5.0
Exceed PSD Significant Impact (Y/N)	N	N	N	N	N
Percent of PSD Significant Impact (%)	16.5	17.8	18.2	17.5	18.3
PSD <i>de minimis</i> Ambient Impact Threshold ( $\mu\text{g}/\text{m}^3$ )	13.0	13.0	13.0	13.0	13.0
Exceed PSD <i>de minimis</i> Ambient Impact (Y/N)	N	N	N	N	N
Percent of PSD <i>de minimis</i> Ambient Impact (%)	6.3	6.8	7.0	6.7	7.0
Receptor UTM Easting (m)	408,494.0	427,205.3	424,948.5	392,039.5	388,760.5
Receptor UTM Northing (m)	3,064,732.5	3,042,433.3	3,036,232.5	3,055,232.5	3,038,550.0
Distance From Grid Origin (m)	19,000	19,000	19,000	19,000	21,000
Direction From Grid Origin (Vector °)	360	100	120	300	250
Date of Maximum Impact	10/9/92	3/28/93	12/25/94	11/27/95	12/28/96
Julian Date of Maximum Impact	283	87	359	331	363

\* Based on modeled emission rate of 10.0 g/s per CT/HRSG unit.

† Ratio of maximum emission rate (g/s) per CT/HRSG unit to modeled 10.0 g/s emission rate.

\*\* Unadjusted ISCST3 impact times emission rate factor.

Source: ECT, 2000.

Table 7-10. ISCST3 Model Results - Maximum 24-Hour Average PM<sub>10</sub> Impacts; HCGF

Maximum 24-Hour Impacts	1992	1993	1994	1995	1996
Unadjusted ISCST3 Impact ( $\mu\text{g}/\text{m}^3$ )*	0.715	<b>0.834</b>	0.798	0.769	0.799
Emission Rate Scaling Factor†	1.046	<b>1.046</b>	1.046	1.046	1.046
Adjusted Impact ( $\mu\text{g}/\text{m}^3$ **	0.75	<b>0.87</b>	0.83	0.80	0.84
PSD Significant Impact ( $\mu\text{g}/\text{m}^3$ )	5.0	<b>5.0</b>	5.0	5.0	5.0
Exceed PSD Significant Impact (Y/N)	N	<b>N</b>	N	N	N
Percent of PSD Significant Impact (%)	14.9	<b>17.4</b>	16.7	16.1	16.7
PSD <i>de minimis</i> Ambient Impact Threshold ( $\mu\text{g}/\text{m}^3$ )	10.0	<b>10.0</b>	10.0	10.0	10.0
Exceed PSD <i>de minimis</i> Ambient Impact (Y/N)	N	<b>N</b>	N	N	N
Percent of PSD <i>de minimis</i> Ambient Impact (%)	7.5	<b>8.7</b>	8.3	8.0	8.4
Receptor UTM Easting (m)	393,494.0	<b>415,564.7</b>	423,216.4	414,279.1	390,639.8
Receptor UTM Northing (m)	3,045,732.5	<b>3,037,306.0</b>	3,037,232.5	3,038,838.0	3,039,234.0
Distance From Grid Origin (m)	15,000	<b>11,000</b>	17,000	9,000	19,000
Direction From Grid Origin (Vector °)	270	<b>140</b>	120	140	250
Date of Maximum Impact	11/10/92	<b>3/14/93</b>	12/25/94	8/14/95	12/28/96
Julian Date of Maximum Impact	315	<b>73</b>	359	226	363

\* Based on modeled emission rate of 10.0 g/s per CT/HRSG unit.

† Ratio of maximum emission rate (g/s) per CT/HRSG unit to modeled 10.0 g/s emission rate.

\*\* Unadjusted ISCST3 impact times emission rate factor.

Source: ECT, 2000.

Table 7-9. ISCST3 Model Results - Annual Average PM<sub>10</sub> Impacts, HCGF

Maximum Annual Impacts	1992	1993	1994	1995	1996
Unadjusted ISCST3 Impact (µg/m <sup>3</sup> )*	0.0461	0.0510	<b>0.0563</b>	0.0510	0.0524
Emission Rate Scaling Factor†	1.046	1.046	<b>1.046</b>	1.046	1.046
Adjusted Impact (µg/m <sup>3</sup> )**	0.048	0.053	<b>0.059</b>	0.053	0.055
PSD Significant Impact (µg/m <sup>3</sup> )	1.0	1.0	<b>1.0</b>	1.0	1.0
Exceed PSD Significant Impact (Y/N)	N	N	<b>N</b>	N	N
Percent of PSD Significant Impact (%)	4.8	5.3	<b>5.9</b>	5.3	5.5
Receptor UTM Easting (m)	419,752.3	416,850.3	<b>398,532.1</b>	398,967.7	398,157.4
Receptor UTM Northing (m)	3,039,232.5	3,035,774.0	<b>3,046,604.0</b>	3,040,232.5	3,041,970.3
Distance From Grid Origin (m)	13,000	13,000	<b>10,000</b>	11,000	11,000
Direction From Grid Origin (Vector °)	120	140	<b>275</b>	240	250

\* Based on modeled emission rate of 10.0 g/s per CT/HRSG unit.

† Ratio of maximum emission rate (g/s) per CT/HRSG unit to modeled 10.0 g/s emission rate.

\*\* Unadjusted ISCST3 impact times emission rate factor.

Source: ECT, 2000.

Table 7-11. ISCST3 Model Results - Maximum 1-Hour Average CO Impacts; HCGF

Maximum 1-Hour Impacts	1992	1993	1994	1995	1996
Unadjusted ISCST3 Impact ( $\mu\text{g}/\text{m}^3$ )*	6.407	7.918	<b>8.172</b>	7.728	6.802
Emission Rate Scaling Factor†	34.123	34.123	<b>34.123</b>	34.123	34.123
Adjusted Impact ( $\mu\text{g}/\text{m}^3$ **	218.63	270.19	<b>278.87</b>	263.72	232.09
PSD Significant Impact ( $\mu\text{g}/\text{m}^3$ )	2,000.0	2,000.0	<b>2,000.0</b>	2,000.0	2,000.0
Exceed PSD Significant Impact (Y/N)	N	N	<b>N</b>	N	N
Percent of PSD Significant Impact (%)	10.9	13.5	<b>13.9</b>	13.2	11.6
Receptor UTM Easting (m)	414,289.6	408,668.3	<b>407,346.8</b>	405,895.9	412,824.1
Receptor UTM Northing (m)	3,044,179.5	3,047,725.0	<b>3,047,370.8</b>	3,044,232.5	3,043,232.5
Distance From Grid Origin (m)	6,000	2,000	<b>2,000</b>	3,000	5,000
Direction From Grid Origin (Vector °)	105	5	<b>325</b>	240	120
Date of Maximum Impact	4/25/92	12/1/93	<b>8/1/94</b>	9/6/95	7/2/96
Julian Date of Maximum Impact	116	335	<b>213</b>	249	184
Ending Hour of Maximum Impact	1200	1500	<b>1900</b>	1200	1000

\* Based on modeled emission rate of 10.0 g/s per CT/HRSG unit.

† Ratio of maximum emission rate (g/s) per CT/HRSG unit to modeled 10.0 g/s emission rate.

\*\* Unadjusted ISCST3 impact times emission rate factor.

Source: ECT, 2000.

7-14

Table 7-14. ISCST3 Model Results—Maximum Class I Area Impacts

Pollutant	Averaging Time	Maximum Impact ( $\mu\text{g}/\text{m}^3$ )	EPA Significant Impact ( $\mu\text{g}/\text{m}^3$ )
NO <sub>x</sub>	Annual	0.027	0.1
PM	Annual	0.005	0.2
	24-hour	0.095	0.3
SO <sub>2</sub>	Annual	0.001	0.1
	24-hour	0.021	0.2
	3-hour	0.135	1.0

Source: ECT, 2000.

Table 7-13. ISCST3 Model Results—Maximum Criteria Pollutant Impacts

Pollutant	Averaging Time	Maximum Impact ( $\mu\text{g}/\text{m}^3$ )	Significant Impact ( $\mu\text{g}/\text{m}^3$ )
NO <sub>x</sub>	Annual	0.275	1.0
CO	8-hour	112.1	500
	1-hour	278.9	2,000
PM	Annual	0.059	1.0
	24-hour	0.87	5.0
SO <sub>2</sub>	Annual	0.059	1.0
	24-hour	0.91	5.0
	3-hour	4.73	25.0

Source: ECT, 2000.



maximum 1-hour SCREEN3 model impact for H<sub>2</sub>SO<sub>4</sub> mist is 1.39 µg/m<sup>3</sup>. Recommended EPA (EPA, 1992) multiplying factors for converting 1-hour averages to 8- and 24-hour averages are 0.7 and 0.4, respectively. Use of these factors yields maximum 8- and 24-hour average H<sub>2</sub>SO<sub>4</sub> mist impacts of 0.97 and 0.56 µg/m<sup>3</sup>, respectively. These impacts are well below the FDEP ambient reference concentrations (ARCs) for H<sub>2</sub>SO<sub>4</sub> mist of 10.0 and 2.4 µg/m<sup>3</sup> for 8- and 24-hour average periods, respectively. Table 7-15 provides a summary of Project H<sub>2</sub>SO<sub>4</sub> mist impacts and the FDEP ARC levels.

## **7.5 CONCLUSIONS**

Comprehensive dispersion modeling using the SCREEN3 and refined ISCST3 models demonstrates that the Project will result in ambient air quality impacts that are:

- Below PSD significant impact levels for all pollutants and all averaging periods.
- Below PSD *de minimis* ambient impact levels for all pollutants and all averaging periods.
- Below the FDEP ARCs for H<sub>2</sub>SO<sub>4</sub> mist.

Table 7-15. Summary of Worst-Case Estimates of H<sub>2</sub>SO<sub>4</sub> Mist Impacts Compared to FDEP ARCs

Pollutant	Averaging Time	Maximum Impact (µg/m <sup>3</sup> )	ARCs (µg/m <sup>3</sup> )
H <sub>2</sub> SO <sub>4</sub> mist	8-hour	0.97	10
	24-hour	0.56	2.4

Source: ECT, 2000.

## 8.0 AMBIENT AIR QUALITY MONITORING AND ANALYSIS

### 8.1 EXISTING AMBIENT AIR QUALITY MONITORING DATA

The nearest FDEP ambient air monitoring station is located in Nichols, Polk County, approximately 37 km north of the project site. The FDEP monitoring station at Nichols monitors PM<sub>10</sub> and SO<sub>2</sub>. The nearest FDEP station that monitors ozone is located in Lakeland, Polk County, approximately 45 km north of the project site. The closest FDEP monitoring stations that monitor PM<sub>10</sub> and SO<sub>2</sub> are situated in Nichols and Mulberry, Polk County, which are respectively located approximately 37 and 38 km north of the project site. The nearest FDEP stations that monitor NO<sub>x</sub> and CO are located in Tampa, Hillsborough County, approximately 74 km northwest of the project site. The nearest FDEP station monitoring for lead is situated in Ruskin, Hillsborough County, approximately 53 km northwest of the project site. A summary of 1996 and 1997 ambient air quality data for these FDEP stations is provided in Tables 8-1 and 8-2.

### 8.2 PRECONSTRUCTION AMBIENT AIR QUALITY MONITORING EXEMPTION APPLICABILITY

FDEP Rule 62-212.400(2)(e), F.A.C., provides an exemption from preconstruction monitoring requirement for sources with *de minimis* air quality impacts. The *de minimis* ambient impact levels were previously presented in Table 4-1. To assess the appropriateness of monitoring exemptions, dispersion modeling analyses were performed to determine the maximum pollutant concentrations caused by emissions from the proposed facility. The results of these analyses are presented in detail in Section 7.2. The following paragraphs summarize the analyses results as applied to the preconstruction ambient air quality monitoring exemptions.

#### 8.2.1 PM<sub>10</sub>

The maximum 24-hour PM<sub>10</sub> impact was predicted to be 0.87 µg/m<sup>3</sup>. This concentration is below the 10 µg/m<sup>3</sup> *de minimis* level ambient impact level. Therefore, a preconstruction monitoring exemption for PM<sub>10</sub> is appropriate for the proposed facility.

Table 8-1. Summary of 1996 FDEP Ambient Air Quality Data

Pollutant	Site Location		Site No.	Averaging Period	Sampling Period	No. of Observations	Ambient Concentration (ug/m <sup>3</sup> )				
	County	City					1st High	2nd High	99th Percentile	Arithmetic Mean	Standard
PM <sub>10</sub>	Polk	Auburndale	0120 001 F01	24-Hr Annual	Jan-May	18	34	34	34	20	150 <sup>1</sup> 50 <sup>2</sup>
		Lakeland	2160 007 F01	24-Hr Annual	Jan-May	21	32	26	32	17	
		Mulberry	2860 006 F02	24-Hr Annual	Jan-May	21	36	28	36	21	
		Nichols	3680 010 F02	24-Hr Annual	Jan-Dec	61	75	45	75	22	
SO <sub>2</sub>	Polk	Mulberry	2860 006 F02	1-Hr	Feb-Dec	7,272	204	165			
				3-Hr			150	124			1,300 <sup>3</sup>
				24-Hr Annual			57	43		11	60 <sup>2</sup>
	Nichols	3680 010 F02	1-Hr	Jan-Dec	8,610	1258	354				
			3-Hr			432	257			1,300 <sup>3</sup>	
			24-Hr Annual			86	80		15	60 <sup>2</sup>	
NO <sub>2</sub>	Hillsborough	Tampa	4360 065 G01	1-Hr Annual	Jan-Dec	8,637	130	100	18	100 <sup>2</sup>	
CO	Hillsborough	Tampa	4360 045 G01	1-Hr	Jan-Dec	8,669	9,200	6,900			40,000 <sup>3</sup>
				8-Hr			4,600	4,600			10,000 <sup>3</sup>
O <sub>3</sub>	Polk	Lakeland	2160 005 F01	1-Hr	Jan-Dec	8,689	187	167			235 <sup>4</sup>
		Lakeland	2160 006 F01	1-Hr	Jan-Dec	8,718	194	181			235 <sup>4</sup>
Lead	Hillsborough	Ruskin	1800 003 G03	24-Hr	Jan-Mar	8				0.0	1.5 <sup>2</sup>
					Apr-Jun					0.0	
					Jul-Sep					0.0	
					Oct-Dec					0.0	

<sup>1</sup> 99th percentile

<sup>2</sup> Arithmetic mean

<sup>3</sup> 2nd high

<sup>4</sup> 4th highest day with hourly value exceeding standard over a 3-year period

Source: FDEP, 1998.

Table 8-2. Summary of 1997 FDEP Ambient Air Quality Data

Pollutant	Site Location		Site No.	Averaging Period	Sampling Period	No. of Observations	Ambient Concentration (ug/m <sup>3</sup> )							
	County	City					1st High	2nd High	99th Percentile	Arithmetic Mean	Standard			
PM <sub>10</sub>	Polk	Nichols	3680 010 F02	24-Hr	Jan-Dec	31	41	36	41	20	150 <sup>1</sup>			
				Annual							50 <sup>2</sup>			
SO <sub>2</sub>	Polk	Mulberry	2860 006 F02	1-Hr	Jan-Dec	8,647	254	173						
				3-Hr								168	134	1,300 <sup>3</sup>
				24-Hr								49	38	260 <sup>3</sup>
	Annual				11	60 <sup>2</sup>								
	Nichols	3680 010 F02	1-Hr	Jan-Dec	8,680	246	199							
			3-Hr									176	148	1,300 <sup>3</sup>
24-Hr				53								48	260 <sup>3</sup>	
Annual				17	60 <sup>2</sup>									
NO <sub>2</sub>	Hillsborough	Tampa	4360 065 G01	1-Hr	Jan-Dec	8,087	111	111						
				Annual					18	100 <sup>2</sup>				
CO	Hillsborough	Tampa	4360 045 G01	1-Hr	Jan-Dec	8,527	5,750	5,750			40,000 <sup>3</sup>			
				8-Hr			3,450	3,450	10,000 <sup>3</sup>					
O <sub>3</sub>	Polk	Lakeland	2160 005 F01	1-Hr	Jan-Dec	8,601	204	200			235 <sup>4</sup>			
			2160 006 F01		Jan-Dec	8,686	216	196						
Lead	Hillsborough	Tampa	180 003 G03	24-Hr										
					Jan-Mar	7			0.0	1.5 <sup>2</sup>				
					Apr-Jun	8			0.0					
					Jul-Sep	7			0.0					
					Oct-Dec	8			0.0					

<sup>1</sup> 99th percentile

<sup>2</sup> Arithmetic mean

<sup>3</sup> 2nd high

<sup>4</sup> 4th highest day with hourly value exceeding standard over a 3-year period

Source: FDEP, 1998.

### 8.2.2 CO

The maximum 8-hour CO impact was predicted to be 112.1  $\mu\text{g}/\text{m}^3$ . This concentration is below the 575- $\mu\text{g}/\text{m}^3$  *de minimis* ambient impact level. Therefore, a preconstruction monitoring exemption for CO is appropriate for the proposed facility.

### 8.2.3 NO<sub>2</sub>

The maximum annual NO<sub>2</sub> impact was predicted to be 0.28  $\mu\text{g}/\text{m}^3$ . This concentration is below the 14- $\mu\text{g}/\text{m}^3$  *de minimis* ambient impact level. Therefore, a preconstruction monitoring exemption is appropriate for the proposed facility.

### 8.2.4 SO<sub>2</sub>

The maximum 24-hour SO<sub>2</sub> impact was predicted to be 0.9  $\mu\text{g}/\text{m}^3$ . This concentration is below the 13- $\mu\text{g}/\text{m}^3$  *de minimis* ambient impact level. Therefore, a preconstruction monitoring exemption is appropriate for the proposed facility.

## **9.0 ADDITIONAL IMPACT ANALYSES**

The additional impacts analysis, required for projects subject to PSD review, evaluates project impacts pertaining to associated growth; soils, vegetation, and wildlife; and visibility impairment. Each of these topics is discussed in the following sections.

### **9.1 GROWTH IMPACT ANALYSIS**

The purpose of the growth impact analysis is to quantify growth resulting from the construction and operation of the proposed project and assess air quality impacts that would result from that growth.

Impacts associated with construction of the HCGF simple-cycle CTGs will be minor. While not readily quantifiable, the temporary increase in vehicle miles traveled in the area would be insignificant, as would any temporary increase in vehicular emissions.

The new, simple-cycle CTGs are being constructed to meet general area electric power demands; therefore, no significant secondary growth effects due to operation of the Project are anticipated. When operational, the simple-cycle CTGs are projected to generate approximately 5 to 10 new jobs; this number of new personnel will not significantly affect growth in the area. The increase in natural gas and distillate fuel oil demand due to operation of the new simple-cycle CTGs will have no major impact on local fuel markets. No significant air quality impacts due to associated industrial/commercial growth are expected.

### **9.2 IMPACTS ON SOILS, VEGETATION, AND WILDLIFE**

Maximum air quality impacts in the vicinity of the HCGF due to operation of the proposed simple-cycle CTGs are well below applicable AAQS. Accordingly, no significant, adverse impacts on soils, vegetation, and wildlife in the vicinity of the HCGF are anticipated. The following sections discuss potential impacts on the nearest Class I area; the Chassahowitzka NWR.

### **9.2.1 IMPACTS ON SOILS**

The U.S. Department of Agriculture (USDA) (1991a and 1991b) lists the primary soil type in Chassahowitzka NWR as Weekiwachee-Durbin muck. This soil type is characterized by high levels of sulfur and organic content. Sulfur levels may approach 4 percent in the upper soil layer. Daily flooding by high tides cause the pH to vary between 6.1 and 7.8.

Typically, SO<sub>2</sub> represents the greatest threat to soil since this pollutant causes increased sulfur content and decreased pH. However, for this project, given the extremely low levels of SO<sub>2</sub> emitted, the distance from the source, the naturally high sulfur content of the Class I area soils, and the pH variability caused by tidal influences, no impacts to soils are expected.

### **9.2.2 IMPACTS ON VEGETATION**

The Chassahowitzka NWR is a complex ecosystem of vegetation assemblages that depend on the subtle interplay of slight changes in elevation, salinity, hydroperiod, and edaphic factors for distribution, extent, and species composition. The mosaic of plant communities at the Chassahowitzka NWR is represented by pine woods and hammock forests within areas of higher ground, various fresh water forested and nonforested wetlands situated within lowland depressions that are inundated/saturated with fresh water for at least part of the year (mixed swamp, marsh, etc.) and brackish to salt water wetlands such as salt marsh and mangrove swamp distributed at lower elevations on land normally inundated by tidal action and freshwater pulses from upland surface water runoff. The predominant flora associated with these associations is typically common to the central Florida region and characterized by a high diversity of terrestrial, wetland, and aquatic species. Common vascular taxa within the Chassahowitzka NWR would include slash pine, laurel oak, live oak, cabbage palm, sweet gum, red maple, saw palmetto, and gallberry in the inland areas and needlerush, red mangrove, cordgrass, and saltgrass in the brackish to marine reaches.

The literature was reviewed as to potential effects of air pollutants on vegetation. It was concluded that even the maximum impacts projected to occur in the immediate vicinity of



HCGF due to operation of the simple-cycle CTGs would be below thresholds shown to cause damage to vegetation. Maximum air pollutant impacts at Chassahowitzka NWR due to emissions from the HCGF simple-cycle CTGs will be far less, as presented previously. The potential for damage at the Chassahowitzka NWR could be negligible given the absence of any plant species at Chassahowitzka NWR that would be especially sensitive to the very low predicted pollutant concentrations.

### **9.2.3 IMPACTS ON WILDLIFE**

Wildlife resources in the 30,500-acre Chassahowitzka NWR are fairly typical of central Florida's Gulf Coast. The eastern portions of the site are fringed by hardwood swamp habitats, but the primary habitats are the estuarine and brackish marshes along with the saltwater bays containing many mangrove-covered islands. These habitats support large numbers of resident and migratory waterfowl, water birds, and shorebirds. Wading birds are also quite common. Deer, raccoons, black bears, otters, and bobcats are the notable mammals. Alligators are numerous. Bald eagles and the West Indian manatee are the primary endangered/threatened species utilizing the area.

Air pollution impacts to wildlife have been reported in the literature, although many of the incidents involved acute exposures to pollutants usually caused by unusual or highly concentrated releases or unique weather conditions.

Based on a review of the limited literature on air pollutant effects on wildlife, it is unlikely that the low concentrations of pollutants resulting from the Project will cause any injury to wildlife.

Bioaccumulation, particularly of mercury, has been a concern in Florida. There is increasing evidence that mercury may be naturally evolved in Florida and that, combined with manmade sources, is becoming bioaccumulated in certain fish and wildlife. It is unknown what naturally occurring levels may be present in onsite fish and wildlife. However, the likelihood that the small amount attributable to this Project would all be methylated, end up in the food chain, and then consumed by predators is considered negligible.

The acid rain effects on wildlife in Florida are primarily those related to aquatic animals. Acidified water may prevent fish egg hatching, damage larvae, and lower immunity factors in adult fish (Barker, 1983). Acid rain can also result in release of metals (especially aluminum) from lake sediments; this can cause a biochemical deterioration of fish gills leading to death by suffocation. However, the sensitivity of Florida lakes to acid rain is in question. Florida lakes have a wide natural range of pH (from 4 to 8.8 pH units). Most well-buffered lakes are in central and south Florida, and rainfall is in the pH range of 4.8 to 5.1. According to Barker (1983) and Charles (1991), no evidence is currently available to clearly show that degradation of aquatic systems have occurred as a direct result of acid precipitation in Florida. The air emissions from the HCGF simple-cycle CTG that could contribute to the formation of atmospheric acids are not predicted to significantly increase acid precipitation and are predicted to have no impact on wildlife at Chassahowitzka NWR.

In conclusion, it is unlikely the projected air emission levels from the HCGF simple-cycle CTGs will have any measurable direct or indirect effects on wildlife utilizing the Chassahowitzka NWR.

### **9.3 VISIBILITY IMPAIRMENT POTENTIAL**

No visibility impairment at the local level is expected due to the types and quantities of emissions projected for the simple-cycle CTG. Opacity of the simple-cycle CTG exhaust will be 10 percent when firing natural gas, 20 percent when firing oil, or less, excluding water. Emissions of primary particulates and sulfur oxides from the CTG will be low due to the primary use of pipeline quality natural gas and low sulfur, low ash distillate fuel oil as the back-up fuel source. The simple-cycle CTG will comply with all applicable FDEP requirements pertaining to visible emissions.

A Level 1 visibility screening analysis was conducted using the VISCREEN program, consistent with EPA (1988) guidance. Emissions input to the VISCREEN program were the maximum short-term (g/s) emission rates for primary PM, NO<sub>x</sub>, and H<sub>2</sub>SO<sub>4</sub> mist from the three proposed simple-cycle CTGs. These rates were 31.37 g/s of PM, 148.85 g/s of

NO<sub>x</sub>, and 4.84 g/s of H<sub>2</sub>SO<sub>4</sub> mist. Table 9-1 summarizes the results of the Level 1 analysis, which, even with the conservative assumptions inherent to such an analysis, resulted in impact values well below the screening thresholds. Therefore, it could be concluded that HCGF simple-cycle CTGs emissions will not cause impairment of visibility in the Chassahowitzka NWR Class I area.

Table 9-1. Visual Effects Screening Analysis

Visual Effects Screening Analysis for  
 Source: Hardee County Generation  
 Class I Area: CHASSAHOWITZKA NWA

\*\*\* Level-1 Screening \*\*\*  
 Input Emissions for

Particulates	31.37	G	/S
NOx (as NO2)	148.85	G	/S
Primary NO2	.00	G	/S
Soot	.00	G	/S
Primary SO4	4.84	G	/S

\*\*\*\* Default Particle Characteristics Assumed

Transport Scenario Specifications:

Background Ozone:	.04	ppm
Background Visual Range:	65.00	km
Source-Observer Distance:	138.00	km
Min. Source-Class I Distance:	138.00	km
Max. Source-Class I Distance:	145.00	km
Plume-Source-Observer Angle:	11.25	degrees
Stability:	6	
Wind Speed:	1.00	m/s

R E S U L T S

Asterisks (\*) indicate plume impacts that exceed screening criteria

Maximum Visual Impacts INSIDE Class I Area  
 Screening Criteria ARE NOT Exceeded

Backgrnd	Theta	Azi	Distance	Alpha	Crit	Delta E		Contrast	
						Plume	Crit	Plume	Crit
SKY	10.	84.	138.0	84.	2.00	.939	.05	.005	
SKY	140.	84.	138.0	84.	2.00	.319	.05	-.012	
TERRAIN	10.	84.	138.0	84.	2.00	.310	.05	.004	
TERRAIN	140.	84.	138.0	84.	2.00	.081	.05	.003	

Maximum Visual Impacts OUTSIDE Class I Area  
 Screening Criteria ARE NOT Exceeded

Backgrnd	Theta	Azi	Distance	Alpha	Crit	Delta E		Contrast	
						Plume	Crit	Plume	Crit
SKY	10.	65.	128.8	104.	2.00	.988	.05	.005	
SKY	140.	65.	128.8	104.	2.00	.331	.05	-.013	
TERRAIN	10.	55.	123.5	114.	2.00	.398	.05	.005	
TERRAIN	140.	55.	123.5	114.	2.00	.108	.05	.004	

## 10.0 REFERENCES

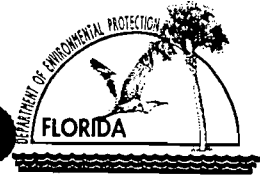
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**APPENDIX A**  
**APPLICATION FOR AIR PERMIT—**  
**TITLE V SOURCE**





# Department of Environmental Protection

## Division of Air Resources Management

### APPLICATION FOR AIR PERMIT - TITLE V SOURCE

See Instructions for Form No. 62-210.900(1)

#### I. APPLICATION INFORMATION

##### Identification of Facility

1. Facility Owner/Company Name: <b>Granite Power Partners II, LP</b> <b>(LS Power, LLC – General Partner)</b>	
2. Site Name: <b>Hardee County Generating Facility</b>	
3. Facility Identification Number: <span style="float: right;"><input checked="" type="checkbox"/> Unknown</span>	
4. Facility Location: <b>5 Miles West of Wachula</b> Street Address or Other Locator: <b>Fort Green Ona Road</b> City: <b>Wachula</b> County: <b>Hardee</b> Zip Code: <b>33834</b>	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Permitted Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

##### Application Contact

1. Name and Title of Application Contact: <b>Michael F. Vogt</b> <b>Project Manager</b>	
2. Application Contact Mailing Address: Organization/Firm: <b>Granite Power Partners II, LP</b> <b>(LS Power, LLC – General Partner)</b> Street Address: <b>655 Craig Road, Suite 336</b> City: <b>St. Louis</b> State: <b>MO</b> Zip Code: <b>63025</b>	
3. Application Contact Telephone Numbers: Telephone: <b>(314)993-2700</b> Fax: <b>(314) 993-2790</b>	

##### Application Processing Information (DEP Use)

1. Date of Receipt of Application:	<i>January 18, 2000</i>
2. Permit Number:	<i>0490049-001-AC</i>
3. PSD Number (if applicable):	<i>P50-F1-281</i>
4. Siting Number (if applicable):	

**Purpose of Application**

**Air Operation Permit Application**

This Application for Air Permit is submitted to obtain: (Check one)

- Initial Title V air operation permit for an existing facility which is classified as a Title V source.
- Initial Title V air operation permit for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.  
Current construction permit number: \_\_\_\_\_
- Title V air operation permit revision to address one or more newly constructed or modified emissions units addressed in this application.  
Current construction permit number: \_\_\_\_\_  
Operation permit number to be revised: \_\_\_\_\_
- Title V air operation permit revision or administrative correction to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)  
Operation permit number to be revised/corrected: \_\_\_\_\_
- Title V air operation permit revision for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.  
Operation permit number to be revised: \_\_\_\_\_  
Reason for revision: \_\_\_\_\_

**Air Construction Permit Application**

This Application for Air Permit is submitted to obtain: (Check one)

- Air construction permit to construct or modify one or more emissions units.
- Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.
- Air construction permit for one or more existing, but unpermitted, emissions units.

**Owner/Authorized Representative or Responsible Official**

1. Name and Title of Owner/Authorized Representative or Responsible Official: <b>Michael F. Vogt, Project Manager</b>
2. Application Contact Mailing Address: Organization/Firm: <b>Granite Power Partners II, LP</b> <b>(LS Power, LLC – General Partner)</b> Street Address: <b>655 Craig Road, Suite 336</b> City: <b>St. Louis</b> State: <b>MO</b> Zip Code: <b>63025</b>
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: <b>(314) 993-2700</b> Fax: <b>(314) 993-2790</b>
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [ ], if so) or the responsible official (check here [ ✓ ], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i>  Signature: <u>Michael F. Vogt</u> Date: <u>1/13/00</u>

\* Attach letter of authorization if not currently on file.

**Professional Engineer Certification**

1. Professional Engineer Name: <b>Thomas W. Davis</b> Registration Number: <b>36777</b>
2. Professional Engineer Mailing Address: Organization/Firm: <b>Environmental Consulting &amp; Technology, Inc.</b> Street Address: <b>3701 Northwest 98<sup>th</sup> Street</b> City: <b>Gainesville</b> State: <b>FL</b> Zip Code: <b>32606</b>
3. Professional Engineer Telephone Numbers: Telephone: <b>(352) 332-0444</b> Fax: <b>(352) 332-6722</b>

4. Professional Engineer Statement:

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

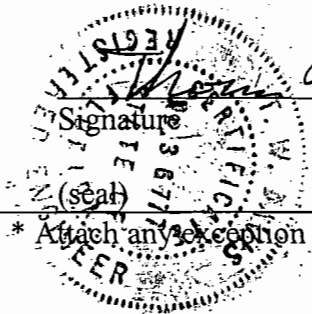
*(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the 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 hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.*

*If the purpose of this application is to obtain a Title V source air operation permit (check here [  ], if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.*

*If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [  ], if so), I further certify that the engineering features of each such emissions unit described in this application have been ~~designed or~~ examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.*

*If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [  ], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.*



Signature

*Dr. Owen*

Date

*1/12/00*

\* Attach any exception to certification statement.

## B. FACILITY POLLUTANTS

### List of Pollutants Emitted

1. Pollutant Emitted	2. Pollutant Classif.	3. Requested Emissions Cap		4. Basis for Emissions Cap	5. Pollutant Comment
		lb/hour	tons/year		
NOX	A	N/A	N/A	N/A	
SO2	A	N/A	N/A	N/A	
CO	A	N/A	N/A	N/A	
PM10	A	N/A	N/A	N/A	
PM	A	N/A	N/A	N/A	
VOC	A	N/A	N/A	N/A	
SAM	B	N/A	N/A	N/A	

## C. FACILITY SUPPLEMENTAL INFORMATION

### Supplemental Requirements

<p>1. Area Map Showing Facility Location: [ <input checked="" type="checkbox"/> ] Attached, Document ID: <b>Fig. 2-1</b> [ <input type="checkbox"/> ] Not Applicable [ <input type="checkbox"/> ] Waiver Requested</p>
<p>2. Facility Plot Plan: [ <input checked="" type="checkbox"/> ] Attached, Document ID: <b>Fig. 2-2</b> [ <input type="checkbox"/> ] Not Applicable [ <input type="checkbox"/> ] Waiver Requested</p>
<p>3. Process Flow Diagram(s): [ <input checked="" type="checkbox"/> ] Attached, Document ID: <b>Fig. 2-3</b> [ <input type="checkbox"/> ] Not Applicable [ <input type="checkbox"/> ] Waiver Requested</p>
<p>4. Precautions to Prevent Emissions of Unconfined Particulate Matter: [ <input checked="" type="checkbox"/> ] Attached, Document ID: <b>Att. A-2</b> [ <input type="checkbox"/> ] Not Applicable [ <input type="checkbox"/> ] Waiver Requested</p>
<p>5. Fugitive Emissions Identification: [ <input type="checkbox"/> ] Attached, Document ID: _____ [ <input checked="" type="checkbox"/> ] Not Applicable [ <input type="checkbox"/> ] Waiver Requested</p>
<p>6. Supplemental Information for Construction Permit Application: [ <input checked="" type="checkbox"/> ] Attached, Document ID: <b>PSD App.</b> [ <input type="checkbox"/> ] Not Applicable</p>
<p>7. Supplemental Requirements Comment:</p>

**Additional Supplemental Requirements for Title V Air Operation Permit Applications**

8. List of Proposed Insignificant Activities: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
9. List of Equipment/Activities Regulated under Title VI: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed <input type="checkbox"/> Not Applicable
10. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
12. Identification of Additional Applicable Requirements: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
13. Risk Management Plan Verification: <input type="checkbox"/> Plan previously submitted to Chemical Emergency Preparedness and Prevention Office (CEPPO). Verification of submittal attached (Document ID: _____) or previously submitted to DEP (Date and DEP Office: _____) <input type="checkbox"/> Plan to be submitted to CEPPO (Date required: _____) <input type="checkbox"/> Not Applicable
14. Compliance Report and Plan: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
15. Compliance Certification (Hard-copy Required): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable

## II. FACILITY INFORMATION

### A. GENERAL FACILITY INFORMATION

#### Facility Location and Type

1. Facility UTM Coordinates: Zone: <b>17</b> East (km): <b>408.49</b> North (km): <b>3,045.73</b>			
2. Facility Latitude/Longitude: Latitude (DD/MM/SS): Longitude (DD/MM/SS):			
3. Governmental Facility Code: <b>0</b>	4. Facility Status Code: <b>C</b>	5. Facility Major Group SIC Code: <b>49</b>	6. Facility SIC(s): <b>4911</b>
7. Facility Comment (limit to 500 characters):			

#### Facility Contact (Not Available – To Be Provided at a Later Date)

1. Name and Title of Facility Contact: <b>Not Available</b>			
2. Facility Contact Mailing Address: Organization/Firm: <b>Granite Power Partners II, LP</b> Street Address: <b>Not Available</b> City: <b>Not Available</b> State: <b>FL</b> Zip Code: <b>33834</b>			
3. Facility Contact Telephone Numbers: Telephone: <b>Not Available</b> Fax: <b>Not Available</b>			



**Facility Regulatory Classifications**

**Check all that apply:**

1. [ ] Small Business Stationary Source?	[ ] Unknown
2. [ <input checked="" type="checkbox"/> ] Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?	
3. [ ] Synthetic Minor Source of Pollutants Other than HAPs?	
4. [ ] Major Source of Hazardous Air Pollutants (HAPs)?	
5. [ ] Synthetic Minor Source of HAPs?	
6. [ <input checked="" type="checkbox"/> ] One or More Emissions Units Subject to NSPS?	
7. [ ] One or More Emission Units Subject to NESHAP?	
8. [ ] Title V Source by EPA Designation?	
9. Facility Regulatory Classifications Comment (limit to 200 characters):	

**List of Applicable Regulations**

<b>See Attachment A-1</b>	

**Scope of Application**

<b>Emissions Unit ID</b>	<b>Description of Emissions Unit</b>	<b>Permit Type</b>	<b>Processing Fee</b>
001	Combustion Turbine Generator Unit No. 1	AC1A	\$7,500
002	Combustion Turbine Generator Unit No. 2	AC1A	*
003	Combustion Turbine Generator Unit No. 3	AC1A	*

**Application Processing Fee**

Check one: [  ] Attached - Amount: \$7,500 [  ] Not Applicable

\* - Similar Emissions Unit Fee provided per Rule 62.4050(4)(a)4., F.A.C.

**Construction/Modification Information**

1. Description of Proposed Project or Alterations:

**Project consists of the installation of three simple cycle combustion turbine generators (CTGs). The CTGS will be either nominal 170-MW GE 7FA units, nominal 170-MW Siemens Westinghouse 501F units, nominal 120-MW Siemens Westinghouse 501D5A units, or nominal 180-MW ABB Power Generation GT-24 units. The CTGs will be fired primarily using pipeline quality natural gas with low-sulfur, distillate fuel oil serving as a backup fuel. The new simple-cycle CTGs will operate at for a total of 3,000 hours per year. Of the 3,000 hours per year total, oil-firing may occur for up to 500 hours per year.**

2. Projected or Actual Date of Commencement of Construction: **4<sup>th</sup> Q 2000**

3. Projected Date of Completion of Construction: **3<sup>rd</sup> Q 2001**

**Application Comment**

[Empty box for Application Comment]

**GENERAL ELECTRIC 7241FA**

**III. EMISSIONS UNIT INFORMATION**

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION  
(All Emissions Units)**

**Emissions Unit Description and Status**

1. Type of Emissions Unit Addressed in This Section: (Check one) <input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent). <input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions. <input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one) <input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit. <input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters): <b>Emission unit consists of three, identical General Electric (GE) 7241 FA simple-cycle combustion turbine generators (CTGs) each having a nominal rating of 170 megawatts (MW). The CTGs will be fired primarily using pipeline quality natural gas with low-sulfur distillate fuel oil serving as a back-up fuel.</b>			
4. Emissions Unit Identification Number: <span style="float: right;">[ ] No ID</span> ID: 001, 002, 003 (CTG Nos. 1, 2, and 3) <span style="float: right;">[ ] ID Unknown</span>			
5. Emissions Unit Status Code: <b>C</b>	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code: <b>49</b>	8. Acid Rain Unit? <input checked="" type="checkbox"/>
9. Emissions Unit Comment: (Limit to 500 Characters)			

Emissions Unit Information Section 1 of 4

**Emissions Unit Control Equipment (Per CTG)**

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

**NO<sub>x</sub> Controls**

**Dry low-NO<sub>x</sub> combustors (natural gas-firing)**

**Water injection (distillate fuel-oil firing)**

2. Control Device or Method Code(s): **25 (dry low-NO<sub>x</sub>), 28 (water injection)**

**Emissions Unit Details (Per CTG)**

1. Package Unit:

Manufacturer: **General Electric**

Model Number: **PG7241(FA)**

2. Generator Nameplate Rating: **170 MW**

3. Incinerator Information:

Dwell Temperature:

°F

Dwell Time:

seconds

Incinerator Afterburner Temperature:

°F

**B. EMISSIONS UNIT CAPACITY INFORMATION  
(Regulated Emissions Units Only)**

**Emissions Unit Operating Capacity and Schedule (Per CTG)**

1. Maximum Heat Input Rate:	<b>1,905 (LHV)</b>	mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:		
4. Maximum Production Rate:		
5. Requested Maximum Operating Schedule:		
	hours/day	days/week
	weeks/year	<b>3,000</b> hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		
<p><b>Maximum heat input is lower heating value (LHV) at 100 percent load, 20°F, fuel oil-firing operating conditions. Heat input will vary with load, fuel type, and ambient temperature.</b></p>		

**C. EMISSIONS UNIT REGULATIONS  
(Regulated Emissions Units Only)**

**List of Applicable Regulations**

See Attachment A-1	



**D. EMISSION POINT (STACK/VENT) INFORMATION  
(Regulated Emissions Units Only)**

**Emission Point Description and Type (Per CTG)**

1. Identification of Point on Plot Plan or Flow Diagram? CT1, CT2, CT3		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):  N/A			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:  N/A			
5. Discharge Type Code: V	6. Stack Height: 100 feet	7. Exit Diameter: 18 feet	
8. Exit Temperature: 1,117 °F	9. Actual Volumetric Flow Rate: 2,377,044 acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters):  <b>Stack temperature and flow rate are at 100 percent load, 59°F, and natural gas-firing operating conditions. Stack temperature and flow rate will vary with load, fuel type, and ambient temperature.</b>			

**E. SEGMENT (PROCESS/FUEL) INFORMATION  
(All Emissions Units)**

**Segment Description and Rate:** Segment 1 of 2 (Per CTG)

1. Segment Description (Process/Fuel Type) (limit to 500 characters):  <b>Combustion turbine fired with pipeline quality natural gas.</b>		
2. Source Classification Code (SCC): <b>20100201</b>		3. SCC Units: <b>Million Cubic Feet Burned</b>
4. Maximum Hourly Rate: <b>1.848</b>	5. Maximum Annual Rate: <b>5,544.0</b>	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: <b>923</b>
10. Segment Comment (limit to 200 characters):  <b>Fuel heat content (Field 9) represents lower heating value (LHV). Maximum hourly rate (Field 12) based on 20°F ambient temperature.</b>		

**Segment Description and Rate:** Segment 2 of 2 (Per CTG)

1. Segment Description (Process/Fuel Type) (limit to 500 characters):  <b>Combustion turbine fired with distillate fuel oil.</b>		
2. Source Classification Code (SCC): <b>20100101</b>		3. SCC Units: <b>Thousand Gallons Burned</b>
4. Maximum Hourly Rate: <b>14.243</b>	5. Maximum Annual Rate: <b>7,121.5</b>	6. Estimated Annual Activity Factor:
6. Maximum % Sulfur: <b>0.05</b>	7. Maximum % Ash: <b>0.01</b>	8. Million Btu per SCC Unit: <b>134</b>
9. Segment Comment (limit to 200 characters):  <b>Fuel heat content (Field 9) represents lower heating value (LHV). Maximum hourly rate (Field 12) based on 20°F ambient temperature.</b>		

**F. EMISSIONS UNIT POLLUTANTS  
(All Emissions Units)**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
<b>1 - NOX</b>	<b>025</b>		<b>EL</b>
<b>2 - CO</b>			<b>EL</b>
<b>3 - PM</b>			<b>EL</b>
<b>4 - PM10</b>			<b>EL</b>
<b>5 - SO2</b>			<b>EL</b>
<b>6 - SAM</b>			<b>EL</b>
<b>7 - VOC</b>			<b>EL</b>

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION  
(Regulated Emissions Units -  
Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions (Per CTG)**

1. Pollutant Emitted: <b>NOX</b>		2. Total Percent Efficiency of Control:	
3. Potential Emissions: <b>371.8 lb/hour</b>		<b>182.4 tons/year</b>	4. Synthetically Limited? [ <input checked="" type="checkbox"/> ]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year			
6. Emission Factor: <b>371.8 lb/hr</b> Reference: <b>GE data</b>		7. Emissions Method Code: <b>5</b>	
8. Calculation of Emissions (limit to 600 characters):  <b>Hourly emission rate based on GE data for 100 percent load, 20°F, fuel oil-firing case. Annual emissions based on 75.7 lb/hr (100 percent load, 59°F, natural gas-firing case) for 2,500 hrs/yr and 350.9 lb/hr (100 percent load, 59°F, distillate fuel oil-firing case) for 500 hrs/yr.</b>			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):			

**Allowable Emissions Allowable Emissions 1 of 2 (Per CTG)**

1. Basis for Allowable Emissions Code: <b>Other</b>		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: <b>10.5 ppmvd @ 15% O<sub>2</sub></b>		4. Equivalent Allowable Emissions: <b>75.7 lb/hour N/A tons/year</b>	
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 20 (initial), NO<sub>x</sub> CEMS</b>			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Unit is also subject to less stringent NO<sub>x</sub> limits of 40 CFR Part 60, Subpart GG (NSPS). Field 4 limit applicable for natural gas-firing at ISO conditions.</b>			

Emissions Unit Information Section 1 of 4

Pollutant Detail Information Page 14 of 14

**Allowable Emissions** Allowable Emissions 2 of 2 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>3.0 ppmvd @ 15% O<sub>2</sub></b>	4. Equivalent Allowable Emissions: <b>7.7 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 18 or 25</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT). Field 4 limit applicable for distillate fuel oil-firing at ISO Conditions.</b>	

**H. VISIBLE EMISSIONS INFORMATION**  
**(Only Regulated Emissions Units Subject to a VE Limitation)**

**Visible Emissions Limitation:** Visible Emissions Limitation 1 of 2

1. Visible Emissions Subtype: <b>VE10</b>	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: <b>10 %</b> Exceptional Conditions:      % Maximum Period of Excess Opacity Allowed:      min/hour	
4. Method of Compliance: <b>EPA Reference Method 9</b>	
5. Visible Emissions Comment (limit to 200 characters):  <b>Rule 62-212.400(5)(c), F.A.C. (BACT).</b> <b>Limit applicable for natural gas or fuel oil firing.</b>	

**Visible Emissions Limitation:** Visible Emissions Limitation 2 of 2

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions:      %      Exceptional Conditions: <b>100 %</b> Maximum Period of Excess Opacity Allowed: <b>60 min/hour</b>	
4. Method of Compliance: <b>EPA Reference Method 9</b>	
5. Visible Emissions Comment (limit to 200 characters):  <b>Excess emissions resulting from startup, shutdown, or malfunction not-to-exceed 2 hours in any 24 hour period unless authorized by FDEP for a longer duration.</b> <b>Rule 62-210.700(1), F.A.C.</b> <b>Limit applicable for natural gas or fuel oil firing.</b>	

**1. CONTINUOUS MONITOR INFORMATION**  
**(Only Regulated Emissions Units Subject to Continuous Monitoring)**

**Continuous Monitoring System:** Continuous Monitor ~~1~~ of ~~2~~

1. Parameter Code: <b>EM</b>	2. Pollutant(s): <b>NOX</b>
3. CMS Requirement:	[ <input checked="" type="checkbox"/> ] Rule [ <input type="checkbox"/> ] Other
4. Monitor Information: Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):  <b>Required by 40 CFR Part 75 (Acid Rain Program).</b> <b>Specific CEMS information will be provided to FDEP when available.</b>	

**Continuous Monitoring System:** Continuous Monitor ~~2~~ of ~~2~~

1. Parameter Code: <b>O<sub>2</sub></b>	2. Pollutant(s):
3. CMS Requirement:	[ <input checked="" type="checkbox"/> ] Rule [ <input type="checkbox"/> ] Other
4. Monitor Information: Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):  <b>Required by 40 CFR Part 75 (Acid Rain Program).</b> <b>Specific CEMS information will be provided to FDEP when available.</b>	

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION  
(Regulated Emissions Units Only)**

**Supplemental Requirements**

1. Process Flow Diagram <input checked="" type="checkbox"/> Attached, Document ID: <u>Fig. 2-3</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input checked="" type="checkbox"/> Attached, Document ID: <u>Att. A-3</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input checked="" type="checkbox"/> Attached, Document ID: <u>Sect. 5.0</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <b>To be provided</b> <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <b>See PSD application</b> <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment:          



**Emissions Unit Information Section 1 of 4**

**Additional Supplemental Requirements for Title V Air Operation Permit Applications**

11. Alternative Methods of Operation [ ] Attached, Document ID: _____ [ ] Not Applicable
12. Alternative Modes of Operation (Emissions Trading) [ ] Attached, Document ID: _____ [ ] Not Applicable
13. Identification of Additional Applicable Requirements [ ] Attached, Document ID: _____ [ ] Not Applicable
14. Compliance Assurance Monitoring Plan [ ] Attached, Document ID: _____ [ ] Not Applicable
15. Acid Rain Part Application (Hard-copy Required) [ ] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ [ ] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ [ ] New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ [ ] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ [ ] Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ [ ] Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ [ ] Not Applicable

**WESTINGHOUSE 501F**

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units -**  
**Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions (Per CTG)**

1. Pollutant Emitted: <b>PM</b>	2. Total Percent Efficiency of Control:
3. Potential Emissions: <b>26.3 lb/hour</b>	4. Synthetically Limited? <input checked="" type="checkbox"/> <b>16.7 tons/year</b>
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: <b>26.3 lb/hr</b> Reference: <b>Westinghouse data</b>	7. Emissions Method Code: <b>5</b>
8. Calculation of Emissions (limit to 600 characters):  <b>Hourly emission rate based on Westinghouse data for 70 percent load, 32°F, fuel oil-firing case. Annual emissions based on 9.5 lb/hr (100 percent load, 59°F, natural gas-firing case) for 2,000 hrs/yr, 9.5 lb/hr (50 percent load, 59°F, natural gas-firing case) for 500 hrs/yr and 19.8 lb/hr (100 percent load, 59°F, distillate fuel oil-firing case) for 500 hrs/yr.</b>	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

**Allowable Emissions** Allowable Emissions 1 of 2 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>10% opacity</b>	4. Equivalent Allowable Emissions: <b>9.5 lb/hour N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 9</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 4 limit applicable for natural gas-firing at ISO conditions.</b>	

Emissions Unit Information Section 2 of 4

Pollutant Detail Information Page 7 of 16

**Allowable Emissions** Allowable Emissions 2 of 2 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>20 % opacity</b>	4. Equivalent Allowable Emissions: <b>26.3 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 9</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 4 limit applicable for 70% load, distillate fuel oil-firing at ISO conditions.</b>	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units -**  
**Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions (Per CTG)**

1. Pollutant Emitted: <b>PM10</b>	2. Total Percent Efficiency of Control:
3. Potential Emissions: <b>26.3 lb/hour</b> <b>16.7 tons/year</b>	4. Synthetically Limited? [ <input checked="" type="checkbox"/> ]
5. Range of Estimated Fugitive Emissions: [ ] 1      [ ] 2      [ ] 3      _____ to _____ tons/year	
6. Emission Factor: <b>26.3 lb/hr</b> Reference: <b>Westinghouse data</b>	7. Emissions Method Code: <b>5</b>
8. Calculation of Emissions (limit to 600 characters):  <b>Hourly emission rate based on Westinghouse data for 70 percent load, 32°F, fuel oil-firing case. Annual emissions based on 9.5 lb/hr (100 percent load, 59°F, natural gas-firing case) for 2,000 hrs/yr, 9.5 lb/hr (50 percent load, 59°F, natural gas-firing case) for 2,000 hrs/yr and 19.8 lb/hr (100 percent load, 59°F, distillate fuel oil-firing case) for 500 hrs/yr.</b>	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

**Allowable Emissions** Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>10% opacity</b>	4. Equivalent Allowable Emissions: <b>9.5 lb/hour</b> <b>N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 9</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 4 limit applicable for natural gas-firing at ISO conditions.</b>	

**Emissions Unit Information Section 2 of 4**

**Pollutant Detail Information Page 9 of 16**

**Allowable Emissions** Allowable Emissions 2 of 2 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>20 % opacity</b>	4. Equivalent Allowable Emissions: <b>26.3 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 9</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 4 limit applicable for 70% load, distillate fuel oil-firing at ISO conditions.</b>	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units -**  
**Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions (Per CTG)**

1. Pollutant Emitted: <b>SO2</b>	2. Total Percent Efficiency of Control:
3. Potential Emissions: <b>95.2 lb/hour</b> <b>33.9 tons/year</b>	4. Synthetically Limited? [ <input checked="" type="checkbox"/> ]
5. Range of Estimated Fugitive Emissions: [ ] 1      [ ] 2      [ ] 3      _____ to _____ tons/year	
6. Emission Factor: <b>95.2 lb/hr</b> Reference: <b>Westinghouse data</b>	7. Emissions Method Code: <b>2</b>
8. Calculation of Emissions (limit to 600 characters):  $(0.05 \text{ lb S}/100 \text{ lb oil}) \times (95,200 \text{ lb oil/hr}) \times (2 \text{ lb SO}_2/\text{lb S}) = 95.2 \text{ lb/hr SO}_2$ <p><b>Annual emissions based on 9.3 lb/hr (100 percent load, 59°F, natural gas-firing case) for 2,500 hrs/yr and 89.1 lb/hr (100 percent load, 59°F, distillate fuel oil-firing case) for 500 hrs/yr.</b></p>	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

**Allowable Emissions** Allowable Emissions 1 of 2 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>2.0 gr S/100 scf</b>	4. Equivalent Allowable Emissions: <b>9.3 lb/hour</b> <b>N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>Fuel analysis for sulfur content</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT)</b> <b>Field 4 limit applicable for natural gas-firing at ISO conditions.</b>	

Emissions Unit Information Section 2 of 4

Pollutant Detail Information Page 11 of 16

Allowable Emissions Allowable Emissions 2 of 2 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>0.05 weight % S</b>	4. Equivalent Allowable Emissions: <b>89.1 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>Fuel analysis for sulfur content</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 4 limit applicable for distillate fuel oil-firing at ISO conditions.</b>	



**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units -**  
**Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions (Per CTG)**

1. Pollutant Emitted: <b>SAM</b>	2. Total Percent Efficiency of Control:
3. Potential Emissions: <b>10.9 lb/hour</b> <b>3.9 tons/year</b>	4. Synthetically Limited? <input checked="" type="checkbox"/>
5. Range of Estimated Fugitive Emissions: [ ] 1      [ ] 2      [ ] 3      _____ to _____ tons/year	
6. Emission Factor: <b>10.9 lb/hr</b> Reference: <b>Westinghouse data</b>	7. Emissions Method Code: <b>2</b>
8. Calculation of Emissions (limit to 600 characters):  $(95.2 \text{ lb/hr SO}_2) \times (7.5/100) \times (98 \text{ lb H}_2\text{SO}_4/64 \text{ lb SO}_2) = 10.9 \text{ lb/hr H}_2\text{SO}_4$ <p><b>Annual emissions based on 1.1 lb/hr (100 percent load, 59°F, natural gas-firing case) for 2,500 hrs/yr and 10.2 lb/hr (100 percent load, 59°F, distillate fuel oil-firing case) for 500 hrs/yr.</b></p>	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

**Allowable Emissions** Allowable Emissions 1 of 2 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>2.0 gr S/100 scf</b>	4. Equivalent Allowable Emissions: <b>1.1 lb/hour</b> <b>N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>Fuel analysis for sulfur content</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT)</b> <b>Field 4 limit applicable for natural gas-firing at ISO conditions.</b>	

Emissions Unit Information Section 2 of 4

Pollutant Detail Information Page 13 of 16

**Allowable Emissions** Allowable Emissions 2 of 2 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>0.05 weight % S</b>	4. Equivalent Allowable Emissions: <b>10.2 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>Fuel analysis for sulfur content</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 4 limit applicable for distillate fuel oil-firing at ISO conditions.</b>	

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION  
(Regulated Emissions Units Only)**

**Supplemental Requirements**

1. Process Flow Diagram <input checked="" type="checkbox"/> Attached, Document ID: <u>Fig. 2-3</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input checked="" type="checkbox"/> Attached, Document ID: <u>Att. A-3</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input checked="" type="checkbox"/> Attached, Document ID: <u>Sect. 5.0</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <b>To be provided</b> <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <b>See PSD application</b> <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment:          

**Additional Supplemental Requirements for Title V Air Operation Permit Applications**

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input type="checkbox"/> Not Applicable

**WESTINGHOUSE 501D5A**

### III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

#### A. GENERAL EMISSIONS UNIT INFORMATION (All Emissions Units)

##### Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)			
[ <input checked="" type="checkbox"/> ] This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).			
[ <input type="checkbox"/> ] This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.			
[ <input type="checkbox"/> ] This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one)			
[ <input checked="" type="checkbox"/> ] The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.			
[ <input type="checkbox"/> ] The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters): Emission unit consists of three, identical Westinghouse 501D5A simple-cycle combustion turbine generators (CTGs) each having a nominal rating of 120 megawatts (MW). The CTGs will be fired primarily using pipeline quality natural gas with low-sulfur distillate fuel oil serving as a back-up fuel.			
4. Emissions Unit Identification Number: [ <input type="checkbox"/> ] No ID			
ID: 001, 002, 003 (CTG Nos. 1, 2, and 3) [ <input type="checkbox"/> ] ID Unknown			
5. Emissions Unit Status Code: C	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code: 49	8. Acid Rain Unit? [ <input checked="" type="checkbox"/> ]
9. Emissions Unit Comment: (Limit to 500 Characters)			

**Emissions Unit Control Equipment (Per CTG)**

<p>1. Control Equipment/Method Description (Limit to 200 characters per device or method):</p> <p><b><u>NO<sub>x</sub> Controls</u></b></p> <p><b>Dry low-NO<sub>x</sub> combustors (natural gas-firing)</b>  <b>Water injection (distillate fuel-oil firing)</b></p>
<p>2. Control Device or Method Code(s): <b>25 (dry low-NO<sub>x</sub>), 28 (water injection)</b></p>

**Emissions Unit Details (Per CTG)**

<p>1. Package Unit:          Manufacturer: <b>Westinghouse</b> <span style="float: right;">Model Number: <b>501D5A</b></span></p>						
<p>2. Generator Nameplate Rating: <b>120 MW</b></p>						
<p>3. Incinerator Information:</p> <table style="width: 100%; border: none;"> <tr> <td style="text-align: right;">Dwell Temperature:</td> <td style="text-align: right;">°F</td> </tr> <tr> <td style="text-align: right;">Dwell Time:</td> <td style="text-align: right;">seconds</td> </tr> <tr> <td style="text-align: right;">Incinerator Afterburner Temperature:</td> <td style="text-align: right;">°F</td> </tr> </table>	Dwell Temperature:	°F	Dwell Time:	seconds	Incinerator Afterburner Temperature:	°F
Dwell Temperature:	°F					
Dwell Time:	seconds					
Incinerator Afterburner Temperature:	°F					

**B. EMISSIONS UNIT CAPACITY INFORMATION  
(Regulated Emissions Units Only)**

**Emissions Unit Operating Capacity and Schedule (Per CTG)**

1. Maximum Heat Input Rate:	1,337 (LHV)	mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:		
4. Maximum Production Rate:		
5. Requested Maximum Operating Schedule:		
	hours/day	days/week
	weeks/year	3,000 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		
<p><b>Maximum heat input is lower heating value (LHV) at 100 percent load, 20°F, fuel oil-firing operating conditions. Heat input will vary with load, fuel type, and ambient temperature.</b></p>		



**C. EMISSIONS UNIT REGULATIONS  
(Regulated Emissions Units Only)**

**List of Applicable Regulations**

See Attachment A-1	

**D. EMISSION POINT (STACK/VENT) INFORMATION  
(Regulated Emissions Units Only)**

**Emission Point Description and Type (Per CTG)**

1. Identification of Point on Plot Plan or Flow Diagram? CT1, CT2, CT3		16. Emission Point Type Code: 1	
17. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):  N/A			
18. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:  N/A			
19. Discharge Type Code: V	6. Stack Height: 100 feet	7. Exit Diameter: 18 feet	
8. Exit Temperature: 997 °F	9. Actual Volumetric Flow Rate: 1,912,234 acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters):  <b>Stack temperature and flow rate are at 100 percent load, 59°F, and natural gas-firing operating conditions. Stack temperature and flow rate will vary with load, fuel type, and ambient temperature.</b>			

**E. SEGMENT (PROCESS/FUEL) INFORMATION**  
(All Emissions Units)

**Segment Description and Rate:** Segment 1 of 2 (Per CTG)

1. Segment Description (Process/Fuel Type) (limit to 500 characters):  <b>Combustion turbine fired with pipeline quality natural gas.</b>		
2. Source Classification Code (SCC): <b>20100201</b>		3. SCC Units: <b>Million Cubic Feet Burned</b>
4. Maximum Hourly Rate: <b>1.388</b>	5. Maximum Annual Rate: <b>4,164.0</b>	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: <b>923</b>
10. Segment Comment (limit to 200 characters):  <b>Fuel heat content (Field 9) represents lower heating value (LHV). Maximum hourly rate (Field 12) based on 20°F ambient temperature.</b>		

**Segment Description and Rate:** Segment 2 of 2 (Per CTG)

1. Segment Description (Process/Fuel Type) (limit to 500 characters):  <b>Combustion turbine fired with distillate fuel oil.</b>		
2. Source Classification Code (SCC): <b>20100101</b>		3. SCC Units: <b>Thousand Gallons Burned</b>
4. Maximum Hourly Rate: <b>9.909</b>	5. Maximum Annual Rate: <b>4,954.5</b>	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: <b>0.05</b>	8. Maximum % Ash: <b>0.01</b>	9. Million Btu per SCC Unit: <b>134</b>
10. Segment Comment (limit to 200 characters):  <b>Fuel heat content (Field 9) represents lower heating value (LHV). Maximum hourly rate (Field 12) based on 20°F ambient temperature.</b>		

**F. EMISSIONS UNIT POLLUTANTS  
(All Emissions Units)**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
1 – NOX	025		EL
2 – CO			EL
3 – PM			EL
4 – PM10			EL
5 – SO2			EL
6 – SAM			EL
7 – VOC			EL

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units -**  
**Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions (Per CTG)**

1. Pollutant Emitted: <b>NOX</b>	2. Total Percent Efficiency of Control:
3. Potential Emissions: <b>260.7 lb/hour</b> <b>178.0 tons/year</b>	4. Synthetically Limited? [ <input checked="" type="checkbox"/> ]
5. Range of Estimated Fugitive Emissions: [ ] 1      [ ] 2      [ ] 3      _____ to _____ tons/year	
6. Emission Factor: <b>260.7 lb/hr</b> Reference: <b>Westinghouse data</b>	7. Emissions Method Code: <b>5</b>
8. Calculation of Emissions (limit to 600 characters):  <b>Hourly emission rate based on Westinghouse data for 100 percent load, 20°F, fuel oil-firing case. Annual emissions based on 80.6 lb/hr (100 percent load, 59°F, natural gas-firing case) for 2,000 hrs/yr, 148.7 lb/hr (50 percent load, 59°F, natural gas-firing case) for 500 hrs/yr, and 240.7 lb/hr (100 percent load, 59°F, distillate fuel oil-firing case) for 500 hrs/yr.</b>	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

**Allowable Emissions** Allowable Emissions   1   of   3   (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>15 ppmvd @ 15% O<sub>2</sub></b>	4. Equivalent Allowable Emissions: <b>80.6 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 20 (initial), NO<sub>x</sub> CEMS</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Unit is also subject to less stringent NO<sub>x</sub> limits of 40 CFR Part 60, Subpart GG (NSPS). Field 4 limit applicable 100% load, natural gas-firing at ISO conditions.</b>	

**Emissions Unit Information Section 3 of 4**

**Pollutant Detail Information Page 2 of 16**

Allowable Emissions Allowable Emissions 2 of 3 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>45 ppmvd @ 15% O<sub>2</sub></b>	4. Equivalent Allowable Emissions: <b>148.7 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 20 (initial), NO<sub>x</sub> CEMS</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Unit is also subject to less stringent NO<sub>x</sub> limits of 40 CFR Part 60, Subpart GG (NSPS). Field 4 limit applicable 50% load, natural gas-firing at ISO conditions.</b>	

Allowable Emissions Allowable Emissions 3 of 3 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>42 ppmvd @ 15% O<sub>2</sub></b>	4. Equivalent Allowable Emissions: <b>240.7 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 20 (initial), NO<sub>x</sub> CEMS</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Unit is also subject to less stringent NO<sub>x</sub> limits of 40 CFR Part 60, Subpart GG (NSPS). Field 4 limit applicable for fuel oil-firing at ISO conditions.</b>	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units -**  
**Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions (Per CTG)**

1. Pollutant Emitted: <b>CO</b>	2. Total Percent Efficiency of Control:
3. Potential Emissions: <b>495.0 lb/hour</b> <b>171.5 tons/year</b>	4. Synthetically Limited? [ <b>CS</b> ]
5. Range of Estimated Fugitive Emissions: [ ] 1      [ ] 2      [ ] 3      _____ to _____ tons/year	
6. Emission Factor: <b>495.0 lb/hr</b> Reference: <b>Westinghouse data</b>	7. Emissions Method Code: <b>5</b>
8. Calculation of Emissions (limit to 600 characters):  <b>Hourly emission rate based on Westinghouse data for 50 percent load, 20°F, natural gas-firing case. Annual emissions based on 31.8 lb/hr (100 percent load, 59°F, natural gas-firing case) for 2,000 hrs/yr, 463.0 lb/hr (50 percent load, 59°F, natural gas-firing case) for 500 hrs/yr and 95.9 lb/hr (100 percent load, 59°F, distillate fuel oil-firing case) for 500 hrs/yr.</b>	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

**Allowable Emissions** Allowable Emissions   1   of   4   (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>10 ppmvd @ 15% O<sub>2</sub></b>	4. Equivalent Allowable Emissions: <b>31.8 lb/hour</b> <b>N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 10</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT)</b> <b>Field 3 limit applicable for 100% load, natural gas-firing.</b> <b>Field 4 limit applicable for 100% load, natural gas-firing at ISO conditions.</b>	

Emissions Unit Information Section 3 of 4

Pollutant Detail Information Page 4 of 16

**Allowable Emissions** Allowable Emissions 2 of 4 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>232 ppmvd @ 15% O<sub>2</sub></b>	4. Equivalent Allowable Emissions: <b>463.0 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 10</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 3 limit applicable for 50% load, natural gas-firing. Field 4 limit applicable for 50% load, natural gas-firing at ISO conditions.</b>	

**Allowable Emissions** Allowable Emissions 3 of 4 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>28 ppmvd @ 15% O<sub>2</sub></b>	4. Equivalent Allowable Emissions: <b>95.9 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 10</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 3 limit applicable for 100% load, fuel oil-firing. Field 4 limit applicable for 100% load, fuel oil-firing at ISO conditions.</b>	



**Emissions Unit Information Section 3 of 4**

**Pollutant Detail Information Page 5 of 16**

**Allowable Emissions** Allowable Emissions 4 of 4 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>75 ppmvd @ 15% O<sub>2</sub></b>	4. Equivalent Allowable Emissions: <b>198.4 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 10</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 3 limit applicable for 75% load, fuel oil-firing. Field 4 limit applicable for 75% load, fuel oil-firing at ISO conditions.</b>	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units -**  
**Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions (Per CTG)**

1. Pollutant Emitted: <b>PM</b>	2. Total Percent Efficiency of Control:
3. Potential Emissions: <b>45.2 lb/hour</b> <b>19.2 tons/year</b>	4. Synthetically Limited? [ <input checked="" type="checkbox"/> ]
5. Range of Estimated Fugitive Emissions: [ ] 1      [ ] 2      [ ] 3      _____ to _____ tons/year	
6. Emission Factor: <b>45.2 lb/hr</b> Reference: <b>Westinghouse data</b>	7. Emissions Method Code: <b>5</b>
8. Calculation of Emissions (limit to 600 characters):  <b>Hourly emission rate based on Westinghouse data for 75 percent load, 20°F, fuel oil-firing case. Annual emissions based on 8.8 lb/hr (100 percent load, 59°F, natural gas-firing case) for 2,500 hrs/yr and 32.9 lb/hr (100 percent load, 59°F, distillate fuel oil-firing case) for 500 hrs/yr.</b>	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

**Allowable Emissions** Allowable Emissions 1 of 2 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>10% opacity</b>	4. Equivalent Allowable Emissions: <b>8.8 lb/hour</b> <b>N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 9</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 4 limit applicable for natural gas-firing at ISO conditions.</b>	

Emissions Unit Information Section 3 of 4

Pollutant Detail Information Page 7 of 16

**Allowable Emissions** Allowable Emissions 2 of 2 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>20 % opacity</b>	4. Equivalent Allowable Emissions: <b>41.2 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 9</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 4 limit applicable for 75% load, distillate fuel oil-firing at ISO conditions.</b>	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units -**  
**Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions (Per CTG)**

1. Pollutant Emitted: <b>PM10</b>	2. Total Percent Efficiency of Control:
3. Potential Emissions: <b>45.2 lb/hour</b> <b>19.2 tons/year</b>	4. Synthetically Limited? <input checked="" type="checkbox"/>
5. Range of Estimated Fugitive Emissions: [ ] 1      [ ] 2      [ ] 3      _____ to _____ tons/year	
6. Emission Factor: <b>45.2 lb/hr</b> Reference: <b>Westinghouse data</b>	7. Emissions Method Code: <b>5</b>
8. Calculation of Emissions (limit to 600 characters):  <b>Hourly emission rate based on Westinghouse data for 75 percent load, 20°F, fuel oil-firing case. Annual emissions based on 8.8 lb/hr (100 percent load, 59°F, natural gas-firing case) for 2,500 hrs/yr and 32.9 lb/hr (100 percent load, 59°F, distillate fuel oil-firing case) for 500 hrs/yr.</b>	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

**Allowable Emissions** Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>10% opacity</b>	4. Equivalent Allowable Emissions: <b>8.8 lb/hour</b> <b>N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 9</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 4 limit applicable for natural gas-firing at ISO conditions.</b>	

**Emissions Unit Information Section 3 of 4**

**Pollutant Detail Information Page 9 of 16**

**Allowable Emissions** Allowable Emissions 2 of 2 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>20 % opacity</b>	4. Equivalent Allowable Emissions: <b>41.2 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 9</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 4 limit applicable for 75% load, distillate fuel oil-firing at ISO conditions.</b>	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION  
(Regulated Emissions Units -  
Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions (Per CTG)**

1. Pollutant Emitted: <b>SO2</b>		2. Total Percent Efficiency of Control:	
3. Potential Emissions: <b>72.4 lb/hour</b>		4. Synthetically Limited? [ <input checked="" type="checkbox"/> ]	
		<b>25.0 tons/year</b>	
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year			
6. Emission Factor: <b>72.4 lb/hr</b> Reference: <b>Westinghouse data</b>		7. Emissions Method Code: <b>2</b>	
8. Calculation of Emissions (limit to 600 characters):  <b><math>(0.05 \text{ lb S}/100 \text{ lb oil}) \times (72,400 \text{ lb oil/hr}) \times (2 \text{ lb SO}_2/\text{lb S}) = 72.4 \text{ lb/hr SO}_2</math></b>  <b>Annual emissions based on 6.7 lb/hr (100 percent load, 59°F, natural gas-firing case) for 2,500 hrs/yr and 66.9 lb/hr (100 percent load, 59°F, distillate fuel oil-firing case) for 500 hrs/yr.</b>			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):			

**Allowable Emissions** Allowable Emissions 1 of 2 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: <b>2.0 gr S/100 scf</b>		4. Equivalent Allowable Emissions: <b>6.7 lb/hour N/A tons/year</b>	
5. Method of Compliance (limit to 60 characters): <b>Fuel analysis for sulfur content</b>			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 4 limit applicable for natural gas-firing at ISO conditions.</b>			

Emissions Unit Information Section 3 of 4

Pollutant Detail Information Page 11 of 16

Allowable Emissions Allowable Emissions 2 of 2 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>0.05 weight % S</b>	4. Equivalent Allowable Emissions: <b>66.9 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>Fuel analysis for sulfur content</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 4 limit applicable for distillate fuel oil-firing at ISO conditions.</b>	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units -**  
**Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions (Per CTG)**

1. Pollutant Emitted: <b>SAM</b>	2. Total Percent Efficiency of Control:
3. Potential Emissions: <b>8.3 lb/hour</b> <b>2.9 tons/year</b>	4. Synthetically Limited? [ <input checked="" type="checkbox"/> ]
5. Range of Estimated Fugitive Emissions: [ ] 1      [ ] 2      [ ] 3      _____ to _____ tons/year	
6. Emission Factor: <b>8.3 lb/hr</b> Reference: <b>Westinghouse data</b>	7. Emissions Method Code: <b>2</b>
8. Calculation of Emissions (limit to 600 characters):  $(72.4 \text{ lb/hr SO}_2) \times (7.5/100) \times (98 \text{ lb H}_2\text{SO}_4/64 \text{ lb SO}_2) = 8.3 \text{ lb/hr H}_2\text{SO}_4$ <p>Annual emissions based on 0.8 lb/hr (100 percent load, 59°F, natural gas-firing case) for 2,500 hrs/yr and 7.7 lb/hr (100 percent load, 59°F, distillate fuel oil-firing case) for 500 hrs/yr.</p>	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

**Allowable Emissions** Allowable Emissions   1   of   2   (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>2.0 gr S/100 scf</b>	4. Equivalent Allowable Emissions: <b>0.8 lb/hour</b> <b>N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>Fuel analysis for sulfur content</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT)</b> <b>Field 4 limit applicable for natural gas-firing at ISO conditions.</b>	



**Emissions Unit Information Section 3 of 4**

**Pollutant Detail Information Page 13 of 16**

**Allowable Emissions** Allowable Emissions 2 of 2 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>0.05 weight % S</b>	4. Equivalent Allowable Emissions: <b>7.7 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>Fuel analysis for sulfur content</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 4 limit applicable for distillate fuel oil-firing at ISO conditions.</b>	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units -**  
**Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions (Per CTG)**

1. Pollutant Emitted: <b>VOC</b>	2. Total Percent Efficiency of Control:
3. Potential Emissions: 49.8 lb/hour                      16.2 tons/year	4. Synthetically Limited? [ <input checked="" type="checkbox"/> ]
5. Range of Estimated Fugitive Emissions: [ ] 1      [ ] 2      [ ] 3      _____ to _____ tons/year	
6. Emission Factor: <b>49.8 lb/hr</b> Reference: <b>Westinghouse data</b>	7. Emissions Method Code: <b>5</b>
8. Calculation of Emissions (limit to 600 characters):  <p><b>Hourly emission rate based on Westinghouse data for 75 percent load, 20°F, distillate fuel oil-firing case. Annual emissions based on 5.4 lb/hr (100 percent load, 59°F, natural gas-firing case) for 2,000 hrs/yr, 23.1 lb/hr (50 percent load, 59°F, natural gas-firing case) for 500 hrs/yr and 20.2 lb/hr (100 percent load, 59°F, distillate fuel oil-firing case) for 500 hrs/yr.</b></p>	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

**Allowable Emissions** Allowable Emissions 1 of 4 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>3 ppmvd @ 15% O<sub>2</sub></b>	4. Equivalent Allowable Emissions: <b>5.4 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 10</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <p><b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT)  Field 3 limit applicable for 100% load, natural gas-firing.  Field 4 limit applicable for 100% load, natural gas-firing at ISO conditions.</b></p>	

Emissions Unit Information Section 3 of 4

Pollutant Detail Information Page 15 of 16

**Allowable Emissions** Allowable Emissions 2 of 4 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>20 ppmvd @ 15% O<sub>2</sub></b>	4. Equivalent Allowable Emissions: <b>23.1 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 10</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 3 limit applicable for 50% load, natural gas-firing. Field 4 limit applicable for 50% load, natural gas-firing at ISO conditions.</b>	

**Allowable Emissions** Allowable Emissions 3 of 4 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>10 ppmvd @ 15% O<sub>2</sub></b>	4. Equivalent Allowable Emissions: <b>20.2 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 10</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 3 limit applicable for 100% load, fuel oil-firing. Field 4 limit applicable for 100% load, fuel oil-firing at ISO conditions.</b>	

**Emissions Unit Information Section 3 of 4**

**Pollutant Detail Information Page 16 of 16**

**Allowable Emissions** Allowable Emissions 4 of 4 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
4. Requested Allowable Emissions and Units: <b>30 ppmvd @ 15% O<sub>2</sub></b>	4. Equivalent Allowable Emissions: <b>47.0 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 10</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 3 limit applicable for 75% load, fuel oil-firing. Field 4 limit applicable for 75% load, fuel oil-firing at ISO conditions.</b>	

**H. VISIBLE EMISSIONS INFORMATION**  
**(Only Regulated Emissions Units Subject to a VE Limitation)**

**Visible Emissions Limitation:** Visible Emissions Limitation 1 of 3

1. Visible Emissions Subtype: <b>VE10</b>	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: <b>10</b> %      Exceptional Conditions:      % Maximum Period of Excess Opacity Allowed:      min/hour	
4. Method of Compliance: <b>EPA Reference Method 9</b>	
5. Visible Emissions Comment (limit to 200 characters):  <b>Rule 62-212.400(5)(c), F.A.C. (BACT).</b> <b>Limit applicable for natural gas firing.</b>	

**Visible Emissions Limitation:** Visible Emissions Limitation 2 of 3

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: <b>20</b> %      Exceptional Conditions:      % Maximum Period of Excess Opacity Allowed:      min/hour	
4. Method of Compliance: <b>EPA Reference Method 9</b>	
5. Visible Emissions Comment (limit to 200 characters):  <b>Rule 62-212.400(5)(c), F.A.C. (BACT).</b> <b>Limit applicable for fuel oil firing.</b>	

Emissions Unit Information Section 3 of 4

**Visible Emissions Limitation:** Visible Emissions Limitation 3 of 3

1. Visible Emissions Subtype: <b>VE10</b>	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: % Exceptional Conditions: <b>100 %</b> Maximum Period of Excess Opacity Allowed: <b>60 min/hour</b>	
4. Method of Compliance: <b>EPA Reference Method 9</b>	
5. Visible Emissions Comment (limit to 200 characters):  <b>Excess emissions resulting from startup, shutdown, or malfunction not-to-exceed 2 hours in any 24 hour period unless authorized by FDEP for a longer duration. Rule 62-210.700(1), F.A.C. Limit applicable for natural gas or fuel oil firing.</b>	

**I. CONTINUOUS MONITOR INFORMATION**  
**(Only Regulated Emissions Units Subject to Continuous Monitoring)**

**Continuous Monitoring System:** Continuous Monitor 1 of 2

1. Parameter Code: <b>EM</b>	2. Pollutant(s): <b>NOX</b>
3. CMS Requirement:	[ <input checked="" type="checkbox"/> ] Rule [ <input type="checkbox"/> ] Other
4. Monitor Information: Manufacturer: Model Number: <span style="float:right">Serial Number:</span>	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):  <b>Required by 40 CFR Part 75 (Acid Rain Program).</b> <b>Specific CEMS information will be provided to FDEP when available.</b>	

**Continuous Monitoring System:** Continuous Monitor 2 of 2

1. Parameter Code: <b>O<sub>2</sub></b>	2. Pollutant(s):
3. CMS Requirement:	[ <input checked="" type="checkbox"/> ] Rule [ <input type="checkbox"/> ] Other
4. Monitor Information: Manufacturer: Model Number: <span style="float:right">Serial Number:</span>	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):  <b>Required by 40 CFR Part 75 (Acid Rain Program).</b> <b>Specific CEMS information will be provided to FDEP when available.</b>	

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION  
(Regulated Emissions Units Only)**

**Supplemental Requirements**

1. Process Flow Diagram <input checked="" type="checkbox"/> Attached, Document ID: <u>Fig. 2-3</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input checked="" type="checkbox"/> Attached, Document ID: <u>Att. A-3</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input checked="" type="checkbox"/> Attached, Document ID: <u>Sect. 5.0</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <b>To be provided</b> <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <b>See PSD application</b> <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment:



**Additional Supplemental Requirements for Title V Air Operation Permit Applications**

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input type="checkbox"/> Not Applicable

**ABB GT-24**

### III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

#### A. GENERAL EMISSIONS UNIT INFORMATION (All Emissions Units)

##### Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one) <input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent). <input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions. <input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one) <input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit. <input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters): <b>Emission unit consists of three, identical ABB GT-24 simple-cycle combustion turbine generators (CTGs) each having a nominal rating of 180 megawatts (MW). The CTGs will be fired primarily using pipeline quality natural gas with low-sulfur distillate fuel oil serving as a back-up fuel.</b>			
4. Emissions Unit Identification Number: <span style="float: right;">[ ] No ID</span> ID: <b>001, 002, 003 (CTG Nos. 1, 2, and 3)</b> <span style="float: right;">[ ] ID Unknown</span>			
5. Emissions Unit Status Code: <b>C</b>	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code: <b>49</b>	8. Acid Rain Unit? [ <input checked="" type="checkbox"/> ]
9. Emissions Unit Comment: (Limit to 500 Characters)			

**Emissions Unit Control Equipment (Per CTG)**

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

**NO<sub>x</sub> Controls**

**Dry low-NO<sub>x</sub> combustors (natural gas-firing)**

**Water injection (distillate fuel-oil firing)**

2. Control Device or Method Code(s): **25 (dry low-NO<sub>x</sub>), 28 (water injection)**

**Emissions Unit Details (Per CTG)**

1. Package Unit:

Manufacturer: **ABB Power Generation**

Model Number: **GT-24**

2. Generator Nameplate Rating: **180 MW**

3. Incinerator Information:

Dwell Temperature:

°F

Dwell Time:

seconds

Incinerator Afterburner Temperature:

°F

**B. EMISSIONS UNIT CAPACITY INFORMATION  
(Regulated Emissions Units Only)**

**Emissions Unit Operating Capacity and Schedule (Per CTG)**

1. Maximum Heat Input Rate:	<b>2,078 (LHV)</b>	mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:		
4. Maximum Production Rate:		
5. Requested Maximum Operating Schedule:		
	hours/day	days/week
	weeks/year	<b>3,000</b> hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		
<p><b>Maximum heat input is lower heating value (LHV) at 100 percent load, 0°F, fuel oil-firing operating conditions. Heat input will vary with load, fuel type, and ambient temperature.</b></p>		

**C. EMISSIONS UNIT REGULATIONS  
(Regulated Emissions Units Only)**

**List of Applicable Regulations**

See Attachment A-1	

**D. EMISSION POINT (STACK/VENT) INFORMATION  
(Regulated Emissions Units Only)**

**Emission Point Description and Type (Per CTG)**

1. Identification of Point on Plot Plan or Flow Diagram? CT1, CT2, CT3		2. Emission Point Type Code: <b>1</b>	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):  N/A			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:  N/A			
5. Discharge Type Code: <b>V</b>	6. Stack Height: <b>100 feet</b>	7. Exit Diameter: <b>18 feet</b>	
8. Exit Temperature: <b>1,000 °F</b>	9. Actual Volumetric Flow Rate: <b>1,914,688 acfm</b>	10. Water Vapor:  %	
11. Maximum Dry Standard Flow Rate: <b>dscfm</b>		12. Nonstack Emission Point Height:  feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters):  <b>Stack temperature and flow rate are at 100 percent load, 59°F, and natural gas-firing operating conditions. Stack temperature and flow rate will vary with load, fuel type, and ambient temperature.</b>			

**E. SEGMENT (PROCESS/FUEL) INFORMATION  
(All Emissions Units)**

**Segment Description and Rate:** Segment 1 of 2 (Per CTG)

1. Segment Description (Process/Fuel Type) (limit to 500 characters):  <b>Combustion turbine fired with pipeline quality natural gas.</b>		
2. Source Classification Code (SCC): <b>20100201</b>		3. SCC Units: <b>Million Cubic Feet Burned</b>
4. Maximum Hourly Rate: <b>1.965</b>	5. Maximum Annual Rate: <b>11,583.7</b>	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: <b>923</b>
10. Segment Comment (limit to 200 characters):  <b>Fuel heat content (Field 9) represents lower heating value (LHV). Maximum hourly rate (Field 12) based on 0°F ambient temperature.</b>		

**Segment Description and Rate:** Segment 2 of 2 (Per CTG)

1. Segment Description (Process/Fuel Type) (limit to 500 characters):  <b>Combustion turbine fired with distillate fuel oil.</b>		
2. Source Classification Code (SCC): <b>20100101</b>		3. SCC Units: <b>Thousand Gallons Burned</b>
4. Maximum Hourly Rate: <b>15.291</b>	5. Maximum Annual Rate: <b>7,645.5</b>	6. Estimated Annual Activity Factor:
6. Maximum % Sulfur: <b>0.05</b>	7. Maximum % Ash: <b>0.01</b>	8. Million Btu per SCC Unit: <b>134</b>
9. Segment Comment (limit to 200 characters):  <b>Fuel heat content (Field 9) represents lower heating value (LHV). Maximum hourly rate (Field 12) based on 0°F ambient temperature.</b>		



**F. EMISSIONS UNIT POLLUTANTS  
(All Emissions Units)**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
<b>1 – NOX</b>	<b>025</b>		<b>EL</b>
<b>2 – CO</b>			<b>EL</b>
<b>3 – PM</b>			<b>EL</b>
<b>4 – PM10</b>			<b>EL</b>
<b>5 – SO2</b>			<b>EL</b>
<b>6 – SAM</b>			<b>EL</b>
<b>7 – VOC</b>			<b>EL</b>

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units -**  
**Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions (Per CTG)**

1. Pollutant Emitted: <b>NOX</b>	2. Total Percent Efficiency of Control:
3. Potential Emissions: <b>398.3 lb/hour</b>	4. Synthetically Limited? [ <input checked="" type="checkbox"/> ] <b>315.2 tons/year</b>
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: <b>398.3 lb/hr</b> Reference: <b>ABB data</b>	7. Emissions Method Code: <b>5</b>
8. Calculation of Emissions (limit to 600 characters):  <b>Hourly emission rate based on ABB data for 100 percent load, 0°F, fuel oil-firing case. Annual emissions based on 183.7 lb/hr (100 percent load, 59°F, natural gas-firing case) for 2,500 hrs/yr, and 342.5 lb/hr (100 percent load, 59°F, distillate fuel oil-firing case) for 500 hrs/yr.</b>	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

**Allowable Emissions** Allowable Emissions 1 of 2 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>25 ppmvd @ 15% O<sub>2</sub></b>	4. Equivalent Allowable Emissions: <b>183.7 lb/hour</b> <b>N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 20 (initial), NO<sub>x</sub> CEMS</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT)</b> <b>Unit is also subject to less stringent NO<sub>x</sub> limits of 40 CFR Part 60, Subpart GG (NSPS).</b> <b>Field 4 limit applicable for natural gas-firing at ISO conditions.</b>	

Emissions Unit Information Section 4 of 4

Pollutant Detail Information Page 2 of 16

**Allowable Emissions** Allowable Emissions 2 of 2 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>42 ppmvd @ 15% O<sub>2</sub></b>	4. Equivalent Allowable Emissions: <b>342.5 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 20 (initial), NO<sub>x</sub> CEMS</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Unit is also subject to less stringent NO<sub>x</sub> limits of 40 CFR Part 60, Subpart GG (NSPS). Field 4 limit applicable for fuel oil-firing at ISO conditions.</b>	

**Allowable Emissions** Allowable Emissions \_\_\_\_\_ of \_\_\_\_\_ (Per CTG)

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions:  lb/hour      tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units -**  
**Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions (Per CTG)**

1. Pollutant Emitted: <b>CO</b>	2. Total Percent Efficiency of Control:
3. Potential Emissions: <b>394.9 lb/hour</b> <b>92.2 tons/year</b>	4. Synthetically Limited? [ <input checked="" type="checkbox"/> ]
5. Range of Estimated Fugitive Emissions: [ ] 1      [ ] 2      [ ] 3      _____ to _____ tons/year	
6. Emission Factor: <b>394.9 lb/hr</b> Reference: <b>ABB data</b>	7. Emissions Method Code: <b>5</b>
8. Calculation of Emissions (limit to 600 characters):  <b>Hourly emission rate based on ABB data for 50 percent load, 0°F, natural gas-firing case. Annual emissions based on 23.1 lb/hr (100 percent load, 59°F, natural gas-firing case) for 2,000 hrs/yr, 149.6 lb/hr (50 percent load, 59°F, natural gas-firing case) for 500 hrs/yr and 126.6 lb/hr (100 percent load, 59°F, distillate fuel oil-firing case) for 500 hrs/yr.</b>	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

**Allowable Emissions** Allowable Emissions   1   of   3   (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>6 ppmvd @ 15% O<sub>2</sub></b>	4. Equivalent Allowable Emissions: <b>23.1 lb/hour</b> <b>N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 10</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT)</b> <b>Field 3 limit applicable for 100% load, natural gas-firing.</b> <b>Field 4 limit applicable for 100% load, natural gas-firing at ISO conditions.</b>	

**Allowable Emissions** Allowable Emissions 2 of 3 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
11. Requested Allowable Emissions and Units: <b>132 ppmvd @ 15% O<sub>2</sub></b>	4. Equivalent Allowable Emissions: <b>149.6 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 10</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 3 limit applicable for 50% load, natural gas-firing. Field 4 limit applicable for 50% load, natural gas-firing at ISO conditions.</b>	

**Allowable Emissions** Allowable Emissions 3 of 3 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
7. Requested Allowable Emissions and Units: <b>28 ppmvd @ 15% O<sub>2</sub></b>	4. Equivalent Allowable Emissions: <b>126.6 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 10</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 3 limit applicable for 100% load, fuel oil-firing. Field 4 limit applicable for 100% load, fuel oil-firing at ISO conditions.</b>	

**Emissions Unit Information Section 4 of 4**

**Pollutant Detail Information Page 5 of 16**

**Allowable Emissions** Allowable Emissions \_\_\_\_ of \_\_\_\_ (Per CTG)

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
12. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour                      tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units -**  
**Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions (Per CTG)**

1. Pollutant Emitted: <b>PM</b>	2. Total Percent Efficiency of Control:
3. Potential Emissions: <b>83.0 lb/hour</b> <b>41.8 tons/year</b>	4. Synthetically Limited? [ <input checked="" type="checkbox"/> ]
5. Range of Estimated Fugitive Emissions: [ ] 1      [ ] 2      [ ] 3      _____ to _____ tons/year	
6. Emission Factor: <b>83.0 lb/hr</b> Reference: <b>ABB data</b>	7. Emissions Method Code: <b>5</b>
8. Calculation of Emissions (limit to 600 characters):  <b>Hourly emission rate based on ABB data for 100 percent load, 0°F, fuel oil-firing case. Annual emissions based on 24.2 lb/hr (100 percent load, 59°F, natural gas-firing case) for 2,500 hrs/yr and 46.2 lb/hr (100 percent load, 59°F, distillate fuel oil-firing case) for 500 hrs/yr.</b>	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

**Allowable Emissions** Allowable Emissions 1 of 2 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
19. Requested Allowable Emissions and Units: <b>10% opacity</b>	4. Equivalent Allowable Emissions: <b>24.2 lb/hour</b> <b>N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 9</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 4 limit applicable for natural gas-firing at ISO conditions.</b>	

**Emissions Unit Information Section 4 of 4**

**Pollutant Detail Information Page 7 of 16**

**Allowable Emissions** Allowable Emissions 2 of 2 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
20. Requested Allowable Emissions and Units: <b>20 % opacity</b>	4. Equivalent Allowable Emissions: <b>46.2 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 9</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 4 limit applicable for 100% load, distillate fuel oil-firing at ISO conditions.</b>	



**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units -**  
**Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions (Per CTG)**

1. Pollutant Emitted: <b>PM10</b>	2. Total Percent Efficiency of Control:
3. Potential Emissions: <b>83.0 lb/hour</b> <b>41.8 tons/year</b>	4. Synthetically Limited? <input checked="" type="checkbox"/>
5. Range of Estimated Fugitive Emissions: [ ] 1      [ ] 2      [ ] 3      _____ to _____ tons/year	
6. Emission Factor: <b>83.0 lb/hr</b> Reference: <b>ABB data</b>	7. Emissions Method Code: <b>5</b>
8. Calculation of Emissions (limit to 600 characters):  <b>Hourly emission rate based on ABB data for 100 percent load, 0°F, fuel oil-firing case. Annual emissions based on 24.2 lb/hr (100 percent load, 59°F, natural gas-firing case) for 2,500 hrs/yr and 46.2 lb/hr (100 percent load, 59°F, distillate fuel oil-firing case) for 500 hrs/yr.</b>	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

**Allowable Emissions** Allowable Emissions   1   of   2  

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
21. Requested Allowable Emissions and Units: <b>10% opacity</b>	4. Equivalent Allowable Emissions: <b>24.2 lb/hour</b> <b>N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 9</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 4 limit applicable for natural gas-firing at ISO conditions.</b>	

Emissions Unit Information Section 4 of 4

Pollutant Detail Information Page 9 of 16

**Allowable Emissions** Allowable Emissions 2 of 2 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
22. Requested Allowable Emissions and Units: <b>20 % opacity</b>	4. Equivalent Allowable Emissions: <b>46.2 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 9</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 4 limit applicable for 100% load, distillate fuel oil-firing at ISO conditions.</b>	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units -**  
**Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions (Per CTG)**

1. Pollutant Emitted: <b>SO2</b>	2. Total Percent Efficiency of Control:
3. Potential Emissions: <b>111.8 lb/hour</b> <b>35.9 tons/year</b>	4. Synthetically Limited? [ <input checked="" type="checkbox"/> ]
5. Range of Estimated Fugitive Emissions: [ ] 1      [ ] 2      [ ] 3      _____ to _____ tons/year	
6. Emission Factor: <b>111.8 lb/hr</b> Reference: <b>ABB data</b>	7. Emissions Method Code: <b>2</b>
8. Calculation of Emissions (limit to 600 characters):  $(0.05 \text{ lb S}/100 \text{ lb oil}) \times (111,800 \text{ lb oil/hr}) \times (2 \text{ lb SO}_2/\text{lb S}) = 111.8 \text{ lb/hr SO}_2$  <b>Annual emissions based on 9.2 lb/hr (100 percent load, 59°F, natural gas-firing case) for 2,500 hrs/yr and 97.5 lb/hr (100 percent load, 59°F, distillate fuel oil-firing case) for 500 hrs/yr.</b>	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

**Allowable Emissions** Allowable Emissions 1 of 2 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
23. Requested Allowable Emissions and Units: <b>2.0 gr S/100 scf</b>	4. Equivalent Allowable Emissions: <b>9.2 lb/hour</b> <b>N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>Fuel analysis for sulfur content</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT)</b> <b>Field 4 limit applicable for natural gas-firing at ISO conditions.</b>	

**Allowable Emissions** Allowable Emissions 2 of 2 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
24. Requested Allowable Emissions and Units: <b>0.05 weight % S</b>	4. Equivalent Allowable Emissions: <b>97.5 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>Fuel analysis for sulfur content</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 4 limit applicable for distillate fuel oil-firing at ISO conditions.</b>	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION  
(Regulated Emissions Units -  
Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions (Per CTG)**

1. Pollutant Emitted: <b>SAM</b>		2. Total Percent Efficiency of Control:	
3. Potential Emissions: <b>12.8 lb/hour</b>		4. Synthetically Limited? <input checked="" type="checkbox"/> <b>4.2 tons/year</b>	
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year			
6. Emission Factor: <b>12.8 lb/hr</b> Reference: <b>ABB data</b>		7. Emissions Method Code: <b>2</b>	
8. Calculation of Emissions (limit to 600 characters):  $(111.8 \text{ lb/hr SO}_2) \times (7.5/100) \times (98 \text{ lb H}_2\text{SO}_4/64 \text{ lb SO}_2) = 12.8 \text{ lb/hr H}_2\text{SO}_4$ <p><b>Annual emissions based on 1.1 lb/hr (100 percent load, 59°F, natural gas-firing case) for 2,500 hrs/yr and 11.2 lb/hr (100 percent load, 59°F, distillate fuel oil-firing case) for 500 hrs/yr.</b></p>			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):			

**Allowable Emissions** Allowable Emissions 1 of 2 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>		2. Future Effective Date of Allowable Emissions:	
25. Requested Allowable Emissions and Units: <b>2.0 gr S/100 scf</b>		4. Equivalent Allowable Emissions: <b>1.1 lb/hour N/A tons/year</b>	
5. Method of Compliance (limit to 60 characters): <b>Fuel analysis for sulfur content</b>			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 4 limit applicable for natural gas-firing at ISO conditions.</b>			

Emissions Unit Information Section 4 of 4

Pollutant Detail Information Page 13 of 16

**Allowable Emissions** Allowable Emissions 2 of 2 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
26. Requested Allowable Emissions and Units: <b>0.05 weight % S</b>	4. Equivalent Allowable Emissions: <b>11.2 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>Fuel analysis for sulfur content</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 4 limit applicable for distillate fuel oil-firing at ISO conditions.</b>	

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**  
**(Regulated Emissions Units -**  
**Emissions-Limited and Preconstruction Review Pollutants Only)**

**Potential/Fugitive Emissions (Per CTG)**

1. Pollutant Emitted: <b>VOC</b>	2. Total Percent Efficiency of Control:
3. Potential Emissions: <b>24.5 lb/hour</b> <b>9.2 tons/year</b>	4. Synthetically Limited? [ <input checked="" type="checkbox"/> ]
5. Range of Estimated Fugitive Emissions: [ ] 1      [ ] 2      [ ] 3      _____ to _____ tons/year	
6. Emission Factor: <b>24.5 lb/hr</b> Reference: <b>ABB data</b>	7. Emissions Method Code: <b>5</b>
8. Calculation of Emissions (limit to 600 characters):  <b>Hourly emission rate based on ABB data for 100 percent load, 0°F, distillate fuel oil-firing case. Annual emissions based on 2.9 lb/hr (100 percent load, 59°F, natural gas-firing case) for 2,500 hrs/yr and 22.7 lb/hr (100 percent load, 59°F, distillate fuel oil-firing case) for 500 hrs/yr.</b>	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

**Allowable Emissions** Allowable Emissions 1 of 3 (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>1.5 ppmvd @ 15% O<sub>2</sub></b>	4. Equivalent Allowable Emissions: <b>2.9 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 10</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 3 limit applicable for 100% load, natural gas-firing. Field 4 limit applicable for 100% load, natural gas-firing at ISO conditions.</b>	

**Emissions Unit Information Section 4 of 4**

**Pollutant Detail Information Page 15 of 16**

**Allowable Emissions** Allowable Emissions  2  of  3  (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>2.8 ppmvd @ 15% O<sub>2</sub></b>	4. Equivalent Allowable Emissions: <b>1.9 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 10</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 3 limit applicable for 50% load, natural gas-firing. Field 4 limit applicable for 50% load, natural gas-firing at ISO conditions.</b>	

**Allowable Emissions** Allowable Emissions  3  of  3  (Per CTG)

1. Basis for Allowable Emissions Code: <b>Other</b>	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: <b>7.5 ppmvd @ 15% O<sub>2</sub></b>	4. Equivalent Allowable Emissions: <b>22.7 lb/hour      N/A tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>EPA Reference Method 10</b>	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):  <b>FDEP Rule 62-212.400(5)(c), F.A.C. (BACT) Field 3 limit applicable for 100% load, fuel oil-firing. Field 4 limit applicable for 100% load, fuel oil-firing at ISO conditions.</b>	



**Emissions Unit Information Section 4 of 4**

**Pollutant Detail Information Page 16 of 16**

**Allowable Emissions** Allowable Emissions \_\_\_\_ of \_\_\_\_ (Per CTG)

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour                      tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

**H. VISIBLE EMISSIONS INFORMATION**  
**(Only Regulated Emissions Units Subject to a VE Limitation)**

**Visible Emissions Limitation:** Visible Emissions Limitation 1 of 3

1. Visible Emissions Subtype: <b>VE10</b>	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: <b>10 %</b> Exceptional Conditions:      % Maximum Period of Excess Opacity Allowed:      min/hour	
4. Method of Compliance: <b>EPA Reference Method 9</b>	
5. Visible Emissions Comment (limit to 200 characters):  <b>Rule 62-212.400(5)(c), F.A.C. (BACT).</b> <b>Limit applicable for natural gas firing.</b>	

**Visible Emissions Limitation:** Visible Emissions Limitation 2 of 3

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: <b>20 %</b> Exceptional Conditions:      % Maximum Period of Excess Opacity Allowed:      min/hour	
4. Method of Compliance: <b>EPA Reference Method 9</b>	
5. Visible Emissions Comment (limit to 200 characters):  <b>Rule 62-212.400(5)(c), F.A.C. (BACT).</b> <b>Limit applicable for fuel oil firing.</b>	

**Emissions Unit Information Section 4 of 4**

**Visible Emissions Limitation:** Visible Emissions Limitation 3 of 3

1. Visible Emissions Subtype: <p style="text-align: center;"><b>VE10</b></p>	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions:                      %    Exceptional Conditions: <b>100 %</b> Maximum Period of Excess Opacity Allowed: <b>60 min/hour</b>	
4. Method of Compliance: <p><b>EPA Reference Method 9</b></p>	
5. Visible Emissions Comment (limit to 200 characters):  <p><b>Excess emissions resulting from startup, shutdown, or malfunction not-to-exceed 2 hours in any 24 hour period unless authorized by FDEP for a longer duration.                  Rule 62-210.700(1), F.A.C.                  Limit applicable for natural gas or fuel oil firing.</b></p>	

**I. CONTINUOUS MONITOR INFORMATION**  
**(Only Regulated Emissions Units Subject to Continuous Monitoring)**

**Continuous Monitoring System:** Continuous Monitor 1 of 2

1. Parameter Code: <b>EM</b>	2. Pollutant(s): <b>NOX</b>
3. CMS Requirement:	[ <input checked="" type="checkbox"/> ] Rule [ <input type="checkbox"/> ] Other
4. Monitor Information: Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):  <b>Required by 40 CFR Part 75 (Acid Rain Program).</b> <b>Specific CEMS information will be provided to FDEP when available.</b>	

**Continuous Monitoring System:** Continuous Monitor 2 of 2

1. Parameter Code: <b>O<sub>2</sub></b>	2. Pollutant(s):
3. CMS Requirement:	[ <input checked="" type="checkbox"/> ] Rule [ <input type="checkbox"/> ] Other
4. Monitor Information: Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):  <b>Required by 40 CFR Part 75 (Acid Rain Program).</b> <b>Specific CEMS information will be provided to FDEP when available.</b>	

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION**  
**(Regulated Emissions Units Only)**

**Supplemental Requirements**

1. Process Flow Diagram <input checked="" type="checkbox"/> Attached, Document ID: <u>Fig. 2-3</u> [ ] Not Applicable [ ] Waiver Requested
2. Fuel Analysis or Specification <input checked="" type="checkbox"/> Attached, Document ID: <u>Att. A-3</u> [ ] Not Applicable [ ] Waiver Requested
3. Detailed Description of Control Equipment <input checked="" type="checkbox"/> Attached, Document ID: <u>Sect. 5.0</u> [ ] Not Applicable [ ] Waiver Requested
4. Description of Stack Sampling Facilities <b>To be provided</b> <input type="checkbox"/> Attached, Document ID: _____ [ ] Not Applicable [ ] Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable [ ] Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable [ ] Waiver Requested
8. Supplemental Information for Construction Permit Application <b>See PSD application</b> <input type="checkbox"/> Attached, Document ID: _____ [ ] Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment:

**Additional Supplemental Requirements for Title V Air Operation Permit Applications**

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input type="checkbox"/> Not Applicable

**APPENDIX A1**  
**REGULATORY APPLICABILITY ANALYSES**

Table A-1. Summary of Federally EPA Regulatory Applicability and Corresponding Requirements (Page 1 of 10)

Regulation	Citation	Not Applicable	Applicable Emission Units	Applicable Requirement or Non-Applicability Rationale
<b>40 CFR Part 60 - Standards of Performance for New Stationary Sources.</b>				
<i>Subpart A - General Provisions</i>				
Notification and Recordkeeping	§60.7(b) - (h)		CTs 1-3	General recordkeeping and reporting requirements.
Performance Tests	§60.8		CTs 1-3	Conduct performance tests as required by EPA or FDEP. <b>(potential future requirement)</b>
Compliance with Standards	§60.11(a) thru (d), and (f)		CTs 1-3	General compliance requirements. Addresses requirements for visible emissions tests.
Circumvention	§60.12		CTs 1-3	Cannot conceal an emission which would otherwise constitute a violation of an applicable standard.
Monitoring Requirements	§60.13(a), (b), (d), (e), and (h)		CTs 1-3	Requirements pertaining to continuous monitoring systems.
General notification and reporting requirements	§60.19		CTs 1-3	General procedures regarding reporting deadlines.
<i>Subpart GG - Standard of Performance for Stationary Gas Turbines</i>				
Standards for Nitrogen Oxides	§60.332(a)(1) and (b), (f), and (i)		CTs 1-3	Establishes NO <sub>x</sub> limit of 75 ppmv at 15% (with corrections for heat rate and fuel bound nitrogen) for electric utility stationary gas turbines with peak heat input greater than 100 MMBtu/hr.
Standards for Sulfur Dioxide	§60.333		CTs 1-3	Establishes exhaust gas SO <sub>2</sub> limit of 0.015 percent by volume (at 15% O <sub>2</sub> , dry) and maximum fuel sulfur content of 0.8 percent by weight.



Table A-1. Summary of Federally EPA Regulatory Applicability and Corresponding Requirements (Page 2 of 10)

Regulation	Citation	Not Applicable	Applicable Emission Units	Applicable Requirement or Non-Applicability Rationale
<i>Subpart GG - Standard of Performance for Stationary Gas Turbines (continued)</i>				
Monitoring Requirements	§60.334(a)		CTs 1-3	Requires continuous monitoring of fuel consumption and ratio of water to fuel being fired in the turbine. Monitoring system must be accurate to ±5.0 percent. Applicable to CTGs using water injection for NO <sub>x</sub> control.
Monitoring Requirements	§60.334(b)(2) and (c)		CTs 1-3	Requires periodic monitoring of fuel sulfur and nitrogen content. Defines excess emissions
Test Methods and Procedures	§60.335		CTs 1-3	Specifies monitoring procedures and test methods.
<b>40 CFR Part 60 - Standards of Performance for New Stationary Sources: Subparts B, C, Ca, Cb, Cc, Cd, Ce, D, Da, Db, Dc, E, Ea, Eb, Ec, F, G, H, I, J, K, Ka, Kb, L, M, N, Na, O, P, Q, R, S, T, U, V, W, X, Y, Z, AA, AAa, BB, CC, DD, EE, HH, KK, LL, MM, NN, PP, QQ, RR, SS, TT, UU, VV, WW, XX, AAA, BBB, DDD, FFF, GGG, HHH, III, JJJ, KKK, LLL, NNN, PPP, QQQ, RRR, SSS, TTT, UUU, VVV, and WWW</b>		X		None of the listed NSPS' contain requirements which are applicable to HCGF CTs 1-3.
<b>40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants: Subparts A, B, C, D, E, F, H, I, J, K, L, M, N, O, P, Q, R, T, V, W, Y, BB, and FF</b>		X		None of the listed NESHAPS' contain requirements which are applicable to HCGF CTs 1-3.
<b>40 CFR Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories: Subparts A, B, C, D, E, F, G, H, I, L, M, N, O, Q, R, S, T, W, X, Y, CC, DD, EE, GG, II, JJ, KK, LL, OO, PP, QQ, RR, VV, EEE, GGG, III, and JJJ</b>		X		None of the listed NESHAPS' contain requirements which are applicable to HCGF CTs 1-3.

Table A-1. Summary of Federally EPA Regulatory Applicability and Corresponding Requirements (Page 3 of 10)

Regulation	Citation	Not Applicable	Applicable Emission Units	Applicable Requirement or Non-Applicability Rationale
<b>40 CFR Part 72 - Acid Rain Program Permits</b>				
<i>Subpart A - Acid Rain Program General Provisions</i>				
Standard Requirements	§72.9 excluding §72.9(c)(3)(i), (ii), and (iii), and §72.9(d)		CTs 1-3	General Acid Rain Program requirements. SO <sub>2</sub> allowance program requirements start January 1, 2000 ( <b>future requirement</b> ).
<i>Subpart B - Designated Representative</i>				
Designated Representative	§72.20 - §72.24		CTs 1-3	General requirements pertaining to the Designated Representative.
<i>Subpart C - Acid Rain Application</i>				
Requirements to Apply	§72.30(a), (b)(2)(ii), (c), and (d)		CTs 1-3	<p>Requirement to submit a complete Phase II Acid Rain permit application to the permitting authority at least 24 months before the later of January 1, 2000 or the date on which the unit commences operation.</p> <p>Requirement to submit a complete Acid Rain permit application for each source with an affected unit at least 6 months prior to the expiration of an existing Acid Rain permit governing the unit during Phase II or such longer time as may be approved under part 70 of this chapter that ensures that the term of the existing permit will not expire before the effective date of the permit for which the application is submitted. (<b>future requirement</b>).</p>
Permit Application Shield	§72.32		CTs 1-3	Acid Rain Program permit shield for units filing a timely and complete application. Application is binding pending issuance of Acid Rain Permit.

Table A-1. Summary of Federally EPA Regulatory Applicability and Corresponding Requirements (Page 4 of 10)

Regulation	Citation	Not Applicable	Applicable Emission Units	Applicable Requirement or Non-Applicability Rationale
<i>Subpart D - Acid Rain Compliance Plan and Compliance Options</i>				
General	§72.40(a)(1)		CTs 1-3	General SO <sub>2</sub> compliance plan requirements.
General	§72.40(a)(2)	X		General NO <sub>x</sub> compliance plan requirements are not applicable to HCGF CTs 1-3.
<i>Subpart E - Acid Rain Permit Contents</i>				
Permit Shield	§72.51		CTs 1-3	Units operating in compliance with an Acid Rain Permit are deemed to be operating in compliance with the Acid Rain Program.
<i>Subpart H - Permit Revisions</i>				
Fast-Track Modifications	§72.82(a) and (c)		CTs 1-3	Procedures for fast-track modifications to Acid Rain Permits. <b>(potential future requirement)</b>
<i>Subpart I - Compliance Certification</i>				
Annual Compliance Certification Report	§72.90		CTs 1-3	Requirement to submit an annual compliance report. <b>(future requirement)</b>
<b>40 CFR Part 75 - Continuous Emission Monitoring</b>				
<i>Subpart A - General</i>				
Prohibitions	§75.5		CTs 1-3	General monitoring prohibitions.
<i>Subpart B - Monitoring Provisions</i>				
General Operating Requirements	§75.10		CTs 1-3	General monitoring requirements.
Specific Provisions for Monitoring SO <sub>2</sub> Emissions	§75.11(d)(2)		CTs 1-3	SO <sub>2</sub> continuous monitoring requirements for gas- and oil-fired units. Appendix D election will be made.

Table A-1. Summary of Federally EPA Regulatory Applicability and Corresponding Requirements (Page 5 of 10)

Regulation	Citation	Not Applicable	Applicable Emission Units	Applicable Requirement or Non-Applicability Rationale
Specific Provisions for Monitoring NO <sub>x</sub> Emissions	§75.12(a) and (b)		CTs 1-3	NO <sub>x</sub> continuous monitoring requirements for coal-fired units, gas-fired nonpeaking units, or oil-fired nonpeaking units
Specific Provisions for Monitoring CO <sub>2</sub> Emissions	§75.13(b)		CTs 1-3	CO <sub>2</sub> continuous monitoring requirements. Appendix G election will be made.
<i>Subpart B - Monitoring Provisions</i>				
Specific Provisions for Monitoring Opacity	§75.14(d)		CTs 1-3	Opacity continuous monitoring exemption for diesel-fired units.
<i>Subpart C - Operation and Maintenance Requirements</i>				
Certification and Recertification Procedures	§75.20(b)		CTs 1-3	Recertification procedures ( <b>potential future requirement</b> )
Certification and Recertification Procedures	§75.20(c)		CTs 1-3	Recertification procedure requirements. ( <b>potential future requirement</b> )
Quality Assurance and Quality Control Requirements	§75.21 except §75.21(b)		CTs 1-3	General QA/QC requirements (excluding opacity).
Reference Test Methods	§75.22		CTs 1-3	Specifies required test methods to be used for recertification testing ( <b>potential future requirement</b> ).
Out-Of-Control Periods	§75.24 except §75.24(e)		CTs 1-3	Specifies out-of-control periods and required actions to be taken when out-of-control periods occur (excluding opacity).
<i>Subpart D - Missing Data Substitution Procedures</i>				
General Provisions	§75.30(a)(3), (b), (c)		CTs 1-3	General missing data requirements.
Determination of Monitor Data Availability for Standard Missing Data Procedures	§75.32		CTs 1-3	Monitor data availability procedure requirements.

Table A-1. Summary of Federally EPA Regulatory Applicability and Corresponding Requirements (Page 6 of 10)

Regulation	Citation	Not Applicable	Applicable Emission Units	Applicable Requirement or Non-Applicability Rationale
Standard Missing Data Procedures	§75.33(a) and (c)		CTs 1-3	Missing data substitution procedure requirements.
<i>Subpart F - Recordkeeping Requirements</i>				
General Recordkeeping Provisions	§75.50(a), (b), (d), and (e)(2)		CTs 1-3	General recordkeeping requirements for NO <sub>x</sub> and Appendix G CO <sub>2</sub> monitoring.
Monitoring Plan	§75.53(a), (b), (c), and (d)(1)		CTs 1-3	Requirement to prepare and maintain a Monitoring Plan.
General Recordkeeping Provisions	§75.54(a), (b), (d), and (e)(2)		CTs 1-3	Requirements pertaining to general recordkeeping.
General Recordkeeping Provisions for Specific Situations	§75.55(c)		CTs 1-3	Specific recordkeeping requirements for Appendix D SO <sub>2</sub> monitoring.
General Recordkeeping Provisions	§75.56(a)(1), (3), (5), (6), and (7)		CTs 1-3	Requirements pertaining to general recordkeeping.
General Recordkeeping Provisions	§75.56(b)(1)		CTs 1-3	Requirements pertaining to general recordkeeping for Appendix D SO <sub>2</sub> monitoring.
<i>Subpart G - Reporting Requirements</i>				
General Provisions	§75.60		CTs 1-3	General reporting requirements.
Notification of Certification and Recertification Test Dates	§75.61(a)(1) and (5), (b), and (c)		CTs 1-3	Requires written submittal of recertification tests and revised test dates for CEMS. Notice of certification testing shall be submitted at least 45 days prior to the first day of recertification testing. Notification of any proposed adjustment to certification testing dates must be provided at least 7 business days prior to the proposed date change.

Table A-1. Summary of Federally EPA Regulatory Applicability and Corresponding Requirements (Page 7 of 10)

Regulation	Citation	Not Applicable	Applicable Emission Units	Applicable Requirement or Non-Applicability Rationale
<i>Subpart G - Reporting Requirements</i>				
Recertification Application	§75.63		CTs 1-3	Requires submittal of a recertification application within 30 days after completing the recertification test. <b>(potential future requirement)</b>
Quarterly Reports	§75.64(a)(1) - (5), (b), (c), and (d)		CTs 1-3	Quarterly data report requirements.
<b>40 CFR Part 76 - Acid Rain Nitrogen Oxides Emission Reduction Program</b>		X		The Acid Rain Nitrogen Oxides Emission Reduction Program only applies to coal-fired utility units that are subject to an Acid Rain emissions limitation or reduction requirement for SO <sub>2</sub> under Phase I or Phase II.
<b>40 CFR Part 77 - Excess Emissions</b>				
Offset Plans for Excess Emissions of Sulfur Dioxide	§77.3		CTs 1-3	Requirement to submit offset plans for excess SO <sub>2</sub> emissions not later than 60 days after the end of any calendar year during which an affected unit has excess SO <sub>2</sub> emissions. Required contents of offset plans are specified <b>(potential future requirement)</b> .
Deduction of Allowances to Offset Excess Emissions of Sulfur Dioxide	§77.5(b)		CTs 1-3	Requirement for the Designated Representative to hold enough allowances in the appropriate compliance subaccount to cover deductions to be made by EPA if a timely and complete offset plan is not submitted or if EPA disapproves a proposed offset plan <b>(potential future requirement)</b> .
Penalties for Excess Emissions of Sulfur Dioxide	§77.6		CTs 1-3	Requirement to pay a penalty if excess emissions of SO <sub>2</sub> occur at any affected unit during any year <b>(potential future requirement)</b> .

Table A-1. Summary of Federally EPA Regulatory Applicability and Corresponding Requirements (Page 8 of 10)

Regulation	Citation	Not Applicable	Applicable Emission Units	Applicable Requirement or Non-Applicability Rationale
<b>40 CFR Part 82 - Protection of Stratospheric Ozone</b>				
Production and Consumption Controls	Subpart A	X		HCGF CTs 1-3 will not produce or consume ozone depleting substances.
Servicing of Motor Vehicle Air Conditioners	Subpart B		Vehicle Fleet Maintenance	Servicing of motor vehicles which involves refrigerant in the motor vehicle air conditioner will be performed by contractors who comply with Subpart B requirements.
Ban on Nonessential Products Containing Class I Substances and Ban on Nonessential Products Containing or Manufactured with Class II Substances	Subpart C	X		The HCGF will not sell or distribute any banned nonessential substances.
The Labeling of Products Using Ozone-Depleting Substances	Subpart E	X		HCGF CTs 1-3 will not produce any products containing ozone depleting substances.
<i>Subpart F - Recycling and Emissions Reduction</i>				
Prohibitions	§82.154	X		Contractors maintain, service, repair, or dispose of any appliances in compliance with §82.154 prohibitions.  Appliances are defined by §82.152 - any device which contains and uses a Class I or II substance as a refrigerant and which is used for household or commercial purposes, including any air conditioner, refrigerator, chiller, or freezer.
Required Practices	§82.156 except §82.156(i)(5), (6), (9), (10), and (11)	X		Contractors maintain, service, repair, and dispose of any appliances in compliance with §82.156 required practices.

Table A-1. Summary of Federally EPA Regulatory Applicability and Corresponding Requirements (Page 9 of 10)

Regulation	Citation	Not Applicable	Applicable Emission Units	Applicable Requirement or Non-Applicability Rationale
<i>Subpart F - Recycling and Emissions Reduction</i>				
Required Practices	§82.156(i)(5), (6), (9), (10), and (11)		Appliances as defined by §82.152	Owner/operator requirements pertaining to repair of leaks.
Technician Certification	§82.161	X		Contractors' technicians meet the certification requirements.
Certification By Owners of Recovery and Recycling Equipment	§82.162	X		Contractors maintain, service, repair, or dispose of any appliances and therefore do not use recovery and recycling equipment.
Reporting and Recordkeeping Requirements	§82.166(k), (m), and (n)		Appliances as defined by §82.152	Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep servicing records documenting the date and type of service, as well as the quantity of refrigerant added.
<b>40 CFR Part 50 - National Primary and Secondary Ambient Air Quality Standards</b>		X		State agency requirements - not applicable to individual emission sources.
<b>40 CFR Part 51 - Requirements for Preparation, Adoption, and Submittal of Implementation Plans</b>		X		State agency requirements - not applicable to individual emission sources.
<b>40 CFR Part 52 - Approval and Promulgation of Implementation Plans</b>		X		State agency requirements - not applicable to individual emission sources.
<b>40 CFR Part 62 - Approval and Promulgation of State Plans for Designated Facilities and Pollutants</b>		X		State agency requirements - not applicable to individual emission sources.
<b>40 CFR Part 64 - Compliance Assurance Monitoring</b>		X		Program only applies to emission units which are equipped with control devices, excluding inherent process equipment.



Table A-1. Summary of Federally EPA Regulatory Applicability and Corresponding Requirements (Page 10 of 10)

Regulation	Citation	Not Applicable	Applicable Emission Units	Applicable Requirement or Non-Applicability Rationale
<b>40 CFR Part 70 - State Operating Permit Programs</b>		X		State agency requirements - not applicable to individual emission sources.
<b>40 CFR Parts 53, 54, 55, 56, 57, 58, 59, 67, 68, 69, 71, 74, 76, 79, 80, 81, 85, 86, 87, 88, 89, 90, 91, 92, 93, 95, and 96</b>		X		The listed regulations do not contain any requirements which are applicable to HCGF CTs 1-3.

Source: ECT, 2000.

Table A-2. Summary of FDEP Regulatory Applicability and Corresponding Requirements (Page 1 of 12)

Regulation	Citation	Not Applicable	Applicable: Facility-Wide	Applicable: Emission Units	Applicable Requirement or Non-Applicability Rationale
<b>Chapter 62-4, F.A.C. - Permits: Part I General</b>					
Scope of Part I	62-4.001, F.A.C.	X			Contains no applicable requirements.
Definitions	62-4.020, .021, F.A.C.	X			Contains no applicable requirements.
Transferability of Definitions	62-4.021, .021, F.A.C.	X			Contains no applicable requirements.
General Prohibition	<b>62-4.030, F.A.C.<sup>1</sup></b>		X		All stationary air pollution sources must be permitted, unless otherwise exempted.
Exemptions	<b>62-4.040, F.A.C.<sup>1</sup></b>		X		Certain structural changes exempt from permitting. Other stationary sources exempt from permitting upon FDEP insignificance determination.
Procedures to Obtain Permits	<b>62-4.050, F.A.C.<sup>1</sup></b>		X		General permitting requirements.
Surveillance Fees	62-4.052, F.A.C.	X			Not applicable to air emission sources.
Permit Processing	62-4.055, F.A.C.	X			Contains no applicable requirements.
Consultation	62-4.060, F.A.C.	X			Consultation is encouraged, not required.
Standards for Issuing or Denying Permits; Issuance; Denial	62-4.070, F.A.C	X			Establishes standard procedures for FDEP. Requirement is not applicable to HCGF CTs 1-3.
Modification of Permit Conditions	62-4.080, F.A.C	X			Application is for initial construction permit. Modification of permit conditions is not being requested.
Renewals	<b>62-4.090, F.A.C.<sup>1</sup></b>		X		Establishes permit renewal criteria. Additional criteria are cited at 62-213.-430(3), F.A.C. ( <b>future requirement</b> )
Suspension and Revocation	<b>62-4.100, F.A.C.<sup>1</sup></b>		X		Establishes permit suspension and revocation criteria.

Table A-2. Summary of FDEP Regulatory Applicability and Corresponding Requirements (Page 2 of 12)

Regulation	Citation	Not Applicable	Applicable: Facility-Wide	Applicable: Emission Units	Applicable Requirement or Non-Applicability Rationale
Financial Responsibility	62-4.110, F.A.C.	X			Contains no applicable requirements.
Transfer of Permits	62-4.120, F.A.C.	X			A sale or legal transfer of a permitted facility is not included in this application.
Plant Operation - Problems	<b>62-4.130, F.A.C.<sup>1</sup></b>		X		Immediate notification is required whenever the permittee is temporarily unable to comply with any permit condition. Notification content is specified. <b>(potential future requirement)</b>
Review	62-4.150, F.A.C.	X			Contains no applicable requirements.
Permit Conditions	62-4.160, F.A.C.	X			Contains no applicable requirements.
Scope of Part II	62-4.200, F.A.C.	X			Contains no applicable requirements.
Construction Permits	62-4.210, F.A.C.	X			General requirements for construction permits.
Operation Permits for New Sources	62-4.220, F.A.C.	X			General requirements for initial new source operation permits. <b>(future requirement)</b>
Water Permit Provisions	62-4.240 - 250, F.A.C.	X			Contains no applicable requirements.
<b>Chapter 62-17, F.A.C. - Electrical Power Plant Siting</b>		X			Power Plant Siting Act provisions.
<b>Chapter 62-102, F.A.C. - Rules of Administrative Procedure - Rule Making</b>			X		General administrative procedures.
<b>Chapter 62-103, F.A.C. - Rules of Administrative Procedure - Final Agency Action</b>			X		General administrative procedures.

Table A-2. Summary of FDEP Regulatory Applicability and Corresponding Requirements (Page 3 of 12)

Regulation	Citation	Not Applicable	Applicable: Facility- Wide	Applicable: Emission Units	Applicable Requirement or Non-Applicability Rationale
<b>Chapter 62-204, F.A.C. - State Implementation Plan</b>					
State Implementation Plan	62-204.100, .200, .220(1)-(3), .240, .260, .320, .340, .360, .400, and .500, F.A.C.	X			Contains no applicable requirements.
Ambient Air Quality Protection	62-204.220(4), F.A.C.		X		Assessments of ambient air pollutant impacts must be made using applicable air quality models, data bases, and other requirements approved by FDEP and specified in 40 CFR Part 51, Appendix W.
State Implementation Plan	62-204.800(1) - (6), F.A.C.	X			Referenced federal regulations contain no applicable requirements.
State Implementation Plan	<b>62-204.800(7)(a), (b) 39., (c), (d), and (e), F.A.C.<sup>1</sup></b>			CTs 1-3	NSPS Subpart GG; see Table A-1 for detailed federal regulatory citations.
State Implementation Plan	62-204.800(8) - (13), (15), (17), (20), and (22) F.A.C.	X			Referenced federal regulations contain no applicable requirements.
State Implementation Plan	62-204.800 (14), (16), (18), (19), F.A.C.			CTs 1-3	Acid Rain Program; see Table A-1 for detailed federal regulatory citations.
State Implementation Plan	<b>62-204.800(21), F.A.C.<sup>1</sup></b>		X		Protection of Stratospheric Ozone; see Table A-1 for detailed federal regulatory citations.
<b>Chapter 62-210, F.A.C. - Stationary Sources - General Requirements</b>					
Purpose and Scope	62-210.100, F.A.C.	X			Contains no applicable requirements.
Definitions	62-210.200, F.A.C.	X			Contains no applicable requirements.
Small Business Assistance Program	62-210.220, F.A.C.	X			Contains no applicable requirements.

Table A-2. Summary of FDEP Regulatory Applicability and Corresponding Requirements (Page 4 of 12)

Regulation	Citation	Not Applicable	Applicable: Facility-Wide	Applicable: Emission Units	Applicable Requirement or Non-Applicability Rationale
Permits Required	62-210.300(1) and (3), F.A.C.		X		Air construction permit required. Exemptions from permitting specified for certain facilities and sources.
Permits Required	62-210.300(2), F.A.C.		X		Air operation permit required. <b>(future requirement)</b>
Air General Permits	62-210.300(4), F.A.C.	X			Not applicable to HCGF CTs 1-3.
Notification of Startup	62-210.300(5), F.A.C.	X			Sources which have been shut down for more than one year shall notify the FDEP prior to startup.
Emission Unit Reclassification	62-210.300(6), F.A.C.		X		Emission unit reclassification <b>(potential future requirement)</b>
Public Notice and Comment					
Public Notice of Proposed Agency Action	62-210.350(1), F.A.C.		X		All permit applicants required to publish notice of proposed agency action.
Additional Notice Requirements for Sources Subject to Prevention of Significant Deterioration or Nonattainment Area New Source Review	62-210.350(2), F.A.C.		X		Additional public notice requirements for PSD and nonattainment area NSR applications.
Additional Public Notice Requirements for Sources Subject to Operation Permits for Title V Sources	62-210.350(3), F.A.C.		X		Notice requirements for Title V operating permit applicants <b>(future requirement)</b> .
Public Notice Requirements for FESOPS and 112(g) Emission Sources	62-210.350(4) and (5), F.A.C.	X			Not applicable to HCGF CTs 1-3.
Administrative Permit Corrections	62-210.360, F.A.C.	X			An administrative permit correction is not requested in this application.

Table A-2. Summary of FDEP Regulatory Applicability and Corresponding Requirements (Page 5 of 12)

Regulation	Citation	Not Applicable	Applicable: Facility-Wide	Applicable: Emission Units	Applicable Requirement or Non-Applicability Rationale
Reports Notification of Intent to Relocate Air Pollutant Emitting Facility	62-210.370(1), F.A.C.	X			Project does not have any relocatable emission units.
Annual Operating Report for Air Pollutant Emitting Facility	62-210.370(3), F.A.C.		X		Specifies annual reporting requirements. <b>(future requirement)</b> .
Stack Height Policy	62-210.550, F.A.C.		X		Limits credit in air dispersion studies to good engineering practice (GEP) stack heights for stacks constructed or modified since 12/31/70.
Circumvention	62-210.650, F.A.C.			CTs 1-3	An applicable air pollution control device cannot be circumvented and must be operated whenever the emission unit is operating.
Excess Emissions	62-210.700(1), F.A.C.		X		Excess emissions due to startup, shut down, and malfunction are permitted for no more than two hours in any 24 hour period unless specifically authorized by the FDEP for a longer duration.
Excess Emissions	62-210.700(2) and (3), F.A.C.	X			Not applicable to HCGF CTs 1-3.
Excess Emissions	62-210.700(4), F.A.C.		X		Excess emissions caused entirely or in part by poor maintenance, poor operations, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction are prohibited. <b>(potential future requirement)</b> .
Excess Emissions	62-210.700(5), F.A.C.	X			Contains no applicable requirements.

Table A-2. Summary of FDEP Regulatory Applicability and Corresponding Requirements (Page 6 of 12)

Regulation	Citation	Not Applicable	Applicable: Facility-Wide	Applicable: Emission Units	Applicable Requirement or Non-Applicability Rationale
Excess Emissions	62-210.700(6), F.A.C.		X		Excess emissions resulting from malfunctions must be reported to the FDEP in accordance with 62-4.130, F.A.C. <b>(potential future requirement)</b> .
Forms and Instructions	62-210.900(5), F.A.C.		X		Contains AOR requirements.
Notification Forms for Air General Permits	62-210.920, F.A.C.	X			Contains no applicable requirements.
<b>Chapter 62-212, F.A.C. - Stationary Sources - Preconstruction Review</b>					
Purpose and Scope	62-212.100, F.A.C.	X			Contains no applicable requirements.
General Preconstruction Review Requirements	62-212.300, F.A.C.		X		General air construction permit requirements.
Prevention of Significant Deterioration	62-212.400, F.A.C.		X		PSD permit required prior to construction of HCGF CTs 1-3.
New Source Review for Nonattainment Areas	62-212.500, F.A.C.	X			HCGF CTs 1-3 is not located in a nonattainment area or a nonattainment area of influence.
Sulfur Storage and Handling Facilities	62-212.600, F.A.C.	X			Applicable only to sulfur storage and handling facilities.
Air Emissions Bubble	62-212.710, F.A.C.	X			Not applicable to HCGF CTs 1-3.
<b>Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution</b>					
Purpose and Scope	62-213.100, F.A.C.	X			Contains no applicable requirements.
Annual Emissions Fee	62-213.205(1), and (4), F.A.C.		X		Annual emissions fee and documentation requirements. <b>(future requirement)</b>
Annual Emissions Fee	62-213.205(2) and (3), F.A.C.	X			Contains no applicable requirements.
Title V Air General Permits	62-213.300, F.A.C.	X			No eligible facilities

Table A-2. Summary of FDEP Regulatory Applicability and Corresponding Requirements (Page 7 of 12)

Regulation	Citation	Not Applicable	Applicable: Facility-Wide	Applicable: Emission Units	Applicable Requirement or Non-Applicability Rationale
Permits and Permit Revisions Required	62-213.400, F.A.C.		X		Title V operation permit required. <b>(future requirement)</b>
Changes Without Permit Revision	62-213.410, F.A.C.		X		Certain changes may be made if specific notice and recordkeeping requirements are met <b>(potential future requirement)</b> .
Immediate Implementation Pending Revision Process	62-213.412, F.A.C.		X		Certain modifications can be implemented pending permit revision if specific criteria are met <b>(potential future requirement)</b> .
Fast-Track Revisions of Acid Rain Parts	62-213.413, F.A.C.			CTs 1-3	Optional provisions for Acid Rain permit revisions <b>(potential future requirement)</b> .
Trading of Emissions within a Source	62-213.415, F.A.C.	X			Applies only to facilities with a federally enforceable emissions cap.
Permit Applications	62-213.420(1)(a)2. and (1)(b), (2), (3), and (4), F.A.C.		X		Title V operating permit application required no later than 180 days after commencing operation. <b>(future requirement)</b>
Permit Issuance, Renewal, and Revision					
Action on Application	62-213.430(1), F.A.C.	X			Contains no applicable requirements.
Permit Denial	62-213.430(2), F.A.C.	X			Contains no applicable requirements.
Permit Renewal	62-213.430(3), F.A.C.		X		Permit renewal application requirements <b>(future requirement)</b> .
Permit Revision	62-213.430(4), F.A.C.		X		Permit revision application requirements <b>(potential future requirement)</b> .
EPA Recommended Actions	62-213.430(5), F.A.C.	X			Contains no applicable requirements.
Insignificant Emission Units	62-213.430(6), F.A.C.		X		Contains no applicable requirements.
Permit Content	62-213.440, F.A.C.	X			Agency procedures, contains no applicable requirements.



Table A-2. Summary of FDEP Regulatory Applicability and Corresponding Requirements (Page 8 of 12)

Regulation	Citation	Not Applicable	Applicable: Facility-Wide	Applicable: Emission Units	Applicable Requirement or Non-Applicability Rationale
Permit Review by EPA and Affected States	62-213.450, F.A.C.	X			Agency procedures, contains no applicable requirements.
Permit Shield	62-213.460, F.A.C.		X		Provides permit shield for facilities in compliance with permit terms and conditions. <b>(future requirement)</b>
Forms and Instructions	62-213.900(1), F.A.C.		X		Contains annual emissions fee form requirements.
<b>Chapter 62-214—Requirements for Sources Subject to the Federal Acid Rain Program</b>					
Purpose and Scope	§62-214.100, F.A.C.	X			Contains no applicable requirements.
Applicability	§62-214.300, F.A.C.		X		HCGF CTs 1-3 includes Acid Rain affected units, therefore compliance with §62-213 and §62-214, F.A.C., is required.
Applications	§62-214.320, F.A.C.			CTs 1-3	Acid Rain application requirements. Application for new units are due at least 24 months before the later of 1/1/2000 or the date on which the unit commences operation.
Acid Rain Compliance Plan and Compliance Options	§62-214.330(1)(a), F.A.C.			CTs 1-3	Acid Rain compliance plan requirements. Sulfur dioxide requirements become effective the later of 1/1/2000 or the deadline for CEMS certification pursuant to 40 CFR Part 75. <b>(future requirement)</b>
Exemptions	§62-214.340, F.A.C.		X		An application may be submitted for certain exemptions <b>(potential future requirement)</b> .
Certification	§62-214.350, F.A.C.			CTs 1-3	The designated representative must certify all Acid Rain submissions. <b>(future requirement)</b>

Table A-2. Summary of FDEP Regulatory Applicability and Corresponding Requirements (Page 9 of 12)

Regulation	Citation	Not Applicable	Applicable: Facility-Wide	Applicable: Emission Units	Applicable Requirement or Non-Applicability Rationale
Department Action on Applications	§62-214.360, F.A.C.	X			Contains no applicable requirements.
Revisions and Administrative Corrections	§62-214.370, F.A.C.			CTs 1-3	Defines revision procedures and automatic amendments ( <b>potential future requirement</b> )..
Acid Rain Part Content	§62-214.420, F.A.C.	X			Agency procedures, contains no applicable requirements.
Implementation and Termination of Compliance Options	§62-214.430, F.A.C.			CTs 1-3	Defines permit activation and termination procedures ( <b>potential future requirement</b> ).
<b>Chapter 62-242 - Motor Vehicle Standards and Test Procedures</b>	62-242, F.A.C.	X			Not applicable to HCGF CTs 1-3.
<b>Chapter 62-243 - Tampering with Motor Vehicle Air Pollution Control Equipment</b>	62-243, F.A.C.	X			Not applicable to HCGF CTs 1-3.
<b>Chapter 62-252 - Gasoline Vapor Control</b>	62-252, F.A.C.	X			Not applicable to HCGF CTs 1-3.
<b>Chapter 62-256 - Open Burning and Frost Protection Fires</b>					
Declaration and Intent	62-256.100, F.A.C.	X			Contains no applicable requirements.
Definitions	62-256.200, F.A.C.	X			Contains no applicable requirements.
Prohibitions	<b>62-256.300, F.A.C.<sup>1</sup></b>		X		Prohibits open burning.
Burning for Cold and Frost Protection	62-256.450, F.A.C.	X			Limited to agricultural protection.
Land Clearing	<b>62-256.500, F.A.C.<sup>1</sup></b>		X		Defines allowed open burning for non-rural land clearing and structure demolition.
Industrial, Commercial, Municipal, and Research Open Burning	<b>62-256.600, F.A.C.<sup>1</sup></b>		X		Prohibits industrial open burning

Table A-2. Summary of FDEP Regulatory Applicability and Corresponding Requirements (Page 10 of 12)

Regulation	Citation	Not Applicable	Applicable: Facility-Wide	Applicable: Emission Units	Applicable Requirement or Non-Applicability Rationale
Open Burning allowed	62-256.700, F.A.C. <sup>1</sup>		X		Specifies allowable open burning activities. <b>(potential future requirement)</b>
Effective Date	62-256.800, F.A.C. <sup>1</sup>	X			Contains no applicable requirements.
<b>Chapter 62-257 - Asbestos Fee</b>	62-257, F.A.C.	X			Not applicable to HCGF CTs 1-3.
<b>Chapter 62-281 - Motor Vehicle Air Conditioning Refrigerant Recovery and Recycling</b>	62-281.300, .400, .500, and .900, F.A.C.	X			Servicing of motor vehicle air conditioners and vehicle maintenance that may release refrigerants. Not applicable to HCGF CTs 1-3.
<b>Chapter 62-296 - Stationary Source - Emission Standards</b>					
Purpose and Scope	62-296.100, F.A.C.	X			Contains no applicable requirements
General Pollutant Emission Limiting Standard, Volatile Organic Compounds Emissions	62-296.320(1), F.A.C.		X		Known and existing vapor control devices must be applied as required by the Department.
General Pollutant Emission Limiting Standard, Objectionable Odor Prohibited	62-296.320(2), F.A.C. <sup>1</sup>		X		Objectionable odor release is prohibited.
General Pollutant Emission Limiting Standard, Industrial, Commercial, and Municipal Open Burning Prohibited	62-296.320(3), F.A.C. <sup>1</sup>		X		Open burning in connection with industrial, commercial, or municipal operations is prohibited.
General Particulate Emission Limiting Standard, Process Weight Table	62-296.320(4)(a), F.A.C.	X			HCGF CTs 1-3 does not have any applicable emission units. Combustion emission units are exempt per 62-296.320(4)(a)1a.
General Particulate Emission Limiting Standard, General Visible Emission Standard	62-296.320(4)(b), F.A.C.		X		Opacity limited to 20 percent, unless otherwise permitted. Test methods specified.
General Particulate Emission Limiting Standard, Unconfined Emission of Particulate Matter	62-296.320(4)(c), F.A.C.		X		Reasonable precautions must be taken to prevent unconfined particulate matter emission.

Table A-2. Summary of FDEP Regulatory Applicability and Corresponding Requirements (Page 11 of 12)

Regulation	Citation	Not Applicable	Applicable: Facility-Wide	Applicable: Emission Units	Applicable Requirement or Non-Applicability Rationale
Specific Emission Limiting and Performance Standards	62-296.401 through 62-296.417, F.A.C.	X			None of the referenced standards are applicable to HCGF CTs 1-3.
Reasonably Available Control Technology (RACT) Volatile Organic Compounds (VOC) and Nitrogen Oxides (NO <sub>x</sub> ) Emitting Facilities	62-296.500 through 62-296.516, F.A.C.	X			HCGF CTs 1-3 is not located in an ozone nonattainment area or an ozone air quality maintenance area.
Reasonably Available Control Technology (RACT) - Requirements for Major VOC- and NO <sub>x</sub> -Emitting Facilities	62-296.570, F.A.C.	X			HCGF CTs 1-3 is not located in a specified ozone nonattainment area or a specified ozone air quality maintenance area (i.e., is not located in Broward, Dade or Palm Beach Counties)
Reasonably Available Control Technology (RACT) - Lead	62-296.600 through 62-296.605, F.A.C.	X			HCGF CTs 1-3 is not located in a lead nonattainment area or a lead air quality maintenance area.
Reasonably Available Control Technology (RACT)—Particulate Matter	§62-296.700 through 62-296.712, F.A.C.	X			HCGF CTs 1-3 is not located in a PM nonattainment area or a PM air quality maintenance area.

Table A-2. Summary of FDEP Regulatory Applicability and Corresponding Requirements (Page 12 of 12)

Regulation	Citation	Not Applicable	Applicable: Facility- Wide	Applicable: Emission Units	Applicable Requirement or Non-Applicability Rationale
<b>Chapter 62-297 - Stationary Sources - Emissions Monitoring</b>					
Purpose and Scope	62-297.100, F.A.C.	X			Contains no applicable requirements.
General Compliance Test Requirements	62-297.310, F.A.C.			CTs 1-3	Specifies general compliance test requirements.
Compliance Test Methods	62-297.401, F.A.C.	X			Contains no applicable requirements.
Supplementary Test Procedures	62-297.440, F.A.C.	X			Contains no applicable requirements.
EPA VOC Capture Efficiency Test Procedures	62-297.450, F.A.C.	X			Not applicable to HCGF CTs 1-3.
CEMS Performance Specifications	62-297.520, F.A.C.	X			Contains no applicable requirements.
Exceptions and Approval of Alter- nate Procedures and Requirements	62-297.620, F.A.C.	X			Exceptions or alternate procedures have not been requested.

<sup>1</sup> - State requirement only; not federally enforceable.

Source: ECT, 2000.

**APPENDIX A2**

**II.E.4—PRECAUTIONS TO PREVENT EMISSIONS OF  
UNCONFINED PARTICULATE MATTER**

## **PRECAUTIONS TO PREVENT EMISSIONS OF UNCONFINED PARTICULATE MATTER**

Unconfined particulate matter emissions that may result from Hardee County Generating Facility operations include:

- Vehicular traffic on paved and unpaved roads.
- Periodic abrasive blasting.

The following techniques may be used to control unconfined particulate matter emissions on an as-needed basis:

- Chemical or water application to:
  - Unpaved roads
  - Unpaved yard areas
- Paving and maintenance of roads, parking areas and yards.
- Landscaping or planting of vegetation.
- Confining abrasive blasting where possible.
- Other techniques, as necessary

**APPENDIX A3**

**III.L.2–FUEL ANALYSES OR SPECIFICATIONS**



## Typical Natural Gas Composition

Component	Mole Percent (by volume)
<u>Gas Composition</u>	
Hexane+	0.0571
Propane	0.7101
I-butane	0.1479
N-butane	0.1558
I-Pentane	0.0476
N-Pentane	0.0308
Nitrogen	0.3750
Methane	94.7805
CO <sub>2</sub>	0.5244
Ethane	3.1708
<u>Other Characteristics</u>	
Heat content (HHV)	1,051.9 Btu/ft <sup>3</sup> at 60°F, 14.73 psia, dry
Real specific gravity	0.5913
Sulfur content (maximum)	2.0 gr/100 scf

Note: Btu/ft<sup>3</sup> = British thermal units per cubic foot.  
psia = pounds per square inch absolute.  
gr/100 scf = grains per 100 standard cubic foot.

Source: ECT, 2000.

## Typical No. 2 Fuel Oil Analysis

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Parameter	Value
Minimum gross heating value, Btu/gal HHV	137,000
Ash, percent by weight (maximum)	0.05
Sulfur, percent by weight (maximum)	0.05
Fuel-bound nitrogen, percent by weight (maximum)	0.015

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Note: Btu/gal = British thermal units per gallon.  
HHV = higher heating value.

Source: ECT, 2000.

**APPENDIX B**  
**CTG VENDOR EMISSIONS DATA**

**GENERAL ELECTRIC 7241FA**

ESTIMATED PERFORMANCE PG7241(FA)

Load Condition		BASE	75%	50%
Ambient Temp.	Deg F.	20.	20.	20.
Fuel Type		Cust Gas	Cust Gas	Cust Gas
Fuel LHV	Btu/lb	20,886	20,886	20,886
Fuel Temperature	Deg F	80	80	80
Output	kW	183,400.	137,500.	91,700.
Heat Rate (LHV)	Btu/kWh	9,300.	9,950.	11,910.
Heat Cons. (LHV) X 10 <sup>6</sup>	Btu/h	1,705.6	1,368.1	1,092.1
Exhaust Flow X 10 <sup>3</sup>	lb/h	3776.	3010.	2473.
Exhaust Temp.	Deg F.	1081.	1111.	1160.
Exhaust Heat (LHV) X 10 <sup>6</sup>	Btu/h	1017.8	848.9	738.3

EMISSIONS

NOx	ppmvd @ 15% O2	9.	9.	9.
NOx AS NO2	lb/h	63.	50.	39.
CO	ppmvd	15.	15.	15.
CO	lb/h	51.	41.	34.
UHC	ppmvw	7.	7.	7.
UHC	lb/h	15.	12.	10.
Particulates	lb/h	9.0	9.0	9.0

EXHAUST ANALYSIS % VOL.

Argon	0.90	0.91	0.90
Nitrogen	75.06	75.07	75.18
Oxygen	12.56	12.59	12.90
Carbon Dioxide	3.87	3.85	3.71
Water	7.61	7.59	7.31

SITE CONDITIONS

Elevation	ft.	143.0
Site Pressure	psia	14.63
Inlet Loss	in Water	4.0
Exhaust Loss	in Water	5.5
Relative Humidity	%	30
Application		7FH2 Hydrogen-Cooled Generator
Combustion System		9/42 DLN Combustor

Emission information based on GE recommended measurement methods. NOx emissions are corrected to 15% O2 without heat rate correction and are not corrected to ISO reference condition per 40CFR 60.335(c)(1). NOx levels shown will be controlled by algorithms within the SPEEDTRONIC control system.

TECO - Polk station

ESTIMATED PERFORMANCE PG7241(FA)

Load Condition		BASE	75%	50%
Ambient Temp.	Deg F.	59.	59.	59.
Fuel Type		Cust Gas	Cust Gas	Cust Gas
Fuel LHV	Btu/lb	20,886	20,886	20,886
Fuel Temperature	Deg F	80	80	80
Output	kW	170,300.	127,700.	85,100.
Heat Rate (LHV)	Btu/kWh	9,370.	10,130.	12,200.
Heat Cons. (LHV) X 10 <sup>6</sup>	Btu/h	1,595.7	1,293.6	1,038.2
Exhaust Flow X 10 <sup>3</sup>	lb/h	3518.	2874.	2384.
Exhaust Temp.	Deg F.	1117.	1139.	1184.
Exhaust Heat (LHV) X 10 <sup>6</sup>	Btu/h	956.6	810.4	708.7

EMISSIONS

NOx	ppmvd @ 15% O2	9.	9.	9.
NOx AS NO2	lb/h	59.	47.	37.
CO	ppmvd	15.	15.	15.
CO	lb/h	48.	39.	32.
UHC	ppmvw	7.	7.	7.
UHC	lb/h	14.	11.	9.
Particulates	lb/h	9.0	9.0	9.0

EXHAUST ANALYSIS % VOL.

Argon	0.89	0.88	0.89
Nitrogen	74.38	74.43	74.54
Oxygen	12.38	12.52	12.85
Carbon Dioxide	3.87	3.80	3.65
Water	8.49	8.37	8.07

SITE CONDITIONS

Elevation	ft.	143.0
Site Pressure	psia	14.63
Inlet Loss	in Water	4.0
Exhaust Loss	in Water	5.5
Relative Humidity	%	60
Application		7FH2 Hydrogen-Cooled Generator
Combustion System		9/42 DLN Combustor

Emission information based on GE recommended measurement methods. NOx emissions are corrected to 15% O2 without heat rate correction and are not corrected to ISO reference condition per 40CFR 60.335(c)(1). NOx levels shown will be controlled by algorithms within the SPEEDTRONIC control system.

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## ESTIMATED PERFORMANCE PG7241(FA)

Load Condition		BASE	75%	50%
Ambient Temp.	Deg F.	90.	90.	90.
Fuel Type		Cust Gas	Cust Gas	Cust Gas
Fuel LHV	Btu/lb	20,886	20,886	20,886
Fuel Temperature	Deg F	80	80	80
Output	kW	151,100.	113,300.	75,500.
Heat Rate. (LHV)	Btu/kWh	9,720.	10,620.	12,860.
Heat Cons. (LHV) X 10 <sup>6</sup>	Btu/h	1,468.7	1,203.2	970.9
Exhaust Flow X 10 <sup>3</sup>	lb/h	3263.	2695.	2262.
Exhaust Temp.	Deg F.	1141.	1166.	1200.
Exhaust Heat (LHV) X 10 <sup>6</sup>	Btu/h	899.5	772.2	676.3

## EMISSIONS

NOx	ppmvd @ 15% O2	9.	9.	9.
NOx AS NO2	lb/h	54.	44.	35.
CO	ppmvd	15.	15.	15.
CO	lb/h	43.	36.	30.
UHC	ppmvw	7.	7.	7.
UHC	lb/h	13.	11.	9.
Particulates	lb/h	9.0	9.0	9.0

## EXHAUST ANALYSIS % VOL.

Argon	0.87	0.87	0.86
Nitrogen	72.32	72.37	72.50
Oxygen	11.96	12.10	12.48
Carbon Dioxide	3.80	3.73	3.56
Water	11.06	10.93	10.60

## SITE CONDITIONS

Elevation	ft.	143.0
Site Pressure	psia	14.63
Inlet Loss	in Water	4.0
Exhaust Loss	in Water	5.5
Relative Humidity	%	80
Application		7FH2 Hydrogen-Cooled Generator
Combustion System		9/42 DLN Combustor

Emission information based on GE recommended measurement methods. NOx emissions are corrected to 15% O2 without heat rate correction and are not corrected to ISO reference condition per 40CFR 60.335(c)(1). NOx levels shown will be controlled by algorithms within the SPEEDTRONIC control system.

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ESTIMATED PERFORMANCE PG7241(FA)

Load Condition		BASE	75%	50%
Ambient Temp.	Deg F.	20.	20.	20.
Fuel Type		Dist.	Dist.	Dist.
Fuel LHV	Btu/lb	18,300	18,300	18,300
Fuel Temperature	Deg F	59	59	59
Liquid Fuel H/C Ratio		1.8	1.8	1.8
Output	kW	189,400.	142,100.	94,700.
Heat Rate (LHV)	Btu/kWh	10,060.	10,880.	12,730.
Heat Cons. (LHV) X 10 <sup>6</sup>	Btu/h	1,905.4	1,546.	1,205.5
Exhaust Flow X 10 <sup>3</sup>	lb/h	3894.	2911.	2430.
Exhaust Temp.	Deg F.	1067.	1184.	1200.
Exhaust Heat (LHV) X 10 <sup>6</sup>	Btu/h	1056.0	900.4	766.3
Water Flow	lb/h	132,150.	102,410.	69,710.

EMISSIONS

NOx	ppmvd @ 15% O2	42.	42.	42.
NOx AS NO2	lb/h	338.	272.	210.
CO	ppmvd	33.	33.	33.
CO	lb/h	113.	84.	71.
UHC	ppmvw	7.	7.	7.
UHC	lb/h	15.	11.	10.
Particulates	lb/h	17.0	17.0	17.0

EXHAUST ANALYSIS % VOL.

Argon	0.87	0.85	0.87
Nitrogen	71.82	71.53	72.47
Oxygen	11.17	10.49	11.37
Carbon Dioxide	5.61	6.02	5.60
Water	10.54	11.11	9.70

SITE CONDITIONS

Elevation	ft.	143.0
Site Pressure	psia	14.63
Inlet Loss	in Water	4.0
Exhaust Loss	in Water	5.5
Relative Humidity	%	30
Application		7FH2 Hydrogen-Cooled Generator
Combustion System		9/42 DLN Combustor

Emission information based on GE recommended measurement methods. NOx emissions are corrected to 15% O2 without heat rate correction and are not corrected to ISO reference condition per 40CFR 60.335(c)(1). NOx levels shown will be controlled by algorithms within the SPEEDTRONIC control system.

Distillate Fuel is Assumed to have 0.015% Fuel-Bound Nitrogen, or less.  
FBN Amounts Greater Than 0.015% Will Add to the Reported NOx Value.



## ESTIMATED PERFORMANCE PG7241(FA)

Load Condition		BASE	75%	50%
Ambient Temp.	Deg F.	59.	59.	59.
Fuel Type		Dist.	Dist.	Dist.
Fuel LHV	Btu/lb	18,300	18,300	18,300
Fuel Temperature	Deg F	59	59	59
Liquid Fuel H/C Ratio		1.8	1.8	1.8
Output	kW	178,800.	134,100.	89,400.
Heat Rate (LHV)	Btu/kWh	10,040.	10,880.	12,840.
Heat Cons. (LHV) X 10 <sup>6</sup>	Btu/h	1,795.2	1,459.	1,147.9
Exhaust Flow X 10 <sup>3</sup>	lb/h	3662.	2812.	2395.
Exhaust Temp.	Deg F.	1098.	1195.	1200.
Exhaust Heat (LHV) X 10 <sup>6</sup>	Btu/h	996.1	854.1	735.2
Water Flow	lb/h	120,430.	91,300.	62,380.

## EMISSIONS

NOx	ppmvd @ 15% O2	42.	42.	42.
NOx AS NO2	lb/h	319.	257.	200.
CO	ppmvd	33.	33.	33.
CO	lb/h	106.	81.	70.
UHC	ppmvw	7.	7.	7.
UHC	lb/h	14.	11.	9.
Particulates	lb/h	17.0	17.0	17.0

## EXHAUST ANALYSIS % VOL.

Argon	0.85	0.86	0.87
Nitrogen	71.31	71.26	72.21
Oxygen	11.04	10.63	11.59
Carbon Dioxide	5.61	5.88	5.40
Water	11.19	11.37	9.94

## SITE CONDITIONS

Elevation	ft.	143.0
Site Pressure	psia	14.63
Inlet Loss	in Water	4.0
Exhaust Loss	in Water	5.5
Relative Humidity	%	60
Application		7FH2 Hydrogen-Cooled Generator
Combustion System		9/42 DLN Combustor

Emission information based on GE recommended measurement methods. NOx emissions are corrected to 15% O2 without heat rate correction and are not corrected to ISO reference condition per 40CFR 60.335(c)(1). NOx levels shown will be controlled by algorithms within the SPEEDTRONIC control system.

Distillate Fuel is Assumed to have 0.015% Fuel-Bound Nitrogen, or less.  
FBN Amounts Greater Than 0.015% Will Add to the Reported NOx Value.

## ESTIMATED PERFORMANCE PG7241(FA)

Load Condition		BASE	75%	50%
Ambient Temp.	Deg F.	90.	90.	90.
Fuel Type		Dist.	Dist.	Dist.
Fuel LHV	Btu/lb	18,300	18,300	18,300
Fuel Temperature	Deg F	59	59	59
Liquid Fuel H/C Ratio		1.8	1.8	1.8
Output	kW	159,900.	119,900.	79,900.
Heat Rate (LHV)	Btu/kWh	10,210.	11,150.	13,240.
Heat Cons. (LHV) X 10 <sup>6</sup>	Btu/h	1,632.6	1,336.9	1,057.9
Exhaust Flow X 10 <sup>3</sup>	lb/h	3375.	2693.	2316.
Exhaust Temp.	Deg F.	1130.	1200.	1200.
Exhaust Heat (LHV) X 10 <sup>6</sup>	Btu/h	931.9	808.1	698.3
Water Flow	lb/h	91,870.	67,650.	44,800.

## EMISSIONS

NOx	ppmvd @ 15% O2	42.	42.	42.
NOx AS NO2	lb/h	290.	235.	184.
CO	ppmvd	33.	33.	33.
CO	lb/h	97.	77.	67.
UHC	ppmvw	7.	7.	7.
UHC	lb/h	13.	11.	9.
Particulates	lb/h	17.0	17.0	17.0

## EXHAUST ANALYSIS % VOL.

Argon	0.85	0.85	0.85
Nitrogen	70.02	70.24	71.08
Oxygen	10.85	10.77	11.69
Carbon Dioxide	5.50	5.59	5.12
Water	12.79	12.56	11.27

## SITE CONDITIONS

Elevation	ft.	143.0
Site Pressure	psia	14.63
Inlet Loss	in Water	4.0
Exhaust Loss	in Water	5.5
Relative Humidity	%	80
Application		7FH2 Hydrogen-Cooled Generator
Combustion System		9/42 DLN Combustor

Emission information based on GE recommended measurement methods. NOx emissions are corrected to 15% O2 without heat rate correction and are not corrected to ISO reference condition per 40CFR 60.335(c)(1). NOx levels shown will be controlled by algorithms within the SPEEDTRONIC control system.

Distillate Fuel is Assumed to have 0.015% Fuel-Bound Nitrogen, or less.  
FBN Amounts Greater Than 0.015% Will Add to the Reported NOx Value.



GE International  
Power Systems

Paul L. Moyer  
Project Manager

Global Power Plant Systems Department  
General Electric International, Inc.  
1 River Road, Bldg. 2 - 341  
Schenectady, NY 12345  
Tele: (518) 385-1563  
Fax: (518) 385-1709

March 29, 1999

Mr. James Badgerow  
Tampa Electric Company  
P.O. Box 111  
Tampa, Florida 33601-0111  
6944 U. S. Highway 41N  
Apollo Beach, Florida 33572

**Subject: Polk Power Station No. 2  
Emission Guarantees**

**GE Ref: GEII/TECO-016/99**

Dear Jim:

As requested, the following are Polk Power Station No. 2 emission guarantees:

EMISSIONS GUARANTEES FOR IPS80571 TECO 7FA							
Fuel	Operation	Diluent	Nox - ppmvd	CO ppmvd	UHC ppmvw	VOC ppmvw	Particulates (TSP/PM10 - FRONT HALF ONLY) lbm/hr
natural gas	base & part(1)	dry	9	15	7	1.4	9
Distillate	base & part(1)	water	42	33	7	3.5	17

If you have any questions, please advise.

Best Regards,

Paul L. Moyer  
Project Manager

PLM-3899  
PLM/pva

cc: M. Broder  
J. Chalfin

A Subsidiary of General Electric Company, USA

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**WESTINGHOUSE 501F**

# SIEMENS Westinghouse

Expected 501F Combustion Turbine Performance  
Combined Cycle / Dry Low NOx Combustor  
2-95x200 Air Cooled Generator (0.85 PF)

CTT-1741 rev8  
10/21/98

SITE CONDITIONS:	Base Load Cases		
	GAS	GAS	GAS
FUEL TYPE	BASE	BASE	BASE
LOAD LEVEL	BASE	BASE	BASE
NET FUEL HEATING VALUE, Btu/lbm (LHV)	20,968	20,968	20,968
GROSS FUEL HEATING VALUE, Btu/lbm (HHV)	23,196	23,196	23,196
AMBIENT TEMPERATURE, °F	95.0	59.0	32.0
AMBIENT RELATIVE HUMIDITY, %	80%	60%	30%
COMPRESSOR INLET TEMPERATURE, °F	95.0	59.0	32.0
BAROMETRIC PRESSURE, psia	14.630	14.630	14.630
<b>COMBUSTION TURBINE PERFORMANCE:</b>			
GROSS POWER OUTPUT, kW	160,720	181,440	197,690
GROSS HEAT RATE, Btu/kWh (LHV)	9,480	9,150	8,970
GROSS HEAT RATE, Btu/kWh (HHV)	10,490	10,120	9,925
FUEL FLOW, lbm/hr	72,683	79,159	84,687
INJECTION RATE, lbm/hr	-	-	-
EXHAUST FLOW, lbm/hr	3,285,274	3,598,208	3,800,538
EXHAUST FLOW, ACFM	948,472	1,018,843	1,071,270
STACK EXIT VELOCITY (ft/sec)	62.0	66.7	70.2
STACK EXHAUST TEMPERATURE (F)	201.0	198.0	197.0
<b>EXHAUST GAS COMPOSITION (BY % VOL):</b>			
OXYGEN	11.84	12.48	12.53
CARBON DIOXIDE	3.87	3.90	3.96
WATER	11.51	8.25	7.55
NITROGEN	71.86	74.42	75.01
ARGON	0.90	0.93	0.94
MOLECULAR WEIGHT	28.06	28.42	28.50
<b>NET EMISSIONS: Based on Westinghouse 21T5620 test methods</b>			
NOx, ppmvd @ 15% O2	6	6	6
NOx, lbm/hr as NO2 (8 ppm case)	89	42	45
NOx, ppmvd @ 15% O2	9	9	9
NOx, lbm/hr as NO2 (8 ppm case)	58	83	88
NOx, ppmvd @ 15% O2	12	12	12
NOx, lbm/hr as NO2 (12 ppm case)	78	85	91
CO, ppmvd	20	20	20
CO, ppmvd @ 15% O2	16	16	16
CO, lbm/hr	62	69	73
SO2, ppmvd	1	1	1
SO2, ppmvd @ 15% O2	1	1	1
SO2, lbm/hr	2	2	2
VOC, ppmvd as CH4	4	4	4
VOC, ppmvd @ 15% O2 as CH4	3	3	3
VOC, lbm/hr as CH4	7	8	8
PARTICULATES, lbm/hr	5.0	5.5	5.9

**NOTES:**

- Performance based on new and clean condition.
- All data are expected and not guaranteed.
- Gross power output is at the generator terminals.
- The information contained in this transmittal has been prepared and submitted per the customer's request. Data included in any permit application or Environmental Impact Statement are strictly the responsibility of the Owner. Westinghouse is available to review permit application data upon request.
- Gas fuel composition is 83.4% CH<sub>4</sub>, 15.8% C<sub>2</sub>H<sub>6</sub>, 0.8% N<sub>2</sub>, and 0.2 grains of sulfur per 100 SCF.
- Gas fuel must be in compliance with the latest revision of the Westinghouse Gas Fuel Spec (21T0306).
- Dry Low NOx combustor utilizing a high ethane content gas fuel may produce a visible plume at the stack.
- Average temperature of the gas fuel is 280 °F. Sensible heat of the fuel is not included in the fuel heating values, heat input, or heat rate.
- Liquid condensable fuels must be removed from the fuel lines.
- Particulates are per US EPA Method 5B (front half only) and do not include H2SO4 mist.
- Maximum gross power is 199 MW.

Please be advised that the information contained in this transmittal has been prepared and is being transmitted per Customer request specifically for information purposes only. Such information is not intended to be used for evaluation of plant design and/or performance relative to contractual commitments. Data included in any permit or Environmental Impact Statement are strictly the responsibility of the owner. Siemens Westinghouse is available to review permit application data upon request.

# SIEMENS Westinghouse

Expected 501F Combustion Turbine Performance  
Combined Cycle / Dry Low NOx Combustor  
2-95x200 Air Cooled Generator (0.85 PF)

CTT-1741 rev6  
10/21/98

Attachment 1

SITE CONDITIONS:	70% Case			50% Case		
	GAS	GAS	GAS	GAS	GAS	GAS
FUEL TYPE	70%	70%	70%	50%	50%	50%
LOAD LEVEL	20,968	20,968	20,968	20,968	20,968	20,968
NET FUEL HEATING VALUE, Btu/lbm (LHV)	23,196	23,196	23,196	23,196	23,196	23,196
GROSS FUEL HEATING VALUE, Btu/lbm (HHV)						
AMBIENT TEMPERATURE, °F	95.0	59.0	32.0	95.0	59.0	32.0
AMBIENT RELATIVE HUMIDITY, %	80%	60%	30%	80%	60%	30%
COMPRESSOR INLET TEMPERATURE, °F	95.0	59.0	32.0	95.0	59.0	32.0
BAROMETRIC PRESSURE, psia	14.630	14.630	14.630	14.630	14.630	14.630
COMBUSTION TURBINE PERFORMANCE:						
GROSS POWER OUTPUT, kW	112,120	126,670	138,020	79,650	90,060	98,190
GROSS HEAT RATE, Btu/kWh (LHV)	10,610	10,160	9,845	11,800	11,155	10,785
GROSS HEAT RATE, Btu/kWh (HHV)	11,740	11,240	10,895	13,050	12,340	11,910
FUEL FLOW, lbm/hr	56,746	61,380	64,827	44,811	47,911	50,416
INJECTION RATE, lbm/hr	-	-	-	-	-	-
EXHAUST FLOW, lbm/hr	2,644,614	2,783,745	2,895,848	2,503,892	2,667,731	2,777,543
EXHAUST FLOW, ACFM	759,168	785,763	813,903	712,717	746,276	773,528
STACK EXIT VELOCITY (ft/sec)	49.7	51.5	53.3	46.7	48.9	50.7
STACK EXHAUST TEMPERATURE (F)	199.0	196.0	195.0	195.0	192.0	191.0
EXHAUST GAS COMPOSITION (BY % VOL):						
OXYGEN	12.16	12.52	12.50	13.41	14.00	14.08
CARBON DIOXIDE	3.72	3.88	3.97	3.13	3.19	3.23
WATER	11.24	8.21	7.57	10.17	6.92	6.19
NITROGEN	71.96	74.44	75.00	72.37	74.94	75.54
ARGON	0.90	0.93	0.94	0.91	0.94	0.95
MOLECULAR WEIGHT	28.08	28.42	28.50	28.14	28.50	28.58
NET EMISSIONS: Based on Westinghouse 2175620 test methods						
NOx, ppmvd @ 15% O2	6	6	6	6	6	6
NOx, lbm/hr as NO2 (6 ppm case)	30	33	35	24	26	27
NOx, ppmvd @ 15% O2	9	9	9	9	9	9
NOx, lbm/hr as NO2 (9 ppm case)	52	49	45	40	38	36
NOx, ppmvd @ 15% O2	12	12	12	12	12	12
NOx, lbm/hr as NO2 (12 ppm case)	60	65	69	47	51	54
CO, ppmvd	20	20	20	83	82	82
CO, ppmvd @ 15% O2	16	16	16	82	83	82
CO, lbm/hr	50	53	56	198	213	223
SO2, ppmvd	1	1	1	1	1	1
SO2, ppmvd @ 15% O2	1	1	1	1	2	2
SO2, lbm/hr	1	1	1	1	1	1
VOC, ppmvd as CH4	4	4	4	20	20	20
VOC, ppmvd @ 15% O2 as CH4	3	3	3	20	20	20
VOC, lbm/hr as CH4	6	6	6	27	30	31
PARTICULATES, lbm/hr	5.0	5.0	5.0	5.0	5.0	5.0

**NOTES:**

- Performance based on new and clean condition.
- All data are expected and not guaranteed.
- Gross power output is at the generator terminals.
- The information contained in this transmittal has been prepared and submitted per the customer's request. Data included in any permit application or Environmental Impact Statement are strictly the responsibility of the Owner. Westinghouse is available to review permit application data upon request.
- Gas fuel composition is 83.4% CH4, 15.8% C2H6, 0.8% N2, and 0.2 grains of sulfur per 100 SCF.
- Gas fuel must be in compliance with the latest revision of the Westinghouse Gas Fuel Spec (21T0306).
- Dry Low NOx combustor utilizing a high ethane content gas fuel may produce a visible plume at the stack.
- Liquid condensable fuels must be removed from the fuel lines.
- Particulates are per US EPA Method 5B (front half only) and do not include H2SO4 mist.
- Maximum exhaust temperature is 1160 °F for base and part load.
- Part load is achieved by modulating the IGVs and is based on percentage unrestricted power output.

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# SIEMENS Westinghouse

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Combined Cycle / Dry Low NOx Combustor  
2-95x200 Air Cooled Generator (0.85 PF)

CTT-1741 rev6  
10/21/98

SITE CONDITIONS:	Base Load Case		
	OIL	OIL	OIL
FUEL TYPE	BASE	BASE	BASE
LOAD LEVEL	18,586	18,586	18,586
NET FUEL HEATING VALUE, Btu/lbm (LHV)	19,845	19,845	19,845
GROSS FUEL HEATING VALUE, Btu/lbm (HHV)			
AMBIENT TEMPERATURE, °F	95.0	59.0	32.0
AMBIENT RELATIVE HUMIDITY, %	80%	60%	30%
COMPRESSOR INLET TEMPERATURE, °F	95.0	59.0	32.0
BAROMETRIC PRESSURE, psia	14.630	14.630	14.630
INJECTION FLUID	WATER	WATER	WATER
INJECTION RATIO, lb Water / lb Fuel	0.40	0.40	0.40
COMBUSTION TURBINE PERFORMANCE:			
GROSS POWER OUTPUT, kW	154,100	174,380	190,310
GROSS HEAT RATE, Btu/kWh (LHV)	9,850	9,490	9,295
GROSS HEAT RATE, Btu/kWh (HHV)	10,515	10,140	9,925
FUEL FLOW, lbm/hr	81,651	89,101	95,178
INJECTION RATE, lbm/hr	32,660	35,620	38,070
EXHAUST FLOW, lbm/hr	3,313,465	3,628,843	3,833,887
EXHAUST FLOW, ACFM	1,074,112	1,158,859	1,223,387
STACK EXIT VELOCITY (ft/sec)	70.3	75.8	80.3
STACK EXHAUST TEMPERATURE (F)	291.0	288.0	291.0
EXHAUST GAS COMPOSITION (BY % VOL):			
OXYGEN	11.93	12.56	12.61
CARBON DIOXIDE	4.96	5.01	5.08
WATER	10.56	7.30	8.59
NITROGEN	71.63	74.18	74.76
ARGON	0.90	0.93	0.94
MOLECULAR WEIGHT	28.33	28.68	28.78
NET EMISSIONS: Based on Westinghouse 21T5620 test methods			
NOx, ppmvd @ 15% O2	42	42	42
NOx, lbm/hr as NO2	275	299	320
CO, ppmvd	25	25	25
CO, ppmvd @ 15% O2	20	20	20
CO, lbm/hr	78	87	92
SO2, ppmvd	13	13	13
SO2, ppmvd @ 15% O2	10	10	10
SO2, lbm/hr	87	94	101
VOC, ppmvd as CH4	13	13	13
VOC, ppmvd @ 15% O2 as CH4	10	10	10
VOC, lbm/hr as CH4	23	26	27
PARTICULATES, lbm/hr	18.1	18.0	19.1

## NOTES:

- Performance based on new and clean condition.
- All data are expected and not guaranteed.
- Gross power output is at the generator terminals.
- The information contained in this transmittal has been prepared and submitted per the customer's request. Data included in any permit application or Environmental Impact Statement are strictly the responsibility of the Owner. Westinghouse is available to review permit application data upon request.
- Fuel oil composition is 86.139% C, 13.8% H, 0.05% S, 0.015% FBN, and 0.001% ash.
- Liquid fuel must be in compliance with the latest revision of the Westinghouse Liquid Fuel Spec (21T4424).
- Injection ratios may be adjusted during plant commissioning to meet emissions.
- Dry Low NOx injection ratios are estimated. Actual injection will be set at the minimum required to reach specified NOx levels.
- Particulates are per US EPA Method 5B (front half only) and do not include H2SO4 mist.
- Particulates for oil fuel are based on specific gravity and may vary depending on fuel.
- Maximum gross power is 199 MW.

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# SIEMENS Westinghouse

Expected 501F Combustion Turbine Performance  
Combined Cycle / Dry Low NOx Combustor  
2.95x200 Air Cooled Generator (0.85 PF)

SITE CONDITIONS:	70% Case			50% Case		
	OIL 70%	OIL 70%	OIL 70%	OIL 50%	OIL 50%	OIL 50%
FUEL TYPE						
LOAD LEVEL						
NET FUEL HEATING VALUE, Btu/lbm (LHV)	18,586	18,586	18,586	18,586	18,586	18,586
GROSS FUEL HEATING VALUE, Btu/lbm (HHV)	19,845	19,845	19,845	19,845	19,845	19,845
AMBIENT TEMPERATURE, °F	95.0	59.0	32.0	95.0	59.0	32.0
AMBIENT RELATIVE HUMIDITY, %	80%	60%	30%	80%	60%	30%
COMPRESSOR INLET TEMPERATURE, °F	95.0	59.0	32.0	95.0	59.0	32.0
BAROMETRIC PRESSURE, psia	14.630	14.630	14.630	14.630	14.630	14.630
INJECTION FLUID	WATER	WATER	WATER	WATER	WATER	WATER
INJECTION RATIO, lb Water / lb Fuel	0.28	0.28	0.28	0.20	0.20	0.20
COMBUSTION TURBINE PERFORMANCE:						
GROSS POWER OUTPUT, kW	107,480	121,720	132,900	76,310	86,520	94,520
GROSS HEAT RATE, Btu/kWh (LHV)	10,720	10,200	9,880	12,155	11,510	11,155
GROSS HEAT RATE, Btu/kWh (HHV)	11,440	10,885	10,550	12,985	12,285	11,910
FUEL FLOW, lbm/hr	61,959	68,764	70,652	49,931	53,560	56,726
INJECTION RATE, lbm/hr	17,350	18,690	19,780	9,990	10,710	11,350
EXHAUST FLOW, lbm/hr	3,109,825	3,389,803	3,568,917	2,664,386	2,859,230	2,987,108
EXHAUST FLOW, ACPM	1,003,017	1,047,957	1,128,252	853,878	901,144	942,059
STACK EXIT VELOCITY (ft/sec)	65.7	68.6	73.9	55.9	59.0	61.7
STACK EXHAUST TEMPERATURE (F)	289.0	286.0	289.0	285.0	282.0	285.0
EXHAUST GAS COMPOSITION (BY % VOL):						
OXYGEN	13.63	14.33	14.44	14.10	14.73	14.79
CARBON DIOXIDE	3.87	3.97	4.01	3.71	3.76	3.83
WATER	9.01	5.86	4.89	8.47	5.16	4.42
NITROGEN	72.47	75.08	75.89	72.79	75.39	75.89
ARGON	0.91	0.94	0.95	0.91	0.95	0.95
MOLECULAR WEIGHT	28.40	28.76	28.85	28.43	28.80	28.89
NET EMISSIONS: Based on Westinghouse 21T5620 test methods						
NOx, ppmvd @ 15% O2	42	42	42	85	65	65
NOx, lbm/hr as NO2	205	215	234	272	299	313
CO, ppmvd	25	25	25	80	80	80
CO, ppmvd @ 15% O2	25	26	26	88	87	87
CO, lbm/hr	74	81	87	204	224	235
SO2, ppmvd	11	10	10	10	10	10
SO2, ppmvd @ 15% O2	11	10	10	11	11	11
SO2, lbm/hr	66	71	75	53	57	60
VOC, ppmvd as CH4	30	30	30	100	100	100
VOC, ppmvd @ 15% O2 as CH4	30	31	31	108	110	109
VOC, lbm/hr as CH4	51	55	60	147	161	169
PARTICULATES, lbm/hr	20.3	22.6	23.9	23.7	26.0	27.3

## NOTES:

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- Fuel oil composition is 86.139% C, 13.8% H, 0.05% S, 0.015% FBN, and 0.001% ash.
- Liquid fuel must be in compliance with the latest revision of the Westinghouse Liquid Fuel Spec (21T4424).
- Injection ratios may be adjusted during plant commissioning to meet emissions.
- Dry Low NOX injection ratios are estimated. Actual injection will be set at the minimum required to reach specified NOX levels.
- Particulates are per US EPA Method 5B (from half only) and do not include H2SO4 mist.
- Particulates for oil fuel are based on specific gravity and may vary depending on fuel.
- Part load is achieved by modulating the IGVs and is based on percentage unrestricted power output.

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**WESTINGHOUSE 501D5A**

SITE CONDITIONS:	CASE 1	CASE 2	CASE 3	CASE 4	CASE 5	CASE 6	CASE 7
FUEL TYPE	GAS	GAS	GAS	GAS	GAS	GAS	GAS
LOAD LEVEL	Peak-Paug	BASE	75%	50%	BASE	75%	50%
NET FUEL HEATING VALUE, Btu/lbm (LHV)	20,981	20,981	20,981	20,981	20,981	20,981	20,981
GROSS FUEL HEATING VALUE, Btu/lbm (HHV)	23,299	23,299	23,299	23,299	23,299	23,299	23,299
EVAPORATIVE COOLER STATUS/EFFICIENCY	85%	85%	OFF	OFF	OFF	OFF	OFF
AMBIENT TEMPERATURE, °F	95.0	95.0	95.0	95.0	20.0	20.0	20.0
AMBIENT RELATIVE HUMIDITY, %	60%	60%	60%	60%	60%	60%	60%
COMPRESSOR INLET TEMPERATURE, °F	84.6	84.6	95.0	95.0	20.0	20.0	20.0
BAROMETRIC PRESSURE, psia	14.696	14.696	14.696	14.696	14.696	14.696	14.696
INLET PRESSURE LOSS, inches of water (Total)	3.8	3.8	3.0	2.1	4.6	3.5	2.3
EXHAUST PRESSURE LOSS, inches of water (Total)	19.5	17.9	13.6	9.6	23.3	17.3	11.5
EXHAUST PRESSURE LOSS, inches of water (Static)	13.4	12.3	9.4	6.6	16.2	12.0	7.9
INJECTION FLUID	STEAM	-	-	-	-	-	-
INJECTION RATIO, lb Steam / lb Fuel	1.4	-	-	-	-	-	-
<b>COMBUSTION TURBINE PERFORMANCE:</b>							
GROSS POWER OUTPUT, kW	123,510	105,950	79,290	52,510	130,770	97,960	64,980
GROSS HEAT RATE, Btu/kWh (LHV)	9,880	10,355	11,190	13,270	9,845	10,305	11,970
GROSS HEAT RATE, Btu/kWh (HHV)	10,970	11,500	12,430	14,735	10,930	11,440	13,290
FUEL FLOW, lbm/hr	58,150	52,280	42,290	33,200	61,340	48,090	37,060
INJECTION RATE, lbm/hr	81,400	-	-	-	-	-	-
HEAT INPUT, mmBtu/hr (LHV)	1,220	1,097	887	697	1,287	1,009	778
HEAT INPUT, mmBtu/hr (HHV)	1,355	1,218	985	774	1,429	1,121	864
EXHAUST TEMPERATURE, °F	1,055	1,021	993	987	972	884	905
EXHAUST FLOW, lbm/hr	2,917,823	2,831,728	2,465,584	2,081,973	3,283,221	2,903,551	2,332,199
<b>EXHAUST GAS COMPOSITION (BY % VOL):</b>							
OXYGEN	12.05	13.33	13.88	14.34	13.87	14.66	14.93
CARBON DIOXIDE	3.32	3.12	2.91	2.70	3.20	2.84	2.72
WATER	14.27	9.82	9.03	8.62	6.59	5.87	5.63
NITROGEN	69.48	72.80	73.24	73.40	75.38	75.66	75.75
ARGON	0.87	0.91	0.92	0.92	0.95	0.95	0.95
MOLECULAR WEIGHT	27.70	28.17	28.24	28.26	28.53	28.58	28.59
<b>NET EMISSIONS: Based on Westinghouse 21T5620 test methods</b>							
NOx, ppmvd @ 15% O2	25	15	18	45	15	18	45
NOx, lbm/hr as NO2	126	68	66	128	79	75	143
CO, ppmvd	50	10	22	200	10	22	200
CO, ppmvd @ 15% O2	43	10	23	227	10	24	232
CO, lbm/hr	132	27	51	394	31	62	450
VOC, ppmvd as CH4	3	3	3	18	3	3	17
VOC, ppmvd @ 15% O2 as CH4	3	3	3	20	3	3	20
VOC, lbm/hr as CH4	4.5	4.5	4.0	20.2	5.4	4.8	21.9
PARTICULATES, lbm/hr	14.6	14.6	12.8	10.9	17.4	15.4	12.4
OPACITY	<= 10%	<= 10%	<= 10%	<= 10%	<= 10%	<= 10%	<= 10%

**NOTES:**

- Performance based on new and clean condition.
  - All data is expected and not guaranteed.
  - Gross power output is at the generator terminals.
  - Expected CT Performance values are dependent upon receiving test tolerances pursuant to the latest revision of SWPC EC- 93208.
  - Gas fuel composition is 98% CH<sub>4</sub>, 0.6% C<sub>2</sub>H<sub>6</sub>, 1.4% N<sub>2</sub>, and 0.2 grains of sulfur per 100 SCF.
  - Gas fuel must be in compliance with the latest revision of the Siemens Westinghouse Gas Fuel Spec (21T0306).
  - Liquid condensable fuels must be removed from the fuel lines.
  - VOC's are non methane, non ethane.
  - Particulates are per US EPA Method 5/202 (front and back half).
- 
- Actual IGV may vary. Part load performance will be adjusted accordingly.
  - Average temperature of the gas fuel is 280 °F. Sensible heat of the fuel is not included in the fuel heating values, heat input, or heat rate.
  - Injection is for power augmentation and not for NO<sub>x</sub> control.
  - Part load is achieved by modulating the IGVs and is based on percentage unrestricted power output.
  - Part load is achieved by lowering the firing temperature and is based on percentage unrestricted power output.

SITE CONDITIONS:	CASE 1	CASE 2	CASE 3	CASE 4	CASE 5	CASE 6
FUEL TYPE	OIL	OIL	OIL	OIL	OIL	OIL
LOAD LEVEL	BASE	75%	50%	BASE	75%	50%
NET FUEL HEATING VALUE, Btu/lbm (LHV)	18,450	18,450	18,450	18,450	18,450	18,450
GROSS FUEL HEATING VALUE, Btu/lbm (HHV)	19,680	19,680	19,680	19,680	19,680	19,680
EVAPORATIVE COOLER STATUS/EFFICIENCY	85%	OFF	OFF	OFF	OFF	OFF
AMBIENT TEMPERATURE, °F	95.0	95.0	95.0	20.0	20.0	20.0
AMBIENT RELATIVE HUMIDITY, %	60%	60%	60%	60%	60%	60%
COMPRESSOR INLET TEMPERATURE, °F	84.6	95.0	95.0	20.0	20.0	20.0
BAROMETRIC PRESSURE, psia	14.696	14.696	14.696	14.696	14.696	14.696
INLET PRESSURE LOSS, inches of water (Total)	3.8	3.5	2.4	4.6	4.2	2.7
EXHAUST PRESSURE LOSS, inches of water (Total)	18.1	15.1	10.4	23.5	19.3	12.7
EXHAUST PRESSURE LOSS, inches of water (Static)	12.4	10.4	7.2	16.2	13.5	8.8
INJECTION FLUID	WATER	WATER	WATER	WATER	WATER	WATER
INJECTION RATIO, lb Water / lb Fuel	0.4	0.3	0.2	0.4	0.3	0.2
<b>COMBUSTION TURBINE PERFORMANCE:</b>						
GROSS POWER OUTPUT, kW	107,060	80,070	53,030	131,760	98,640	65,440
GROSS HEAT RATE, Btu/kWh (LHV)	10,650	11,465	13,490	10,145	10,605	12,195
GROSS HEAT RATE, Btu/kWh (HHV)	11,380	12,230	14,385	10,825	11,310	13,010
FUEL FLOW, lbm/hr	61,770	49,740	38,760	72,440	56,690	43,250
INJECTION RATE, lbm/hr	24,710	15,920	7,750	28,980	18,140	8,650
HEAT INPUT, mmBtu/hr (LHV)	1,140	918	715	1,337	1,046	798
HEAT INPUT, mmBtu/hr (HHV)	1,216	979	763	1,426	1,116	851
EXHAUST TEMPERATURE, °F	1,023	935	936	975	831	841
EXHAUST FLOW, lbm/hr	2,865,385	2,668,437	2,218,996	3,322,700	3,150,143	2,532,546
<b>EXHAUST GAS COMPOSITION (BY % VOL):</b>						
OXYGEN	13.15	14.28	14.77	13.69	15.05	15.47
CARBON DIOXIDE	4.35	3.73	3.47	4.46	3.64	3.43
WATER	8.97	7.65	7.02	5.72	4.51	3.93
NITROGEN	72.80	73.40	73.80	75.17	75.82	76.20
ARGON	0.91	0.92	0.93	0.94	0.95	0.96
MOLECULAR WEIGHT	28.44	28.52	28.56	28.81	28.86	28.90
<b>NET EMISSIONS: Based on Westinghouse 21T5820 test methods</b>						
NO <sub>x</sub> , ppmvd @ 15% O <sub>2</sub>	42	42	65	42	42	65
NO <sub>x</sub> , lbm/hr as NO <sub>2</sub>	202	181	192	237	183	214
CO, ppmvd	30	65	1,000	30	65	1,000
CO, ppmvd @ 15% O <sub>2</sub>	27	71	1,177	28	75	1,229
CO, lbm/hr	80	164	2,112	95	198	2,462
VOC, ppmvd as CH <sub>4</sub>	11	28	55	11	26	53
VOC, ppmvd @ 15% O <sub>2</sub> as CH <sub>4</sub>	10	30	65	10	30	65
VOC, lbm/hr as CH <sub>4</sub>	16.9	40.4	66.4	20.0	45.3	74.6
PARTICULATES, lbm/hr	55.0	68.1	84.2	65.2	82.2	98.3
OPACITY	<= 20%	<= 20%	<= 50%	<= 20%	<= 20%	<= 50%

### NOTES:

- Performance based on new and clean condition.
- All data is expected and not guaranteed.
- Gross power output is at the generator terminals.
- Expected CT Performance values are dependent upon receiving test tolerances pursuant to the latest revision of SWPC EC- 93208.
- VOC's are non methane, non ethane.
- Particulates are per US EPA Method 5/202 (front and back half).
- Fuel oil composition is 86.434% C, 13.5% H, 0.05% S, 0.015% FBN, and 0.001% ash.
- Liquid fuel must be in compliance with the latest revision of the Siemens Westinghouse Liquid Fuel Spec (21T4424).
- Actual IGV may vary. Part load performance will be adjusted accordingly.
- Injection ratios may be adjusted during plant commissioning to meet emissions. Performance will be adjusted to the actual injection rate.
- Dry Low NO<sub>x</sub> Injection ratios are estimated. Actual injection will be set at the minimum required to reach specified NO<sub>x</sub> levels.
- Part load is achieved by modulating the IGVs and is based on percentage unrestricted power output.

**ABB GT-24**



GT-24 Units

Conditions	G100N20	G75N20	G60N20	G50N20	G100N16	G75N16	G60N16	G50N16	G100N37	G100E37	G100S37	G100C37	G75N37	G60N37	G50N37	G100E43	G100C43
Casename	Nat. Gas	Nat. Gas	Nat. Gas	Nat. Gas	Nat. Gas	Nat. Gas	Nat. Gas	Nat. Gas	Nat. Gas	Nat. Gas	Nat. Gas	Nat. Gas	Nat. Gas	Nat. Gas	Nat. Gas	Nat. Gas	Nat. Gas
Fuel Type	Nat. Gas	Nat. Gas	Nat. Gas	Nat. Gas	Nat. Gas	Nat. Gas	Nat. Gas	Nat. Gas	Nat. Gas	Nat. Gas	Nat. Gas	Nat. Gas	Nat. Gas	Nat. Gas	Nat. Gas	Nat. Gas	Nat. Gas
GT Load, %	100	75	60	50	100	75	60	50	100	100	100	100	75	60	50	100	100
Evaporative Cooler Status	OFF	OFF	OFF	OFF	OFF	OFF	OFF	OFF	OFF	ON	OFF	ON	OFF	OFF	OFF	ON	ON
Steam Injection	OFF	OFF	OFF	OFF	OFF	OFF	OFF	OFF	OFF	OFF	ON	ON	OFF	OFF	OFF	OFF	ON
Ambient Dry Bulb Temperature, F	-5	-5	-5	-5	60	60	60	60	98	98	98	98	98	98	98	109	109
Barometric Pressure, psia	14.61	14.61	14.61	14.61	14.61	14.61	14.61	14.61	14.61	14.61	14.61	14.61	14.61	14.61	14.61	14.61	14.61
Relative Humidity, %	60	60	60	60	60	60	60	60	35	35	35	35	35	35	35	35	35
<b>Unit Stack Emissions 2,3,4,5</b>																	
GT Exhaust Flow, klb/hr(each unit)	3341	2690	2409	2205	3044	2570	2301	2111	2850	2938	2930	3095	2461	2204	2028	2883	3039
Stack Temperature, F	199	182	179	176	194	184	181	179	194	198	193	192	187	184	182	205	200
NOx, lb/hr (Method 20)	68	54	44	41	61	49	40	38	57	59	60	65	45	37	35	59	65
NOx, ppmvd	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9
CO, lb/hr (Method 10)	23	54	149	277	21	50	136	252	19	20	20	22	46	126	234	20	22
CO, ppmvd	5	15	50	100	5	15	50	100	5	5	5	5	15	50	100	5	5
VOC as C3H8, lb/hr (Method 18 & 25a)	2.8	2.3	1.9	3	2.6	2.1	1.7	2.8	2.4	2.5	2.5	2.8	1.9	1.6	2.6	2.5	2.7
VOC as C3H8, ppmvd (Method 18 & 25a)	0.4	0.4	0.4	0.7	0.4	0.4	0.4	0.7	0.4	0.4	0.4	0.4	0.4	0.4	0.7	0.4	0.4
PM10, lb/hr (Method 5)	24	20	17	15	22	18	16	14	21	22	22	24	17	15	13	21	23
SO2, lb/hr (based on 0.14 grains S/100 scf)	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1
SO3, lb/hr (based on 0.14 grains S/100 scf)	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1
NH3 slip, ppmvd	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10
<b>Unit Stack Exhaust Gas Composition</b>																	
Mole fraction of N2 in exhaust	0.74667	0.74685	0.7481	0.74909	0.73942	0.74106	0.7423	0.74326	0.73177	0.72592	0.70106	0.66923	0.73403	0.7353	0.73616	0.71875	0.66213
Mole fraction of O2 in exhaust	0.11354	0.11406	0.1177	0.12043	0.11201	0.11669	0.1203	0.12302	0.11123	0.10855	0.10202	0.09207	0.11784	0.1213	0.12401	0.10674	0.09028
Mole fraction of H2O in exhaust	0.08618	0.08571	0.0825	0.08003	0.09525	0.09109	0.0879	0.08546	0.10443	0.11247	0.14424	0.18570	0.09860	0.0955	0.09314	0.12159	0.19472
Mole fraction of CO2 in exhaust	0.04468	0.04444	0.0428	0.04149	0.04447	0.04230	0.0406	0.03937	0.04382	0.04438	0.04430	0.04501	0.04075	0.0391	0.03789	0.04432	0.04495
Mole fraction of Ar in exhaust	0.00893	0.00893	0.0089	0.00896	0.00884	0.00886	0.0089	0.00889	0.00875	0.00868	0.00838	0.00800	0.00878	0.0088	0.00880	0.00859	0.00792

**APPENDIX C**  
**CONTROL SYSTEM VENDOR QUOTE**

Best Available Copy

**ENGELHARD**

101 WOOD AVENUE  
ISELIN, NJ 08830  
732-205-5000

POWER GENERATION SALES:  
ENGELHARD CORPORATION  
2205 CHEQUERS COURT  
BEL AIR, MD 21015  
PHONE 410-569-0297  
FAX 410-569-1841  
E-Mail Fred\_Booth@ENGELHARD.COM

ary 26, 1999

gent & Lundy  
N: Paula Scholl

Sargent and Lundy / Tampa Electric – Polk Station  
GE Fr7FA Simple Cycle Turbine  
Oxidation Catalyst Components  
High Temperature SCR Catalyst System Components  
Engelhard Budgetary Proposal EPB99318

r Ms Scholl,

provide Engelhard Budgetary Proposal EPB99318 for Engelhard Camet® CO Oxidation Catalyst System Components and rCAT ZNX™ High Temperature SCR Catalyst system components for the above project. This is per your FAXed request of uary 25, 1999.

Budgetary Proposal is based on:

Given data for GE 7EA Gas Turbine operating in simple cycle mode;  
Oxidation Catalysts for 90% CO reduction as noted;  
Catalysts for NOx reduction as noted with ammonia slip of 5 ppmvd@15%O<sub>2</sub>;  
Option 1: NOx reduction from 10.5 ppmvd @ 15% O<sub>2</sub> to 6 ppmvd @ 15% O<sub>2</sub>  
Option 2: NOx reduction from 10.5 ppmvd @ 15% O<sub>2</sub> to 3.5 ppmvd @ 15% O<sub>2</sub>  
Option 3: NOx reduction from 12 ppmvd @ 15% O<sub>2</sub> to 6 ppmvd @ 15% O<sub>2</sub>  
Option 4: NOx reduction from 12 ppmvd @ 15% O<sub>2</sub> to 3.5 ppmvd @ 15% O<sub>2</sub>

Delta P through SCR system - Nominal 3"WG;  
Assumed internally insulated ducts with cross sections at the catalysts as illustrated.  
Scope as noted. Please note that we have assumed horizontal gas flow through the CO / SCR reactor and the use of 28% aqueous ammonia. The system proposed requires the use of an ambient air cooling system to reduce the gas temperature to the SCR catalyst.  
Three (3) Year Performance Guarantee (expected life five to seven years).

request the opportunity to work with you on this project.

incerely yours,

IGELHARD CORPORATION



ederick A. Booth  
iles Engineer

: Nancy Ellison - Proposal Administrator

Sargent and Lundy / Tampa Electric - Polk  
 GE 7FA Simple Cycle Turbine  
 CAMEL™ CO Catalyst Systems  
 ZNX™ SCR Catalyst Systems  
 Engelhard Budgetary Proposal EPB99318  
 January 26, 1999

**ENGELHARD CORPORATION**  
**CAMEL™ CO CATALYST SYSTEM**  
**NOxCAT ZNX™ HIGH TEMPERATURE SCR NOx ABATEMENT CATALYST SYSTEM**

Engelhard Corporation ("Engelhard") offers to supply to Buyer the CAMEL™ metal substrate CO Catalyst System components and NOxCAT ZNX™ ceramic substrate SCR system components summarized herein.

**Scope of Supply**

- Engelhard CAMEL™ CO and NOxCAT ZNX™ SCR catalyst in modules;
- Internal support structures for catalyst modules (frames);
- Internally insulated reactor ductwork - with stainless steel liner sheets - to house CO catalyst modules, AIG, and SCR catalyst modules;
- Ammonia Injection Grid (AIG);
- AIG manifold with flow control valves ;
- H<sub>2</sub> Vaporization / Air dilution skid: 28% Aqueous Ammonia to skid;
- Ambient air cooling system components as required.

<b>SET PRICES:</b>	<b>Per Turbine-</b>	<b>Option 1</b>	<b>Option 2</b>	<b>Option 3</b>	<b>Option 4</b>
CO Catalyst System		\$ 885,000	\$1,075,000	\$ 960,000	\$1,100,000
Replacement CO Modules		\$ 700,000	\$ 850,000	\$ 780,000	\$ 900,000
SCR Catalyst System		\$2,400,000	\$3,400,000	\$2,600,000	\$3,500,000
Replacement ZNX Modules		\$1,000,000	\$1,800,000	\$1,200,000	\$2,000,000

**WARRANTY AND GUARANTEE:**

Mechanical Warranty: One year of operation\* or 1.5 years after catalyst delivery, whichever occurs first.  
 Performance Guarantee: Three (3) years of operation\* or 3.5 years after catalyst delivery, whichever occurs first. Catalyst warranty is prorated over the guaranteed life

**DOCUMENT / MATERIAL DELIVERY SCHEDULE**

- Drawings / Documentation - 6 - 8 weeks after notice to proceed and Engelhard receipt of all engineering specifications and details
- Operating manuals
- Material Delivery 20 - 24 weeks after approval and release for fabrication

**SYSTEM DESIGN BASIS:**

Flow from:	GE Fr7FA - with ambient air cooling
Flow:	Assumed Horizontal
:	Natural Gas
Flow Rate (At catalyst face):	See Performance data
Temperature (At catalyst face):	See Performance data
Concentration (At catalyst face):	See Performance data
Reduction:	90%
Concentration (At catalyst face):	See Performance data
Reduction:	See Performance data
Slip:	5 ppmvd@15%O <sub>2</sub>
Pressure Drop through SCR	Nom. 3"WG through ea. catalyst



Sargent and Lundy / Tampa Electric - Polk  
 GE 7FA Simple Cycle Turbine  
 CAMET® CO Catalyst Systems  
 ZNX™ SCR Catalyst Systems  
 Engelhard Budgetary Proposal EPB99318  
 January 26, 1999

### Performance Data

GIVEN / CALCULATED DATA		OPTION 1	OPTION 2	OPTION 3	OPTION 4
AMBIENT		90	90	90	90
LOAD		BASE	BASE	BASE	BASE
TURBINE EXHAUST TEMPERATURE, F		1,140	1,140	1,140	1,140
TURBINE EXHAUST FLOW, lb/hr		3,280,000	3,280,000	3,280,000	3,280,000
TURBINE EXHAUST GAS ANALYSIS, % VOL.	N2	74.19	74.19	74.19	74.19
	O2	12.47	12.47	12.47	12.47
	CO2	3.80	3.80	3.80	3.80
	H2O	8.65	8.65	8.65	8.65
	Ar	0.89	0.89	0.89	0.89
AMBIENT AIR FLOW, lb/hr		443,597	443,597	443,597	443,597
TOTAL FLOW - TURBINE EXHAUST + AMBIENT - lb/hr		3,723,597	3,723,597	3,723,597	3,723,597
AMBIENT + EXHAUST GAS ANALYSIS, % VOL.	N2	75.02	75.02	75.02	75.02
	O2	13.21	13.21	13.21	13.21
	CO2	3.35	3.35	3.35	3.35
	H2O	7.63	7.63	7.63	7.63
	Ar	0.79	0.79	0.79	0.79
CALCULATED AIR + GAS MOL. WT.		28.41	28.41	28.41	28.41
GIVEN: TURBINE CO, ppmvd @ 15% O2		15.0	15.0	15.0	15.0
CALC.: TURBINE CO, lb/hr		54.5	54.5	54.5	54.5
GIVEN: TURBINE NOx, ppmvd @ 15% O2		10.5	10.5	12.0	12.0
CALC.: TURBINE NOx, lb/hr		62.7	62.7	71.6	71.6
CALC.: CO, ppmvd@15%O2 - AT CATALYST FACE		14.4	14.4	14.4	14.4
CALC.: NOx, ppmvd@15%O2 - AT CATALYST FACE		10.1	10.1	11.5	11.5
AMBIENT + EXHAUST GAS TEMP. @ CATALYSTS, F		1,025	1,025	1,025	1,025
<b>DESIGN REQUIREMENTS</b>					
<u>CO CATALYST</u>	CO OUT, ppmvd@15%O2	1.4	1.4	1.4	1.4
<u>SCR CATALYST</u>	NOx OUT, ppmvd@15%O2	6.0	3.5	6.0	3.5
	NH3 SLIP, ppmvd@15%O2	5	5	5	5
	SCR PRESSURE DROP, "WG - Max.	3"	3"	3"	3"
<b>GUARANTEED PERFORMANCE DATA</b>					
<u>CO CATALYST</u>	CO CONVERSION - % Max.	90.0%	90.0%	90.0%	90.0%
	CO OUT, ppmvd@15%O2 - Max.	1.4	1.4	1.4	1.4
	CO OUT, lb/hr - Max.	5.5	5.5	5.5	5.5
	CO PRESSURE DROP, "WG - Max.	1.7	1.1	1.4	1.0
<u>SCR CATALYST</u>	NOx CONVERSION, % - Min.	42.9%	66.7%	50.0%	70.8%
	NOx OUT, lb/hr - Max.	35.8	20.9	35.8	20.9
	NOx OUT, ppmvd@15%O2 - Max.	5.8	3.4	5.8	3.4
EXPECTED AQUEOUS NH3 (28% SOL.) FLOW, lb/hr		77	96	88	108
	NH3 SLIP, ppmvd@15%O2 - Max.	5	5	5	5
	SCR PRESSURE DROP, "WG - Max.	3.0	3.0	3.0	3.0

Equipment supplied is installed by others in accordance with the Engelhard design and installation instructions.

Recommended Dimensions / Sketch:

Reactor Width  
 Reactor Height  
 Reactor Depth

Option 1  
 (A) 49'-3"  
 (B) 32'-3"  
 (C) 15'-0"

Reactor Width  
 Reactor Height  
 Reactor Depth

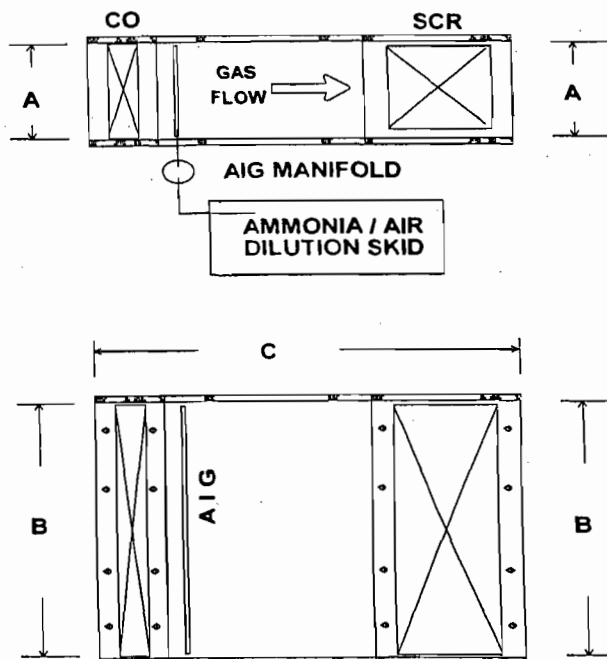
Option 2  
 (A) 54'-0"  
 (B) 38'-6"  
 (C) 15'-6"

Reactor Width  
 Reactor Height  
 Reactor Depth

Option 3  
 (A) 45'-0"  
 (B) 40'-0"  
 (C) 15'-0"

Reactor Width  
 Reactor Height  
 Reactor Depth

Option 4  
 (A) 57'-3"  
 (B) 38'-6"  
 (C) 16'-0"



Included from Scope of Supply:

- Ammonia storage and pumping
- Duct transitions to and from reactor
- Electrical grounding equipment
- Foundations
- Other items not specifically listed in Scope of Supply

- Any interconnecting field piping or wiring
- Utilities
- All Monitors

Item Description	Comments/Assumptions	Material or Equipment	Quantity	Units	Unit Price matl/equip	Total matl or equip Cost	Unit Labor Rate	Total Manhours	Crew Wage Rate	Total Labor Cost	Total Projected Cost
Ambient air fans	Provide 2 blowers and duct work on each side of the exhaust upstream of silencer to inject cool air.	Fans	2	Ea	25,000.00	\$50,000	100	200	41.00	\$8,200	\$58,200
Foundation for ambient air fans	Assume small support pedestals on 4' thick mat. Each mat plan area estimated at 100 sq. ft. Add 30% for pedestals.	Concrete	39	CY	70.17	\$2,700	1.885	73	19.57	\$1,400	\$4,100
		Reinforcing	3.4	TN	562.00	\$1,900	23.1	78	32.03	\$2,500	\$4,400
		Formwork	416	SF	2.18	\$900	0.185	77	26.92	\$2,100	\$3,000
		Piles	8	Ea	1,000.00	\$8,000	5.55	44	70.12	\$3,100	\$11,100
Ambient air cooling ductwork.	Assume 2 ducts 7' x 7' x 40' long. Use a ductwork weight of 20 psf.	Stiffened plate, A36 material	22.4	TN	1,600.00	\$35,800	20	448	65.96	\$29,600	\$65,400
		Support Steel	5.6	TN	1,600.00	\$9,000	20	112	65.96	\$7,400	\$16,400
	Insulation & Lagging	Mineral Wool	2,240	SF	17.04	\$38,200	0.146	327	37.00	\$12,100	\$50,300
Transition duct after silencer, before SCR.	Assume length of 35' and weight of 40 psf to include extensive turning vanes and lower material properties at high temperatures. Transitions from 25'W x 22'H to 63.5'W x 41.75'H	Stiffened plate	118	TN	1,600.00	\$189,200	25	2,957	65.96	\$195,000	\$384,200
		Support Steel	29.6	TN	1,600.00	\$47,300	25	739	65.96	\$48,800	\$96,100
	Insulation & Lagging	Mineral Wool	5,880	SF	17.04	\$100,200	0.146	858	37.00	\$31,800	\$132,000
SCR & CO Catalyst System	Assume that the reactor dimensions are as follows: 63.5'W x 41.75'H x 16"D.		1	Ea	See Vendor Quote		12,000	12,000	62.00	\$744,000	\$744,000

Item Description	Comments/Assumptions	Material or Equipment	Quantity	Units	Unit Price matl/equip	Total matl or equip Cost	Unit Labor Rate	Total Manhours	Crew Wage Rate	Total Labor Cost	Total Projected Cost
		Support Steel	40	TN	1,600.00	\$64,000	25	1,000	65.96	\$66,000	\$130,000
	Insulation & Lagging	Mineral Wool	3,368	SF	17.04	\$57,400	0.146	492	37.00	\$18,200	\$75,600
Transition duct after SCR, before stack.	Assume length of 40' and weight of 40 psf to include extensive turning vanes and lower material properties at high temperatures. Transitions from 63.5'W x 41.75'H to 18'W x 41.75'H	Stiffened plate	142	TN	1,600.00	\$227,700	25	3,558	65.96	\$234,700	\$462,400
		Support Steel	35.6	TN	1,600.00	\$56,900	25	890	65.96	\$58,700	\$115,600
	Insulation & Lagging	Mineral Wool	7,101	SF	17.04	\$121,000	0.146	1,037	37.00	\$38,400	\$159,400
Expansion joints	Ambient air ducts	Fabric	56	LF	120.00	\$6,700	2	112	62.00	\$6,900	\$13,600
	Between silencer & transition	Fabric	94	LF	120.00	\$11,300	2	188	62.00	\$11,700	\$23,000
	Between transition and stack	Fabric	120	LF	120.00	\$14,300	2	239	62.00	\$14,800	\$29,100
Galleries to access SCR	Platforms and stairs	Steel	3,000	SF	30.00	\$90,000	0.380	1,140	65.96	\$75,200	\$165,200
Foundation under transition ducts and SCR	Assume 4' thick mat, 91' long and 65' wide. Assumed volume includes allowance for small plers/pads for equipment and duct/SCR support on main mat.	Concrete	964	CY	70.17	\$67,600	1.885	1,817	19.57	\$35,600	\$103,200
		Reinforcing	83.4	TN	562.00	\$46,900	23.1	1,926	32.03	\$61,700	\$108,600
		Formwork	1,373	SF	2.18	\$3,000	0.185	254	26.92	\$6,800	\$9,800
		Piles	54	Ea	1,000.00	\$54,000	5.55	300	70.12	\$21,000	\$75,000
<b>Total Direct Costs</b>						<b>\$1,304,000</b>		<b>30,866</b>		<b>\$1,735,700</b>	<b>\$3,039,700</b>
Engineering Indirects	7% of total direct costs										\$212,800

**APPENDIX D**  
**EMISSION RATE CALCULATIONS**

**GENERAL ELECTRIC 7241FA**

**Table 1. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
CT Operating Scenarios - General Electric 7241FA CT**

Case	Ambient Temperature (oF)	Load (%)	CT-1	CT-2	CT-3	Natural Gas Firing	Fuel Oil Firing
1	20	100	X	X	X	X	X
2	20	75	X	X	X	X	X
3	20	50	X	X	X	X	X
4	59	100	X	X	X	X	X
5	59	75	X	X	X	X	X
6	59	50	X	X	X	X	X
7	90	100	X	X	X	X	X
8	90	75	X	X	X	X	X
9	90	50	X	X	X	X	X

Sources: GPP, 1999.  
ECT, 1999.

**General Electric 7241FA CT; Natural Gas-Firing  
CT Hourly Criteria and H<sub>2</sub>SO<sub>4</sub> Emission Rates (Per CT)**

Temp. (°F)	Case	Load (%)	PM/PM <sub>10</sub> <sup>1</sup>		SO <sub>2</sub> <sup>2</sup>		H <sub>2</sub> SO <sub>4</sub> <sup>3</sup>		Pb <sup>4</sup>	
			(lb/hr) <sup>5</sup>	(g/sec)	(lb/hr)	(g/sec)	(lb/hr)	(g/sec)	(lb/hr)	(g/sec)
20	1	100	9.9	1.25	9.8	1.24	1.1	0.14	9.24E-04	1.16E-04
	2	75	9.9	1.25	7.9	0.99	0.9	0.11	7.41E-04	9.34E-05
	3	50	9.9	1.25	6.3	0.79	0.7	0.09	5.92E-04	7.46E-05
59	4	100	9.9	1.25	9.2	1.16	1.1	0.13	8.65E-04	1.09E-04
	5	75	9.9	1.25	7.5	0.94	0.9	0.11	7.01E-04	8.83E-05
	6	50	9.9	1.25	6.0	0.75	0.7	0.09	5.62E-04	7.09E-05
90	7	100	9.9	1.25	8.5	1.07	1.0	0.12	7.96E-04	1.00E-04
	8	75	9.9	1.25	6.9	0.87	0.8	0.10	6.52E-04	8.21E-05
	9	50	9.9	1.25	5.6	0.71	0.6	0.08	5.26E-04	6.63E-05
<b>Maximums</b>			<b>9.9</b>	<b>1.25</b>	<b>9.8</b>	<b>1.24</b>	<b>1.1</b>	<b>0.14</b>	<b>9.24E-04</b>	<b>1.16E-04</b>

Temp. (°F)	Case	Load (%)	NO <sub>x</sub>			CO			VOC		
			(ppmvd) <sup>6</sup>	(lb/hr) <sup>5</sup>	(g/sec)	(ppmvd) <sup>6</sup>	(lb/hr) <sup>5</sup>	(g/sec)	(ppmvd) <sup>6</sup>	(lb/hr) <sup>5</sup>	(g/sec)
20	1	100	10.5	80.9	10.19	12.1	56.1	7.07	1.2	3.3	0.42
	2	75	10.5	64.2	8.09	12.2	45.1	5.68	1.2	2.6	0.33
	3	50	10.5	50.1	6.31	12.7	37.4	4.71	1.3	2.2	0.28
59	4	100	10.5	75.7	9.54	12.0	52.8	6.65	1.2	3.1	0.39
	5	75	10.5	60.3	7.60	12.2	42.9	5.41	1.2	2.4	0.30
	6	50	10.5	47.5	5.98	12.8	35.2	4.44	1.3	2.0	0.25
90	7	100	10.5	69.3	8.73	11.9	47.3	5.96	1.2	2.9	0.36
	8	75	10.5	56.5	7.11	12.1	39.6	4.99	1.3	2.4	0.30
	9	50	10.5	44.9	5.66	12.8	33.0	4.16	1.3	2.0	0.25
<b>Maximums</b>			<b>10.5</b>	<b>80.9</b>	<b>10.19</b>	<b>12.8</b>	<b>56.1</b>	<b>7.07</b>	<b>1.3</b>	<b>3.3</b>	<b>0.42</b>

<sup>1</sup> As measured by EPA Reference Method 5B or 17.

<sup>2</sup> Based on natural gas sulfur content of 2.0 gr/100 ft<sup>3</sup>.

<sup>3</sup> Based on 7.5% conversion of SO<sub>2</sub> to H<sub>2</sub>SO<sub>4</sub>.

<sup>4</sup> Table 1.4-2, AP-42, March 1998.

<sup>5</sup> Includes a 10% margin for variability in stack sampling.

<sup>6</sup> Corrected to 15% O<sub>2</sub>.

Sources: ECT, 1999.  
GE, 1999.



**General Electric 7241FA CT; Distillate Fuel Oil-Firing  
CT Hourly Criteria and H<sub>2</sub>SO<sub>4</sub> Emission Rates (Per CT)**

Temp. (°F)	Case	Load (%)	PM/PM <sub>10</sub> <sup>1</sup>		SO <sub>2</sub> <sup>2</sup>		H <sub>2</sub> SO <sub>4</sub> <sup>3</sup>		Pb <sup>4</sup>	
			(lb/hr) <sup>5</sup>	(g/sec)	(lb/hr)	(g/sec)	(lb/hr)	(g/sec)	(lb/hr)	(g/sec)
20	1	100	18.7	2.36	104.1	13.12	12.0	1.51	0.111	0.014
	2	75	18.7	2.36	84.5	10.64	9.7	1.22	0.090	0.011
	3	50	18.7	2.36	65.9	8.30	7.6	0.95	0.070	0.009
59	4	100	18.7	2.36	98.1	12.36	11.3	1.42	0.104	0.013
	5	75	18.7	2.36	79.7	10.05	9.2	1.15	0.085	0.011
	6	50	18.7	2.36	62.7	7.90	7.2	0.91	0.067	0.008
90	7	100	18.7	2.36	89.2	11.24	10.2	1.29	0.095	0.012
	8	75	18.7	2.36	73.1	9.20	8.4	1.06	0.078	0.010
	9	50	18.7	2.36	57.8	7.28	6.6	0.84	0.061	0.008
<b>Maximums</b>			<b>18.7</b>	<b>2.36</b>	<b>104.1</b>	<b>13.12</b>	<b>12.0</b>	<b>1.51</b>	<b>0.111</b>	<b>0.014</b>

Temp. (°F)	Case	Load (%)	NO <sub>x</sub>			CO			VOC		
			(ppmvd) <sup>6</sup>	(lb/hr) <sup>5</sup>	(g/sec)	(ppmvd) <sup>6</sup>	(lb/hr) <sup>5</sup>	(g/sec)	(ppmvd) <sup>6</sup>	(lb/hr) <sup>5</sup>	(g/sec)
20	1	100	42.0	371.8	46.85	23.1	124.3	15.66	2.7	8.3	1.04
	2	75	42.0	299.2	37.70	21.4	92.4	11.64	2.6	6.1	0.76
	3	50	42.0	231.0	29.11	23.4	78.1	9.84	2.8	5.5	0.69
59	4	100	42.0	350.9	44.21	23.0	116.6	14.69	2.7	7.7	0.97
	5	75	42.0	282.7	35.62	21.9	89.1	11.23	2.6	6.1	0.76
	6	50	42.0	220.0	27.72	24.2	77.0	9.70	2.9	5.0	0.62
90	7	100	42.0	319.0	40.19	23.0	106.7	13.44	2.8	7.2	0.90
	8	75	42.0	258.5	32.57	22.7	84.7	10.67	2.8	6.1	0.76
	9	50	42.0	202.4	25.50	25.2	73.7	9.29	3.0	5.0	0.62
<b>Maximums</b>			<b>42.0</b>	<b>371.8</b>	<b>46.85</b>	<b>25.2</b>	<b>124.3</b>	<b>15.66</b>	<b>3.0</b>	<b>8.3</b>	<b>1.04</b>

- <sup>1</sup> As measured by EPA Reference Method 5B or 17.
- <sup>2</sup> Based on fuel oil sulfur content of 0.05 wt percent.
- <sup>3</sup> Based on 7.5% conversion of SO<sub>2</sub> to H<sub>2</sub>SO<sub>4</sub>.
- <sup>4</sup> Table 3.1-4., AP-42, October 1996.
- <sup>5</sup> Includes a 10% margin for variability in stack sampling.
- <sup>6</sup> Corrected to 15% O<sub>2</sub>.

Sources: ECT, 1999.  
GE, 1999.

**General Electric 7241FA CT; Natural Gas-Firing  
CT Hourly Hazardous Air Pollutant Emission Rates (Per CT)**

**Best Available Copy**

Parameter	Units	Case		
		100% - 20 °F	100% - 59 °F	100% - 90 °F
Maximum Hourly Fuel Flow:	10 <sup>6</sup> ft <sup>3</sup> /hr	1.848	1.729	1.591
Maximum Annual Hours:		N/A	3,000	N/A

Pollutant	Emission Factor <sup>1</sup> (lb/10 <sup>6</sup> ft <sup>3</sup> )	Emission Rates			
		20 °F	59 °F	90 °F	Annual
		(lb/hr)	(lb/hr)	(lb/hr)	(ton/yr)
Arsenic	2.00E-04	3.70E-04	3.46E-04	3.18E-04	5.19E-04
Benzene	2.10E-03	3.88E-03	3.63E-03	3.34E-03	5.45E-03
Beryllium	1.20E-05	2.22E-05	2.07E-05	1.91E-05	3.11E-05
Cadmium	1.10E-03	2.03E-03	1.90E-03	1.75E-03	2.85E-03
Chromium	1.40E-03	2.59E-03	2.42E-03	2.23E-03	3.63E-03
Cobalt	8.40E-05	1.55E-04	1.45E-04	1.34E-04	2.18E-04
Dichlorobenzene	1.20E-03	2.22E-03	2.07E-03	1.91E-03	3.11E-03
Formaldehyde	7.50E-02	1.39E-01	1.30E-01	1.19E-01	1.95E-01
Lead	5.00E-04	9.24E-04	8.65E-04	7.96E-04	1.30E-03
Manganese	3.80E-04	7.02E-04	6.57E-04	6.05E-04	9.86E-04
Mercury	2.60E-04	4.81E-04	4.50E-04	4.14E-04	6.74E-04
Naphthalene	6.10E-04	1.13E-03	1.05E-03	9.71E-04	1.58E-03
Nickel	2.10E-03	3.88E-03	3.63E-03	3.34E-03	5.45E-03
Polycyclic Organic Matter	8.82E-05	1.63E-04	1.53E-04	1.40E-04	2.29E-04
Selenium	2.40E-05	4.44E-05	4.15E-05	3.82E-05	6.22E-05
Toluene	3.40E-03	6.28E-03	5.88E-03	5.41E-03	8.82E-03

<sup>1</sup> Section 1.4, Natural Gas Combustion, Tables 1.4-2., 1.4-3 and 1.4-4, EPA AP-42, March 1998.

Source: ECT, 1999.

**Table 5. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
General Electric 7241FA CT; Distillate Fuel Oil-Firing  
CT Hourly Hazardous Air Pollutant Emission Rates (Per CT)**

Parameter	Units	Case		
		100% - 20 °F	100% - 59 °F	100% - 90 °F
Maximum Hourly Fuel Flow:	10 <sup>6</sup> Btu/hr	1,905.4	1,795.2	1,632.6
Maximum Annual Hours:		N/A	500	N/A

Pollutant	Emission Factor <sup>1</sup> (lb/10 <sup>6</sup> Btu)	Emission Rates			
		20 °F	59 °F	90 °F	Annual
		(lb/hr)	(lb/hr)	(lb/hr)	(ton/yr)
Antimony	2.20E-05	4.19E-02	3.95E-02	3.59E-02	9.87E-03
Arsenic	4.90E-06	9.34E-03	8.80E-03	8.00E-03	2.20E-03
Beryllium	3.30E-07	6.29E-04	5.92E-04	5.39E-04	1.48E-04
Cadmium	4.20E-06	8.00E-03	7.54E-03	6.86E-03	1.88E-03
Chromium	4.70E-05	8.96E-02	8.44E-02	7.67E-02	2.11E-02
Cobalt	9.10E-06	1.73E-02	1.63E-02	1.49E-02	4.08E-03
Lead	5.80E-05	1.11E-01	1.04E-01	9.47E-02	2.60E-02
Manganese	3.40E-04	6.48E-01	6.10E-01	5.55E-01	1.53E-01
Mercury	9.10E-07	1.73E-03	1.63E-03	1.49E-03	4.08E-04
Nickel	1.20E-03	2.29E+00	2.15E+00	1.96E+00	5.39E-01
Phosphorus	3.00E-04	5.72E-01	5.39E-01	4.90E-01	1.35E-01
Selenium	5.30E-06	1.01E-02	9.51E-03	8.65E-03	2.38E-03

<sup>1</sup> Section 3.1, Stationary Gas Turbines, Table 3.1-4, EPA AP-42, October 1996.

Source: ECT, 1999.

**Table 6. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
General Electric 7241FA CTs  
CT Annual Emission Rates - Criteria Pollutants**

Source	Case	No. of CTs	Annual Operations (hrs/yr/CT)	Emission Rates					
				NO <sub>x</sub>		CO		VOC	
				(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)
CT 1-3	4 - NG	3	2,500	227.2	283.9	158.4	198.0	9.2	11.6
CT 1-3	4 - Oil	3	500	1,052.7	263.2	349.8	87.5	23.1	5.8
			<b>Totals</b>	<b>N/A</b>	<b>547.1</b>	<b>N/A</b>	<b>285.5</b>	<b>N/A</b>	<b>17.3</b>

Source	Case	No. of CTs	Annual Operations (hrs/yr/CT)	Emission Rates					
				PM/PM <sub>10</sub>		SO <sub>2</sub>		Pb	
				(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)
CT 1-3	4 - NG	3	2,500	29.7	37.1	27.6	34.5	0.003	0.003
CT 1-3	4 - Oil	3	500	56.1	14.0	294.3	73.6	0.31	0.08
			<b>Totals</b>	<b>N/A</b>	<b>51.2</b>	<b>N/A</b>	<b>108.1</b>	<b>N/A</b>	<b>0.08</b>

1. CT-1, CT-2, and CT-3 operating with natural gas-firing at base load for 2,500 hours/year (Case 4).
2. CT-1, CT-2, and CT-3 operating with fuel oil-firing at base load for 500 hours/year at base load (Case 4).
3. SO<sub>2</sub> and H<sub>2</sub>SO<sub>4</sub> rates based on natural gas sulfur content of 2.0 gr/100 ft<sup>3</sup> and 7.5% conversion of SO<sub>2</sub> to H<sub>2</sub>SO<sub>4</sub>.
4. SO<sub>2</sub> and H<sub>2</sub>SO<sub>4</sub> rates based on fuel oil sulfur content of 0.05 wt. percent and 7.5% conversion of SO<sub>2</sub> to H<sub>2</sub>SO<sub>4</sub>.

Sources: ECT, 1999.  
GE, 1999.  
GPP, 1999.

**Table 7. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
General Electric 7241FA CTs  
CT Annual Emission Rates - Hazardous Air Pollutants**

Pollutant	Annual Emissions (ton/yr)
Antimony	9.87E-03
Arsenic	2.72E-03
Benzene	5.45E-03
Beryllium	1.79E-04
Cadmium	4.74E-03
Chromium	2.47E-02
Cobalt	4.30E-03
Dichlorobenzene	3.11E-03
Formaldehyde	1.95E-01
Lead	2.73E-02
Manganese	1.54E-01
Mercury	1.08E-03
Naphthalene	1.58E-03
Nickel	5.44E-01
Phosphorus	1.35E-01
Polycyclic Organic Matter	2.29E-04
Selenium	2.44E-03
Toluene	8.82E-03
Total HAPS	1.12

Source: ECT, 1999.

**Table 8. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
General Electric 7241FA CT  
NSPS GG NO<sub>x</sub> Limits**

Fuel	7241FA Gas Turbine ISO Heat Rate (LHV)		F	NO <sub>x</sub> Std (ppmvd)
	(Btu/kw-hr)	(kj/w-hr)		
Gas	9,370	9.886	0.0	109.2
Distillate	10,040	10.593	0.0	102.0

Sources: ECT, 1999.  
GE, 1998.

**Table 9.A. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
CT Exhaust Data - General Electric 7241FA CT (Per CT)  
Natural Gas-Firing**

**A. Exhaust Molecular Weight (MW)**

		Exhaust Gas Composition - Volume %								
Component	MW (lb/mole) Case	100 % Load			75 % Load			50 % Load		
		20 °F 1	59 °F 4	90 °F 7	20 °F 2	59 °F 5	90 °F 8	20 °F 3	59 °F 6	90 °F 9
Ar	39.944	0.90	0.89	0.87	0.91	0.88	0.87	0.90	0.89	0.86
N <sub>2</sub>	28.013	75.06	74.38	72.32	75.07	74.43	72.37	75.18	74.54	72.50
O <sub>2</sub>	31.999	12.56	12.38	11.96	12.59	12.52	12.10	12.90	12.85	12.48
CO <sub>2</sub>	44.010	3.87	3.87	3.80	3.85	3.80	3.73	3.71	3.65	3.56
H <sub>2</sub> O	18.015	7.61	8.49	11.06	7.59	8.37	10.93	7.31	8.07	10.60
SO <sub>2</sub>	64.063	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
CO	28.010	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HC (CH <sub>4</sub> )	16.043	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NO	30.006	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Totals		100.00	100.01	100.01	100.01	100.00	100.00	100.00	100.00	100.00
Exhaust MW (lb/mole)		28.48	28.39	28.10	28.48	28.39	28.10	28.50	28.41	28.12
Exhaust Flow (lb/sec)		1,048.89	977.22	906.39	836.11	798.33	748.61	686.94	662.22	628.33
Exhaust Temp. (°F)		1,081	1,117	1,141	1,111	1,139	1,166	1,160	1,184	1,200
(K)		856	876	889	873	888	903	900	913	922
Exhaust O <sub>2</sub> (Vol %, Dry)		13.59	13.53	13.45	13.62	13.66	13.58	13.92	13.98	13.96

Sources: ECT, 1999.  
GE, 1998.

**Table 9.B. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
CT Exhaust Data - General Electric 7241FA CT (Per CT)  
Natural Gas-Firing**

**B. Exhaust Flow Rates**

	Flow Rates (ft <sup>3</sup> /min)								
	100 % Load			75 % Load			50 % Load		
	20 °F	59 °F	90 °F	20 °F	59 °F	90 °F	20 °F	59 °F	90 °F
Case	1	4	7	2	5	8	3	6	9
ACFM	2,484,905	2,377,044	2,261,182	2,019,122	1,968,831	1,896,425	1,709,803	1,677,915	1,623,873
Velocity (fps)	162.8	155.7	148.1	132.2	129.0	124.2	112.0	109.9	106.4
Velocity (m/s)	49.6	47.5	45.1	40.3	39.3	37.9	34.1	33.5	32.4
SCFM, Dry <sup>1</sup>	786,605	728,296	663,247	627,104	595,705	548,505	516,533	495,404	461,759
ACFM (15% O <sub>2</sub> , Dry)	2,842,518	2,717,722	2,540,365	2,301,008	2,212,655	2,094,306	1,875,628	1,809,694	1,707,709

<sup>1</sup> At 68 °F.

Sources: ECT, 1999.  
GE, 1998.



**Table 9.C. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
CT Exhaust Data - General Electric 7241FA CT (Per CT)  
Natural Gas-Firing**

**C. Correction of GE CO and VOC Concentrations to 15% O<sub>2</sub>, dry**

Case	Flow Rates (ft <sup>3</sup> /min)								
	100 % Load			75 % Load			50 % Load		
	20 °F	59 °F	90 °F	20 °F	59 °F	90 °F	20 °F	59 °F	90 °F
	1	4	7	2	5	8	3	6	9
CO (ppmvd)	15.0	15.0	15.0	15.0	15.0	15.0	15.0	15.0	15.0
CO (15% O <sub>2</sub> )	12.1	12.0	11.9	12.2	12.2	12.1	12.7	12.8	12.8
VOC (ppmww)	1.4	1.4	1.4	1.4	1.4	1.4	1.4	1.4	1.4
VOC (ppmvd)	1.5	1.5	1.6	1.5	1.5	1.6	1.5	1.5	1.6
VOC (15% O <sub>2</sub> )	1.2	1.2	1.2	1.2	1.2	1.3	1.3	1.3	1.3

Sources: ECT, 1999.  
GE, 1999.

**Table 10.A. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
CT Exhaust Data - General Electric 7241FA CT (Per CT)  
Distillate Fuel Oil-Firing**

**A. Exhaust Molecular Weight (MW)**

		Exhaust Gas Composition - Volume %								
Component	MW (lb/mole) Case	100 % Load			75 % Load			50 % Load		
		20 °F 1	59 °F 4	90 °F 7	20 °F 2	59 °F 5	90 °F 8	20 °F 3	59 °F 6	90 °F 9
Ar	39.944	0.87	0.85	0.85	0.85	0.86	0.85	0.87	0.87	0.85
N <sub>2</sub>	28.013	71.82	71.31	70.02	71.53	71.26	70.24	72.47	72.21	71.08
O <sub>2</sub>	31.999	11.17	11.04	10.85	10.49	10.63	10.77	11.37	11.59	11.69
CO <sub>2</sub>	44.010	5.61	5.61	5.50	6.02	5.88	5.59	5.60	5.40	5.12
H <sub>2</sub> O	18.015	10.54	11.19	12.79	11.11	11.37	12.56	9.70	9.94	11.27
SO <sub>2</sub>	64.063	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
CO	28.010	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HC (CH <sub>4</sub> )	16.043	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NO	30.006	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Totals	100.01	100.00	100.01	100.00	100.00	100.01	100.01	100.01	100.01
Exhaust MW (lb/mole)		28.41	28.33	28.15	28.39	28.34	28.19	28.50	28.45	28.28
Exhaust Flow (lb/sec)		1,081.67	1,017.22	937.50	808.61	781.11	748.06	675.00	665.28	643.33
Exhaust Temp. (°F)		1,067	1,098	1,130	1,184	1,195	1,200	1,200	1,200	1,200
(K)		848	865	883	913	919	922	922	922	922
Exhaust O <sub>2</sub> (Vol %, Dry)		12.49	12.43	12.44	11.80	11.99	12.32	12.59	12.87	13.17

Sources: ECT, 1999.  
GE, 1998.

**Table 10.B. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
CT Exhaust Data - General Electric 7241FA CT (Per CT)  
Distillate Fuel Oil-Firing**

**B. Exhaust Flow Rates**

	Flow Rates (ft <sup>3</sup> /min)								
	100 % Load			75 % Load			50 % Load		
	20 °F	59 °F	90 °F	20 °F	59 °F	90 °F	20 °F	59 °F	90 °F
Case	1	4	7	2	5	8	3	6	9
ACFM	2,545,637	2,449,067	2,318,407	2,050,538	1,996,983	1,929,016	1,721,459	1,699,480	1,653,661
Velocity (fps)	166.7	160.4	151.8	134.3	130.8	126.3	112.7	111.3	108.3
Velocity (m/s)	50.8	48.9	46.3	40.9	39.9	38.5	34.4	33.9	33.0
SCFM, Dry'	787,445	737,105	671,418	585,400	564,665	536,503	494,436	486,826	466,705
ACFM (15% O <sub>2</sub> , Dry)	3,247,689	3,122,059	2,898,752	2,810,978	2,671,783	2,453,761	2,189,083	2,083,315	1,921,209

Sources: ECT, 1999.  
GE, 1998.

**Table 10.B. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
CT Exhaust Data - General Electric 7241FA CT (Per CT)  
Distillate Fuel Oil-Firing**

**B. Exhaust Flow Rates**

	Flow Rates (ft <sup>3</sup> /min)								
	100 % Load			75 % Load			50 % Load		
	20 °F	59 °F	90 °F	20 °F	59 °F	90 °F	20 °F	59 °F	90 °F
Case	1	4	7	2	5	8	3	6	9
ACFM	2,545,637	2,449,067	2,318,407	2,050,538	1,996,983	1,929,016	1,721,459	1,699,480	1,653,661
Velocity (fps)	166.7	160.4	151.8	134.3	130.8	126.3	112.7	111.3	108.3
Velocity (m/s)	50.8	48.9	46.3	40.9	39.9	38.5	34.4	33.9	33.0
SCFM, Dry'	787,445	737,105	671,418	585,400	564,665	536,503	494,436	486,826	466,705
ACFM (15% O <sub>2</sub> , Dry)	3,247,689	3,122,059	2,898,752	2,810,978	2,671,783	2,453,761	2,189,083	2,083,315	1,921,209

Sources: ECT, 1999.  
GE, 1998.

**Table 10.C. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
CT Exhaust Data - General Electric 7241FA CT (Per CT)  
Distillate Fuel Oil-Firing**

**C. Correction of GE CO and VOC Concentrations to 15% O<sub>2</sub>, dry**

Case	Flow Rates (ft <sup>3</sup> /min)								
	100 % Load			75 % Load			50 % Load		
	20 °F	59 °F	90 °F	20 °F	59 °F	90 °F	20 °F	59 °F	90 °F
	1	4	7	2	5	8	3	6	9
CO (ppmvd)	33.0	33.0	33.0	33.0	33.0	33.0	33.0	33.0	33.0
CO (15% O <sub>2</sub> )	23.1	23.0	23.0	21.4	21.9	22.7	23.4	24.2	25.2
VOC (ppmvw)	3.5	3.5	3.5	3.5	3.5	3.5	3.5	3.5	3.5
VOC (ppmvd)	3.9	3.9	4.0	3.9	3.9	4.0	3.9	3.9	3.9
VOC (15% O <sub>2</sub> )	2.7	2.7	2.8	2.6	2.6	2.8	2.8	2.9	3.0

Sources: ECT, 1999.  
GE, 1999.

**Table 11. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
CT Fuel Flow Rate Data - General Electric PG7241FA (Per CT)**

**A. Natural Gas-Firing**

Case	100 % Load			75 % Load			50 % Load		
	20 °F	59 °F	90 °F	20 °F	59 °F	90 °F	20 °F	59 °F	90 °F
	1	4	7	2	5	8	3	6	9
Heat Input - LHV (MMBtu/hr)	1,706	1,596	1,469	1,368	1,294	1,203	1,092	1,038	971
Fuel Rate (lb/hr)	81,662	76,400	70,320	65,503	61,936	57,608	52,289	49,708	46,486
Fuel Rate (10 <sup>6</sup> ft <sup>3</sup> /hr)	1.848	1.729	1.591	1.482	1.402	1.304	1.183	1.125	1.052
Fuel Rate (lb/sec)	22.684	21.222	19.533	18.195	17.205	16.002	14.525	13.808	12.913

**B. Distillate Fuel Oil-Firing**

Case	100 % Load			75 % Load			50 % Load		
	20 °F	59 °F	90 °F	20 °F	59 °F	90 °F	20 °F	59 °F	90 °F
	1	4	7	2	5	8	3	6	9
Heat Input - LHV (MMBtu/hr)	1,905	1,795	1,633	1,546	1,459	1,337	1,206	1,148	1,058
Fuel Rate (lb/hr)	104,120	98,098	89,213	84,481	79,727	73,055	65,874	62,727	57,809
Fuel Rate (10 <sup>3</sup> gal/hr)	14.243	13.419	12.204	11.557	10.906	9.993	9.011	8.581	7.908
Fuel Rate (lb/sec)	28.922	27.250	24.781	23.467	22.146	20.293	18.298	17.424	16.058

Sources: ECT, 1999.  
GE, 1998.

**WESTINGHOUSE 501F**

**Table 1. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
CT Operating Scenarios - Westinghouse 501F CT**

Case	Ambient Temperature (oF)	Load (%)	CT-1	CT-2	CT-3	Natural Gas Firing	Fuel Oil Firing
1	32	100	X	X	X	X	X
2	32	70	X	X	X	X	X
3	32	50	X	X	X	X	
4	59	100	X	X	X	X	X
5	59	70	X	X	X	X	X
6	59	50	X	X	X	X	
7	95	100	X	X	X	X	X
8	95	70	X	X	X	X	X
9	95	50	X	X	X	X	

Sources: GPP, 1999.  
ECT, 1999.



Table 2: Hardee County Generating Facility,  
Westinghouse 501F CT; Natural Gas-Firing  
CT Hourly Criteria and H<sub>2</sub>SO<sub>4</sub> Emission Rates (Per CT)

Temp. (°F)	Case	Load (%)	PM/PM <sub>10</sub> <sup>1</sup>		SO <sub>2</sub> <sup>2</sup>		H <sub>2</sub> SO <sub>4</sub> <sup>3</sup>		Pb <sup>4</sup>	
			(lb/hr) <sup>5</sup>	(g/sec)	(lb/hr)	(g/sec)	(lb/hr)	(g/sec)	(lb/hr)	(g/sec)
32	1	100	9.5	1.19	9.9	1.25	1.1	0.144	9.57E-04	1.21E-04
	2	70	9.5	1.19	7.6	0.96	0.9	0.110	7.34E-04	9.24E-05
	3	50	9.5	1.19	5.9	0.75	0.7	0.086	5.70E-04	7.19E-05
59	4	100	9.5	1.19	9.3	1.17	1.1	0.135	8.96E-04	1.13E-04
	5	70	9.5	1.19	7.2	0.91	0.8	0.104	6.95E-04	8.75E-05
	6	50	9.5	1.19	5.6	0.71	0.6	0.081	5.42E-04	6.83E-05
95	7	100	9.5	1.19	8.5	1.08	1.0	0.124	8.22E-04	1.04E-04
	8	70	9.5	1.19	6.7	0.84	0.8	0.096	6.42E-04	8.09E-05
	9	50	9.5	1.19	5.3	0.66	0.6	0.076	5.07E-04	6.39E-05
<b>Maximums</b>			<b>9.5</b>	<b>1.19</b>	<b>9.9</b>	<b>1.25</b>	<b>1.14</b>	<b>0.144</b>	<b>9.57E-04</b>	<b>1.21E-04</b>

Temp. (°F)	Case	Load (%)	NO <sub>x</sub>			CO			VOC <sup>7</sup>		
			(ppmvd) <sup>6</sup>	(lb/hr) <sup>5</sup>	(g/sec)	(ppmvd) <sup>6</sup>	(lb/hr) <sup>5</sup>	(g/sec)	(ppmvd) <sup>6</sup>	(lb/hr) <sup>5</sup>	(g/sec)
32	1	100	15	125.1	15.77	16	80.3	10.12	3.0	8.8	1.11
	2	70	15	94.9	11.95	16	61.6	7.76	3.0	6.6	0.83
	3	50	15	74.3	9.36	82	245.3	30.91	20.0	34.1	4.30
59	4	100	15	116.9	14.73	16	75.9	9.56	3.0	8.8	1.11
	5	70	15	89.4	11.26	16	58.3	7.35	3.0	6.6	0.83
	6	50	15	70.1	8.84	83	234.3	29.52	20.0	33.0	4.16
95	7	100	15	107.3	13.51	16	68.2	8.59	3.0	7.7	0.97
	8	70	15	82.5	10.40	16	55.0	6.93	3.0	6.6	0.83
	9	50	15	64.6	8.14	82	217.8	27.44	20.0	29.7	3.74
<b>Maximums</b>			<b>15</b>	<b>125.1</b>	<b>15.77</b>	<b>83</b>	<b>245.3</b>	<b>30.91</b>	<b>20.0</b>	<b>34.1</b>	<b>4.30</b>

<sup>1</sup> As measured by EPA Reference Method 5B or 17.

<sup>2</sup> Based on natural gas sulfur content of 2.0 gr/100 ft<sup>3</sup>.

<sup>3</sup> Based on 7.5% conversion of SO<sub>2</sub> to H<sub>2</sub>SO<sub>4</sub>.

<sup>4</sup> Table 1.4-2, AP-42, March 1998.

<sup>5</sup> Includes a 10% margin for variability in stack sampling.

<sup>6</sup> Corrected to 15% O<sub>2</sub>.

<sup>7</sup> Non-methane, non-ethane hydrocarbons (NMHC) expressed as methane.

Sources: ECT, 1998.

Westinghouse, 1998.

**Table 3. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
Westinghouse 501F CT; Distillate Fuel Oil-Firing  
CT Hourly Criteria and H<sub>2</sub>SO<sub>4</sub> Emission Rates (Per CT)**

Temp. (°F)	Case	Load (%)	PM/PM <sub>10</sub> <sup>1</sup>		SO <sub>2</sub> <sup>2</sup>		H <sub>2</sub> SO <sub>4</sub> <sup>3</sup>		Pb <sup>4</sup>	
			(lb/hr) <sup>5</sup>	(g/sec)	(lb/hr)	(g/sec)	(lb/hr)	(g/sec)	(lb/hr)	(g/sec)
32	1	100	21.0	2.65	95.2	11.99	10.9	1.38	0.103	0.013
	2	70	26.3	3.31	70.7	8.90	8.1	1.02	0.078	0.010
	3	50								
59	4	100	19.8	2.49	89.1	11.23	10.2	1.29	0.096	0.012
	5	70	24.9	3.13	66.8	8.41	7.7	0.97	0.072	0.009
	6	50								
95	7	100	17.7	2.23	81.7	10.29	9.4	1.18	0.088	0.011
	8	70	22.3	2.81	62.0	7.81	7.1	0.90	0.067	0.008
	9	50								
<b>Maximums</b>			<b>26.3</b>	<b>3.31</b>	<b>95.2</b>	<b>11.99</b>	<b>10.9</b>	<b>1.38</b>	<b>0.103</b>	<b>0.013</b>

Temp. (°F)	Case	Load (%)	NO <sub>x</sub>			CO			VOC <sup>7</sup>		
			(ppmv) <sup>6</sup>	(lb/hr) <sup>5</sup>	(g/sec)	(ppmv) <sup>6</sup>	(lb/hr) <sup>5</sup>	(g/sec)	(ppmv) <sup>6</sup>	(lb/hr) <sup>5</sup>	(g/sec)
32	1	100	42	352.0	44.35	20	101.2	12.75	10.0	29.7	3.74
	2	70	42	257.4	32.43	26	95.7	12.06	31.0	66.0	8.32
	3	50									
59	4	100	42	328.9	41.44	20	95.7	12.06	10.0	28.6	3.60
	5	70	42	236.5	29.80	26	89.1	11.23	31.0	60.5	7.62
	6	50									
95	7	100	42	302.5	38.12	20	85.8	10.81	10.0	25.3	3.19
	8	70	42	225.5	28.41	25	81.4	10.28	30.0	56.1	7.07
	9	50									
<b>Maximums</b>			<b>42</b>	<b>352.0</b>	<b>44.35</b>	<b>26</b>	<b>101.2</b>	<b>12.75</b>	<b>31.0</b>	<b>66.0</b>	<b>8.32</b>

<sup>1</sup> As measured by EPA Reference Method 5B or 17.

<sup>2</sup> Based on fuel oil sulfur content of 0.05 wt percent.

<sup>3</sup> Based on 7.5% conversion of SO<sub>2</sub> to H<sub>2</sub>SO<sub>4</sub>.

<sup>4</sup> Table 3.1-4., AP-42, October 1996.

<sup>5</sup> Includes a 10% margin for variability in stack sampling.

<sup>6</sup> Corrected to 15% O<sub>2</sub>.

<sup>7</sup> Non-methane, non-ethane hydrocarbons (NMHC) expressed as methane.

Sources: ECT, 1998.

Westinghouse, 1998.

**Table 4. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
Westinghouse 501F CT; Natural Gas-Firing  
CT Hourly Hazardous Air Pollutant Emission Rates (Per CT)**

Parameter	Units	Case		
		100% - 32 °F	100% - 59 °F	100% - 95 °F
Maximum Hourly Fuel Flow:	10 <sup>6</sup> ft <sup>3</sup> /hr	1.914	1.791	1.645
Maximum Annual Hours:		N/A	3,000	N/A

Pollutant	Emission Factor <sup>1</sup> (lb/10 <sup>6</sup> ft <sup>3</sup> )	Emission Rates			
		32 °F	59 °F	95 °F	Annual
		(lb/hr)	(lb/hr)	(lb/hr)	(ton/yr)
Arsenic	2.00E-04	3.83E-04	3.58E-04	3.29E-04	5.37E-04
Benzene	2.10E-03	4.02E-03	3.76E-03	3.45E-03	5.64E-03
Beryllium	1.20E-05	2.30E-05	2.15E-05	1.97E-05	3.22E-05
Cadmium	1.10E-03	2.11E-03	1.97E-03	1.81E-03	2.96E-03
Chromium	1.40E-03	2.68E-03	2.51E-03	2.30E-03	3.76E-03
Cobalt	8.40E-05	1.61E-04	1.50E-04	1.38E-04	2.26E-04
Dichlorobenzene	1.20E-03	2.30E-03	2.15E-03	1.97E-03	3.22E-03
Formaldehyde	7.50E-02	1.44E-01	1.34E-01	1.23E-01	2.02E-01
Lead	5.00E-04	9.57E-04	8.96E-04	8.22E-04	1.34E-03
Manganese	3.80E-04	7.27E-04	6.81E-04	6.25E-04	1.02E-03
Mercury	2.60E-04	4.98E-04	4.66E-04	4.28E-04	6.99E-04
Naphthalene	6.10E-04	1.17E-03	1.09E-03	1.00E-03	1.64E-03
Nickel	2.10E-03	4.02E-03	3.76E-03	3.45E-03	5.64E-03
Polycyclic Organic Matter	8.82E-05	1.69E-04	1.58E-04	1.45E-04	2.37E-04
Selenium	2.40E-05	4.59E-05	4.30E-05	3.95E-05	6.45E-05
Toluene	3.40E-03	6.51E-03	6.09E-03	5.59E-03	9.14E-03

<sup>1</sup> Section 1.4, Natural Gas Combustion, Tables 1.4-2., 1.4-3 and 1.4-4, EPA AP-42, March 1998.

Source: ECT, 1999.

**Table 5. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
Westinghouse 501F CT; Distillate Fuel Oil-Firing  
CT Hourly Hazardous Air Pollutant Emission Rates (Per CT)**

Parameter	Units	Case		
		100% - 32 °F	100% - 59 °F	100% - 95 °F
Maximum Hourly Fuel Flow:	10 <sup>6</sup> Btu/hr	1,769.0	1,656.0	1,517.6
Maximum Annual Hours:		N/A	500	N/A

Pollutant	Emission Factor <sup>1</sup> (lb/10 <sup>5</sup> Btu)	Emission Rates			
		32 °F	59 °F	95 °F	Annual
		(lb/hr)	(lb/hr)	(lb/hr)	(ton/yr)
Antimony	2.20E-05	3.89E-02	3.64E-02	3.34E-02	9.11E-03
Arsenic	4.90E-06	8.67E-03	8.11E-03	7.44E-03	2.03E-03
Beryllium	3.30E-07	5.84E-04	5.46E-04	5.01E-04	1.37E-04
Cadmium	4.20E-06	7.43E-03	6.96E-03	6.37E-03	1.74E-03
Chromium	4.70E-05	8.31E-02	7.78E-02	7.13E-02	1.95E-02
Cobalt	9.10E-06	1.61E-02	1.51E-02	1.38E-02	3.77E-03
Lead	5.80E-05	1.03E-01	9.60E-02	8.80E-02	2.40E-02
Manganese	3.40E-04	6.01E-01	5.63E-01	5.16E-01	1.41E-01
Mercury	9.10E-07	1.61E-03	1.51E-03	1.38E-03	3.77E-04
Nickel	1.20E-03	2.12E+00	1.99E+00	1.82E+00	4.97E-01
Phosphorus	3.00E-04	5.31E-01	4.97E-01	4.55E-01	1.24E-01
Selenium	5.30E-06	9.38E-03	8.78E-03	8.04E-03	2.19E-03

<sup>1</sup> Section 3.1, Stationary Gas Turbines, Table 3.1-4, EPA AP-42, October 1996.

Source: ECT, 1999.

Table 6A. Hardee County Generating Facility, CT 1, CT 2, and CT 3  
Westinghouse 501F CTs  
CT Annual Emission Rates - Criteria Pollutants

Best Available Copy

Source	Case	No. of CTs	Annual Operations (hrs/yr/CT)	Emission Rates					
				NO <sub>x</sub>		CO		VOC	
				(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)
CT 1-3	4 - NG	3	2,000	350.6	350.6	227.7	227.7	26.4	26.4
CT 1-3	6 - NG	3	500	210.4	52.6	702.9	175.7	99.0	24.8
CT 1-3	4 - Oil	3	500	986.7	246.7	287.1	71.8	85.8	21.5
			<b>Totals</b>	<b>N/A</b>	<b>649.9</b>	<b>N/A</b>	<b>475.2</b>	<b>N/A</b>	<b>72.6</b>

Source	Case	No. of CTs	Annual Operations (hrs/yr/CT)	Emission Rates					
				PM/PM <sub>10</sub>		SO <sub>2</sub>		Pb	
				(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)
CT 1-3	4 - NG	3	2,000	28.4	28.4	27.9	27.9	0.003	0.003
CT 1-3	6 - NG	3	500	28.4	7.1	16.9	4.2	0.002	0.0004
CT 1-3	4 - Oil	3	500	59.4	14.9	267.3	66.8	0.29	0.07
			<b>Totals</b>	<b>N/A</b>	<b>50.3</b>	<b>N/A</b>	<b>98.9</b>	<b>N/A</b>	<b>0.08</b>

1. CT-1, CT-2, and CT-3 operating with natural gas-firing at base load for 2,000 hours/year (Case 4).
2. CT-1, CT-2, and CT-3 operating with natural gas-firing at 50% load for 500 hours/year (Case 6).
3. CT-1, CT-2, and CT-3 operating with fuel oil-firing at base load for 500 hours/year at base load (Case 4).
4. SO<sub>2</sub> and H<sub>2</sub>SO<sub>4</sub> rates based on natural gas sulfur content of 2.0 gr/100 ft<sup>3</sup> and 7.5% conversion of SO<sub>2</sub> to H<sub>2</sub>SO<sub>4</sub>.
5. SO<sub>2</sub> and H<sub>2</sub>SO<sub>4</sub> rates based on fuel oil sulfur content of 0.05 wt. percent and 7.5% conversion of SO<sub>2</sub> to H<sub>2</sub>SO<sub>4</sub>.

Sources: ECT, 1999.  
Westinghouse, 1999.  
GPP, 1999.

## Westinghouse 501F CTs

## CT Annual Emission Rates - Criteria Pollutants

Best Available Copy

Source	Case	No. of CTs	Annual Operations (hrs/yr/CT)	Emission Rates					
				NO <sub>x</sub>		CO		VOC	
				(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)
CT 1-3	4 - NG	3	2,500	350.6	438.3	227.7	284.6	26.4	33.0
CT 1-3	6 - NG	3	0	210.4	0.0	702.9	0.0	99.0	0.0
CT 1-3	4 - Oil	3	500	986.7	246.7	287.1	71.8	85.8	21.5
			<b>Totals</b>	<b>N/A</b>	<b>685.0</b>	<b>N/A</b>	<b>356.4</b>	<b>N/A</b>	<b>54.5</b>

Source	Case	No. of CTs	Annual Operations (hrs/yr/CT)	Emission Rates					
				PM/PM <sub>10</sub>		SO <sub>2</sub>		Pb	
				(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)
CT 1-3	4 - NG	3	2,500	28.4	35.5	27.9	34.9	0.003	0.003
CT 1-3	6 - NG	3	0	28.4	0.0	16.9	0.0	0.002	0.0000
CT 1-3	4 - Oil	3	500	59.4	14.9	267.3	66.8	0.29	0.07
			<b>Totals</b>	<b>N/A</b>	<b>50.3</b>	<b>N/A</b>	<b>101.7</b>	<b>N/A</b>	<b>0.08</b>

1. CT-1, CT-2, and CT-3 operating with natural gas-firing at base load for 2,500 hours/year (Case 4).
2. CT-1, CT-2, and CT-3 operating with natural gas-firing at 50% load for 0 hours/year (Case 6).
3. CT-1, CT-2, and CT-3 operating with fuel oil-firing at base load for 500 hours/year at base load (Case 4).
4. SO<sub>2</sub> and H<sub>2</sub>SO<sub>4</sub> rates based on natural gas sulfur content of 2.0 gr/100 ft<sup>3</sup> and 7.5% conversion of SO<sub>2</sub> to H<sub>2</sub>SO<sub>4</sub>.
5. SO<sub>2</sub> and H<sub>2</sub>SO<sub>4</sub> rates based on fuel oil sulfur content of 0.05 wt. percent and 7.5% conversion of SO<sub>2</sub> to H<sub>2</sub>SO<sub>4</sub>.

Sources: ECT, 1999.

Westinghouse, 1999.

GPP, 1999.

**Table 7. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
Westinghouse 501F CTs  
CT Annual Emission Rates - Hazardous Air Pollutants**

<b>Pollutant</b>	<b>Annual Emissions (ton/yr)</b>
Antimony	9.11E-03
Arsenic	2.57E-03
Benzene	5.64E-03
Beryllium	1.69E-04
Cadmium	4.69E-03
Chromium	2.32E-02
Cobalt	3.99E-03
Dichlorobenzene	3.22E-03
Formaldehyde	2.02E-01
Lead	2.54E-02
Manganese	1.42E-01
Mercury	1.08E-03
Naphthalene	1.64E-03
Nickel	5.02E-01
Phosphorus	1.24E-01
Polycyclic Organic Matter	2.37E-04
Selenium	2.26E-03
Toluene	9.14E-03
<b>Total HAPS</b>	<b>1.06</b>

Source: ECT, 1999.

**Table 8. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
Westinghouse 501D5A CT  
NSPS GG NO<sub>x</sub> Limits**

Fuel	501D5A Gas Turbine ISO Heat Rate (LHV)		F	NO <sub>x</sub> Std (ppmvd)
	(Btu/kw-hr)	(kj/w-hr)		
Gas	10,110	10.667	0.0	101.2
Oil	10,408	10.981	0.0	98.4

Sources: Westinghouse, 1998.  
ECT, 1998.



**Table 9.A. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
CT Exhaust Data - Westinghouse 501F CT (Per CT)  
Natural Gas-Firing**

**A. Exhaust MW**

		Exhaust Gas Composition - Volume %								
Component	MW (lb/mole) Case	100 % Load			70 % Load			50 % Load		
		32 °F	59 °F	95 °F	32 °F	59 °F	95 °F	32 °F	59 °F	95 °F
		1	4	7	2	5	8	3	6	9
Ar	39.944	0.94	0.93	0.90	0.94	0.93	0.90	0.95	0.94	0.91
N <sub>2</sub>	28.016	75.01	74.42	71.86	75.00	74.44	71.96	75.54	74.94	72.37
O <sub>2</sub>	32.000	12.53	12.48	11.84	12.50	12.52	12.16	14.08	14.00	13.41
CO <sub>2</sub>	44.010	3.96	3.90	3.87	3.97	3.88	3.72	3.23	3.19	3.13
H <sub>2</sub> O	17.008	7.55	8.25	11.51	7.57	8.21	11.24	6.19	6.92	10.17
CO <sub>2</sub>	64.066	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
CO	28.010	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HC (CH <sub>4</sub> )	16.042	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NO	30.008	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	<b>Totals</b>	<b>99.99</b>	<b>99.98</b>	<b>99.98</b>	<b>99.98</b>	<b>99.98</b>	<b>99.98</b>	<b>99.99</b>	<b>99.99</b>	<b>99.99</b>
Exhaust MW (lb/mole)		28.43	28.33	27.94	28.42	28.34	27.96	28.52	28.43	28.04
Exhaust Flow (lb/sec)		1,055.71	999.50	912.58	804.40	773.26	734.62	771.54	741.04	695.53
Exhaust Temp. (°F)		1,085	1,099	1,123	1,026	1,041	1,064	1,165	1,166	1,200
(K)		858	866	879	825	834	846	903	903	922
Exhaust O <sub>2</sub> (Vol %, Dry)		13.55	13.60	13.38	13.52	13.64	13.70	15.01	15.04	14.93

Sources: ECT, 1999.

Westinghouse, 1998.

**Table 9.B. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
CT Exhaust Data - Westinghouse 501F CT (Per CT)  
Natural Gas-Firing**

**B. Exhaust Flow Rates**

Case	Flow Rates (ft <sup>3</sup> /min)								
	100 % Load			70 % Load			50 % Load		
	32 °F	59 °F	95 °F	32 °F	59 °F	95 °F	32 °F	59 °F	95 °F
	1	4	7	2	5	8	3	6	9
Exh. Temp. (°F)	1,085	1,099	1,123	1,026	1,041	1,064	1,165	1,166	1,200
ACFM	2,512,232	2,407,886	2,263,696	1,841,412	1,793,375	1,753,177	1,924,588	1,855,565	1,803,036
Velocity (fps)	164.5	157.7	148.3	120.6	117.5	114.8	126.1	121.5	118.1
Velocity (m/s)	50.2	48.1	45.2	36.8	35.8	35.0	38.4	37.0	36.0
SCFM, Dry <sup>1</sup>	793,729	748,221	668,137	604,755	579,055	539,128	586,634	560,849	515,171
ACFM (15% O <sub>2</sub> , Dry)	2,892,069	2,732,645	2,553,146	2,127,883	2,025,635	1,899,030	1,802,683	1,715,208	1,639,379

<sup>1</sup> At 68 °F.

Sources: ECT, 1999.

Westinghouse, 1998.

**Table 10.A. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
CT Exhaust Data - Westinghouse 501F CT (Per CT)  
Distillate Fuel Oil-Firing**

**A. Exhaust MW**

		Exhaust Gas Composition - Volume %								
Component	MW (lb/mole)	100 % Load			70 % Load			50 % Load		
		32 °F	59 °F	95 °F	32 °F	59 °F	95 °F	32 °F	59 °F	95 °F
	Case	1	4	7	2	5	8	3	6	9
Ar	39.944	0.94	0.93	0.90	0.95	0.94	0.91	0.95	0.95	0.91
N <sub>2</sub>	28.016	74.76	74.18	71.63	75.69	75.08	72.47	75.99	75.39	72.79
O <sub>2</sub>	32.000	12.81	12.56	11.93	14.44	14.33	13.63	14.79	14.73	14.10
CO <sub>2</sub>	44.010	5.08	5.01	4.96	4.01	3.97	3.97	3.83	3.76	3.71
H <sub>2</sub> O	17.008	6.59	7.30	10.56	4.89	5.66	9.01	4.42	5.16	8.47
CO <sub>2</sub>	64.066	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
CO	28.010	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HC (CH <sub>4</sub> )	16.042	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NO	30.008	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Totals	100.18	99.98	99.98	99.98	99.98	99.99	99.98	99.99	99.98
Exhaust MW (lb/mole)		28.78	28.62	28.22	28.80	28.71	28.31	28.84	28.75	28.34
Exhaust Flow (lb/sec)		1,064.91	1,008.04	920.41	991.20	941.56	863.87	829.75	794.23	740.11
Exhaust Temp. (°F)		1,071	1,080	1,112	1,099	1,097	1,200	1,200	1,200	1,200
(K)		850	855	873	866	865	922	922	922	922
Exhaust O <sub>2</sub> (Vol %, Dry)		13.71	13.55	13.34	15.18	15.19	14.98	15.47	15.53	15.40

Sources: ECT, 1999.

Westinghouse, 1998.

**Table 10.B. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
CT Exhaust Data - Westinghouse 501F CT (Per CT)  
Distillate Fuel Oil-Firing**

**B. Exhaust Flow Rates**

Case	Flow Rates (ft <sup>3</sup> /min)								
	100 % Load			70 % Load			50 % Load		
	32 °F	59 °F	95 °F	32 °F	59 °F	95 °F	32 °F	59 °F	95 °F
	1	4	7	2	5	8	3	6	9
Exh. Temp. (°F)	1,071	1,080	1,112	1,099	1,097	1,200	1,200	1,200	1,200
ACFM	2,480,708	2,374,946	2,244,563	2,349,090	2,236,087	2,218,013	2,091,189	2,008,088	1,897,988
Velocity (fps)	162.5	155.5	147.0	153.9	146.5	145.3	137.0	131.5	124.3
Velocity (m/s)	49.5	47.4	44.8	46.9	44.6	44.3	41.7	40.1	37.9
SCFM, Dry <sup>1</sup>	799,149	754,826	674,287	756,682	715,369	641,924	635,750	605,759	552,564
ACFM (15% O <sub>2</sub> , Dry)	2,822,411	2,742,982	2,572,863	2,165,140	2,041,684	2,025,125	1,838,197	1,732,932	1,618,041

<sup>1</sup> At 68 °F.

Sources: ECT, 1999.

Westinghouse, 1998.

**Table 11. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
CT Fuel Flow Rate Data - Westinghouser 501F (Per CT)**

**A. Natural Gas-Firing**

Case	100 % Load			70 % Load			50 % Load		
	32 °F	59 °F	95 °F	32 °F	59 °F	95 °F	32 °F	59 °F	95 °F
	1	4	7	2	5	8	3	6	9
Heat Input - LHV (MMBtu/hr)	1,774	1,660	1,524	1,359	1,287	1,190	1,057	1,005	940
Fuel Rate (lb/hr)	84,587	79,159	72,683	64,827	61,380	56,746	50,416	47,911	44,811
Fuel Rate (10 <sup>6</sup> ft <sup>3</sup> /hr)	1.914	1.791	1.645	1.467	1.389	1.284	1.141	1.084	1.014
Fuel Rate (lb/sec)	23.496	21.989	20.190	18.008	17.050	15.763	14.004	13.309	12.448

**B. Distillate Fuel Oil-Firing**

Case	100 % Load			70 % Load			50 % Load		
	32 °F	59 °F	95 °F	32 °F	59 °F	95 °F	32 °F	59 °F	95 °F
	1	4	7	2	5	8	3	6	9
Heat Input - LHV (MMBtu/hr)	1,769	1,656	1,518	1,313	1,241	1,152	1,054	995	928
Fuel Rate (lb/hr)	95,179	89,101	81,651	70,652	66,764	61,959	56,726	53,560	49,931
Fuel Rate (10 <sup>3</sup> gal/hr)	13.020	12.189	11.169	9.665	9.133	8.476	7.760	7.327	6.830
Fuel Rate (lb/sec)	26.439	24.750	22.681	19.626	18.546	17.211	15.757	14.878	13.870

Sources: ECT, 1999.  
Westinghouse, 1998.

**WESTINGHOUSE 501D5A**

**Table 1. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
CT Operating Scenarios - Westinghouse 501D5A CT**

Case	Ambient Temperature (°F)	Load (%)	CT-1	CT-2	CT-3	Natural Gas Firing	Fuel Oil Firing
1	20	100	X	X	X	X	X
2	20	75	X	X	X	X	X
3	20	50	X	X	X	X	
4	59	100	X	X	X	X	X
5	59	75	X	X	X	X	X
6	59	50	X	X	X	X	
7	95	100	X	X	X	X	X
8	95	75	X	X	X	X	X
9	95	50	X	X	X	X	

Sources: GPP, 1999.  
ECT, 1999.

Westinghouse 501D5A CT; Natural Gas-Firing  
 CT Hourly Criteria and H<sub>2</sub>SO<sub>4</sub> Emission Rates (Per CT)

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Temp. (°F)	Case	Load (%)	PM/PM <sub>10</sub> <sup>1</sup>		SO <sub>2</sub> <sup>2</sup>		H <sub>2</sub> SO <sub>4</sub> <sup>3</sup>		Pb <sup>4</sup>	
			(lb/hr) <sup>5</sup>	(g/sec)	(lb/hr)	(g/sec)	(lb/hr)	(g/sec)	(lb/hr)	(g/sec)
20	1	100	9.6	1.21	7.2	0.91	0.8	0.104	6.94E-04	8.75E-05
	2	75	8.5	1.07	5.6	0.71	0.6	0.082	5.44E-04	6.86E-05
	3	50	6.8	0.86	4.4	0.55	0.5	0.063	4.19E-04	5.28E-05
59 (6)	4	100	8.8	1.10	6.7	0.84	0.8	0.096	6.41E-04	8.07E-05
	5	75	7.7	0.97	5.3	0.67	0.6	0.077	5.10E-04	6.43E-05
	6	50	6.4	0.81	4.1	0.52	0.5	0.060	3.97E-04	5.00E-05
95	7	100	8.0	1.01	6.1	0.77	0.7	0.089	5.92E-04	7.45E-05
	8	75	7.0	0.89	5.0	0.63	0.6	0.072	4.79E-04	6.03E-05
	9	50	6.0	0.76	3.9	0.49	0.4	0.056	3.76E-04	4.73E-05
Maximums			9.6	1.21	7.2	0.91	0.83	0.104	6.94E-04	8.75E-05

Temp. (°F)	Case	Load (%)	NO <sub>x</sub>			CO			VOC <sup>8</sup>		
			(ppmvd) <sup>7</sup>	(lb/hr) <sup>5</sup>	(g/sec)	(ppmvd) <sup>7</sup>	(lb/hr) <sup>5</sup>	(g/sec)	(ppmvd) <sup>7</sup>	(lb/hr) <sup>5</sup>	(g/sec)
20	1	100	15	86.9	10.95	10	34.1	4.3	3.0	5.9	0.75
	2	75	18	82.5	10.40	24	68.2	8.6	3.0	5.3	0.67
	3	50	45	157.3	19.82	232	495.0	62.4	20.0	24.1	3.04
59 (6)	4	100	15	80.6	10.16	10	31.8	4.0	3.0	5.4	0.68
	5	75	18	77.4	9.75	23	61.9	7.8	3.0	4.8	0.61
	6	50	45	148.7	18.74	229	463.0	58.3	20.0	23.1	2.91
95	7	100	15	74.8	9.42	10	29.7	3.7	3.0	5.0	0.62
	8	75	18	72.6	9.15	23	56.1	7.1	3.0	4.4	0.55
	9	50	45	140.8	17.74	227	433.4	54.6	20.0	22.2	2.80
Maximums			45	157.3	19.82	232	495.0	62.37	20.0	24.1	3.04

<sup>1</sup> As measured by EPA Reference Method 5B or 17.

<sup>2</sup> Based on natural gas sulfur content of 2.0 gr/100 ft<sup>3</sup>.

<sup>3</sup> Based on 7.5% conversion of SO<sub>2</sub> to H<sub>2</sub>SO<sub>4</sub>.

<sup>4</sup> Table 1.4-2, AP-42, March 1998.

<sup>5</sup> Includes a 10% margin for variability in stack sampling.

<sup>6</sup> Estimated from linear interpolation of 20 and 95 °F data.

<sup>7</sup> Corrected to 15% O<sub>2</sub>.

<sup>8</sup> Non-methane, non-ethane hydrocarbons (NMHC) expressed as methane.

Sources: ECT, 1998.

Westinghouse, 1998.



**Table 3. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
Westinghouse 501D5A CT; Distillate Fuel Oil-Firing  
CT Hourly Criteria and H<sub>2</sub>SO<sub>4</sub> Emission Rates (Per CT)**

Temp. (°F)	Case	Load (%)	PM/PM <sub>10</sub> <sup>1</sup>		SO <sub>2</sub> <sup>2</sup>		H <sub>2</sub> SO <sub>4</sub> <sup>3</sup>		Pb <sup>4</sup>	
			(lb/hr) <sup>5</sup>	(g/sec)	(lb/hr)	(g/sec)	(lb/hr)	(g/sec)	(lb/hr)	(g/sec)
20	1	100	35.9	4.52	72.4	9.13	8.3	1.05	0.078	0.010
	2	75	45.2	5.70	56.7	7.14	6.5	0.82	0.061	0.008
	3	50								
(6) 59	4	100	32.9	4.15	66.9	8.43	7.7	0.97	0.072	0.009
	5	75	41.2	5.19	53.1	6.69	6.1	0.77	0.057	0.007
	6	50								
95	7	100	30.3	3.81	61.8	7.78	7.1	0.89	0.066	0.008
	8	75	37.5	4.72	49.7	6.27	5.7	0.72	0.053	0.007
	9	50								
<b>Maximums</b>			<b>45.2</b>	<b>5.70</b>	<b>72.4</b>	<b>9.13</b>	<b>8.3</b>	<b>1.05</b>	<b>0.078</b>	<b>0.010</b>

Temp. (°F)	Case	Load (%)	NO <sub>x</sub>			CO			VOC <sup>8</sup>		
			(ppmvd) <sup>7</sup>	(lb/hr) <sup>5</sup>	(g/sec)	(ppmvd) <sup>7</sup>	(lb/hr) <sup>5</sup>	(g/sec)	(ppmvd) <sup>7</sup>	(lb/hr) <sup>5</sup>	(g/sec)
20	1	100	42	260.7	32.85	28	104.5	13.2	10.0	22.0	2.77
	2	75	42	201.3	25.36	75	217.8	27.4	30.0	49.8	6.28
	3	50									
(6) 59	4	100	42	240.7	30.33	27	95.9	12.1	10.0	20.2	2.55
	5	75	42	188.7	23.78	73	198.4	25.0	30.0	47.0	5.93
	6	50									
95	7	100	42	222.2	28.00	27	88.0	11.1	10.0	18.6	2.34
	8	75	42	177.1	22.31	71	180.4	22.7	30.0	44.4	5.60
	9	50									
<b>Maximums</b>			<b>42</b>	<b>260.7</b>	<b>32.85</b>	<b>75</b>	<b>217.8</b>	<b>27.44</b>	<b>30.0</b>	<b>49.8</b>	<b>6.28</b>

<sup>1</sup> As measured by EPA Reference Method 5B or 17.

<sup>2</sup> Based on fuel oil sulfur content of 0.05 wt percent.

<sup>3</sup> Based on 7.5% conversion of SO<sub>2</sub> to H<sub>2</sub>SO<sub>4</sub>.

<sup>4</sup> Table 3.1-4., AP-42, October 1996.

<sup>5</sup> Includes a 10% margin for variability in stack sampling.

<sup>6</sup> Estimated from linear interpolation of 20 and 95 °F data.

<sup>7</sup> Corrected to 15% O<sub>2</sub>.

<sup>8</sup> Non-methane, non-ethane hydrocarbons (NMHC) expressed as methane.

Sources: ECT, 1998.

Westinghouse, 1998.

**Table 4. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
Westinghouse 501D5A CT; Natural Gas-Firing  
CT Hourly Hazardous Air Pollutant Emission Rates (Per CT)**

Parameter	Units	Case		
		100% - 32 °F	100% - 59 °F	100% - 95 °F
Maximum Hourly Fuel Flow:	10 <sup>6</sup> ft <sup>3</sup> /hr	1.388	1.282	1.183
Maximum Annual Hours:		N/A	3,000	N/A

Pollutant	Emission Factor <sup>1</sup> (lb/10 <sup>6</sup> ft <sup>3</sup> )	Emission Rates			
		32 °F	59 °F	95 °F	Annual
		(lb/hr)	(lb/hr)	(lb/hr)	(ton/yr)
Arsenic	2.00E-04	2.78E-04	2.56E-04	2.37E-04	3.84E-04
Benzene	2.10E-03	2.92E-03	2.69E-03	2.48E-03	4.04E-03
Beryllium	1.20E-05	1.67E-05	1.54E-05	1.42E-05	2.31E-05
Cadmium	1.10E-03	1.53E-03	1.41E-03	1.30E-03	2.11E-03
Chromium	1.40E-03	1.94E-03	1.79E-03	1.66E-03	2.69E-03
Cobalt	8.40E-05	1.17E-04	1.08E-04	9.94E-05	1.61E-04
Dichlorobenzene	1.20E-03	1.67E-03	1.54E-03	1.42E-03	2.31E-03
Formaldehyde	7.50E-02	1.04E-01	9.61E-02	8.87E-02	1.44E-01
Lead	5.00E-04	6.94E-04	6.41E-04	5.92E-04	9.61E-04
Manganese	3.80E-04	5.28E-04	4.87E-04	4.50E-04	7.31E-04
Mercury	2.60E-04	3.61E-04	3.33E-04	3.08E-04	5.00E-04
Naphthalene	6.10E-04	8.47E-04	7.82E-04	7.22E-04	1.17E-03
Nickel	2.10E-03	2.92E-03	2.69E-03	2.48E-03	4.04E-03
Polycyclic Organic Matter	8.82E-05	1.22E-04	1.13E-04	1.04E-04	1.70E-04
Selenium	2.40E-05	3.33E-05	3.08E-05	2.84E-05	4.61E-05
Toluene	3.40E-03	4.72E-03	4.36E-03	4.02E-03	6.54E-03

<sup>1</sup> Section 1.4, Natural Gas Combustion, Tables 1.4-2., 1.4-3 and 1.4-4, EPA AP-42, March 1998.

Source: ECT, 1999.

**Table 5. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
Westinghouse 501D5A CT; Distillate Fuel Oil-Firing  
CT Hourly Hazardous Air Pollutant Emission Rates (Per CT)**

Parameter	Units	Case		
		100% - 32 °F	100% - 59 °F	100 % - 95 °F
Maximum Hourly Fuel Flow:	10 <sup>6</sup> Btu/hr	1,336.5	1,234.2	1,139.7
Maximum Annual Hours:		N/A	500	N/A

Pollutant	Emission Factor <sup>1</sup> (lb/10 <sup>6</sup> Btu)	Emission Rates			
		32 °F	59 °F	95 °F	Annual
		(lb/hr)	(lb/hr)	(lb/hr)	(ton/yr)
Antimony	2.20E-05	2.94E-02	2.72E-02	2.51E-02	6.79E-03
Arsenic	4.90E-06	6.55E-03	6.05E-03	5.58E-03	1.51E-03
Beryllium	3.30E-07	4.41E-04	4.07E-04	3.76E-04	1.02E-04
Cadmium	4.20E-06	5.61E-03	5.18E-03	4.79E-03	1.30E-03
Chromium	4.70E-05	6.28E-02	5.80E-02	5.36E-02	1.45E-02
Cobalt	9.10E-06	1.22E-02	1.12E-02	1.04E-02	2.81E-03
Lead	5.80E-05	7.75E-02	7.16E-02	6.61E-02	1.79E-02
Manganese	3.40E-04	4.54E-01	4.20E-01	3.87E-01	1.05E-01
Mercury	9.10E-07	1.22E-03	1.12E-03	1.04E-03	2.81E-04
Nickel	1.20E-03	1.60E + 00	1.48E + 00	1.37E + 00	3.70E-01
Phosphorus	3.00E-04	4.01E-01	3.70E-01	3.42E-01	9.26E-02
Selenium	5.30E-06	7.08E-03	6.54E-03	6.04E-03	1.64E-03

<sup>1</sup> Section 3.1, Stationary Gas Turbines, Table 3.1-4, EPA AP-42, October 1996.

Source: ECT, 1999.

**Table 6A. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
Westinghouse 501D5A CTs  
CT Annual Emission Rates - Criteria Pollutants**

Source	Case	No. of CTs	Annual Operations (hrs/yr/CT)	Emission Rates					
				NO <sub>x</sub>		CO		VOC	
				(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)
CT 1-3	4 - NG	3	2,000	241.8	241.8	95.4	95.4	16.3	16.3
CT 1-3	6 - NG	3	500	446.2	111.5	1,388.9	347.2	69.4	17.3
CT 1-3	4 - Oil	3	500	722.0	180.5	287.8	71.9	60.7	15.2
			<b>Totals</b>	<b>N/A</b>	<b>533.9</b>	<b>N/A</b>	<b>514.6</b>	<b>N/A</b>	<b>48.8</b>

Source	Case	No. of CTs	Annual Operations (hrs/yr/CT)	Emission Rates					
				PM/PM <sub>10</sub>		SO <sub>2</sub>		Pb	
				(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)
CT 1-3	4 - NG	3	2,000	26.3	26.3	20.0	20.0	0.002	0.002
CT 1-3	6 - NG	3	500	19.2	4.8	12.4	3.1	0.001	0.0003
CT 1-3	4 - Oil	3	500	98.8	24.7	200.7	50.2	0.21	0.05
			<b>Totals</b>	<b>N/A</b>	<b>55.8</b>	<b>N/A</b>	<b>73.2</b>	<b>N/A</b>	<b>0.06</b>

1. CT-1, CT-2, and CT-3 operating with natural gas-firing at base load for 2,000 hours/year (Case 4).
2. CT-1, CT-2, and CT-3 operating with natural gas-firing at 50% load for 500 hours/year (Case 6).
3. CT-1, CT-2, and CT-3 operating with fuel oil-firing at base load for 500 hours/year at base load (Case 4).
4. SO<sub>2</sub> and H<sub>2</sub>SO<sub>4</sub> rates based on natural gas sulfur content of 2.0 gr/100 ft<sup>3</sup> and 7.5% conversion of SO<sub>2</sub> to H<sub>2</sub>SO<sub>4</sub>.
5. SO<sub>2</sub> and H<sub>2</sub>SO<sub>4</sub> rates based on fuel oil sulfur content of 0.05 wt. percent and 7.5% conversion of SO<sub>2</sub> to H<sub>2</sub>SO<sub>4</sub>.

Sources: ECT, 1999.  
Westinghouse, 1999.  
GPP, 1999.

**Table 6B. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
Westinghouse 501D5A CTs  
CT Annual Emission Rates - Criteria Pollutants**

Source	Case	No. of CTs	Annual Operations (hrs/yr/CT)	Emission Rates					
				NO <sub>x</sub>		CO		VOC	
				(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)
CT 1-3	4 - NG	3	2,500	241.8	302.3	95.4	119.3	16.3	20.3
CT 1-3	6 - NG	3	0	446.2	0.0	1,388.9	0.0	69.4	0.0
CT 1-3	4 - Oil	3	500	722.0	180.5	287.8	71.9	60.7	15.2
			<b>Totals</b>	<b>N/A</b>	<b>482.8</b>	<b>N/A</b>	<b>191.2</b>	<b>N/A</b>	<b>35.5</b>

Source	Case	No. of CTs	Annual Operations (hrs/yr/CT)	Emission Rates					
				PM/PM <sub>10</sub>		SO <sub>2</sub>		Pb	
				(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)
CT 1-3	4 - NG	3	2,500	26.3	32.9	20.0	24.9	0.002	0.002
CT 1-3	6 - NG	3	0	19.2	0.0	12.4	0.0	0.001	0.0000
CT 1-3	4 - Oil	3	500	98.8	24.7	200.7	50.2	0.21	0.05
			<b>Totals</b>	<b>N/A</b>	<b>57.6</b>	<b>N/A</b>	<b>75.1</b>	<b>N/A</b>	<b>0.06</b>

1. CT-1, CT-2, and CT-3 operating with natural gas-firing at base load for 2,500 hours/year (Case 4).
2. CT-1, CT-2, and CT-3 operating with natural gas-firing at 50% load for 0 hours/year (Case 6).
3. CT-1, CT-2, and CT-3 operating with fuel oil-firing at base load for 500 hours/year at base load (Case 4).
4. SO<sub>2</sub> and H<sub>2</sub>SO<sub>4</sub> rates based on natural gas sulfur content of 2.0 gr/100 ft<sup>3</sup> and 7.5% conversion of SO<sub>2</sub> to H<sub>2</sub>SO<sub>4</sub>.
5. SO<sub>2</sub> and H<sub>2</sub>SO<sub>4</sub> rates based on fuel oil sulfur content of 0.05 wt. percent and 7.5% conversion of SO<sub>2</sub> to H<sub>2</sub>SO<sub>4</sub>.

Sources: ECT, 1999.  
Westinghouse, 1999.  
GPP, 1999.

**Table 7. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
Westinghouse 501D5A CTs  
CT Annual Emission Rates - Hazardous Air Pollutants**

Pollutant	Annual Emissions (ton/yr)
Antimony	6.79E-03
Arsenic	1.90E-03
Benzene	4.04E-03
Beryllium	1.25E-04
Cadmium	3.41E-03
Chromium	1.72E-02
Cobalt	2.97E-03
Dichlorobenzene	2.31E-03
Formaldehyde	1.44E-01
Lead	1.89E-02
Manganese	1.06E-01
Mercury	7.81E-04
Naphthalene	1.17E-03
Nickel	3.74E-01
Phosphorus	9.26E-02
Polycyclic Organic Matter	1.70E-04
Selenium	1.68E-03
Toluene	6.54E-03
Total HAPS	0.78

Source: ECT, 1999.

**Table 8. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
Westinghouse 501F CT  
NSPS GG NO<sub>x</sub> Limits**

Fuel	501F Gas Turbine ISO Heat Rate (LHV)		F	NO <sub>x</sub> Std (ppmvd)
	(Btu/kw-hr)	(kj/w-hr)		
Gas	9,150	9.654	0.0	111.9
Oil	9,490	10.012	0.0	107.9

Sources: Westinghouse, 1998.  
ECT, 1998.

**Table 9.A. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
CT Exhaust Data - Westinghouse 501D5A CT (Per CT)  
Natural Gas-Firing**

**A. Exhaust MW**

Component	MW (lb/mole) Case	Exhaust Gas Composition - Volume %								
		100 % Load			75 % Load			50 % Load		
		20 °F	59 °F	95 °F	20 °F	59 °F	95 °F	20 °F	59 °F	95 °F
		1	4	7	2	5	8	3	6	9
Ar	39.944	0.95	0.93	0.91	0.95	0.93	0.92	0.95	0.93	0.92
N <sub>2</sub>	28.016	75.38	74.04	72.80	75.66	74.40	73.24	75.75	74.53	73.40
O <sub>2</sub>	32.000	13.87	13.59	13.33	14.66	14.25	13.88	14.93	14.62	14.34
CO <sub>2</sub>	44.010	3.20	3.16	3.12	2.84	2.88	2.91	2.72	2.71	2.70
H <sub>2</sub> O	17.008	6.59	8.27	9.82	5.87	7.51	9.03	5.63	7.18	8.62
CO <sub>2</sub>	64.066	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
CO	28.010	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HC (CH <sub>4</sub> )	16.042	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NO	30.008	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Totals	99.99	99.98	99.98	99.98	99.98	99.98	99.98	99.98	99.98
	Exhaust MW (lb/mole)	28.47	28.26	28.07	28.52	28.32	28.14	28.53	28.35	28.17
	Exhaust Flow (lb/sec)	912.01	846.79	786.59	806.54	743.28	684.88	647.83	611.69	578.33
	Exhaust Temp. (°F)	972	997	1,021	884	941	993	905	948	987
	(K)	795	810	823	746	778	807	758	782	804
	Exhaust O <sub>2</sub> (Vol %, Dry)	14.85	14.81	14.78	15.57	15.41	15.26	15.82	15.76	15.69

Sources: ECT, 1999.

Westinghouse, 1998.



**Table 9.B. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
CT Exhaust Data - Westinghouse 501D5A CT (Per CT)  
Natural Gas-Firing**

**B. Exhaust Flow Rates**

Case	Flow Rates (ft <sup>3</sup> /min)								
	100 % Load			75 % Load			50 % Load		
	20 °F	59 °F	95 °F	20 °F	59 °F	95 °F	20 °F	59 °F	95 °F
	1	4	7	2	5	8	3	6	9
Exh. Temp. (°F)	972	997	1,021	884	941	993	905	948	987
ACFM	2,008,808	1,912,234	1,817,224	1,664,396	1,609,431	1,548,123	1,356,914	1,329,943	1,300,478
Velocity (fps)	131.6	125.2	119.0	109.0	105.4	101.4	88.9	87.1	85.2
Velocity (m/s)	40.1	38.2	36.3	33.2	32.1	30.9	27.1	26.5	26.0
SCFM, Dry <sup>1</sup>	691,867	635,456	584,248	615,488	561,109	511,767	495,322	463,014	433,630
ACFM (15% O <sub>2</sub> , Dry)	1,924,605	1,809,314	1,699,449	1,414,220	1,384,477	1,346,796	1,102,396	1,076,392	1,048,851

<sup>1</sup> At 68 °F.

Sources: ECT, 1999.

Westinghouse, 1998.

**Table 10.A. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
CT Exhaust Data - Westinghouse 501D5A CT (Per CT)  
Distillate Fuel Oil-Firing**

**A. Exhaust MW**

		Exhaust Gas Composition - Volume %								
Component	MW (lb/mole) Case	100 % Load			75 % Load			50 % Load		
		20 °F	59 °F	95 °F	20 °F	59 °F	95 °F	20 °F	59 °F	95 °F
		1	4	7	2	5	8	3	6	9
Ar	39.944	0.94	0.92	0.91	0.95	0.93	0.92	0.96	0.94	0.93
N <sub>2</sub>	28.016	75.17	73.83	72.60	75.82	74.56	73.40	76.20	74.95	73.80
O <sub>2</sub>	32.000	13.69	13.41	13.15	15.05	14.65	14.28	15.47	15.11	14.77
CO <sub>2</sub>	44.010	4.46	4.40	4.35	3.64	3.69	3.73	3.43	3.45	3.47
H <sub>2</sub> O	17.008	5.72	7.41	8.97	4.51	6.14	7.65	3.93	5.54	7.02
CO <sub>2</sub>	64.066	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
CO	28.010	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HC (CH <sub>4</sub> )	16.042	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NO	30.008	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Totals		99.98	99.98	99.98	99.97	99.98	99.98	99.99	99.99	99.99
Exhaust MW (lb/mole)		28.75	28.54	28.35	28.81	28.62	28.44	28.86	28.67	28.49
Exhaust Flow (lb/sec)		922.97	856.92	795.94	875.04	805.46	741.23	703.49	658.19	616.39
Exhaust Temp. (°F)		975	1,000	1,023	831	885	935	841	890	936
(K)		797	811	824	717	747	775	723	750	775
Exhaust O <sub>2</sub> (Vol %, Dry)		14.52	14.48	14.45	15.76	15.61	15.46	16.10	15.99	15.89

Sources: ECT, 1999.

Westinghouse, 1998.

**Table 10.B. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
CT Exhaust Data - Westinghouse 501D5A CT (Per CT)  
Distillate Fuel Oil-Firing**

**B. Exhaust Flow Rates**

Case	Flow Rates (ft <sup>3</sup> /min)								
	100 % Load			75 % Load			50 % Load		
	20 °F	59 °F	95 °F	20 °F	59 °F	95 °F	20 °F	59 °F	95 °F
	1	4	7	2	5	8	3	6	9
Exh. Temp. (°F)	975	1,000	1,023	831	885	935	841	890	936
ACFM	2,016,948	1,919,067	1,822,918	1,717,054	1,657,582	1,591,702	1,388,519	1,357,387	1,322,179
Velocity (fps)	132.1	125.7	119.4	112.5	108.6	104.2	90.9	88.9	86.6
Velocity (m/s)	40.3	38.3	36.4	34.3	33.1	31.8	27.7	27.1	26.4
SCFM, Dry <sup>1</sup>	699,675	642,609	590,805	670,578	610,701	556,363	541,373	501,346	464,974
ACFM (15% O <sub>2</sub> , Dry)	2,056,098	1,932,764	1,815,277	1,428,185	1,395,334	1,354,606	1,084,605	1,066,770	1,044,929

<sup>1</sup> At 68 °F.

Sources: ECT, 1999.

**Table 11. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
CT Fuel Flow Rate Data - Westinghouse 501D5A (Per CT)**

**A. Natural Gas-Firing**

Case	100 % Load			75 % Load			50 % Load		
	20 °F	59 °F	95 °F	20 °F	59 °F	95 °F	20 °F	59 °F	95 °F
	1	4	7	2	5	8	3	6	9
Heat Input - LHV (MMBtu/hr)	1,287	1,188	1,097	1,009	946	887	778	735	697
Fuel Rate (lb/hr)	61,340	56,629	52,280	48,090	45,074	42,290	37,060	35,053	33,200
Fuel Rate (10 <sup>6</sup> ft <sup>3</sup> /hr)	1.388	1.282	1.183	1.088	1.020	0.957	0.839	0.793	0.751
Fuel Rate (lb/sec)	17.039	15.730	14.522	13.358	12.521	11.747	10.294	9.737	9.222

**B. Distillate Fuel Oil-Firing**

Case	100 % Load			75 % Load			50 % Load		
	20 °F	59 °F	95 °F	20 °F	59 °F	95 °F	20 °F	59 °F	95 °F
	1	4	7	2	5	8	3	6	9
Heat Input - LHV (MMBtu/hr)	1,337	1,234	1,140	1,046	979	918	798	755	715
Fuel Rate (lb/hr)	72,440	66,892	61,770	56,690	53,076	49,740	43,250	40,915	38,760
Fuel Rate (10 <sup>3</sup> gal/hr)	9.909	9.150	8.450	7.755	7.261	6.804	5.916	5.597	5.302
Fuel Rate (lb/sec)	20.122	18.581	17.158	15.747	14.743	13.817	12.014	11.365	10.767

Note: 59 °F data estimated from linear interpolation of 20 and 95 °F data.

Sources: ECT, 1999.

Westinghouse, 1998.

**ABB GT-24**

**Table 1. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
CT Operating Scenarios - ABB GT-24 CT**

Case	Ambient Temperature (°F)	Load (%)	CT-1	CT-2	CT-3	Natural Gas Firing	Fuel Oil Firing
1	0	100	X	X	X	X	X
2	0	75	X	X	X	X	X
3	0	50	X	X	X	X	
4	60	100	X	X	X	X	X
5	60	75	X	X	X	X	X
6	60	60	X	X	X	X	
7	98	100	X	X	X	X	X
8	98	75	X	X	X	X	X
9	98	60	X	X	X	X	

Sources: GPP, 1999.  
ECT, 1999.

**Table 2. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
 ABB GT-24 CT; Natural Gas-Firing  
 CT Hourly Criteria and H<sub>2</sub>SO<sub>4</sub> Emission Rates (Per CT)**

Temp. (°F)	Case	Load (%)	PM/PM <sub>10</sub> <sup>1</sup>		SO <sub>2</sub> <sup>2</sup>		H <sub>2</sub> SO <sub>4</sub> <sup>3</sup>		Pb <sup>4</sup>	
			(lb/hr) <sup>5</sup>	(g/sec)	(lb/hr)	(g/sec)	(lb/hr)	(g/sec)	(lb/hr)	(g/sec)
0	1	100	41.8	5.27	10.2	1.28	1.2	0.148	9.83E-04	1.24E-04
	2	75	37.4	4.71	8.1	1.03	0.9	0.118	7.85E-04	9.89E-05
	3	50	28.6	3.60	6.2	0.78	0.7	0.090	5.99E-04	7.54E-05
60	4	100	24.2	3.05	9.2	1.16	1.1	0.133	8.87E-04	1.12E-04
	5	75	19.8	2.49	7.4	0.93	0.8	0.107	7.11E-04	8.96E-05
	6	60	17.6	2.22	6.4	0.80	0.7	0.092	6.13E-04	7.73E-05
98	7	100	23.1	2.91	8.5	1.07	1.0	0.123	8.21E-04	1.03E-04
	8	75	18.7	2.36	6.8	0.86	0.8	0.099	6.58E-04	8.29E-05
	9	60	16.5	2.08	5.9	0.74	0.7	0.085	5.68E-04	7.16E-05
<b>Maximums</b>			<b>41.8</b>	<b>5.27</b>	<b>10.2</b>	<b>1.28</b>	<b>1.17</b>	<b>0.148</b>	<b>9.83E-04</b>	<b>1.24E-04</b>

Temp. (°F)	Case	Load (%)	NO <sub>x</sub>			CO			VOC <sup>7</sup>		
			(ppmvd) <sup>6</sup>	(lb/hr) <sup>5</sup>	(g/sec)	(ppmvd) <sup>6</sup>	(lb/hr) <sup>5</sup>	(g/sec)	(ppmvd) <sup>6</sup>	(lb/hr) <sup>5</sup>	(g/sec)
0	1	100	25	203.5	25.64	6	31.9	4.0	1.5	4.2	0.53
	2	75	25	162.8	20.51	19	75.9	9.6	1.6	3.6	0.46
	3	50	25	124.3	15.66	132	394.9	49.8	2.8	4.8	0.61
60	4	100	25	183.7	23.15	5	23.1	2.9	1.1	2.9	0.36
	5	75	25	148.5	18.71	15	55.0	6.9	1.1	2.3	0.29
	6	60	25	122.2	15.40	50	149.6	18.8	1.1	1.9	0.24
98	7	100	25	172.7	21.76	5	20.9	2.6	1.1	2.6	0.33
	8	75	25	137.5	17.33	15	50.6	6.4	1.1	2.1	0.26
	9	60	25	113.1	14.25	50	138.6	17.5	1.1	1.8	0.22
<b>Maximums</b>			<b>25</b>	<b>203.5</b>	<b>25.64</b>	<b>132</b>	<b>394.9</b>	<b>49.76</b>	<b>2.8</b>	<b>4.8</b>	<b>0.61</b>

<sup>1</sup> As measured by EPA Reference Method 5B or 17.

<sup>2</sup> Based on natural gas sulfur content of 2.0 gr/100 ft<sup>3</sup>.

<sup>3</sup> Based on 7.5% conversion of SO<sub>2</sub> to H<sub>2</sub>SO<sub>4</sub>.

<sup>4</sup> Table 1.4-2, AP-42, March 1998.

<sup>5</sup> Includes a 10% margin for variability in stack sampling.

<sup>6</sup> Corrected to 15% O<sub>2</sub>.

<sup>7</sup> Non-methane, non-ethane hydrocarbons (NMHC) expressed as methane.

Sources: ECT, 1998.  
 ABB, 1998.

**Table 3. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
 ABB GT-24 CT; Distillate Fuel Oil-Firing  
 CT Hourly Criteria and H<sub>2</sub>SO<sub>4</sub> Emission Rates (Per CT)**

Temp. (°F)	Case	Load (%)	PM/PM <sub>10</sub> <sup>1</sup>		SO <sub>2</sub> <sup>2</sup>		H <sub>2</sub> SO <sub>4</sub> <sup>3</sup>		Pb <sup>4</sup>	
			(lb/hr) <sup>5</sup>	(g/sec)	(lb/hr)	(g/sec)	(lb/hr)	(g/sec)	(lb/hr)	(g/sec)
0	1	100	83.0	10.46	111.8	14.08	12.8	1.62	0.120	0.015
	2	75	78.0	9.83	86.7	10.93	10.0	1.25	0.093	0.012
	3	50								
60	4	100	46.2	5.82	97.5	12.28	11.2	1.41	0.105	0.013
	5	75	46.2	5.82	77.6	9.77	8.9	1.12	0.084	0.011
	6	60								
98 (6)	7	100	22.9	2.88	84.3	10.63	9.7	1.22	0.091	0.011
	8	75	26.1	3.28	69.1	8.70	7.9	1.00	0.075	0.009
	9	60								
<b>Maximums</b>			<b>83.0</b>	<b>10.46</b>	<b>111.8</b>	<b>14.08</b>	<b>12.8</b>	<b>1.62</b>	<b>0.120</b>	<b>0.015</b>

Temp. (°F)	Case	Load (%)	NO <sub>x</sub>			CO			VOC <sup>8</sup>		
			(ppmvd) <sup>7</sup>	(lb/hr) <sup>5</sup>	(g/sec)	(ppmvd) <sup>7</sup>	(lb/hr) <sup>5</sup>	(g/sec)	(ppmvd) <sup>7</sup>	(lb/hr) <sup>5</sup>	(g/sec)
0	1	100	42	393.8	49.62	25	141.9	17.9	7.5	24.5	3.09
	2	75	42	305.8	38.53	13	56.1	7.1	7.5	19.0	2.40
	3	50									
60 (9)	4	100	42	342.5	43.15	25	126.6	16.0	7.5	22.7	2.86
	5	75	42	259.4	32.68	13	48.8	6.1	7.5	16.1	2.03
	6	60									
98 (9)	7	100	42	314.6	39.64	25	113.6	14.3	7.5	20.1	2.53
	8	75	42	247.7	31.22	13	44.5	5.6	7.5	14.8	1.88
	9	60									
<b>Maximums</b>			<b>42</b>	<b>393.8</b>	<b>49.62</b>	<b>25</b>	<b>141.9</b>	<b>17.88</b>	<b>7.5</b>	<b>24.5</b>	<b>3.09</b>

<sup>1</sup> As measured by EPA Reference Method 5B or 17.

<sup>2</sup> Based on fuel oil sulfur content of 0.05 wt percent.

<sup>3</sup> Based on 7.5% conversion of SO<sub>2</sub> to H<sub>2</sub>SO<sub>4</sub>.

<sup>4</sup> Table 3.1-4., AP-42, October 1996.

<sup>5</sup> Includes a 10% margin for variability in stack sampling.

<sup>6</sup> Estimated from 0 and 60 °F data.

<sup>7</sup> Corrected to 15% O<sub>2</sub>.

<sup>8</sup> Non-methane, non-ethane hydrocarbons (NMHC) expressed as methane.

<sup>9</sup> Estimated from 0 °F ABB data and Westinghouse 501F data.

Sources: ECT, 1998.

ABB, 1998.



**Table 4. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
ABB GT-24 CT; Natural Gas-Firing  
CT Hourly Hazardous Air Pollutant Emission Rates (Per CT)**

Parameter	Units	Case		
		100% - 0 °F	100% - 60 °F	100% - 98 °F
Maximum Hourly Fuel Flow:	10 <sup>6</sup> ft <sup>3</sup> /hr	1.965	1.774	1.643
Maximum Annual Hours:		N/A	3,000	N/A

Pollutant	Emission Factor <sup>1</sup> (lb/10 <sup>6</sup> ft <sup>3</sup> )	Emission Rates			
		0 °F	60 °F	98 °F	Annual
		(lb/hr)	(lb/hr)	(lb/hr)	(ton/yr)
Arsenic	2.00E-04	3.93E-04	3.55E-04	3.29E-04	5.32E-04
Benzene	2.10E-03	4.13E-03	3.73E-03	3.45E-03	5.59E-03
Beryllium	1.20E-05	2.36E-05	2.13E-05	1.97E-05	3.19E-05
Cadmium	1.10E-03	2.16E-03	1.95E-03	1.81E-03	2.93E-03
Chromium	1.40E-03	2.75E-03	2.48E-03	2.30E-03	3.73E-03
Cobalt	8.40E-05	1.65E-04	1.49E-04	1.38E-04	2.24E-04
Dichlorobenzene	1.20E-03	2.36E-03	2.13E-03	1.97E-03	3.19E-03
Formaldehyde	7.50E-02	1.47E-01	1.33E-01	1.23E-01	2.00E-01
Lead	5.00E-04	9.83E-04	8.87E-04	8.21E-04	1.33E-03
Manganese	3.80E-04	7.47E-04	6.74E-04	6.24E-04	1.01E-03
Mercury	2.60E-04	5.11E-04	4.61E-04	4.27E-04	6.92E-04
Naphthalene	6.10E-04	1.20E-03	1.08E-03	1.00E-03	1.62E-03
Nickel	2.10E-03	4.13E-03	3.73E-03	3.45E-03	5.59E-03
Polycyclic Organic Matter	8.82E-05	1.73E-04	1.56E-04	1.45E-04	2.35E-04
Selenium	2.40E-05	4.72E-05	4.26E-05	3.94E-05	6.39E-05
Toluene	3.40E-03	6.68E-03	6.03E-03	5.59E-03	9.05E-03

<sup>1</sup> Section 1.4, Natural Gas Combustion, Tables 1.4-2., 1.4-3 and 1.4-4, EPA AP-42, March 1998.

Source: ECT, 1999.

**Table 5. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
 ABB GT-24 CT; Distillate Fuel Oil-Firing  
 CT Hourly Hazardous Air Pollutant Emission Rates (Per CT)**

Parameter	Units	Case		
		100% - 0 °F	100% - 60 °F	100% - 98 °F
Maximum Hourly Fuel Flow:	10 <sup>6</sup> Btu/hr	2,077.5	1,811.6	1,568.1
Maximum Annual Hours:		N/A	500	N/A

Pollutant	Emission Factor <sup>1</sup> (lb/10 <sup>6</sup> Btu)	Emission Rates			
		0 °F	60 °F	98 °F	Annual
		(lb/hr)	(lb/hr)	(lb/hr)	(ton/yr)
Antimony	2.20E-05	4.57E-02	3.99E-02	3.45E-02	9.96E-03
Arsenic	4.90E-06	1.02E-02	8.88E-03	7.68E-03	2.22E-03
Beryllium	3.30E-07	6.86E-04	5.98E-04	5.17E-04	1.49E-04
Cadmium	4.20E-06	8.73E-03	7.61E-03	6.59E-03	1.90E-03
Chromium	4.70E-05	9.76E-02	8.51E-02	7.37E-02	2.13E-02
Cobalt	9.10E-06	1.89E-02	1.65E-02	1.43E-02	4.12E-03
Lead	5.80E-05	1.20E-01	1.05E-01	9.10E-02	2.63E-02
Manganese	3.40E-04	7.06E-01	6.16E-01	5.33E-01	1.54E-01
Mercury	9.10E-07	1.89E-03	1.65E-03	1.43E-03	4.12E-04
Nickel	1.20E-03	2.49E+00	2.17E+00	1.88E+00	5.43E-01
Phosphorus	3.00E-04	6.23E-01	5.43E-01	4.70E-01	1.36E-01
Selenium	5.30E-06	1.10E-02	9.60E-03	8.31E-03	2.40E-03

<sup>1</sup> Section 3.1, Stationary Gas Turbines, Table 3.1-4, EPA AP-42, October 1996.

Source: ECT, 1999.

**Table 6A. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
ABB GT-24 CTs  
CT Annual Emission Rates - Criteria Pollutants**

Source	Case	No. of CTs	Annual Operations (hrs/yr/CT)	Emission Rates					
				NO <sub>x</sub>		CO		VOC	
				(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)
CT 1-3	4 - NG	3	2,000	551.1	551.1	69.3	69.3	8.6	8.6
CT 1-3	6 - NG	3	500	366.6	91.7	448.8	112.2	5.6	1.4
CT 1-3	4 - Oil	3	500	1,027.4	256.9	379.9	95.0	68.1	17.0
			<b>Totals</b>	<b>N/A</b>	<b>899.6</b>	<b>N/A</b>	<b>276.5</b>	<b>N/A</b>	<b>27.0</b>

Source	Case	No. of CTs	Annual Operations (hrs/yr/CT)	Emission Rates					
				PM/PM <sub>10</sub>		SO <sub>2</sub>		Pb	
				(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)
CT 1-3	4 - NG	3	2,000	72.6	72.6	27.6	27.6	0.003	0.003
CT 1-3	6 - NG	3	500	52.8	13.2	19.1	4.8	0.002	0.0005
CT 1-3	4 - Oil	3	500	138.6	34.7	292.4	73.1	0.32	0.08
			<b>Totals</b>	<b>N/A</b>	<b>120.5</b>	<b>N/A</b>	<b>105.5</b>	<b>N/A</b>	<b>0.08</b>

1. CT-1, CT-2, and CT-3 operating with natural gas-firing at base load for 2,000 hours/year (Case 4).
2. CT-1, CT-2, and CT-3 operating with natural gas-firing at 50% load for 500 hours/year (Case 6).
3. CT-1, CT-2, and CT-3 operating with fuel oil-firing at base load for 500 hours/year at base load (Case 4).
4. SO<sub>2</sub> and H<sub>2</sub>SO<sub>4</sub> rates based on natural gas sulfur content of 2.0 gr/100 ft<sup>3</sup> and 7.5% conversion of SO<sub>2</sub> to H<sub>2</sub>SO<sub>4</sub>.
5. SO<sub>2</sub> and H<sub>2</sub>SO<sub>4</sub> rates based on fuel oil sulfur content of 0.05 wt. percent and 7.5% conversion of SO<sub>2</sub> to H<sub>2</sub>SO<sub>4</sub>.

Sources: ECT, 1999.  
ABB, 1999.  
GPP, 1999.

**Table 6B. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
ABB GT-24 CTs  
CT Annual Emission Rates - Criteria Pollutants**

Source	Case	No. of CTs	Annual Operations (hrs/yr/CT)	Emission Rates					
				NO <sub>x</sub>		CO		VOC	
				(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)
CT 1-3	4 - NG	3	2,500	551.1	688.9	69.3	86.6	8.6	10.7
CT 1-3	6 - NG	3	0	366.6	0.0	448.8	0.0	5.6	0.0
CT 1-3	4 - Oil	3	500	1,027.4	256.9	379.9	95.0	68.1	17.0
			<b>Totals</b>	<b>N/A</b>	<b>945.7</b>	<b>N/A</b>	<b>181.6</b>	<b>N/A</b>	<b>27.7</b>

Source	Case	No. of CTs	Annual Operations (hrs/yr/CT)	Emission Rates					
				PM/PM <sub>10</sub>		SO <sub>2</sub>		Pb	
				(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)
CT 1-3	4 - NG	3	2,500	72.6	90.8	27.6	34.5	0.003	0.003
CT 1-3	6 - NG	3	0	52.8	0.0	19.1	0.0	0.002	0.0000
CT 1-3	4 - Oil	3	500	138.6	34.7	292.4	73.1	0.32	0.08
			<b>Totals</b>	<b>N/A</b>	<b>125.4</b>	<b>N/A</b>	<b>107.6</b>	<b>N/A</b>	<b>0.08</b>

1. CT-1, CT-2, and CT-3 operating with natural gas-firing at base load for 2,500 hours/year (Case 4).
2. CT-1, CT-2, and CT-3 operating with natural gas-firing at 50% load for 0 hours/year (Case 6).
3. CT-1, CT-2, and CT-3 operating with fuel oil-firing at base load for 500 hours/year at base load (Case 4).
4. SO<sub>2</sub> and H<sub>2</sub>SO<sub>4</sub> rates based on natural gas sulfur content of 2.0 gr/100 ft<sup>3</sup> and 7.5% conversion of SO<sub>2</sub> to H<sub>2</sub>SO<sub>4</sub>.
5. SO<sub>2</sub> and H<sub>2</sub>SO<sub>4</sub> rates based on fuel oil sulfur content of 0.05 wt. percent and 7.5% conversion of SO<sub>2</sub> to H<sub>2</sub>SO<sub>4</sub>.

Sources: ECT, 1999.  
ABB, 1999.  
GPP, 1999.

**Table 7. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
 ABB GT-24 CTs  
 CT Annual Emission Rates - Hazardous Air Pollutants**

Pollutant	Annual Emissions (ton/yr)
Antimony	9.96E-03
Arsenic	2.75E-03
Benzene	5.59E-03
Beryllium	1.81E-04
Cadmium	4.83E-03
Chromium	2.50E-02
Cobalt	4.35E-03
Dichlorobenzene	3.19E-03
Formaldehyde	2.00E-01
Lead	2.76E-02
Manganese	1.55E-01
Mercury	1.10E-03
Naphthalene	1.62E-03
Nickel	5.49E-01
Phosphorus	1.36E-01
Polycyclic Organic Matter	2.35E-04
Selenium	2.46E-03
Toluene	9.05E-03
Total HAPS	1.14

Source: ECT, 1999.

**Table 8. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
 ABB GT-24 CT  
 NSPS GG NO<sub>x</sub> Limits**

Fuel	GT-24 Gas Turbine ISO Heat Rate (LHV)		F	NO <sub>x</sub> Std (ppmvd)
	(Btu/kw-hr)	(kj/w-hr)		
Gas	8,910	9.401	0.0	114.9
Oil	9,241	9.750	0.0	110.8

Note: Oil data estimated from ABB gas data and Westinghouse 501F data.

Sources: ABB, 1998.  
 ECT, 1998.

**Table 9.A. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
CT Exhaust Data - ABB GT-24 CT (Per CT)  
Natural Gas-Firing**

**A. Exhaust MW**

		Exhaust Gas Composition - Volume %								
Component	MW (lb/mole) Case	100 % Load			75 % Load			60 % Load		
		0 °F	60 °F	98 °F	0 °F	60 °F	98 °F	0 °F	60 °F	98 °F
		1	4	7	2	5	8	3	6	9
Ar	39.944	0.90	0.88	0.88	0.90	0.89	0.88	0.90	0.89	0.89
N <sub>2</sub>	28.016	74.60	73.94	73.18	74.60	74.11	73.40	74.80	74.23	73.53
O <sub>2</sub>	32.000	11.10	11.20	11.12	11.20	11.67	11.78	11.90	12.03	12.13
CO <sub>2</sub>	44.010	4.50	4.45	4.38	4.40	4.23	4.08	4.10	4.06	3.91
H <sub>2</sub> O	17.008	9.00	9.53	10.44	8.80	9.11	9.86	8.30	8.79	9.55
CO <sub>2</sub>	64.066	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
CO	28.010	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HC (CH <sub>4</sub> )	16.042	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NO	30.008	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Totals	100.10	100.00	100.00	99.90	100.00	100.00	100.00	100.00	100.01
Exhaust MW (lb/mole)		28.32	28.23	28.11	28.28	28.26	28.16	28.34	28.28	28.18
Exhaust Flow (lb/sec)		937.06	845.56	791.67	757.78	713.89	683.61	620.59	637.39	611.44
Exhaust Temp. (°F)		1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000
(K)		811	811	811	811	811	811	811	811	811
Exhaust O <sub>2</sub> (Vol %, Dry)		12.20	12.38	12.42	12.28	12.84	13.07	12.98	13.19	13.41

Sources: ECT, 1999.  
ABB, 1998.

**Table 9.B. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
CT Exhaust Data - ABB GT-24 CT (Per CT)  
Natural Gas-Firing**

**B. Exhaust Flow Rates**

Case	Flow Rates (ft <sup>3</sup> /min)								
	100 % Load			75 % Load			60 % Load		
	0 °F	60 °F	98 °F	0 °F	60 °F	98 °F	0 °F	60 °F	98 °F
	1	4	7	2	5	8	3	6	9
Exh. Temp. (°F)	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000
ACFM	2,114,956	1,914,688	1,800,017	1,713,112	1,614,826	1,552,024	1,399,847	1,440,606	1,386,914
Velocity (fps)	138.5	125.4	117.9	112.2	105.8	101.7	91.7	94.4	90.8
Velocity (m/s)	42.2	38.2	35.9	34.2	32.2	31.0	27.9	28.8	27.7
SCFM, Dry <sup>1</sup>	696,023	626,481	582,985	565,017	530,796	505,938	464,227	475,192	453,669
ACFM (15% O <sub>2</sub> , Dry)	2,838,701	2,501,516	2,316,961	2,282,446	2,005,455	1,855,921	1,723,780	1,717,225	1,592,377

<sup>1</sup> At 68 °F.

Sources: ECT, 1999.  
ABB, 1998.



**Table 10.A. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
CT Exhaust Data - ABB GT-24 CT (Per CT)  
Distillate Fuel Oil-Firing**

**A. Exhaust MW**

Component	MW (lb/mole) Case	Exhaust Gas Composition - Volume %								
		100 % Load			75 % Load			60 % Load		
		0 °F	60 °F	98 °F	0 °F	60 °F	98 °F	0 °F	60 °F	98 °F
		1	4	7	2	5	8	3	6	9
Ar	39.944	0.80	0.80	0.80	0.80	0.80	0.80	0.90	0.90	0.90
N <sub>2</sub>	28.016	70.10	70.10	70.10	71.10	71.10	71.10	72.10	72.10	72.10
O <sub>2</sub>	32.000	9.00	9.00	9.00	9.70	9.70	9.70	10.60	10.60	10.60
CO <sub>2</sub>	44.010	6.70	6.70	6.70	6.40	6.40	6.40	6.00	6.00	6.00
H <sub>2</sub> O	17.008	13.30	13.30	13.30	11.90	11.90	11.90	10.50	10.50	10.50
CO <sub>2</sub>	64.066	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
CO	28.010	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HC (CH <sub>4</sub> )	16.042	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NO	30.008	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Totals	99.90	99.90	99.90	99.90	99.90	99.90	100.10	100.10	100.10
Exhaust MW (lb/mole)		28.05	28.05	28.05	28.18	28.18	28.18	28.38	28.38	28.38
Exhaust Flow <sup>1</sup> (lb/sec)		940.83	807.02	709.08	766.67	649.87	563.04	626.11	542.53	482.05
Exhaust Temp. (°F)		1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000
(K)		811	811	811	811	811	811	811	811	811
Exhaust O <sub>2</sub> (Vol %, Dry)		10.38	10.38	10.38	11.01	11.01	11.01	11.84	11.84	11.84

<sup>1</sup> Data for 60 and 98 °F estimated from 0 °F ABB data and Westinghouse 501F data.

Sources: ECT, 1999.

ABB, 1998.

**Table 10.B. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
CT Exhaust Data - ABB GT-24 CT (Per CT)  
Distillate Fuel Oil-Firing**

**B. Exhaust Flow Rates**

Case	Flow Rates (ft <sup>3</sup> /min)								
	100 % Load			75 % Load			60 % Load		
	0 °F	60 °F	98 °F	0 °F	60 °F	98 °F	0 °F	60 °F	98 °F
	1	4	7	2	5	8	3	6	9
Exh. Temp. (°F)	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000
ACFM	2,144,158	1,839,201	1,615,997	1,738,924	1,474,003	1,277,058	1,410,415	1,222,146	1,085,889
Velocity (fps)	140.4	120.5	105.8	113.9	96.5	83.6	92.4	80.0	71.1
Velocity (m/s)	42.8	36.7	32.3	34.7	29.4	25.5	28.2	24.4	21.7
SCFM, Dry <sup>1</sup>	672,290	576,673	506,688	554,035	469,629	406,881	456,511	395,573	351,471
ACFM (15% O <sub>2</sub> , Dry)	3,314,468	2,843,062	2,498,030	2,567,978	2,176,752	1,885,912	1,937,647	1,679,000	1,491,809

<sup>1</sup> At 68 °F.

Sources: ECT, 1999.  
ABB, 1998.

**Table 11. Hardee County Generating Facility, CT-1, CT-2, and CT-3  
CT Fuel Flow Rate Data - ABB GT-24 (Per CT)**

**A. Natural Gas-Firing**

Case	100 % Load			75 % Load			60 % Load		
	0 °F	60 °F	98 °F	0 °F	60 °F	98 °F	0 °F	60 °F	98 °F
	1	4	7	2	5	8	3	6	9
Heat Input - LHV (MMBtu/hr)	1,821	1,644	1,522	1,454	1,318	1,220	1,110	1,136	1,053
Fuel Rate (lb/hr)	86,827	78,385	72,583	69,339	62,849	58,173	52,916	54,200	50,221
Fuel Rate (10 <sup>6</sup> ft <sup>3</sup> /hr)	1.965	1.774	1.643	1.569	1.422	1.317	1.198	1.227	1.137
Fuel Rate (lb/sec)	24.119	21.774	20.162	19.261	17.458	16.159	14.699	15.055	13.950

**B. Distillate Fuel Oil-Firing**

Case	100 % Load			75 % Load			60 % Load		
	0 °F	60 °F	98 °F	0 °F	60 °F	98 °F	0 °F	60 °F	98 °F
	1	4	7	2	5	8	3	6	9
Heat Input - LHV (MMBtu/hr)	2,078	1,812	1,568	1,612	1,442	1,285	1,219	1,080	962
Fuel Rate (lb/hr)	111,779	97,478	84,331	86,707	77,559	69,079	65,576	58,127	51,722
Fuel Rate (10 <sup>3</sup> gal/hr)	15.291	13.334	11.536	11.861	10.610	9.450	8.970	7.951	7.075
Fuel Rate (lb/sec)	31.050	27.077	23.425	24.085	21.544	19.189	18.216	16.146	14.367

Note: Fuel oil data for 60 and 98 °F estimated from 0 °F ABB data and Westinghouse 501F data.

Sources: ECT, 1999.  
ABB, 1998.

# EMISSION INVENTORY WORKSHEET

Hardee County Generating Facility

NGH-1

## EMISSION SOURCE TYPE

NATURAL GAS COMBUSTION - CRITERIA POLLUTANTS

Figure:

## FACILITY AND SOURCE DESCRIPTION

Emission Source Description: Natural Gas Heater  
 Emission Control Method(s)/ID No.(s): None  
 Emission Point ID: NGH-1

## EMISSION ESTIMATION EQUATIONS

Emission (lb/hr) = Heat Input (MMBtu/hr) x Pollutant Emission Factor (lb/MMBtu)

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

Source: ECT, 2000.

## INPUT DATA AND EMISSIONS CALCULATIONS

Operating Hours: 24 Hrs/Day                      7 Days/Wk                      8,760 Hrs/Yr

Criteria Pollutant	Heat Input (MMBtu/hr)	Pollutant Emission Factor <sup>1</sup> (lb/MMBtu)	Potential Emission Rates	
			(lb/hr)	(tpy)
SO <sub>2</sub>	10.0	0.0006	0.01	0.03
NO <sub>x</sub>	10.0	0.10	1.0	4.4
PM/PM <sub>10</sub> <sup>2</sup>	10.0	0.0019	0.0	0.1
CO	10.0	0.084	0.8	3.7
VOC	10.0	0.0055	0.1	0.2

## SOURCES OF INPUT DATA

Parameter	Data Source
Operating Hours	GPP, 2000.
Maximum Heat Input	GPP, 2000.
Emission Factors	AP-42, EPA, March 1998.

## NOTES AND OBSERVATIONS

<sup>1</sup> Emission factors based on natural gas heat content of 1,000 Btu/scf, and density of 0.04419 lb/ft<sup>3</sup>.

<sup>2</sup> PM/PM<sub>10</sub> represents filterable particulate matter.

## DATA CONTROL

Data Collected by:	T. Davis	Date:	1/00
Evaluated by:	T. Davis	Date:	1/00
Data Entered by:	T. Davis	Date:	1/00
Reviewed by:	T. Davis	Date:	1/00

TANKS PROGRAM 3.0  
EMISSIONS REPORT - DETAIL FORMAT  
TANK IDENTIFICATION AND PHYSICAL CHARACTERISTICS

01/07/00  
PAGE 1

## Best Available Copy

### Identification

Identification No.: ST1  
City: Wachula  
State: FL  
Company: HCGF  
Type of Tank: Vertical Fixed Roof

### Tank Dimensions

Shell Height (ft): 30.0  
Diameter (ft): 110.0  
Liquid Height (ft): 21.1  
Avg. Liquid Height (ft): 15.0  
Volume (gallons): 1500150  
Turnovers: 5.1  
Net Throughput (gal/yr): 7650765

### Paint Characteristics

Shell Color/Shade: White/White  
Shell Condition: Good  
Roof Color/Shade: White/White  
Roof Condition: Good

### Roof Characteristics

Type: Cone  
Height (ft): 2.70  
Radius (ft) (Dome Roof): 0.00  
Slope (ft/ft) (Cone Roof): 0.0491

### Breather Vent Settings

Vacuum Setting (psig): -0.01  
Pressure Setting (psig): 0.01

Meteorological Data Used in Emission Calculations: Tampa, Florida

(Avg Atmospheric Pressure = 14.7 psia)

TANKS PROGRAM 3.0  
 EMISSIONS REPORT - DETAIL FORMAT  
 LIQUID CONTENTS OF STORAGE TANK

Mixture/Component	Month	Daily Liquid Surf. Temperatures (deg F)			Liquid Bulk	Vapor Pressures (psia)			Vapor	Liquid	Vapor	Mol. Weight	Basis for Vapor Pressure Calculations
		Avg.	Min.	Max.	Temp. (deg F)	Avg.	Min.	Max.	Weight	Mass	Mass		
Distillate fuel oil no. 2	All	74.01	68.83	79.19	72.02	0.0102	0.0086	0.0119	130.000			130.00	Option 3: A=12.1010, B=8907.0

## Best Available Copy

### Annual Emission Calculations

Standing Losses (lb): 475.3251  
 Vapor Space Volume (cu ft): 151102.6  
 Vapor Density (lb/cu ft): 0.0002  
 Vapor Space Expansion Factor: 0.037669  
 Vented Vapor Saturation Factor: 0.991506

Tank Vapor Space Volume  
 Vapor Space Volume (cu ft): 151102.6  
 Tank Diameter (ft): 110.0  
 Vapor Space Outage (ft): 15.90  
 Tank Shell Height (ft): 30.0  
 Average Liquid Height (ft): 15.0  
 Roof Outage (ft): 0.90

Roof Outage (Cone Roof)  
 Roof Outage (ft): 0.90  
 Roof Height (ft): 2.700  
 Roof Slope (ft/ft): 0.04909  
 Shell Radius (ft): 55.0

Vapor Density  
 Vapor Density (lb/cu ft): 0.0002  
 Vapor Molecular Weight (lb/lb-mole): 130.000000  
 Vapor Pressure at Daily Average Liquid  
 Surface Temperature (psia): 0.010165  
 Daily Avg. Liquid Surface Temp. (deg. R): 533.68  
 Daily Average Ambient Temp. (deg. R): 531.67  
 Ideal Gas Constant R  
 (psia cuft / (lb-mole-deg R)): 10.731  
 Liquid Bulk Temperature (deg. R): 531.69  
 Tank Paint Solar Absorptance (Shell): 0.17  
 Tank Paint Solar Absorptance (Roof): 0.17  
 Daily Total Solar Insolation  
 Factor (Btu/sqftday): 1492.00

Vapor Space Expansion Factor  
 Vapor Space Expansion Factor: 0.037669  
 Daily Vapor Temperature Range (deg.R): 20.71  
 Daily Vapor Pressure Range (psia): 0.003303  
 Breather Vent Press. Setting Range (psia): 0.02  
 Vapor Pressure at Daily Average Liquid  
 Surface Temperature (psia): 0.010165  
 Vapor Pressure at Daily Minimum Liquid  
 Surface Temperature (psia): 0.008631  
 Vapor Pressure at Daily Maximum Liquid  
 Surface Temperature (psia): 0.011934  
 Daily Avg. Liquid Surface Temp. (deg R): 533.68  
 Daily Min. Liquid Surface Temp. (deg R): 528.50  
 Daily Max. Liquid Surface Temp. (deg R): 538.86  
 Daily Ambient Temp. Range (deg.R): 18.90

## Best Available Copy

### Annual Emission Calculations

#### Vented Vapor Saturation Factor

Vented Vapor Saturation Factor:	0.991506
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	0.010165
Vapor Space Outage (ft):	15.90

#### Working Losses (lb):

Working Losses (lb):	240.7235
Vapor Molecular Weight (lb/lb-mole):	130.000000
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	0.010165
Annual Net Throughput (gal/yr):	7650765
Turnover Factor:	1.0000
Maximum Liquid Volume (cuft):	200520
Maximum Liquid Height (ft):	21.1
Tank Diameter (ft):	110.0
Working Loss Product Factor:	1.00

Total Losses (lb):	716.05
--------------------	--------



Best Available Copy

Annual Emissions Report

Liquid Contents	Losses (lbs.):		Total
	Standing	Working	
Distillate fuel oil no. 2	475.33	240.72	716.05
Total:	475.33	240.72	716.05

**APPENDIX E**  
**DISPERSION MODELING FILES**

**U.S. Postal Service**  
**CERTIFIED MAIL RECEIPT**  
*(Domestic Mail Only; No Insurance Coverage Provided)*

7099 3400 0000 1453 1460

Article Sent To:  
**Mr. Michael F./Vogt**

Postage	\$	Grainite Power
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
<b>Total Postage &amp; Fees</b>	<b>\$</b>	Postmark Here

Name (Please Print Clearly) (to be completed by mailer)  
**Mr. Michael F. Vogt**  
 Street, Apt. No., or PO Box No.  
**655 Craig Rd.-Ste 336**  
 City, State, ZIP+4  
**St. Louis, MO 63141**  
 PS Form 3800, July 1999 See Reverse for Instructions

**SENDER: COMPLETE THIS SECTION**

- Complete items 1., 2., and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:  
**Mr. Michael F. Vogt**  
**Granite Power Partners II, L.P.**  
**655 Craig Rd., Ste 336**  
**St. Louis, Mo 63141**

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly) B. Date of Delivery  
**11-30**

C. Signature  Agent  
 Addressee  
**X** *[Signature]*

D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

3. Service Type  
 Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes

2. Article Number (Copy from service label)  
**7099 3400 0000 1453 1460**

PS Form 3811, July 1999 Domestic Return Receipt 102595-99-M-1789

TEB2 E5HT 0000 00HE 6607

**U.S. Postal Service  
CERTIFIED MAIL RECEIPT**  
(Domestic Mail Only, No Insurance Coverage Provided)

Article Sent To:

Mr Michael F Vogt

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$</b>

87/00

Postmark  
Here

Name (Please Print Clearly) (to be completed by mailer)

Mr. Michael F Vogt - Granite Power

Street, Apt. No., or PO Box No.

655 Craig Rd Ste 336

City, State, ZIP+4

St. Louis, MO 63025 63141

PS Form 3800, July 1999

See Reverse for Instructions

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

MR MICHAEL F VOGT  
GRANITE POWER PARTNERS II LP  
655 CRAIG RD STE 336  
ST LOUIS MO ~~63025~~

63141

2. Article Number (Copy from service label)

7099 3400 0000 1453 2931

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly)

Cindy Schutte

B. Date of Delivery

8/14/00

C. Signature

x Cindy Schutte

- Agent  
 Addressee

D. Is delivery address different from item 1?  Yes

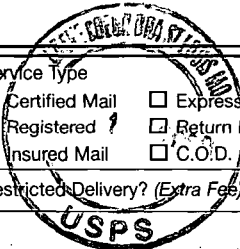
If YES, enter delivery address below:  No

3. Service type

- Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)

Yes



**COMMENT CARD**  
**DEP PUBLIC MEETING**  
**July 12, 2000**

(please print)

**NAME:** Ann Vanek / Citizens for a Rational Energy Policy  
**ADDRESS:** 305 Crest St.  
Sanford, FL 32771

**COMMENTS:**

thank you  
for a Wonderful Presentation - well done.

We are concerned with the DEP's lack of authority to look at the cumulative impact of the 25-30 plants currently locating in FL. We feel these plants pose a serious threat to the ambient air quality and therefore Human Health. Even this plant will increase the emissions in the city by nearly 100%.

**COMMENT CARD**  
**DEP PUBLIC MEETING**  
**July 12, 2000**

(please print)

**NAME:** Andy Quinn, Polk Sierra  
**ADDRESS:** Po Box 2237  
LAKELAND, FL 33806

**COMMENTS:**

THANKS FOR THE PRESENTATION. PLEASE CONSIDER CUMULATIVE EFFECTS OF POWER PLANTS IN FLORIDA. ALTHOUGH THE PRESENTATION NOTES MINIMAL EFFECTS OF PM, SO<sub>2</sub>, NOX ON PEOPLE, HOW ABOUT ON GREENWAYS? CONSIDER HAVING SOMEONE RESEARCH EFFECTS OF PEOPLE. (JUST DO A LITERATURE REVIEW)

FACSIMILE COVER SHEET



LS POWER, LLC  
655 Craig Road, Suite 336  
St. Louis, MO 63141  
(314) 993-2700 Fax (314) 993-2790

---

DATE: May 30, 2000 FAX #: (850) 922-6979  
TO: Al Linero / Joe Kahn  
FROM: Mike Vogt  
SUBJECT: Comments to Granite Power Partners II, L.P. Hardee Project  
PAGES TO FOLLOW: 5

Please see attached letter. Original to follow via regular mail.

Joe,

I don't believe that any of the requested changes in this letter will change the results of the modeling. In the original AP, they conducted a modeling screening analysis that considered all of the possible CT's, loads, and temperatures. Refined modeling was then conducted using the worst case scenario.  
Chris



Florida  
Department of  
Environmental Protection

Jeb Bush  
Governor

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

David Struhs  
Secretary

F A X T R A N S M I

Post-it® Fax Note	7671	Date	5/15	# of pages	5
To	Michael Vogt	From	de lino		
Co./Dept	Granite PP	Co.	DEP-DARM		
Phone #		Phone #	850-921-9523		
Fax #		Fax #			

DATE: 5-10-00  
TO: MARJANE MONTAN  
PHONE: 921-9720

FAX: \_\_\_\_\_

FROM: MIKE HALPIN, BAR/NSR PHONE: 921-9530  
Division of Air Resources Management FAX: **850.922.6979**

RE: \_\_\_\_\_  
CC: \_\_\_\_\_

Total number of pages including cover sheet: 5

**Message**

THIS PETITION FOR AN ADM. HEARING  
CAME TO OUR FAX MACHINE. CAN YOU PLEASE  
SEE THAT IT ENDS UP AT THE RIGHT PLACE?

Thanks  
Mike Halpin

If there are any problems with this fax transmittal, please call the above phone number.

"Protect, Conserve, and Manage Florida's Environmental and Natural Resources"

Printed on recycled paper

Z 031 391 947

US Postal Service  
**Receipt for Certified Mail**

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to	
Mr. Michael F. Vogt	
Street & Number	
Granite Power Partners	
Post Office, State, & ZIP Code	
St. Louis, Mo.	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	
0490044-001-AL 4-17-00	
PSD-FL-281	

PS Form 3800, April 1995

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Received by (Please Print Clearly) B. Date of Delivery</p> <p>INDY Schulte 4-24-00</p>
<p>1. Article Addressed to:</p> <p>Mr. Michael F. Vogt Granite Power Partners II, L.P. 655 Craig Road, Suite 336 St. Louis, Missouri <del>63025</del> 63141</p>	<p>C. Signature</p> <p>X. <i>Indy Schulte</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>
<p>2. Article Number (Copy from service label)</p> <p>Z 031 391 947</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If YES, enter delivery address below:</p> <p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>



Z 031 391 865

US Postal Service

**Receipt for Certified Mail**

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to	
Michael Vogt	
Street & Number	
Granite Power P	
Post Office, State & ZIP Code	
St. Louis, MO	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	
2-17-00	
0490044-001-AC	
PSD-F1-281	

PS Form 3800, April 1995

Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- 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.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. Michael Vogt, P. Mgr.  
Granite Power Partners  
655 Craig Rd, Ste 336  
St. Louis, MO 63025

4a. Article Number

Z 031 391 865

4b. Service Type

- Registered
- Express Mail
- Return Receipt for Merchandise
- Certified
- Insured
- COD

7. Date of Delivery

2-22-00

5. Received By: (Print Name)

Crystal Abernathy

6. Signature: (Addressee or Agent)

X Crystal Abernathy

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



Thank you for using Return Receipt Service.

Z 031 391 920

US Postal Service

**Receipt for Certified Mail**

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sender	
Michael Vost	
Street & Number	
Granite Power Partners	
Post Office, State, & ZIP Code	
St. Louis MO	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	1-20-99
0490044-001-AC	
PSD-FI-281	

PS Form 3800, April 1995

Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- 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.

I also wish to receive the following services (for an extra fee):

- 1.  Addressee's Address
- 2.  Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Michael Vost, Proj Mgr  
Granite Power Partners  
655 Craig Rd - Suite 336  
St. Louis, MO

63025

4a. Article Number

Z031 391 920

4b. Service Type

- Registered
- Certified
- Express Mail
- Insured
- Return Receipt for Merchandise
- COD

7. Date of Delivery

1-24-00

5. Received By: (Print Name)

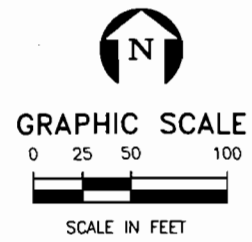
Jerry Charles

6. Signature: (Addressee or Agent)

X

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

Thank you for using Return Receipt Service.



**LEGEND**

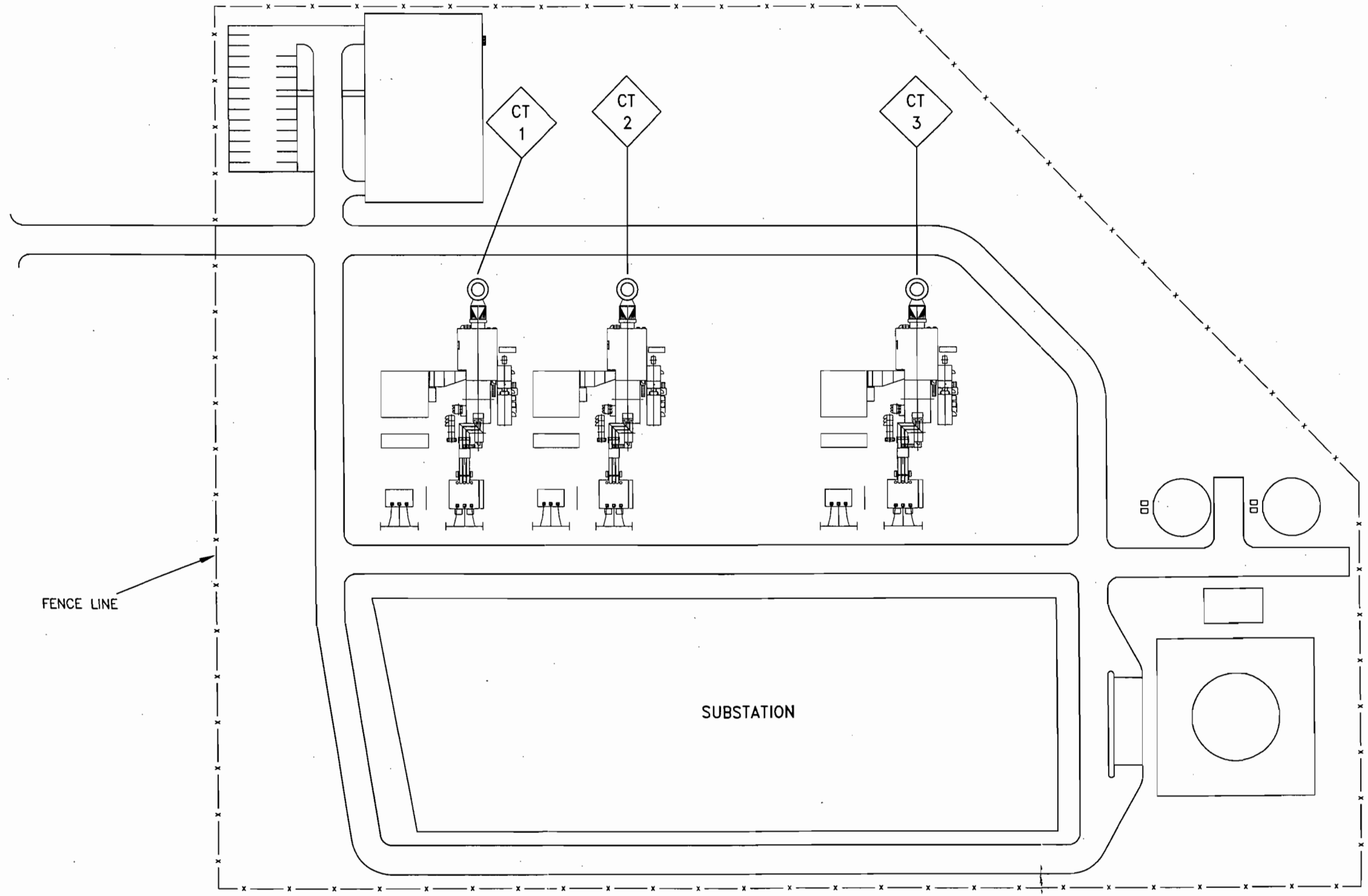


FIGURE 2-2.

HARDEE COUNTY GENERATION FACILITY SITE PLAN

Source: ECT, 1999.



Table 5-4. RBLC PM Summary for Natural Gas Fired CTS

RBLC ID	Facility Name	City	Permit Dates		Process Description	Thruput Rate	Emission Limit	Control System Description	Basis
			Issuance	Update					
AL-0096	MEAD COATED BOARD, INC.	PHENIX CITY	3/12/97	5/31/97	COMBINED CYCLE TURBINE (25 MW)	568 MMBTU/HR	2.5 LBS/HR (GAS)	EFFICIENT OPERATION OF THE COM. BUSTION TURBINE	BACT-PSD
AL-0109	SOUTHERN NATURAL GAS	AUBURN	3/2/98	4/24/98	9160 HP GE MODEL M53002G NATURAL GAS FIRED TURBINE	9160 HP	10.95 TPY	FUEL SPEC: NATURAL GAS	BACT-PSD
AL-0110	SOUTHERN NATURAL GAS	WARD	3/4/98	4/24/98	2-9160 HP GE MODEL M53002G NATURAL GAS FIRED TURBINES	9160 HP	10.95 TPY	FUEL SPEC: NATURAL GAS	BACT-PSD
AL-0120	GENERAL ELECTRIC PLASTICS	BURKVILLE	5/27/98	7/2/98	COMBINED CYCLE (TURBINE AND DUCT BURNER)		0.01 LBS/MMBTU	CLEAN FUEL - NATURAL GAS/HYDROGEN	BACT-PSD
AL-0128	ALABAMA POWER COMPANY - THEODORE COGENERATION	THEODORE	3/16/99	4/20/99	170 MW TURBINE W/ DUCT BURNER, HR BOILER, SCR	170 MW	0.012 LB/MMBTU	COMBUSTION OF NATURAL GAS ONLY	BACT-PSD
AL-0128	ALABAMA POWER COMPANY - THEODORE COGENERATION	THEODORE	3/16/99	4/20/99	220 MMBTU/HR BOILER	220 MMBTU/HR	0.008 LB/MMBTU	COMBUSTION OF NATURAL GAS ONLY	BACT-PSD
CA-0768	NORTHERN CALIFORNIA POWER AGENCY	LODI	10/2/97	3/16/98	GE FRAME 5 GAS TURBINE	325 MMBTU/HR	4.3 LB/DAY	NATURAL GAS, AIR INTAKE COOLER	LAER
CA-0793	TEMPO PLASTICS	VISALIA	12/31/96	4/23/98	GAS TURBINE COGENERATION UNIT		0.012 LB/MMBTU	OPACITY LIMIT APPLIES TO LUBE OIL VENTS.	LAER
CO-0017	THERMO INDUSTRIES, LTD.	FT. LUPTON	2/19/92	3/24/95	TURBINE, GAS FIRED, 5 EACH	246 MMBTU/H	25.8 LB/H	FUEL SPEC: NATURAL GAS FIRED	OTHER
CO-0018	BRUSH COGENERATION PARTNERSHIP	BRUSH		7/20/94	TURBINE	350 MMBTU/H	9.9 T/YR		OTHER
CO-0018	BRUSH COGENERATION PARTNERSHIP	BRUSH		7/20/94	TURBINE	350 MMBTU/H	9.9 T/YR		OTHER
CO-0019	COLORADO POWER PARTNERSHIP	BRUSH		7/20/94	TURBINES, 2 NAT GAS & 2 DUCT BURNERS	385 MMBTU/H EACH TURBINE	12.4 T/YR		OTHER
CO-0019	COLORADO POWER PARTNERSHIP	BRUSH		7/20/94	TURBINES, 2 NAT GAS & 2 DUCT BURNERS	385 MMBTU/H EACH TURBINE	12.4 T/YR		OTHER
FL-0045	CHARLES LARSEN POWER PLANT	CITY OF OF LAKELAND	7/25/91	3/24/95	TURBINE, GAS, 1 EACH	80 MW	0.006 LB/MMBTU	COMBUSTION CONTROL	BACT-PSD
FL-0045	CHARLES LARSEN POWER PLANT	CITY OF OF LAKELAND	7/25/91	3/24/95	TURBINE, GAS, 1 EACH	80 MW	0.006 LB/MMBTU	COMBUSTION CONTROL	BACT-PSD
FL-0052	FLORIDA POWER AND LIGHT	NORTH PALM BEACH	6/5/91	3/24/95	TURBINE, GAS, 4 EACH	400 MW	18 LB/H	COMBUSTION CONTROL	BACT-PSD
FL-0052	FLORIDA POWER AND LIGHT	NORTH PALM BEACH	6/5/91	3/24/95	TURBINE, CG, 4 EACH	400 MW	19 LB/H	COMBUSTION CONTROL	BACT-PSD
FL-0052	FLORIDA POWER AND LIGHT	NORTH PALM BEACH	6/5/91	3/24/95	TURBINE, GAS, 4 EACH	400 MW	18 LB/H	COMBUSTION CONTROL	BACT-PSD
FL-0052	FLORIDA POWER AND LIGHT	NORTH PALM BEACH	6/5/91	3/24/95	TURBINE, CG, 4 EACH	400 MW	19 LB/H	COMBUSTION CONTROL	BACT-PSD
FL-0053	FLORIDA POWER AND LIGHT	LAVOGROME REPOWERING S	3/31/91	3/24/95	TURBINE, GAS, 4 EACH	240 MW	15.4 LB/H	COMBUSTION CONTROL	BACT-PSD
FL-0053	FLORIDA POWER AND LIGHT	LAVOGROME REPOWERING S	3/14/91	3/24/95	TURBINE, GAS, 4 EACH	240 MW	15.4 LB/H	COMBUSTION CONTROL	BACT-PSD
FL-0054	LAKE COGEN LIMITED	UMATILLA	11/20/91	3/24/95	TURBINE, GAS, 2 EACH	42 MW	0.0065 LB/MMBTU	COMBUSTION CONTROL, FUEL SPEC: CLEAN FUEL	BACT-PSD
FL-0054	LAKE COGEN LIMITED	UMATILLA	11/20/91	3/24/95	TURBINE, GAS, 2 EACH	42 MW	0.0065 LB/MMBTU	COMBUSTION CONTROL, FUEL SPEC: CLEAN FUEL	BACT-PSD
FL-0068	ORANGE COGENERATION LP	BARTOW	12/30/93	1/13/95	TURBINE, NATURAL GAS, 2	368.3 MMBTU/H	5 LB/H	GOOD COMBUSTION	BACT-PSD
FL-0072	TIGER BAY LP	FT. MEADE	5/17/93	1/13/95	TURBINE, GAS	1614.8 MMBTU/H	9 LB/H	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0072	TIGER BAY LP	FT. MEADE	5/17/93	1/13/95	TURBINE, GAS	1614.8 MMBTU/H	9 LB/H	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0078	KISSIMMEE UTILITY AUTHORITY	INTERCESSION CITY	4/7/93	1/13/95	TURBINE, NATURAL GAS	869 MMBTU/H	7 LB/H	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0078	KISSIMMEE UTILITY AUTHORITY	INTERCESSION CITY	4/7/93	1/13/95	TURBINE, NATURAL GAS	367 MMBTU/H	9 LB/H	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0078	KISSIMMEE UTILITY AUTHORITY	INTERCESSION CITY	4/7/93	1/13/95	TURBINE, NATURAL GAS	869 MMBTU/H	7 LB/H	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0078	KISSIMMEE UTILITY AUTHORITY	INTERCESSION CITY	4/7/93	1/13/95	TURBINE, NATURAL GAS	367 MMBTU/H	9 LB/H	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0080	AUBURNDALE POWER PARTNERS, LP	AUBURNDALE	12/14/92	1/13/95	TURBINE, GAS	1214 MMBTU/H	0.0136 LB/MMBTU	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0080	AUBURNDALE POWER PARTNERS, LP	AUBURNDALE	12/14/92	1/13/95	TURBINE, GAS	1214 MMBTU/H	0.0136 LB/MMBTU	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0082	FLORIDA POWER CORPORATION POLK COUNTY SITE	BARTOW	2/25/94	1/13/95	TURBINE, NATURAL GAS (2)	1510 MMBTU/H	9 LB/H	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0082	FLORIDA POWER CORPORATION POLK COUNTY SITE	BARTOW	2/25/94	1/13/95	TURBINE, NATURAL GAS (2)	1510 MMBTU/H	9 LB/H	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0092	GAINESVILLE REGIONAL UTILITIES	GAINESVILLE	4/11/95	5/29/95	SIMPLE CYCLE COMBUSTION TURBINE, GAS/NO 2 OIL B-UP	74 MW	7 LB/HR AT 20 F	FUEL SPEC: LOW SULFUR FUELS	BACT-PSD
FL-0092	GAINESVILLE REGIONAL UTILITIES	GAINESVILLE	4/11/95	5/29/95	SIMPLE CYCLE COMBUSTION TURBINE, GAS/NO 2 OIL B-UP	74 MW	7 LB/HR AT 20 F	FUEL SPEC: LOW SULFUR FUELS	BACT-PSD
GA-0052	SAVANNAH ELECTRIC AND POWER CO.		2/12/92	3/24/95	TURBINES, 8	1032 MMBTU/H, NAT GAS	0.006 LB/MMBTU	FUEL SPEC: LOW SULFUR FUEL OIL	BACT-PSD
GA-0052	SAVANNAH ELECTRIC AND POWER CO.		2/12/92	3/24/95	TURBINES, 8	1032 MMBTU/H, NAT GAS	0.006 LB/MMBTU	FUEL SPEC: LOW SULFUR FUEL OIL	BACT-PSD
GA-0053	HARTWELL ENERGY LIMITED PARTNERSHIP	HARTWELL	7/28/92	3/24/95	TURBINE, GAS FIRED (2 EACH)	1817 M BTU/HR	0.0064 LB/M BTU	FUEL SPEC: CLEAN BURNING FUELS	BACT-PSD
GA-0053	HARTWELL ENERGY LIMITED PARTNERSHIP	HARTWELL	7/28/92	3/24/95	TURBINE, GAS FIRED (2 EACH)	1817 M BTU/HR	0.0064 LB/M BTU	FUEL SPEC: CLEAN BURNING FUELS	BACT-PSD
GA-0063	MID-GEORGIA COGEN.	KATHLEEN	4/3/96	8/19/96	COMBUSTION TURBINE (2), NATURAL GAS	116 MW	18 LB/HR	CLEAN FUEL	BACT-PSD
GA-0063	MID-GEORGIA COGEN.	KATHLEEN	35158	8/19/96	COMBUSTION TURBINE (2), NATURAL GAS	116 MW	18 LB/HR	CLEAN FUEL	BACT-PSD
IN-0071	PORTSIDE ENERGY CORP.	PORTAGE	5/13/96	5/31/97	TURBINE, NATURAL GAS FIRED	63 MEGAWATT	5 LBS/HR		BACT-PSD
LA-0091	GEORGIA GULF CORPORATION	PLAQUEMINE	3/26/96	4/21/97	GENERATOR, NATURAL GAS FIRED TURBINE	1123 MM BTU/HR	92 TPY CAP FOR 3 TURB.	GOOD COMBUSTION PRACTICE	BACT-PSD
LA-0096	UNION CARBIDE CORPORATION	HAHNVILLE	9/22/95	5/31/97	GENERATOR, GAS TURBINE	1313 MM BTU/HR	18.3 LB/HR	NO CONTROL CLEAN FUEL	BACT-PSD
MA-0023	DIGHTON POWER ASSOCIATE, LP	DIGHTON	10/6/97	4/19/99	TURBINE, COMBUSTION, ABB GT11N2	1327 MMBTU/H	12.5 LB/H	DLN WITH SCR ADD-ON NOX CONTROL.	BACT-PSD
ME-0018	WESTBROOK POWER LLC	WESTBROOK	12/4/98	4/19/99	TURBINE, COMBINED CYCLE, TWO	528 MW TOTAL	0.06 LB/MMBTU		BACT-PSD
ME-0018	WESTBROOK POWER LLC	WESTBROOK	12/4/98	4/19/99	TURBINE, COMBINED CYCLE, TWO	528 MW TOTAL	0.06 LB/MMBTU		BACT-PSD
ME-0019	CHAMPION INTERNATL CORP. & CHAMP. CLEAN ENERGY	BUCKSPORT	9/14/98	4/19/99	TURBINE, COMBINED CYCLE, NATURAL GAS	175 MW	0.06 LB/MMBTU		BACT-OTHER
ME-0019	CHAMPION INTERNATL CORP. & CHAMP. CLEAN ENERGY	BUCKSPORT	9/14/98	4/19/99	TURBINE, COMBINED CYCLE, NATURAL GAS	175 MW	9 LB/H GAS		BACT-OTHER
ME-0020	CASCO RAY ENERGY CO.	VEAZIE	7/13/98	4/19/99	TURBINE, COMBINED CYCLE, NATURAL GAS, TWO	170 MW EACH	0.06 LB/MMBTU		BACT-PSD
NC-0055	DUKE POWER CO. LINCOLN COMBUSTION TURBINE STATION	LOWESVILLE	12/20/91	3/24/95	TURBINE, COMBUSTION	1313 MM BTU/HR	5 LB/HR	COMBUSTION CONTROL	BACT-PSD
NC-0055	DUKE POWER CO. LINCOLN COMBUSTION TURBINE STATION	LOWESVILLE	12/20/91	3/24/95	TURBINE, COMBUSTION	1313 MM BTU/HR	5 LB/HR	COMBUSTION CONTROL	BACT-PSD
NJ-0013	LAKEWOOD COGENERATION, L.P.	LAKEWOOD TOWNSHIP	4/1/91	5/29/95	TURBINES (NATURAL GAS) (2)	1190 MMBTU/HR (EACH)	0.0023 LB/MMBTU	TURBINE DESIGN	BACT-OTHER
NJ-0013	LAKEWOOD COGENERATION, L.P.	LAKEWOOD TOWNSHIP	4/1/91	5/29/95	TURBINES (NATURAL GAS) (2)	1190 MMBTU/HR (EACH)	0.0023 LB/MMBTU	TURBINE DESIGN	BACT-OTHER
NJ-0017	NEWARK BAY COGENERATION PARTNERSHIP, L.P.	NEWARK	6/9/93	5/29/95	TURBINES, COMBUSTION, NATURAL GAS FIRED (2)	617 MMBTU/HR (EACH)	0.006 LB/MMBTU	TURBINE DESIGN	BACT-PSD
NM-0024	MILAGRO, WILLIAMS FIELD SERVICE	BLOOMFIELD		5/29/95	TURBINE/COGEN, NATURAL GAS (2)	900 MMCF/DAY	SEE P2 DESC.	COMBUSTION AIR FILTERS	BACT-PSD
NM-0028	SOUTHWESTERN PUBLIC SERVICE CO/CUNNINGHAM STATIC	HOBBS	35373	12/30/96	COMBUSTION TURBINE, NATURAL GAS	100 MW	SEE P2	GOOD COMBUSTION PRACTICES	BACT-PSD
NM-0029	SOUTHWESTERN PUBLIC SERVICE COMPANY/CUNNINGHAM	HOBBS	2/15/97	3/31/97	COMBUSTION TURBINE, NATURAL GAS	100 MW			BACT-PSD
NM-0031	LORDSBURG L.P.	LORDSBURG	6/18/97	9/29/97	TURBINE, NATURAL GAS-FIRED, ELEC. GEN.	100 MW	5.3 LBS/HR	HIGH COMBUSTION EFFICIENCY	BACT-PSD
NM-0039	TNP TECHN, LLC (FORMERLY TX-NM POWER CO.)	LORDSBURG	8/7/98	2/10/99	GAS TURBINES	375 MMBTU/H	7.8 LB/H PER TURBINE	GOOD COMBUSTION PRACTICES	BACT-PSD
NV-0017	NEVADA POWER COMPANY, HARRY ALLEN PEAKING PLANT	LAS VEGAS	9/18/92	3/24/95	COMBUSTION TURBINE ELECTRIC POWER GENERATION	600 MW (8 UNITS 75 EACH)	30.6 TPY (EACH TURBINE)	PRECISION CONTROL FOR THE COMBUSTOR	BACT-PSD
NY-0045	SELKIRK COGENERATION PARTNERS, L.P.	SELKIRK	6/18/92	9/13/94	COMBUSTION TURBINES (2) (252 MW)	1173 MMBTU/HR (EACH)	0.004 LB/MMBTU GAS (BASE)	COMBUSTION CONTROLS AND LOW SULFUR OIL	BACT-OTHER
NY-0045	SELKIRK COGENERATION PARTNERS, L.P.	SELKIRK	6/18/92	9/13/94	COMBUSTION TURBINE (79 MW)	1173 MMBTU/HR	0.004 LB/MMBTU, GAS	COMBUSTION CONTROLS AND LOW SULFUR OIL	BACT-OTHER
NY-0046	SARANAC ENERGY COMPANY	PLATTSBURGH	7/31/92	9/13/94	TURBINES, COMBUSTION (2) (NATURAL GAS)	1123 MMBTU/HR (EACH)	0.0062 LB/MMBTU	COMBUSTION CONTROLS	BACT-OTHER
NY-0048	KAMINE/BESICORP CORNING L.P.	SOUTH CORNING	33913	9/13/94	TURBINE, COMBUSTION (79 MW)	653 MMBTU/HR	0.008 LB/MMBTU	COMBUSTION CONTROL	BACT-OTHER
OH-0218	CNG TRANSMISSION	WASHINGTON COURT HOUSE	8/12/92	4/5/95	TURBINE (NATURAL GAS) (3)	5500 HP (EACH)	0.035 LB/MMBTU	FUEL SPEC: USE OF NATURAL GAS	OTHER
PA-0099	FLEETWOOD COGENERATION ASSOCIATES	FLEETWOOD	4/22/94	11/22/94	NG TURBINE (GE LM6000) WITH WASTE HEAT BOILER	360 MMBTU/HR	8 LB/HR		BACT-OTHER
PR-0004	ECOELECTRICA, L.P.	PENUELAS	10/1/96	5/6/98	TURBINES, COMBINED-CYCLE COGENERATION	461 MW	0.0015 % OF FLOW	TWO STAGE MIST ELIMINATOR TO RESTRICT DRIFT.	BACT-OTHER
PR-0004	ECOELECTRICA, L.P.	PENUELAS	10/1/96	5/6/98	TURBINES, COMBINED-CYCLE COGENERATION	461 MW	12 LB/HR	IMPLEMENT GOOD COMBUSTION PRACTICES	BACT-PSD
PR-0004	ECOELECTRICA, L.P.	PENUELAS	10/1/96	5/6/98	TURBINES, COMBINED-CYCLE COGENERATION	461 MW	59 LB/HR	IMPLEMENT GOOD COMBUSTION PRACTICES.	BACT-PSD
RI-0010	NARRAGANSETT ELECTRIC/NEW ENGLAND POWER CO.	PROVIDENCE	4/13/92	5/31/92	TURBINE, GAS AND DUCT BURNER	1360 MMBTU/H EACH	0.005 LB/MMBTU, GAS		BACT-PSD
SC-0029	SC ELECTRIC AND GAS COMPANY - HAGOOD STATION	CHARLESTON	12/11/89	3/24/95	INTERNAL COMBUSTION TURBINE	110 MEGAWATTS	45 LBS/HR	FUEL SPEC: LOW ASH CONTENT FUELS	BACT-PSD
SC-0031	BMW MANUFACTURING CORPORATION	GREER	1/7/94	8/12/96	TURBINE, NAT GAS FIRED (3 - 1 SPARE) AND 2 BOILERS	54.5 MM BTU/HR TURBINES	3.79 TPY		BACT-PSD
TX-0231	WEST CAMPUS COGENERATION COMPANY	COLLEGE STATION	5/2/94	10/31/94	GAS TURBINES	75.3 MW (TOTAL POWER)	52 TPY	INTERNAL COMBUSTION CONTROLS	BACT

Source: RBLC 1999.

Table 5-5. RBLC PM Summary for Distillate/Multiple Fuel Fired CTGs

RBLC ID	Facility Name	City	Permit Dates		Fuel Type	Process Description	Thruput Rate	Emission Limit	Control System Description	Basis
			Issuance	Update						
AL-0069	INTERNATIONAL PAPER CO. RIVERDALE MILL	SELMA	1/11/93	3/24/95	DIESEL	TURBINE, STATIONARY (GAS FIRED) WITH DUCT BURNER	40 MW	0.01 LB/MMBTU (GAS)	FUEL SPECIFICATION	BACT-PSD
AL-0126	MOBILE ENERGY LLC	MOBILE	1/5/99	4/9/99	DIESEL	TURBINE, GAS, COMBINED CYCLE	168 MW	0.009 LB/MMBTU	COMBUSTION OF CLEAN FUELS	BACT-PSD
FL-0045	CHARLES LARSEN POWER PLANT	CITY OF OF LAKE LAND	7/25/91	3/24/95	DIESEL	TURBINE, OIL, 1 EACH	80 MW	0.025 LB/MMBTU	COMBUSTION CONTROL	BACT-PSD
FL-0045	CHARLES LARSEN POWER PLANT	CITY OF OF LAKE LAND	7/25/91	3/24/95	GAS/OIL	TURBINE, OIL, 1 EACH	80 MW	0.025 LB/MMBTU	COMBUSTION CONTROL	BACT-PSD
FL-0052	FLORIDA POWER AND LIGHT	NORTH PALM BEACH	6/5/91	3/24/95	GAS/OIL	TURBINE, OIL, 2 EACH	400 MW	60.6 LB/H	COMBUSTION CONTROL	BACT-PSD
FL-0052	FLORIDA POWER AND LIGHT	NORTH PALM BEACH	6/5/91	3/24/95	GAS/OIL	TURBINE, OIL, 2 EACH	400 MW	60.6 LB/H	COMBUSTION CONTROL	BACT-PSD
FL-0053	FLORIDA POWER AND LIGHT	LAVOGROME REPOWERING S	3/14/91	3/24/95	GAS/OIL	TURBINE, OIL, 4 EACH		58 LB/H	COMBUSTION CONTROL	BACT-PSD
FL-0053	FLORIDA POWER AND LIGHT	LAVOGROME REPOWERING S	3/14/91	3/24/95	GAS/OIL	TURBINE, OIL, 4 EACH		58 LB/H	COMBUSTION CONTROL	BACT-PSD
FL-0054	LAKE COGEN LIMITED	UMATILLA	11/20/91	3/24/95	GAS/OIL	TURBINE, OIL, 2 EACH	42 MW	0.026 LB/MMBTU	COMBUSTION CONTROL FUEL SPEC: CLEAN FUEL	BACT-PSD
FL-0054	LAKE COGEN LIMITED	UMATILLA	11/20/91	3/24/95	GAS/OIL	TURBINE, OIL, 2 EACH	42 MW	0.026 LB/MMBTU	COMBUSTION CONTROL FUEL SPEC: CLEAN FUEL	BACT-PSD
FL-0057	FLORIDA POWER GENERATION	DEBARY	10/18/91	3/24/95	GAS/OIL	TURBINE, OIL, 6 EACH	92.9 MW	15 LB/H	COMBUSTION CONTROL	BACT-PSD
FL-0072	TIGER BAY LP	FT. MEADE	5/17/93	1/13/95	GAS/OIL	TURBINE, OIL	1849.9 MMBTU/H	17 LB/H	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0072	TIGER BAY LP	FT. MEADE	5/17/93	1/13/95	GAS/OIL	TURBINE, OIL	1849.9 MMBTU/H	17 LB/H	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0078	KISSIMMEE UTILITY AUTHORITY	INTERCESSION CITY	4/7/93	1/13/95	GAS/OIL	TURBINE, FUEL OIL	928 MMBTU/H	15 LB/H	FUEL SPEC: LOW SULFUR FUEL	BACT-PSD
FL-0078	KISSIMMEE UTILITY AUTHORITY	INTERCESSION CITY	4/7/93	1/13/95	GAS/OIL	TURBINE, FUEL OIL	371 MMBTU/H	10 LB/H	FUEL SPEC: LOW SULFUR FUEL	BACT-PSD
FL-0078	KISSIMMEE UTILITY AUTHORITY	INTERCESSION CITY	4/7/93	1/13/95	GAS/OIL	TURBINE, FUEL OIL	928 MMBTU/H	15 LB/H	FUEL SPEC: LOW SULFUR FUEL	BACT-PSD
FL-0078	KISSIMMEE UTILITY AUTHORITY	INTERCESSION CITY	4/7/93	1/13/95	GAS/OIL	TURBINE, FUEL OIL	371 MMBTU/H	10 LB/H	FUEL SPEC: LOW SULFUR FUEL	BACT-PSD
FL-0080	AUBURNDALE POWER PARTNERS, LP	AUBURNDALE	12/14/92	1/13/95	GAS/OIL	TURBINE, OIL	1170 MMBTU/H	0.0472 LB/MMBTU	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0080	AUBURNDALE POWER PARTNERS, LP	AUBURNDALE	12/14/92	1/13/95	GAS/OIL	TURBINE, OIL	1170 MMBTU/H	0.0472 LB/MMBTU	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0081	TECO POLK POWER STATION	BARTOW	34389	3/24/95	GAS/OIL	TURBINE, FUEL OIL	1765 MMBTU/H	0.009 LB/MMBTU	GOOD COMBUSTION	BACT-PSD
FL-0082	FLORIDA POWER CORPORATION POLK COUNTY SITE	BARTOW	2/25/94	1/13/95	GAS/OIL	TURBINE, FUEL OIL (2)	1730 MMBTU/H	17 LB/H	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0082	FLORIDA POWER CORPORATION POLK COUNTY SITE	BARTOW	2/25/94	1/13/95	GAS/OIL	TURBINE, FUEL OIL (2)	1730 MMBTU/H	17 LB/H	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0083	FLORIDA POWER CORPORATION	INTERCESSION CITY	8/17/92	1/13/95	GAS/OIL	TURBINE, OIL	1029 MMBTU/H	15 LB/H	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0083	FLORIDA POWER CORPORATION	INTERCESSION CITY	8/17/92	1/13/95	GAS/OIL	TURBINE, OIL	1866 MMBTU/H	17 LB/H	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0104	SEMINOLE HARDEE UNIT 3	FORT GREEN	1/1/96	5/31/96	GAS/OIL	COMBINED CYCLE COMBUSTION TURBINE	140 MW	7 LB/HR (NAT. GAS)	DRY LNB FUEL SPEC: LOW S OIL, GOOD COMBUSTION	BACT-PSD
GA-0052	SAVANNAH ELECTRIC AND POWER CO.		2/12/92	3/24/95	GAS/OIL	TURBINES, 8	972 MMBTU/H, #2 OIL	0.012 LB/MMBTU	FUEL SPEC: LOW SULFUR FUEL OIL	BACT-PSD
GA-0052	SAVANNAH ELECTRIC AND POWER CO.		2/12/92	3/24/95	GAS/OIL	TURBINES, 8	972 MMBTU/H, #2 OIL	0.012 LB/MMBTU	FUEL SPEC: LOW SULFUR FUEL OIL	BACT-PSD
GA-0053	HARTWELL ENERGY LIMITED PARTNERSHIP	HARTWELL	7/28/92	3/24/95	GAS/OIL	TURBINE, OIL FIRED (2 EACH)	1840 M BTU/HR	0.0156 LB/M BTU	FUEL SPEC: CLEAN BURNING FUELS	BACT-PSD
GA-0053	HARTWELL ENERGY LIMITED PARTNERSHIP	HARTWELL	7/28/92	3/24/95	GAS/OIL	TURBINE, OIL FIRED (2 EACH)	1840 M BTU/HR	0.0156 LB/M BTU	FUEL SPEC: CLEAN BURNING FUELS	BACT-PSD
GA-0063	MID-GEORGIA COGEN.	KATHLEEN	4/3/96	8/19/96	GAS/OIL	COMBUSTION TURBINE (2), FUEL OIL	116 MW	55 LB/HR	CLEAN FUEL	BACT-PSD
GA-0063	MID-GEORGIA COGEN.	KATHLEEN	4/3/96	8/19/96	GAS/OIL	COMBUSTION TURBINE (2), FUEL OIL	116 MW	55 LB/HR	CLEAN FUEL	BACT-PSD
HI-0013	MAUI ELECTRIC COMPANY, LTD.	MAALAEA	12/3/91	3/24/95	GAS/OIL	TURBINE, FUEL OIL #2	28 MW	0.045 GR/DSCF	FUEL SPEC: 0.4 % SULFUR	BACT-PSD
HI-0014	HAWAII ELECTRIC LIGHT CO., INC	KEEAU	2/12/92	3/24/95	GAS/OIL	TURBINE, FUEL OIL #2	20 MW	19.7 LB/HR	COMBUSTION DESIGN	BACT-PSD
HI-0015	MAUI ELECTRIC COMPANY, LTD. MAALAEA GENERATING STA	MAUI	7/28/92	3/24/95	GAS/OIL	TURBINE, COMBINED-CYCLE COMBUSTION	28 MW	19.7 LB/HR	COMBUSTION TECHNOLOGY/DESIGN	BACT-OTHER
KY-0053	KENTUCKY UTILITIES COMPANY	MERCER	3/10/92	3/24/95	GAS/OIL	TURBINE, #2 FUEL OIL/NATURAL GAS (8)	1500 MM BTU/HR (EACH)	67 LB/HR (EACH)	COMBUSTION CONTROL	BACT-PSD
KY-0057	EAST KENTUCKY POWER COOPERATIVE		3/24/93	3/24/95	GAS/OIL	TURBINES (5), #2 FUEL OIL AND NAT. GAS FIRED	1492 MMBTU/HR (EACH)	54 LBS/H (EACH)	PROPER COMBUSTION TECHNIQUES	BACT-OTHER
MA-0015	PEABODY MUNICIPAL LIGHT PLANT	PEABODY	11/30/89	3/24/95	GAS/OIL	TURBINE, 38 MW OIL FIRED	412 MMBTU/HR	0.05 LB/MMBTU	FUEL SPECIFICATION: NO. 2 LIGHT OIL	BACT-OTHER
MA-0015	PEABODY MUNICIPAL LIGHT PLANT	PEABODY	11/30/89	3/24/95	GAS/OIL	TURBINE, 38 MW OIL FIRED	412 MMBTU/HR	0.05 LB/MMBTU	FUEL SPECIFICATION: NO. 2 LIGHT OIL	BACT-OTHER
MA-0021	MILLENNIUM POWER PARTNER, LP	CHARLTON	2/2/98	4/19/99	GAS/OIL	TURBINE, COMBUSTION, WESTINGHOUSE MODEL 501G	2534 MMBTU/HR	0.006 LB/MMBTU	DLN IN CONJUNCTION WITH SCR ADD-ON NOX CONTROL	BACT-PSD
MA-0022	BERKSHIRE POWER DEVELOPMENT, INC.	AGAWAM	9/22/97	4/19/99	GAS/OIL	TURBINE, COMBUSTION, ABB GT24	1792 MMBTU/HR	17.4 LB/H	DLN WITH SCR ADD-ON NOX CONTROL	BACT-PSD
MA-0023	DIGHTON POWER ASSOCIATE, LP	DIGHTON	10/6/97	4/19/99	GAS/OIL	ENGINE, DIESEL, FIRE PUMP	1.5 MMBTU/HR	0.31 LB/MMBTU	DLN WITH SCR ADD-ON NOX CONTROL	BACT-PSD
ME-0016	GORHAM ENERGY LIMITED PARTNERSHIP	GORHAM	36133	4/19/99	GAS/OIL	TURBINE, COMBINED CYCLE	900 MW TOTAL	0.06 LB/MMBTU NAT GAS	.05 % SULFUR OIL #2 IS USED. EMISSION IS FROM EACH 300 MW SYSTEM.	BACT-PSD
MN-0022	LSP-COTTAGE GROVE, L.P.	COTTAGE GROVE	3/1/95	5/29/95	GAS/OIL	DIESEL ENGINE-DRIVEN FIRE PUMP	2.7 MMBTU/HR	0.7 LB/HR	FUEL SELECTION: GOOD COMBUSTION	BACT-PSD
MN-0022	LSP-COTTAGE GROVE, L.P.	COTTAGE GROVE	3/1/95	5/29/95	GAS/OIL	COMBUSTION TURBINE/GENERATOR	1970 MMBTU/HR	10.7 LB/HR GAS	FUEL SELECTION, GOOD COMBUSTION	BACT-PSD
MN-0035	LSP-COTTAGE GROVE, L.P.	COTTAGE GROVE	11/10/98	4/19/99	GAS/OIL	ENGINE, DIESEL, EMERGENCY FIRE PUMP	2.7 MMBTU/HR	0.26 LB/MMBTU	LIMITED TO BURN DIESEL 150 H/YR.	BACT-PSD
MN-0035	LSP-COTTAGE GROVE, L.P.	COTTAGE GROVE	11/10/98	4/19/99	GAS/OIL	GENERATOR, COMBUSTION TURBINE & DUCT BURNER	1988 MMBTU/HR (CTG)	0.0089 LB/MMBTU (INAT GAS)	COMBUSTING NATURAL GAS	BACT-PSD
MN-0035	LSP-COTTAGE GROVE, L.P.	COTTAGE GROVE	11/10/98	4/19/99	GAS/OIL	ENGINE, DIESEL, EMERGENCY FIRE PUMP	2.7 MMBTU/HR	0.26 LB/MMBTU	LIMITED TO BURN DIESEL 150 H/YR.	BACT-PSD
MN-0035	LSP-COTTAGE GROVE, L.P.	COTTAGE GROVE	11/10/98	4/19/99	GAS/OIL	GENERATOR, COMBUSTION TURBINE & DUCT BURNER	1988 MMBTU/HR (CTG)	0.0089 LB/MMBTU (INAT GAS)	NATURAL GAS COMBUSTION	BACT-PSD
MO-0016	EMPIRE DISTRICT ELECTRIC CO.	JOPLIN	5/17/94	10/6/97	GAS/OIL	INSTALL TWO NEW SIMPLE-CYCLE TURBINES	1345 MMBTU/HR	163.5 TPY	NONE	BACT-PSD
MO-0016	EMPIRE DISTRICT ELECTRIC CO.	JOPLIN	5/17/94	10/6/97	GAS/OIL	INSTALL TWO NEW SIMPLE-CYCLE TURBINES	1345 MMBTU/HR	24.5 TPY	NONE	BACT-PSD
MO-0017	EMPIRE DISTRICT ELECTRIC CO.	JOPLIN	2/28/95	10/6/97	GAS/OIL	INSTALL TWO NEW SIMPLE-CYCLE TURBINES	88.77 MW	12.25 TPY	GOOD COMBUSTION CONTROL	BACT-PSD
MO-0043	UNION ELECTRIC CO	WEST ALTON	5/6/79	10/6/97	GAS/OIL	CONSTRUCTION OF A NEW OIL FIRED COMBUSTION TURBINE	622 MM BTU/HR	174 TPY		BACT-PSD
MS-0028	SOUTH MISSISSIPPI ELECTRIC POWER ASSOC.	MOSELL	4/9/96	8/19/96	DIESEL	COMBUSTION TURBINE, COMBINED CYCLE	1299 MMBTU/HR NAT GAS	8.1 LB/HR, GAS	GOOD COMBUSTION CONTROLS	BACT-PSD
NC-0059	CAROLINA POWER & LIGHT	GOLDSBORO	4/11/96	8/19/96	DIESEL	COMBUSTION TURBINE, 4 EACH	1907.6 MMBTU/HR	9 LB/HR	COMBUSTION CONTROL	BACT-PSD
NC-0059	CAROLINA POWER & LIGHT	GOLDSBORO	4/11/96	8/19/96	GAS/OIL	COMBUSTION TURBINE, 4 EACH	1907.6 MMBTU/HR	17 LB/HR	COMBUSTION CONTROL	BACT-PSD
NJ-0013	LAKEWOOD COGENERATION, L.P.	LAKEWOOD TOWNSHIP	4/1/91	5/29/95	GAS/OIL	TURBINES (#2 FUEL OIL) (2)	1190 MMBTU/HR (EACH)	0.026 LB/MMBTU	TURBINE DESIGN	BACT-OTHER
NJ-0013	LAKEWOOD COGENERATION, L.P.	LAKEWOOD TOWNSHIP	4/1/91	5/29/95	GAS/OIL	TURBINES (#2 FUEL OIL) (2)	1190 MMBTU/HR (EACH)	0.026 LB/MMBTU	TURBINE DESIGN	BACT-OTHER
NJ-0029	ALGONQUIN GAS TRANSMISSION COMPANY	HANOVER	3/31/95	2/10/99	GAS/OIL	TURBINES COMBUSTION, TWO SOLAR CENTAUR	3.1 MW EACH	3.44 LB/H		BACT-PSD
NV-0015	SAGUARO POWER COMPANY	HENDERSON	6/17/91	6/1/93	GAS/OIL	COMBUSTION TURBINE GENERATOR	34.5 MW	2.5 PPH	COMBUSTION SYSTEM	BACT-PSD
NV-0030	MUDDY RIVER L.P.	MOAPA	6/10/94	3/24/95	GAS/OIL	COMBUSTION TURBINE, DIESEL & NATURAL GAS	140 MEGAWATT	17 LB/HR	FUEL SPEC: NATURAL GAS	BACT-PSD
NV-0031	CSW NEVADA, INC.	MOAPA	6/10/94	3/24/95	GAS/OIL	COMBUSTION TURBINE, DIESEL & NATURAL GAS	140 MEGAWATT	17 LB/HR	FUEL SPEC: NATURAL GAS	BACT-PSD
NY-0049	KAMINE/BESICORP BEAVER FALLS COGENERATION FACILITY	BEAVER FALLS	11/9/92	9/13/94	GAS/OIL	TURBINE, COMBUSTION (INAT. GAS & OIL FUEL) (79MW)	650 MMBTU/HR	0.008 LB/MMBTU	COMBUSTION CONTROLS	BACT-OTHER
NY-0049	KAMINE/BESICORP BEAVER FALLS COGENERATION FACILITY	BEAVER FALLS	11/9/92	9/13/94	GAS/OIL	TURBINE, COMBUSTION (INAT. GAS & OIL FUEL) (79MW)	650 MMBTU/HR	0.008 LB/MMBTU	COMBUSTION CONTROLS	BACT-OTHER
NY-0057	MEGAN-RACINE ASSOCIATES, INC	CANTON	8/5/89	3/30/95	GAS/OIL	GE LM5000-N COMBINED CYCLE GAS TURBINE	401 LB/MMBTU	0.028 LB/MMBTU, 12 LB/HR	NO CONTROLS	BACT-OTHER
NY-0061	ANITEC COGEN PLANT	BINGHAMTON	7/7/93	4/27/95	GAS/OIL	GE LM5000 COMBINED CYCLE GAS TURBINE EP #00001	451 MMBTU/HR	0.005 LB/MMBTU, 2.0 LB/HR	FUEL SPEC: SULFUR CONTENT NOT TO EXCEED 0.1% BY WEIGHT	BACT-OTHER
NY-0062	FULTON COGEN PLANT	FULTON	9/15/94	4/27/95	GAS/OIL	GE LM5000 GAS TURBINE	500 MMBTU/HR	0.024 LB/MMBTU, 12.0 LB/HR	FUEL SPEC: SULFUR CONTENT NOT TO EXCEED 0.3% BY WEIGHT	BACT-OTHER
NY-0063	TBG COGEN COGENERATION PLANT	BETHPAGE	8/5/90	4/27/95	GAS/OIL	GE LM2600 GAS TURBINE	214.9 MMBTU/HR	0.024 LB/MMBTU, 5.0 LB/HR	FUEL SPEC: SULFUR CONTENT NOT TO EXCEED 0.037% BY WEIGHT	BACT-OTHER
NY-0084	INDECK-OSWEGO ENERGY CENTER	OSWEGO	10/6/94	4/27/95	GAS/OIL	GE FRAME 6 GAS TURBINE	533 LB/MMBTU	0.008 LB/MMBTU, 5.00 LB/HR	FUEL SPEC: SULFUR CONTENT NOT TO EXCEED 0.27% BY WEIGHT	BACT-OTHER
NY-0065	KAMINE/BESICORP CARTHAGE L.P.	CARTHAGE	1/18/94	4/27/95	GAS/OIL	GE FRAME 6 GAS TURBINE	491 BTU/HR	0.005 LB/MMBTU, 3.0 LB/HR	FUEL SPEC: SULFUR CONTENT NOT TO EXCEED 0.20% BY WEIGHT	BACT-OTHER
NY-0066	INDECK ENERGY COMPANY	SILVER SPRINGS	34101	3/31/95	GAS/OIL	GE FRAME 6 GAS TURBINE EP #00001	491 MMBTU/HR	0.006 LB/MMBTU, 2.5 LB/HR	NO CONTROLS	BACT-OTHER
NY-0068	KAMINE/BESICORP NATURAL DAM L.P.	NATURAL DAM	12/31/91	6/30/95	GAS/OIL	GE FRAME 6 GAS TURBINE	500 MMBTU/HR	SEE NOTE #1	FUEL SPECIFICATION	BACT-OTHER
NY-0071	KAMINE SOUTH GLENS FALLS COGEN CO	SOUTH GLENS FALLS	9/10/92	4/27/95	GAS/OIL	GE FRAME 6 GAS TURBINE	498 MMBTU/HR	0.005 LB/MMBTU, 3.0 LB/HR	FUEL SPEC: SULFUR CONTENT NOT TO EXCEED 0.20% BY WEIGHT	BACT-OTHER
NY-0072	KAMINE/BESICORP SYRACUSE LP	SOLVAY	12/10/94	4/27/95	GAS/OIL	DIESEL GENERATOR (EP #00005)	22 MMBTU/HR	0.024 LB/MMBTU, 0.53 LB/HR	NO CONTROLS	BACT-OTHER
NY-0072	KAMINE/BESICORP SYRACUSE LP	SOLVAY	12/10/94	4/27/95	GAS/OIL	FIRE PUMP (EP #00007)	1.5 MMBTU/HR	0.2 LB/MMBTU, 0.29 LB/HR	FUEL SPEC: SULFUR CONTENT NOT TO EXCEED 0.15% BY WEIGHT	BACT-OTHER
NY-0072	KAMINE/BESICORP SYRACUSE LP	SOLVAY	12/10/94	4/27/95	GAS/OIL	SIEMENS V64.3 GAS TURBINE (EP #00001)	650 MMBTU/HR	0.008 LB/MMBTU, 5.8 LB/HR	FUEL SPEC: SULFUR CONTENT NOT TO EXCEED 0.15% BY WEIGHT	BACT-OTHER
NY-0073	LOCKPORT COGEN FACILITY	LOCKPORT	7/14/93	4/27/95	DIESEL	(6) GE FRAME 6 TURBINES (EP #S 00001-00006)	423.9 MMBTU/HR	0.006 LB/MMBTU, 2.5 LB/HR	FUEL SPEC: SULFUR CONTENT NOT TO EXCEED 0.20% BY WEIGHT	BACT-OTHER
NY-0075	PILGRIM ENERGY CENTER	ISLIP		4/27/95	DIESEL	(2) WESTINGHOUSE W501D5 TURBINES (EP #S 00001&2)	1400 MMBTU/HR	0.007 LB/MMBTU, 7.20 LB/HR	FUEL SPEC: SULFUR CONTENT NOT TO EXCEED 0.05% BY WEIGHT	BACT-OTHER
NY-0076	TRIGEN MITCHEL FIELD	HEMPSTEAD	4/16/93	3/31/95	DIESEL	GE FRAME 6 GAS TURBINE	424.7 MMBTU/HR	0.006 LB/MMBTU, 2.9 LB/HR	NO CONTROLS	BACT-OTHER
NY-0079	LEDERLE LABORATORIES	PEARL RIVER		4/27/95	DIESEL	(2) GAS TURBINES (EP #S 00101&102)	110 MMBTU/HR	SEE NOTE #2	FUEL SPEC: SULFUR CONTENT NOT TO EXCEED 0.30% BY WEIGHT	BACT-OTHER
NY-0081	LILCO SHOREHAM	HICKSVILLE	5/10/93	3/30/95	GAS/OIL	(3) GE FRAME 7 TURBINES (EP #S 00007-9)	850 MMBTU/HR	0.012 LB/MMBTU, 10.2 LB/HR	NO CONTROLS	BACT-OTHER
OK-0027	OKLAHOMA MUNICIPAL POWER AUTHORITY	PONCA CITY	12/17/92	3/24/95	GAS/OIL	TURBINE, COMBUSTION	58 MW	0.0125 LB/MMBTU	FUEL SPEC: USE OF DISTILLATE FUEL	BACT-OTHER
PA-0098	GRAYS FERRY CO. GENERATION PARTNERSHIP	PHILADELPHIA	11/4/92	7/20/94	GAS/OIL	TURBINE (NATURAL GAS & OIL)	1150 MMBTU	0.1 LB/MMBTU*	DRY LOW NOX BURNER, COMBUSTION CONTROL	BACT-OTHER

Table 5-13. RBLC CO Summary for Natural Gas Fired CTs

RBLC ID	Facility Name	City	Permit Dates		Process Description	Thruput Rate	Emission Limit	Control System Description	Basis
			Issuance	Update					
AL-0074	FLORIDA GAS TRANSMISSION COMPANY	MOBILE	8/5/93	5/12/94	TURBINE, NATURAL GAS	12600 BHP	0.42 GM/HP-HR	AIR-TO-FUEL RATIO CONTROL, DRY COMBUSTION CON	BACT-PSD
AL-0096	MEAD COATED BOARD, INC.	PHENIX CITY	3/12/97	5/31/97	COMBINED CYCLE TURBINE (25 MW)	568 MMBTU/HR	28 PPMVD@15% O2 (GAS)	PROPER DESIGN AND GOOD COMBUSTION PRACTICES	BACT-PSD
AL-0120	GENERAL ELECTRIC PLASTICS	BURKVILLE	5/27/98	7/2/98	COMBINED CYCLE (TURBINE AND DUCT BURNER)				BACT-PSD
AL-0128	ALABAMA POWER COMPANY - THEODORE COGENERATION	THEODORE	3/16/99	4/20/99	170 MW TURBINE W/ DUCT BURNER, HR BOILER, SCR	170 MW			BACT-PSD
AL-0128	ALABAMA POWER COMPANY - THEODORE COGENERATION	THEODORE	3/16/99	4/20/99	220 MMBTU/HR BOILER	220 MMBTU/HR	0.165 LB/MMBTU	EFFICIENT COMBUSTION	BACT-PSD
AZ-0010	EL PASO NATURAL GAS		10/25/91	3/24/95	TURBINE, GAS, SOLAR CENTAUR H	5500 HP	10.5 PPM @ 15% O2	FUEL SPEC: LEAN FUEL MIX	BACT-PSD
AZ-0011	EL PASO NATURAL GAS		10/25/91	3/24/95	TURBINE, GAS, SOLAR CENTAUR H	5500 HP	10.5 PPM @ 15% O2	FUEL SPEC: LEAN FUEL MIX	BACT-PSD
AZ-0012	EL PASO NATURAL GAS		10/18/91	7/20/94	TURBINE, NAT. GAS TRANSM., GE FRAME 3	12000 HP	60 PPM @ 15% O2	LEAN BURN	BACT-PSD
CA-0418	SOUTHERN CALIFORNIA GAS	WHEELER RIDGE	10/29/91	8/4/93	TURBINE, GAS-FIRED	47.64 MMBTU/H	7.74 PPM @ 15% O2	HIGH TEMPERATURE OXIDATION CATALYST	BACT-PSD
CA-0463	SOUTHERN CALIFORNIA GAS	WHEELER RIDGE	10/29/91	5/31/92	TURBINE, GAS FIRED, SOLAR MODEL H	5500 HP	7.74 PPM @ 15% O2	HIGH TEMP OXIDATION CATALYST	BACT-PSD
CA-0613	UNOCAL	WILMINGTON	7/18/89	12/5/94	TURBINE, GAS (SEE NOTES)		10 PPM @ 15% O2	OXIDATION CATALYST	BACT-OTHER
CA-0853	KERN FRONT LIMITED	BAKERSFIELD	11/4/86	4/19/99	TURBINE, GAS, GENERAL ELECTRIC LM-2500	25 MW	669.19 LB/D	OXIDATION CATALYST	BACT-OTHER
CA-0858	BEAR MOUNTAIN LIMITED	BAKERSFIELD	8/19/94	4/19/99	TURBINE, GE, COGENERATION, 48 MW	48 MW	252.6 LB/D	OXIDATION CATALYST	BACT-OTHER
CO-0017	THERMO INDUSTRIES, LTD.	FT. LUPTON	2/19/92	3/24/95	TURBINE, GAS FIRED, 5 EACH	246 MMBTU/H	25 PPM @ 15% O2	COMBUSTION CONTROL	BACT-PSD
CO-0019	COLORADO POWER PARTNERSHIP	BRUSH		7/20/94	TURBINES, 2 NAT GAS & 2 DUCT BURNERS	385 MMBTU/H EACH TURBINE	22.4 PPM @ 15% O2		BACT-PSD
CO-0020	CIMARRON CHEMICAL	JOHNSTOWN	3/25/91	7/20/94	TURBINE #2, GE FRAME 6	33 MW	250 T/YR, LESS THAN	CO CATALYST	OTHER
CT-0130	BRIDGEPORT ENERGY, LLC	BRIDGEPORT	6/29/98	1/21/99	TURBINES, COMBUSTION MODEL V84.3A, 2 SIEMES	260 MW/HRSG PER TURBINE	10 PPM GAS & OIL	PRE-MIX FUEL FAIR TO OPTIMIZE EFFICIENCY ACTUAL F	BACT-PSD
FL-0045	CHARLES LARSEN POWER PLANT	CITY OF OF LAKELAND	7/25/91	3/24/95	TURBINE, GAS, 1 EACH	80 MW	25 PPM @ 15% O2	COMBUSTION CONTROL	BACT-PSD
FL-0045	CHARLES LARSEN POWER PLANT	CITY OF OF LAKELAND	7/25/91	3/24/95	TURBINE, GAS, 1 EACH	80 MW	25 PPM @ 15% O2	COMBUSTION CONTROL	BACT-PSD
FL-0052	FLORIDA POWER AND LIGHT	NORTH PALM BEACH	33394	3/24/95	TURBINE, GAS, 4 EACH	400 MW	30 PPM @ 15% O2	COMBUSTION CONTROL	BACT-PSD
FL-0052	FLORIDA POWER AND LIGHT	NORTH PALM BEACH	6/5/91	3/24/95	TURBINE, CG, 4 EACH	400 MW	33 PPM @ 15% O2	COMBUSTION CONTROL	BACT-PSD
FL-0052	FLORIDA POWER AND LIGHT	NORTH PALM BEACH	6/5/91	3/24/95	TURBINE, GAS, 4 EACH	400 MW	30 PPM @ 15% O2	COMBUSTION CONTROL	BACT-PSD
FL-0052	FLORIDA POWER AND LIGHT	NORTH PALM BEACH	6/5/91	3/24/95	TURBINE, CG, 4 EACH	400 MW	33 PPM @ 15% O2	COMBUSTION CONTROL	BACT-PSD
FL-0053	FLORIDA POWER AND LIGHT	LAVOGROME REPOWERING S	3/14/91	3/24/95	TURBINE, GAS, 4 EACH	240 MW	30 PPM @ 15% O2	COMBUSTION CONTROL	BACT-PSD
FL-0053	FLORIDA POWER AND LIGHT	LAVOGROME REPOWERING S	3/14/91	3/24/95	TURBINE, GAS, 4 EACH	240 MW	30 PPM @ 15% O2	COMBUSTION CONTROL	BACT-PSD
FL-0054	LAKE COGEN LIMITED	UMATILLA	11/20/91	3/24/95	TURBINE, GAS, 2 EACH	42 MW	42 PPM @ 15% O2	COMBUSTION CONTROL	BACT-PSD
FL-0054	LAKE COGEN LIMITED	UMATILLA	11/20/91	3/24/95	TURBINE, GAS, 2 EACH	42 MW	42 PPM @ 15% O2	COMBUSTION CONTROL	BACT-PSD
FL-0056	ORLANDO UTILITIES COMMISSION	TITUSVILLE	11/5/91	5/14/93	TURBINE, GAS, 4 EACH	35 MW	10 PPM @ 15% O2	COMBUSTION CONTROL	BACT-PSD
FL-0056	ORLANDO UTILITIES COMMISSION	TITUSVILLE	11/5/91	5/14/93	TURBINE, GAS, 4 EACH	35 MW	10 PPM @ 15% O2	COMBUSTION CONTROL	BACT-PSD
FL-0068	ORANGE COGENERATION LP	BARTOW	12/30/93	1/13/95	TURBINE, NATURAL GAS, 2	368.3 MMBTU/H	30 PPMVD	GOOD COMBUSTION	BACT-PSD
FL-0072	TIGER BAY LP	FT. MEADE	5/17/93	1/13/95	TURBINE, GAS	1614.8 MMBTU/H	49 LB/H	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0072	TIGER BAY LP	FT. MEADE	5/17/93	1/13/95	TURBINE, GAS	1614.8 MMBTU/H	49 LB/H	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0078	KISSIMMEE UTILITY AUTHORITY	INTERCESSION CITY	4/7/93	1/13/95	TURBINE, NATURAL GAS	869 MMBTU/H	54 LB/H	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0078	KISSIMMEE UTILITY AUTHORITY	INTERCESSION CITY	4/7/93	1/13/95	TURBINE, NATURAL GAS	869 MMBTU/H	54 LB/H	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0078	KISSIMMEE UTILITY AUTHORITY	INTERCESSION CITY	4/7/93	1/13/95	TURBINE, NATURAL GAS	869 MMBTU/H	54 LB/H	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0078	KISSIMMEE UTILITY AUTHORITY	INTERCESSION CITY	4/7/93	1/13/95	TURBINE, NATURAL GAS	367 MMBTU/H	40 LB/H	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0080	AUBURNDALE POWER PARTNERS, LP	AUBURNDALE	12/14/92	1/13/95	TURBINE, GAS	1214 MMBTU/H	15 PPMVD	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0080	AUBURNDALE POWER PARTNERS, LP	AUBURNDALE	12/14/92	1/13/95	TURBINE, GAS	1214 MMBTU/H	15 PPMVD	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0082	FLORIDA POWER CORPORATION POLK COUNTY SITE	BARTOW	2/25/94	1/13/95	TURBINE, NATURAL GAS (2)	1510 MMBTU/H	25 PPMVD	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0082	FLORIDA POWER CORPORATION POLK COUNTY SITE	BARTOW	2/25/94	1/13/95	TURBINE, NATURAL GAS (2)	1510 MMBTU/H	25 PPMVD	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0102	PANDA-KATHLEEN, L.P.	LAKELAND	6/1/95	5/20/96	COMBINED CYCLE COMBUSTION TURBINE (TOTAL 115MW)	75 MW	25 PPM @ 15% O2	COMBUSTION CONTROLS STANDARD ONLY APPLIES IF	BACT-PSD
FL-0109	KEY WEST CITY ELECTRIC SYSTEM	KEY WEST	34970	5/31/96	TURBINE, EXISTING CT RELOCATION TO A NEW PLANT	23 MW	20 PPM @ 15% O2 FULL LD	GOOD COMBUSTION	BACT-PSD
FL-0116	SANTA ROSA ENERGY LLC	NORTHBROOK	12/4/98	4/16/99	TURBINE, COMBUSTION, NATURAL GAS	241 MW			BACT-PSD
GA-0052	SAVANNAH ELECTRIC AND POWER CO.		2/12/92	3/24/95	TURBINES, 8	1032 MMBTU/H, NAT GAS	9 PPM @ 15% O2	FUEL SPEC: LOW SULFUR FUEL OIL	BACT-PSD
GA-0052	SAVANNAH ELECTRIC AND POWER CO.		2/12/92	3/24/95	TURBINES, 8	1032 MMBTU/H, NAT GAS	9 PPM @ 15% O2	FUEL SPEC: LOW SULFUR FUEL OIL	BACT-PSD
GA-0053	HARTWELL ENERGY LIMITED PARTNERSHIP	HARTWELL	7/28/92	3/24/95	TURBINE, GAS FIRED (2 EACH)	1817 M BTU/HR	25 PPMVD @ FULL LOAD	FUEL SPEC: CLEAN BURNING FUELS	BACT-PSD
GA-0053	HARTWELL ENERGY LIMITED PARTNERSHIP	HARTWELL	7/28/92	3/24/95	TURBINE, GAS FIRED (2 EACH)	1817 M BTU/HR	25 PPMVD @ FULL LOAD	FUEL SPEC: CLEAN BURNING FUELS	BACT-PSD
GA-0063	MID-GEORGIA COGEN.	KATHLEEN	4/3/96	8/19/96	COMBUSTION TURBINE (2), NATURAL GAS	116 MW	10 PPMVD	COMPLETE COMBUSTION	BACT-PSD
GA-0063	MID-GEORGIA COGEN.	KATHLEEN	4/3/96	8/19/96	COMBUSTION TURBINE (2), NATURAL GAS	116 MW	10 PPMVD	COMPLETE COMBUSTION	BACT-PSD
IN-0071	PORTSIDE ENERGY CORP.	PORTAGE	5/13/96	5/31/97	TURBINE, NATURAL GAS-FIRED	63 MEGAWATT	12 LBS/HR	GOOD COMBUSTION AND EMISSIONS NOT TO EXCEED	BACT-PSD
IN-0071	PORTSIDE ENERGY CORP.	PORTAGE	5/13/96	5/31/97	TURBINE, NATURAL GAS-FIRED	63 MEGAWATT	40 LBS/HR	GOOD COMBUSTION AND EMISSIONS NOT TO EXCEED	BACT-PSD
LA-0079	ENRON LOUISIANA ENERGY COMPANY	EUNICE	8/5/91	10/30/91	TURBINE, GAS, 2	39.1 MMBTU/H	60 PPM @ 15% O2	BASE CASE, NO ADDITIONAL CONTROLS	BACT-PSD
LA-0086	INTERNATIONAL PAPER	MANSFIELD	2/24/94	4/17/95	TURBINE/HRSG, GAS COGEN	338 MM BTU/HR TURBINE	165.9 LB/HR	COMBUSTION CONTROL	BACT
LA-0089	FORMOSA PLASTICS CORPORATION, LOUISIANA	BATON ROUGE	3/2/95	4/17/95	TURBINE/HRSG, GAS COGENERATION	450 MM BTU/HR	25.8 LB/HR	PROPER OPERATION	BACT-PSD
LA-0091	GEORGIA GULF CORPORATION	PLAQUEMINE	3/26/96	4/21/97	GENERATOR, NATURAL GAS FIRED TURBINE	1123 MM BTU/HR	972.4 TPY CAP FOR 3 TURB.	GOOD COMBUSTION PRACTICE AND PROPER OPERATIO	BACT-PSD
LA-0093	FORMOSA PLASTICS CORPORATION, BATON ROUGE PLANT	BATON ROUGE	3/7/97	4/28/97	TURBINE/HRSG, GAS COGENERATION	450 MM BTU/HR	70 LB/HR	COMBUSTION DESIGN AND CONSTRUCTION.	BACT-PSD
LA-0096	UNION CARBIDE CORPORATION	HAHNVILLE	9/22/95	5/31/97	GENERATOR, GAS TURBINE	1313 MM BTU/HR	198.6 LB/HR	NO ADD-ON CONTROL GOOD COMBUSTION PRACTICE	BACT-PSD
MA-0015	PEABODY MUNICIPAL LIGHT PLANT	PEABODY	32842	3/24/95	TURBINE, 38 MW NATURAL GAS FIRED	412 MMBTU/HR	40 PPM @ 15% O2	GOOD COMBUSTION PRACTICES	BACT-OTHER
MA-0015	PEABODY MUNICIPAL LIGHT PLANT	PEABODY	11/30/89	3/24/95	TURBINE, 38 MW NATURAL GAS FIRED	412 MMBTU/HR	40 PPM @ 15% O2	GOOD COMBUSTION PRACTICES	BACT-OTHER
MA-0022	BERKSHIRE POWER DEVELOPMENT, INC.	AGAWAM	9/22/97	4/19/99	ENGINES, CHILLER, NATURAL GAS-FIRED, TWO	23.4 MMBTU/H	0.4 LB/H	DRY LOW NOX COMBUSTION TECHNOLOGY WITH SCR	BACT-PSD
MA-0023	DIGHTON POWER ASSOCIATE, LP	DIGHTON	10/6/97	4/19/99	TURBINE, COMBUSTION, ABB GT11N2	1327 MMBTU/H	5.97 LB/H	DRY LOW NOX COMBUSTION TECHNOLOGY WITH SCR	BACT-PSD
MD-0019	BALTIMORE GAS & ELECTRIC - PERRYMAN PLANT	PERRYMMAN		3/24/95	TURBINE, 140 MW NATURAL GAS FIRED ELECTRIC	140 MW	20 PPM @ 15% O2	GOOD COMBUSTION PRACTICES	BACT-PSD
MD-0019	BALTIMORE GAS & ELECTRIC - PERRYMAN PLANT	PERRYMMAN		3/24/95	TURBINE, 140 MW NATURAL GAS FIRED ELECTRIC	140 MW	20 PPM @ 15% O2	GOOD COMBUSTION PRACTICES	BACT-PSD
ME-0018	WESTBROOK POWER LLC	WESTBROOK		12/4/98	4/19/99	TURBINE, COMBINED CYCLE, TWO	528 MW TOTAL	15 PPM @ 15% O2	USING 15% EXCESS AIR.
ME-0019	CHAMPION INTERNATL CORP. & CHAMP. CLEAN ENERGY	BUCKSPORT	9/14/98	4/19/99	TURBINE, COMBINED CYCLE, NATURAL GAS	175 MW	9 PPMVD @ 15% O2 GAS		BACT-OTHER
ME-0020	CASCO RAY ENERGY CO	VEAZIE	35989	4/19/99	TURBINE, COMBINED CYCLE, NATURAL GAS, TWO	170 MW EACH	20 PPM @ 15% O2	15% EXCESS AIR	BACT-PSD
MI-0206	KALAMAZOO POWER LIMITED	COMSTOCK	12/3/91	3/23/94	TURBINE, GAS-FIRED, 2, W/ WASTE HEAT BOILERS	1805.9 MMBTU/H	20 PPMV	DRY LOW NOX TURBINES	BACT-PSD
MI-0244	WYANDOTTE ENERGY	WYANDOTTE	2/8/99	4/19/99	TURBINE, COMBINED CYCLE, POWER PLANT	500 MW	3 PPM	CATALYTIC OXIDIZER	LAER
NC-0055	DUKE POWER CO. LINCOLN COMBUSTION TURBINE STATION	LOWESVILLE	12/20/91	3/24/95	TURBINE, COMBUSTION	1313 MM BTU/HR	59 LB/HR	COMBUSTION CONTROL	BACT-PSD
NC-0055	DUKE POWER CO. LINCOLN COMBUSTION TURBINE STATION	LOWESVILLE	12/20/91	3/24/95	TURBINE, COMBUSTION	1313 MM BTU/HR	59 LB/HR	COMBUSTION CONTROL	BACT-PSD
NJ-0009	NEWARK BAY COGENERATION PARTNERSHIP	NEWARK	11/1/90	7/7/93	TURBINE, NATURAL GAS FIRED	585 MMBTU/HR	0.0055 LB/MMBTU	CATALYTIC OXIDATION	BACT-PSD
NJ-0013	LAKEWOOD COGENERATION, L.P.	LAKEWOOD TOWNSHIP	4/1/91	5/29/95	TURBINES (NATURAL GAS) (2)	1190 MMBTU/HR (EACH)	0.026 LB/MMBTU	TURBINE DESIGN	BACT-OTHER
NJ-0013	LAKEWOOD COGENERATION, L.P.	LAKEWOOD TOWNSHIP	4/1/91	5/29/95	TURBINES (NATURAL GAS) (2)	1190 MMBTU/HR (EACH)	0.026 LB/MMBTU	TURBINE DESIGN	BACT-OTHER
NJ-0017	NEWARK BAY COGENERATION PARTNERSHIP, L.P.	NEWARK	6/9/93	5/29/95	TURBINES, COMBUSTION, NATURAL GAS-FIRED (2)	617 MMBTU/HR (EACH)	1.8 PPMVD	OXIDATION CATALYST	OTHER
NJ-0031	UNIVERSITY OF MEDICINE & DENTISTRY OF NEW JERSEY	NEWARK	6/26/97	2/17/99	COMBUSTION TURBINE COGENERATION UNITS, 3	56 MMBTU/H	75 PPMVD NAT GAS		RACT
NM-0021	WILLIAMS FIELD SERVICES CO. - EL CEDRO COMPRESSOR	BLANCO	10/29/93	3/2/94	TURBINE, GAS-FIRED	11257 HP	50 PPM @ 15% O2	COMBUSTION CONTROL	BACT-PSD
NM-0021	WILLIAMS FIELD SERVICES CO. - EL CEDRO COMPRESSOR	BLANCO	10/29/93	3/2/94	ENGINE, GAS-FIRED, RECIPROCATING	1000 HP	2.5 G/B-HP-H	CLEAN/LEAN BURN TECHNOLOGY	BACT-PSD
NM-0022	MARATHON OIL CO. - INDIAN BASIN N.G. PLAN	CARLSBAD	1/11/95	4/26/95	TURBINES, NATURAL GAS (2)	5500 HP	13.2 LBS/HR	LEAN-PREMIXED COMBUSTION TECHNOLOGY	BACT-PSD
NM-0024	MILAGRO, WILLIAMS FIELD SERVICE	BLOOMFIELD		5/29/95	TURBINE/COGEN, NATURAL GAS (2)	900 MMCF/DAY	27.6 PPM @ 15% O2		BACT-PSD
NM-0029	SOUTHWESTERN PUBLIC SERVICE COMPANY/CUNNINGHAM STA	HOBBS	2/15/97	3/31/97	COMBUSTION TURBINE, NATURAL GAS	100 MW	SEE FACILITY NOTES	GOOD COMBUSTION PRACTICES	BACT-PSD
NM-0031	LORDSBURG L.P.	LORDSBURG	6/18/97	9/29/97	TURBINE, NATURAL GAS-FIRED, ELEC. GEN.	100 MW	27 LBS/HR	DRY LOW-NOX TECHNOLOGY BY MAINTAINING PROPEF	BACT-PSD
NM-0039	TNP TECHN. LLC (FORMERLY TX-NM POWER CO.)	LORDSBURG	8/7/98	2/10/99	GAS TURBINES	375 MMBTU/H	18 PPM	GOOD COMBUSTION PRACTICES	BACT-PSD

Table 5-13. RBLC CO Summary for Natural Gas Fired CTs (Page 2 of 2)

RBLC ID	Facility Name	City	Permit Dates		Process Description	Thruput Rate	Emission Limit	Control System Description	Basis
			Issuance	Update					
NV-0017	NEVADA POWER COMPANY, HARRY ALLEN PEAKING PLANT	LAS VEGAS	9/18/92	3/24/95	COMBUSTION TURBINE ELECTRIC POWER GENERATION	600 MW (8 UNITS 75 EACH)	152.5 TPY (EACH TURBINE)	PRECISION CONTROL FOR THE LOW NOX COMBUSTOR	BACT-PSD
NY-0044	BROOKLYN NAVY YARD COGENERATION PARTNERS L.P.	NEW YORK CITY	6/6/95	6/30/95	TURBINE, NATURAL GAS FIRED	240 MW	4 PPM @ 15% O2		LAER
NY-0044	BROOKLYN NAVY YARD COGENERATION PARTNERS L.P.	NEW YORK CITY	6/6/95	6/30/95	TURBINE, NATURAL GAS FIRED	240 MW	4 PPM @ 15% O2		LAER
NY-0045	SELKIRK COGENERATION PARTNERS, L.P.	SELKIRK	6/18/92	9/13/94	COMBUSTION TURBINES (2) (252 MW)	1173 MMBTU/HR (EACH)	10 PPM	COMBUSTION CONTROLS	BACT-OTHER
NY-0045	SELKIRK COGENERATION PARTNERS, L.P.	SELKIRK	6/18/92	9/13/94	COMBUSTION TURBINE (79 MW)	1173 MMBTU/HR	25 PPM	COMBUSTION CONTROL	BACT-OTHER
NY-0046	SARANAC ENERGY COMPANY	PLATTSBURGH	7/31/92	9/13/94	TURBINES, COMBUSTION (2) (NATURAL GAS)	1123 MMBTU/HR (EACH)	3 PPM	OXIDATION CATALYST	BACT-OTHER
NY-0047	PASNY/HOLTSVILLE COMBINED CYCLE PLANT	HOLTSVILLE	9/1/92	9/13/94	GENERATOR, EMERGENCY (NATURAL GAS)	1.5 MMBTU/HR	6.5 LB/MMBTU	COMBUSTION CONTROL	BACT-OTHER
NY-0050	SITHE/INDEPENDENCE POWER PARTNERS	OSWEGO	33932	9/13/94	TURBINES, COMBUSTION (4) (NATURAL GAS) (1012 MW)	2133 MMBTU/HR (EACH)	13 PPM	COMBUSTION CONTROLS	BACT-OTHER
NY-0080	PROJECT ORANGE ASSOCIATES	SYRACUSE	12/1/93	3/31/95	GE LM-5000 GAS TURBINE	550 MMBTU/HR	92 LB/HR TEMP > 20F	NO CONTROLS	BACT-OTHER
OH-0218	CNG TRANSMISSION	WASHINGTON COURT HOUSI	8/12/92	4/5/95	TURBINE (NATURAL GAS) (3)	5500 HP (EACH)	0.015 G/HP-HR	FUEL SPEC: USE OF NATURAL GAS	OTHER
OR-0010	PORTLAND GENERAL ELECTRIC CO.	BOARDMAN	5/31/94	8/6/97	TURBINES, NATURAL GAS (2)	1720 MMBTU	15 PPM @ 15% O2	GOOD COMBUSTION PRACTICES	BACT-PSD
OR-0011	HERMISTON GENERATING CO.	HERMISTON	7/7/94	1/27/99	TURBINES, NATURAL GAS (2)	1696 MMBTU/H	15 PPM @ 15% O2	GOOD COMBUSTION PRACTICES	BACT-PSD
PA-0083	NORTHERN CONSOLIDATED POWER	NORTH EAST	5/3/91	7/20/94	TURBINES, GAS, 2	34.6 KW EACH	110 T/YR	OXIDATION CATALYST	OTHER
PA-0148	BLUE MOUNTAIN POWER, LP	RICHLAND	7/31/96	1/12/99	COMBUSTION TURBINE WITH HEAT RECOVERY BOILER	153 MW	3.1 PPM @ 15% O2	OXIDATION CATALYST 16 PPM @ 15% O2 WHEN FIRIN	OTHER
PA-0149	BUCKNELL UNIVERSITY	LEWISBURG	11/26/97	11/30/97	NG FIRED TURBINE, SOLAR TAURUS T-7300S	5 MW	50 PPMV @ 15% O2	GOOD COMBUSTION	BACT-OTHER
PR-0004	ECOELCTRICA, L.P.	PENUELAS	10/1/96	5/6/98	TURBINES, COMBINED-CYCLE COGENERATION	461 MW	33 PPM DV	COMBUSTION CONTROLS	BACT-PSD
PR-0004	ECOELCTRICA, L.P.	PENUELAS	10/1/96	5/6/98	TURBINES, COMBINED-CYCLE COGENERATION	461 MW	100 PPM DV AT MIN. LOAD	COMBUSTION CONTROLS	BACT-PSD
RI-0010	NARRAGANSETT ELECTRIC/NEW ENGLAND POWER CO.	PROVIDENCE	4/13/92	5/31/92	TURBINE, GAS AND DUCT BURNER	1360 MMBTU/H EACH	11 PPM @ 15% O2, GAS		BACT-PSD
RI-0012	ALGONQUIN GAS TRANSMISSION CO.	BURRILLVILLE	7/31/91	5/31/92	TURBINE, GAS, 2	49 MMBTU/H	0.114 LB/MMBTU	GOOD COMBUSTION PRACTICES	BACT-OTHER
SC-0029	SC ELECTRIC AND GAS COMPANY - HAGOOD STATION	CHARLESTON	12/11/89	3/24/95	INTERNAL COMBUSTION TURBINE	110 MEGAWATTS	23 LBS/HR	GOOD COMBUSTION PRACTICES	BACT-PSD
TX-0231	WEST CAMPUS COGENERATION COMPANY	COLLEGE STATION	5/2/94	10/31/94	GAS TURBINES	75.3 MW (TOTAL POWER)	300 TPY	INTERNAL COMBUSTION CONTROLS	BACT
VA-0238	COMMONWEALTH CHESAPEAKE CORPORATION	NEW CHURCH	5/21/96	7/21/97	3 COMBUSTION TURBINES (OIL-FIRED)	6000 HRS/YR	96 TPY	GOOD COMBUSTION OPERATING PRACTICES	BACT/NSPS
WA-0027	SUMAS ENERGY INC.	SUMAS	6/25/91	8/1/91	TURBINE, NATURAL GAS	88 MW	6 PPM @ 15% O2	CO CATALYST	BACT-PSD
WY-0032	QUESTAR PIPELINE CORP. - RK SPRINGS COMPRESSOR COM	ROCK SPRINGS	9/25/97	2/1/99	TURBINE COMPRESSOR ENGINE, NATURAL GAS FIRED, 2EA	1001 HP	3.5 G/B-HP-H		BACT-PSD
WY-0039	TWO ELK GENERATION PARTNERS, LIMITED PARTNERSHIP	15 MILES SE OF WRIGHT	2/27/98	3/31/99	TURBINE, STATIONARY	33.3 MW	25 PPM @ 15% O2		OTHER

Source: RBLC 1999.

Table 5-14. RBLC CO Summary for Distillate/Multiple Fuel Fired CTGs

RBLC ID	Facility Name	City	Permit Dates		Fuel Type	Process Description	Thruput Rate	Emission Limit	Control System Description	Basis
			Issuance	Update						
AL-0069	INTERNATIONAL PAPER CO RIVERDALE MILL	SELMA	1/11/93	3/24/95	GAS/OIL	TURBINE, STATIONARY (GAS-FIRED) WITH DUCT BURNER	40 MW	22.1 LB/HR	DESIGN	BACT-PSD
AL-0126	MOBILE ENERGY LLC	MOBILE	1/5/99	4/9/99	GAS/OIL	TURBINE, GAS, COMBINED CYCLE	168 MW	0.04 LB/MMBTU	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0045	CHARLES LARSEN POWER PLANT	CITY OF OF LAKELAND	7/25/91	3/24/95	GAS/OIL	TURBINE, OIL, 1 EACH	80 MW	25 PPM @ 15% O2	COMBUSTION CONTROL	BACT-PSD
FL-0045	CHARLES LARSEN POWER PLANT	CITY OF OF LAKELAND	7/25/91	3/24/95	GAS/OIL	TURBINE, OIL, 1 EACH	80 MW	25 PPM @ 15% O2	COMBUSTION CONTROL	BACT-PSD
FL-0052	FLORIDA POWER AND LIGHT	NORTH PALM BEACH	6/5/91	3/24/95	GAS/OIL	TURBINE, OIL, 2 EACH	400 MW	33 PPM @ 15% O2	COMBUSTION CONTROL	BACT-PSD
FL-0052	FLORIDA POWER AND LIGHT	NORTH PALM BEACH	6/5/91	3/24/95	GAS/OIL	TURBINE, OIL, 2 EACH	400 MW	33 PPM @ 15% O2	COMBUSTION CONTROL	BACT-PSD
FL-0053	FLORIDA POWER AND LIGHT	LAVOGROME REPOWERING S	3/14/91	3/24/95	GAS/OIL	TURBINE, OIL, 4 EACH	33 PPM @ 15% O2	COMBUSTION CONTROL	BACT-PSD	
FL-0053	FLORIDA POWER AND LIGHT	LAVOGROME REPOWERING S	3/14/91	3/24/95	GAS/OIL	TURBINE, OIL, 4 EACH	33 PPM @ 15% O2	COMBUSTION CONTROL	BACT-PSD	
FL-0054	LAKE COGEN LIMITED	UMATILLA	11/20/91	3/24/95	GAS/OIL	TURBINE, OIL, 2 EACH	42 MW	78 PPM @ 15% O2	COMBUSTION CONTROL	BACT-PSD
FL-0054	LAKE COGEN LIMITED	UMATILLA	11/20/91	3/24/95	GAS/OIL	TURBINE, OIL, 2 EACH	42 MW	78 PPM @ 15% O2	COMBUSTION CONTROL	BACT-PSD
FL-0056	ORLANDO UTILITIES COMMISSION	TITUSVILLE	11/5/91	5/14/93	GAS/OIL	TURBINE, OIL, 4 EACH	35 MW	10 PPM @ 15% O2	COMBUSTION CONTROL	BACT-PSD
FL-0056	ORLANDO UTILITIES COMMISSION	TITUSVILLE	11/5/91	5/14/93	GAS/OIL	TURBINE, OIL, 4 EACH	35 MW	10 PPM @ 15% O2	COMBUSTION CONTROL	BACT-PSD
FL-0057	FLORIDA POWER GENERATION	DEBARY	10/18/91	3/24/95	GAS/OIL	TURBINE, OIL, 6 EACH	92.9 MW	54 LB/H	COMBUSTION CONTROL	BACT-PSD
FL-0072	TIGER BAY LP	FT. MEADE	5/17/93	1/13/95	GAS/OIL	TURBINE, OIL	1849.9 MMBTU/H	98.4 LB/H	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0072	TIGER BAY LP	FT. MEADE	5/17/93	1/13/95	GAS/OIL	TURBINE, OIL	1849.9 MMBTU/H	98.4 LB/H	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0078	KISSIMMEE UTILITY AUTHORITY	INTERCESSION CITY	4/7/93	1/13/95	GAS/OIL	TURBINE, FUEL OIL	928 MMBTU/H	65 LB/H	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0078	KISSIMMEE UTILITY AUTHORITY	INTERCESSION CITY	4/7/93	1/13/95	GAS/OIL	TURBINE, FUEL OIL	371 MMBTU/H	76 LB/H	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0078	KISSIMMEE UTILITY AUTHORITY	INTERCESSION CITY	4/7/93	1/13/95	GAS/OIL	TURBINE, FUEL OIL	928 MMBTU/H	65 LB/H	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0078	KISSIMMEE UTILITY AUTHORITY	INTERCESSION CITY	4/7/93	1/13/95	GAS/OIL	TURBINE, FUEL OIL	371 MMBTU/H	76 LB/H	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0080	AUBURNDALE POWER PARTNERS, LP	AUBURNDALE	33952	1/13/95	GAS/OIL	TURBINE, OIL	1170 MMBTU/H	25 PPMVD	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0080	AUBURNDALE POWER PARTNERS, LP	AUBURNDALE	12/14/92	1/13/95	GAS/OIL	TURBINE, OIL	1170 MMBTU/H	25 PPMVD	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0081	TECO POLK POWER STATION	BARTOW	2/24/94	3/24/95	GAS/OIL	TURBINE, FUEL OIL	1765 MMBTU/H	40 PPMVD	GOOD COMBUSTION	BACT-PSD
FL-0082	FLORIDA POWER CORPORATION POLK COUNTY SITE	BARTOW	2/25/94	1/13/95	GAS/OIL	TURBINE, FUEL OIL (2)	1730 MMBTU/H	30 PPMVD	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0082	FLORIDA POWER CORPORATION POLK COUNTY SITE	BARTOW	2/25/94	1/13/95	GAS/OIL	TURBINE, FUEL OIL (2)	1730 MMBTU/H	30 PPMVD	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0083	FLORIDA POWER CORPORATION	INTERCESSION CITY	8/17/92	1/13/95	GAS/OIL	TURBINE, OIL	1029 MMBTU/H	54 LB/H	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0083	FLORIDA POWER CORPORATION	INTERCESSION CITY	8/17/92	1/13/95	GAS/OIL	TURBINE, OIL	1866 MMBTU/H	79 LB/H	GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0104	SEMINOLE HARDEE UNIT 3	FORT GREEN	1/1/96	5/31/96	GAS/OIL	COMBINED CYCLE COMBUSTION TURBINE	140 MW	20 PPM (NAT. GAS)	DRY LNB GOOD COMBUSTION PRACTICES	BACT-PSD
FL-0115	CITY OF LAKELAND ELECTRIC AND WATER UTILITIES	LAKELAND	7/10/98	4/16/99	GAS/OIL	TURBINE, COMBUSTION, GAS FIRED W/ FUEL OIL ALSO	2174 MMBTU/H	25 PPM	GOOD COMBUSTION WITH DLN	BACT-PSD
GA-0052	SAVANNAH ELECTRIC AND POWER CO.		2/12/92	3/24/95	GAS/OIL	TURBINES, 8	972 MMBTU/H, #2 OIL	9 PPM @ 15% O2	FUEL SPEC. LOW SULFUR FUEL OIL	BACT-PSD
GA-0052	SAVANNAH ELECTRIC AND POWER CO.		2/12/92	3/24/95	GAS/OIL	TURBINES, 8	972 MMBTU/H, #2 OIL	9 PPM @ 15% O2	FUEL SPEC. LOW SULFUR FUEL OIL	BACT-PSD
GA-0053	HARTWELL ENERGY LIMITED PARTNERSHIP	HARTWELL	7/28/92	3/24/95	GAS/OIL	TURBINE, OIL FIRED (2 EACH)	1840 M BTU/HR	25 PPMVD @ FULL LOAD	FUEL SPEC. CLEAN BURNING FUELS	BACT-PSD
GA-0053	HARTWELL ENERGY LIMITED PARTNERSHIP	HARTWELL	7/28/92	3/24/95	GAS/OIL	TURBINE, OIL FIRED (2 EACH)	1840 M BTU/HR	25 PPMVD @ FULL LOAD	FUEL SPEC. CLEAN BURNING FUELS	BACT-PSD
GA-0063	MID-GEORGIA COGEN	KATHLEEN	4/3/96	8/19/96	GAS/OIL	COMBUSTION TURBINE (2), FUEL OIL	116 MW	30 PPMVD	COMPLETE COMBUSTION	BACT-PSD
GA-0063	MID-GEORGIA COGEN	KATHLEEN	4/3/96	8/19/96	GAS/OIL	COMBUSTION TURBINE (2), FUEL OIL	116 MW	30 PPMVD	COMPLETE COMBUSTION	BACT-PSD
HI-0013	MAUI ELECTRIC COMPANY, LTD.	MAALAEA	12/3/91	3/24/95	GAS/OIL	TURBINE, FUEL OIL #2	28 MW	SEE NOTES	GOOD COMBUSTION PRACTICES	BACT-PSD
HI-0014	HAWAII ELECTRIC LIGHT CO., INC.	KEEAU	2/12/92	3/24/95	GAS/OIL	TURBINE, FUEL OIL #2	20 MW	26.8 LB/HR @ 100% PEAKLD	COMBUSTION DESIGN	BACT-PSD
HI-0014	HAWAII ELECTRIC LIGHT CO., INC.	KEEAU	2/12/92	3/24/95	GAS/OIL	TURBINE, FUEL OIL #2	20 MW	56.4 LB/HR @ 75 < 100% PKLD	COMBUSTION DESIGN	BACT-PSD
HI-0014	HAWAII ELECTRIC LIGHT CO., INC.	KEEAU	2/12/92	3/24/95	GAS/OIL	TURBINE, FUEL OIL #2	20 MW	181 LB/HR @ 50 < 75% PKLD	COMBUSTION DESIGN	BACT-PSD
HI-0014	HAWAII ELECTRIC LIGHT CO., INC.	KEEAU	2/12/92	3/24/95	GAS/OIL	TURBINE, FUEL OIL #2	20 MW	475.6 LB/HR @ 25 < 50% PKLD	COMBUSTION DESIGN	BACT-PSD
HI-0015	MAUI ELECTRIC COMPANY, LTD. MAALAEA GENERATING STA	MAUI	7/28/92	3/24/95	GAS/OIL	TURBINE, COMBINED-CYCLE COMBUSTION	28 MW	26.9 LB/HR	COMBUSTION TECHNOLOGY/DESIGN	BACT-OTHER
IN-0053	PSI ENERGY, INC. WABASH RIVER STATION	WEST TERRE HAUTE	5/27/93	7/20/94	GAS/OIL	COMBINED CYCLE SYNGAS TURBINE	1775 MMBTU/HR	15 LESS THAN PPM	OPERATION PRAC. AND GOOD COMB. SYNGAS TURBINE	BACT-PSD
KY-0053	KENTUCKY UTILITIES COMPANY	MERCER	33673	3/24/95	GAS/OIL	TURBINE, #2 FUEL OIL/NATURAL GAS (8)	1500 MM BTU/HR (EACH)	75 LB/HR (EACH)	COMBUSTION CONTROL	BACT-PSD
KY-0057	EAST KENTUCKY POWER COOPERATIVE		3/24/93	3/24/95	GAS/OIL	TURBINES (5), #2 FUEL OIL AND NAT. GAS FIRED	1492 MMBTU/HR (EACH)	75 LBS/H (EACH)	PROPER COMBUSTION TECHNIQUES	BACT-OTHER
MA-0021	MILLENNIUM POWER PARTNER, LP	CHARLTON	2/2/98	4/19/99	GAS/OIL	TURBINE, COMBUSTION, WESTINGHOUSE MODEL 501G	2534 MMBTU/HR	0.07 LB/MMBTU	DLN IN CONJ. WITH SCR ADD-ON NOX CONTROL	BACT-PSD
MA-0022	BERKSHIRE POWER DEVELOPMENT, INC.	AGAWAM	9/22/97	4/19/99	GAS/OIL	TURBINE, COMBUSTION, ABB GT24	1792 MMBTU/HR	14.3 LB/HR	DLN WITH SCR ADD-ON NOX CONTROL	BACT-PSD
MA-0023	DIGHTON POWER ASSOCIATE, LP	DIGHTON	10/6/97	4/19/99	DIESEL	ENGINE, DIESEL, FIRE PUMP	1.5 MMBTU/HR	0.95 LB/MMBTU	DLN WITH SCR ADD-ON NOX CONTROL	BACT-PSD
ME-0016	GORHAM ENERGY LIMITED PARTNERSHIP	GORHAM	12/4/98	4/19/99	GAS/OIL	TURBINE, COMBINED CYCLE	900 MW TOTAL	5 PPM @ 15% O2 (NAT. G)	0.05% S #2 IS USED: EACH 300 MW SYSTEM	BACT-PSD
MO-0016	EMPIRE DISTRICT ELECTRIC CO.	JOPLIN	34471	10/6/97	GAS/OIL	INSTALL TWO NEW SIMPLE-CYCLE TURBINES	1345 MMBTU/HR	1290 TPY	NONE	BACT-PSD
MO-0016	EMPIRE DISTRICT ELECTRIC CO.	JOPLIN	5/17/94	10/6/97	GAS/OIL	INSTALL TWO NEW SIMPLE-CYCLE TURBINES	1345 MMBTU/HR	120 TPY	NONE	BACT-PSD
MO-0017	EMPIRE DISTRICT ELECTRIC CO.	JOPLIN	2/28/95	10/6/97	GAS/OIL	INSTALL TWO NEW SIMPLE-CYCLE TURBINES	88.77 MW	427.5 TPY	GOOD COMBUSTION CONTROL	BACT-PSD
MO-0043	UNION ELECTRIC CO	WEST ALTON	5/6/79	10/6/97	GAS/OIL	CONSTRUCTION OF A NEW OIL FIRED COMBUSTION TURBINE	622 MM BTU/HR	463 TPY		BACT-PSD
MS-0028	SOUTH MISSISSIPPI ELECTRIC POWER ASSOC.	MOSELL	4/9/96	8/19/96	GAS/OIL	COMBUSTION TURBINE, COMBINED CYCLE	1299 MMBTU/HR NAT GAS	26.3 PPM @ 15% O2, GAS	GOOD COMBUSTION CONTROLS	BACT-PSD
NC-0055	DUKE POWER CO. LINCOLN COMBUSTION TURBINE STATION	LOWESVILLE	12/20/91	3/24/95	GAS/OIL	TURBINE, COMBUSTION	1247 MM BTU/HR	60 LB/HR	COMBUSTION CONTROL	BACT-PSD
NC-0055	DUKE POWER CO. LINCOLN COMBUSTION TURBINE STATION	LOWESVILLE	12/20/91	3/24/95	GAS/OIL	TURBINE, COMBUSTION	1247 MM BTU/HR	60 LB/HR	COMBUSTION CONTROL	BACT-PSD
NC-0059	CAROLINA POWER & LIGHT	GOLDSBORO	4/11/96	8/19/96	GAS/OIL	COMBUSTION TURBINE, 4 EACH	1907.6 MMBTU/HR	80 LB/HR	COMBUSTION CONTROL	BACT-PSD
NC-0059	CAROLINA POWER & LIGHT	GOLDSBORO	4/11/96	8/19/96	GAS/OIL	COMBUSTION TURBINE, 4 EACH	1907.6 MMBTU/HR	81 LB/HR	COMBUSTION CONTROL	BACT-PSD
NJ-0009	NEWARK BAY COGENERATION PARTNERSHIP	NEWARK	11/1/90	7/7/93	GAS/OIL	TURBINE, KEROSENE FIRED	595 MMBTU/HR	0.063 LB/MMBTU	CATALYTIC OXIDATION	BACT-PSD
NJ-0013	LAKEWOOD COGENERATION, L.P.	LAKEWOOD TOWNSHIP	4/1/91	5/29/95	GAS/OIL	TURBINES (#2 FUEL OIL) (2)	1190 MMBTU/HR (EACH)	0.06 LB/MMBTU	TURBINE DESIGN	BACT-OTHER
NJ-0013	LAKEWOOD COGENERATION, L.P.	LAKEWOOD TOWNSHIP	4/1/91	5/29/95	GAS/OIL	TURBINES (#2 FUEL OIL) (2)	1190 MMBTU/HR (EACH)	0.06 LB/MMBTU	TURBINE DESIGN	BACT-OTHER
NJ-0029	ALGONQUIN GAS TRANSMISSION COMPANY	HANOVER	3/31/95	2/10/99	GAS/OIL	TURBINES COMBUSTION, TWO SOLAR CENTAUR	3.1 MW EACH	15.2 LB/H		BACT
NV-0015	SAGUARO POWER COMPANY	HENDERSON	6/17/91	6/1/93	GAS/OIL	COMBUSTION TURBINE GENERATOR	34.5 MW	9 PPH	CONVERTER (CATALYTIC)	BACT-PSD
NV-0030	MUDDY RIVER L.P.	MOAPA	6/10/94	3/24/95	GAS/OIL	COMBUSTION TURBINE, DIESEL & NATURAL GAS	140 MEGAWATT	77 LB/HR	FUEL SPEC. NATURAL GAS	BACT-PSD
NV-0031	CSW NEVADA, INC.	MOAPA	6/10/94	3/24/95	GAS/OIL	COMBUSTION TURBINE, DIESEL & NATURAL GAS	140 MEGAWATT	83 LB/HR	FUEL SPEC. NATURAL GAS	BACT-PSD
NY-0044	BROOKLYN NAVY YARD COGENERATION PARTNERS L.P.	NEW YORK CITY	6/6/95	6/30/95	DIESEL	TURBINE, OIL FIRED	240 MW	5 PPM @ 15% O2		LAER
NY-0044	BROOKLYN NAVY YARD COGENERATION PARTNERS L.P.	NEW YORK CITY	6/6/95	6/30/95	DIESEL	GENERATOR, 3000 KW EMERGENCY	3000 KW	0.25 LB/MMBTU		LAER
NY-0044	BROOKLYN NAVY YARD COGENERATION PARTNERS L.P.	NEW YORK CITY	6/6/95	6/30/95	DIESEL	TURBINE, OIL FIRED	240 MW	5 PPM @ 15% O2		LAER
NY-0044	BROOKLYN NAVY YARD COGENERATION PARTNERS L.P.	NEW YORK CITY	6/6/95	6/30/95	DIESEL	GENERATOR, 3000 KW EMERGENCY	3000 KW	0.25 LB/MMBTU		LAER
NY-0047	PASNY/HOLTSVILLE COMBINED CYCLE PLANT	HOLTSVILLE	9/1/92	9/13/94	DIESEL	FIRE PUMP (DIESEL)	1.3 MMBTU/HR	0.71 LB/MMBTU	COMBUSTION CONTROL	BACT-OTHER
NY-0047	PASNY/HOLTSVILLE COMBINED CYCLE PLANT	HOLTSVILLE	9/1/92	9/13/94	GAS/OIL	TURBINE, COMBUSTION GAS (150-MW)	1146 MMBTU/HR (GAS) *	8.5 PPM	COMBUSTION CONTROL	BACT-OTHER
NY-0049	KAMINE/BESICORP BEAVER FALLS COGENERATION FACILITY	BEAVER FALLS	33917	9/13/94	GAS/OIL	TURBINE, COMBUSTION (NAT. GAS & OIL FUEL) (79MW)	650 MMBTU/HR	9.5 PPM	COMBUSTION CONTROLS	BACT-OTHER
NY-0057	MEGAN RACINE ASSOCIATES, INC.	CANTON	8/5/89	3/30/95	GAS/OIL	GE LM5000-N COMBINED CYCLE GAS TURBINE	401 LB/MMBTU	0.026 LB/MMBTU, 11 LB/HR	NO CONTROLS	BACT-OTHER
NY-0061	ANITEC COGEN PLANT	BINGHAMTON	7/7/93	4/27/95	GAS/OIL	GE LM5000 COMBINED CYCLE GAS TURBINE EP #00001	451 MMBTU/HR	36 PPM, 33 LB/HR	BAFFLE CHAMBER	SEE NOTE #4
NY-0062	FULTON COGEN PLANT	FULTON	9/15/94	4/27/95	GAS/OIL	GE LM5000 GAS TURBINE	500 MMBTU/HR	107 PPM, 120 LB/HR	NO CONTROLS	BACT-OTHER
NY-0063	TBG COGEN COGENERATION PLANT	BETHPAGE	8/5/90	4/27/95	GAS/OIL	GE LM2500 GAS TURBINE	214.9 MMBTU/HR	0.181 LB/MMBTU	CATALYTIC OXIDIZER	BACT
NY-0064	INDECK-OSWEGO ENERGY CENTER	OSWEGO	10/6/94	4/27/95	GAS/OIL	GE FRAME 6 GAS TURBINE	533 LB/MMBTU	10 PPM, 10.00 LB/HR	NO CONTROLS	BACT-OTHER
NY-0065	KAMINE/BESICORP CARTHAGE L.P.	CARTHAGE	1/18/94	4/27/95	GAS/OIL	GE FRAME 6 GAS TURBINE	491 BTU/HR	10 PPM, 11.0 LB/HR	NO CONTROLS	BACT-OTHER
NY-0066	INDECK ENERGY COMPANY	SILVER SPRINGS	5/12/93	3/31/95	GAS/OIL	GE FRAME 6 GAS TURBINE EP #00001	491 MMBTU/HR	40 PPM	NO CONTROLS	BACT-OTHER
NY-0068	KAMINE/BESICORP NATURAL DAM LP	NATURAL DAM	12/31/91	6/30/95	GAS/OIL	GE FRAME 6 GAS TURBINE	500 MMBTU/HR	0.02 LB/MMBTU, 10 LB/HR	NO CONTROLS	BACT-OTHER
NY-0071	KAMINE SOUTH GLENS FALLS COGEN CO	SOUTH GLENS FALLS	9/10/92	4/27/95	GAS/OIL	GE FRAME 6 GAS TURBINE	498 MMBTU/HR	9 PPM, 11.0 LB/HR	NO CONTROLS	BACT-OTHER
NY-0072	KAMINE/BESICORP SYRACUSE LP	SOLVAY	12/10/94	4/27/95	DIESEL	DIESEL GENERATOR (EP #00005)	22 MMBTU/HR	0.371 LB/MMBTU, 8.27 LB/HR	NO CONTROLS	BACT-OTHER
NY-0072	KAMINE/BESICORP SYRACUSE LP	SOLVAY	12/10/94	4/27/95	DIESEL	FIRE PUMP (EP #00007)	1.5 MMBTU/HR	2.88 LB/MMBTU, 4.23 LB/HR	NO CONTROLS	BACT-OTHER
NY-0072	KAMINE/BESICORP SYRACUSE LP	SOLVAY	12/10/94	4/27/95	GAS/OIL	SIEMENS V64.3 GAS TURBINE (EP #00001)	650 MMBTU/HR	9.5 PPM	NO CONTROLS	BACT-OTHER
NY-0073	LOCKPORT COGEN FACILITY	LOCKPORT	7/14/93	4/27/95	GAS/OIL	(6) GE FRAME 6 TURBINES (EP #S 00001-00006)	423.9 MMBTU/HR	10 PPM	NO CONTROLS	BACT-OTHER
NY-0075	PLGRIM ENERGY CENTER	ISLIP	4/27/95	4/27/95	GAS/OIL	(2) WESTINGHOUSE W501D5 TURBINES (EP #S 00001&2)	1400 MMBTU/HR	10 PPM, 29.0 LB/HR		BACT-OTHER
NY-0076	TRIGEN MITCHEL FIELD	HEMPSTEAD	4/16/93	3/31						



Table 5-14. RBLC CO Summary for Distillate/Multiple Fuel Fired CTGs (Page 2 of 2)

RBLC ID	Facility Name	City	Permit Dates		Fuel Type	Process Description	Thruput Rate	Emission Limit	Control System Description	Basis
			Issuance	Update						
NY-0077	INDECK-YERKES ENERGY SERVICES	TONAWANDA	6/24/92	3/31/95	GAS/OIL	GE FRAME 6 GAS TURBINE (EP #00001)	432.2 MMBTU/HR	10 PPM, 10 LB/HR	NO CONTROLS	BACT-OTHER
NY-0079	LEDERLE LABORATORIES	PEARL RIVER		4/27/95	GAS/OIL	(2) GAS TURBINES (EP #S 00101&102)	110 MMBTU/HR	48 PPM, 12.6 LB/HR		BACT-OTHER
NY-0081	LILCO SHOREHAM	HICKSVILLE	5/10/93	3/30/95	DIESEL	(3) GE FRAME 7 TURBINES (EP #S 00007-9)	850 MMBTU/HR	10 PPM, 19.7 LB/HR	NO CONTROLS	BACT-OTHER
PA-0083	NORTHERN CONSOLIDATED POWER	NORTH EAST	5/3/91	7/20/94	DIESEL	GENERATORS, DIESEL, 2	1135 KW EACH	7.9 LB/H EACH		OTHER
PA-0098	GRAYS FERRY CO. GENERATION PARTNERSHIP	PHILADELPHIA	11/4/92	7/20/94	GAS/OIL	TURBINE (NATURAL GAS & OIL)	1150 MMBTU	0.0055 LB/MMBTU (GAS)*	COMBUSTION	BACT-OTHER
PA-0098	GRAYS FERRY CO. GENERATION PARTNERSHIP	PHILADELPHIA	11/4/92	7/20/94	GAS/OIL	GENERATOR, STEAM	450 MMBTU	0.0055 LB/MMBTU (NAT. GAS)*	COMBUSTION	BACT-OTHER
PR-0002	PUERTO RICO ELECTRIC POWER AUTHORITY (PREPA)	ARECIBO	34911	5/6/98	GAS/OIL	COMBUSTION TURBINES (3), 83 MW SIMPLE-CYCLE EACH	248 MW	20 LB/HR	IMPLEMENT GOOD COMBUSTION PRACTICES.	BACT-PSD
PR-0002	PUERTO RICO ELECTRIC POWER AUTHORITY (PREPA)	ARECIBO	7/31/95	5/6/98	GAS/OIL	COMBUSTION TURBINES (3), 83 MW SIMPLE-CYCLE EACH	248 MW	104 LB/HR	IMPLEMENT GOOD COMBUSTION PRACTICES.	BACT-PSD
SC-0021	CAROLINA POWER AND LIGHT CO.	DARLINGTON	9/23/91	3/24/95	GAS/OIL	TURBINE, I.C.	80 MW	60 LB/H		BACT-PSD
SC-0036	CAROLINA POWER AND LIGHT	HARTSVILLE	8/31/94	4/29/96	GAS/OIL	STATIONARY GAS TURBINE	1520 MMBTU/H	702 LB/H	PROPER OPERATION TO ACHIEVE GOOD COMBUSTION	BACT-PSD
SC-0036	CAROLINA POWER AND LIGHT	HARTSVILLE	8/31/94	4/29/96	GAS/OIL	STATIONARY GAS TURBINE	1520 MMBTU/H	414 LB/H	PROPER OPERATION TO ACHIEVE GOOD COMBUSTION	BACT-PSD
SC-0038	GENERAL ELECTRIC GAS TURBINES	GREENVILLE	4/19/96	8/19/96	GAS/OIL	I.C. TURBINE	2700 MMBTU/HR	27169 LB/HR	GOOD COMBUSTION PRACTICES TO MIN. EMISSIONS	BACT-PSD
SD-0001	NORTHERN STATES POWER COMPANY	NEAR SIOUX FALLS, SOUTH I	9/2/92	3/24/95	GAS/OIL	TURBINE, SIMPLE CYCLE, 4 EACH	129 MW	50 PPM FOR GAS	GOOD COMBUSTION TECHNIQUES	BACT-PSD
VA-0189	GORDONSVILLE ENERGY L.P.	FAIRFAX	9/25/92	3/24/95	GAS/OIL	TURBINE FACILITY, GAS	1331.13 X10(7) SCF/YR NAT GAS	249.9 TOTAL TPY	GOOD COMBUSTION PRACTICES	BACT-PSD
VA-0189	GORDONSVILLE ENERGY L.P.	FAIRFAX	9/25/92	3/24/95	GAS/OIL	TURBINE FACILITY, GAS	7.44 X10(7) GPY FUEL OIL	249.9 TOTAL TPY	GOOD COMBUSTION PRACTICES	BACT-PSD
VA-0189	GORDONSVILLE ENERGY L.P.	FAIRFAX	9/25/92	3/24/95	GAS/OIL	TURBINES (2) (EACH WITH A SF)	1.51 X10(9) BTU/HR N GAS	57 LBS/HR/UNIT	GOOD COMBUSTION PRACTICES	BACT-PSD
VA-0189	GORDONSVILLE ENERGY L.P.	FAIRFAX	9/25/92	3/24/95	GAS/OIL	TURBINES (2) (EACH WITH A SF)	1.36 X10(9) BTU/HR #2 OIL	68 LBS/HR/UNIT	GOOD COMBUSTION PRACTICES	BACT-PSD
VA-0190	BEAR ISLAND PAPER COMPANY, L.P.	ASHLAND	10/30/92	5/7/97	GAS/OIL	TURBINE, COMBUSTION GAS	474 X10(6) BTU/HR N GAS	11 LBS/HR	GOOD COMBUSTION	BACT-PSD
VA-0190	BEAR ISLAND PAPER COMPANY, L.P.	ASHLAND	10/30/92	5/7/97	GAS/OIL	TURBINE, COMBUSTION GAS	468 X10(6) BTU/HR #2 OIL	11 LBS/HR	GOOD COMBUSTION	BACT-PSD
VA-0190	BEAR ISLAND PAPER COMPANY, L.P.	ASHLAND	10/30/92	5/7/97	GAS/OIL	TURBINE, COMBUSTION GAS (TOTAL)		48.2 TPY	GOOD COMBUSTION	BACT-PSD
VA-0206	PATOWMACK POWER PARTNERS, LIMITED PARTNERSHIP	LEESBURG	9/15/93	5/7/97	GAS/OIL	TURBINE, COMBUSTION, SIEMENS MODEL V84.2, 3	10.2 X109 SCF/YR NAT GAS	26 LB/HR	GOOD COMBUSTION OPERATING PRACTICES	BACT-PSD
WA-0280	EEX POWER SYSTEMS, ENCOGEN NW COGENERATION PROJECT	BELLINGHAM	9/26/91	4/16/99	GAS/OIL	TURBINES, COMBINED CYCLE COGEN, GE FRAME 6	123 MW	10 PPM DV @ 15% O2		BACT-PSD
WI-0067	WEPCU, PARIS SITE	PARIS	8/29/92	7/20/94	GAS/OIL	TURBINES, COMBUSTION (4)		25 LBS/HR (SEE NOTES)		BACT-PSD

Source: RBLC 1999.

Table 5-22. RBLC NO<sub>x</sub> Summary for Natural Gas Fired CTs

RBLC ID	Facility Name	City	Permit Dates		Process Description	Thruput Rate	Emission Limit	Control System Description	Basis
			Issuance	Update					
AL-0074	FLORIDA GAS TRANSMISSION COMPANY	MOBILE	8/5/93	5/12/94	TURBINE, NATURAL GAS	12600 BHP	0.58 GM/HP-HR	AIR-TO-FUEL RATIO CONTROL, DLN COMBUSTION	BACT-PSD
AL-0089	SOUTHERN NATURAL GAS COMPANY SELMA COMPRESS	SELMA	12/4/96	12/18/96	9160 HP GE MS3002G NATURAL GAS FIRED TURBINE		53 LB/HR		BACT-PSD
AL-0096	MEAD COATED BOARD, INC.	PHENIX CITY	3/12/97	5/31/97	COMBINED CYCLE TURBINE (25 MW)	568 MMBTU/HR	25 PPMVD @ 15% O <sub>2</sub> (GAS)		BACT-PSD
AL-0109	SOUTHERN NATURAL GAS	AUBURN	3/2/98	4/24/98	9160 HP GE MODEL M53002G NATURAL GAS FIRED TURBINE	9160 HP	53 LB/HR		BACT-PSD
AL-0110	SOUTHERN NATURAL GAS	WARD	3/4/98	4/24/98	2-9160 HP GE MODEL M53002G NATURAL GAS TURBINES	9160 HP	53 LB/HR		BACT-PSD
AL-0115	ALABAMA POWER COMPANY	MCINTOSH	12/17/97	4/24/98	COMBUSTION TURBINE W/ DUCT BURNER (COMBINED CYCLE)	100 MW	15 PPM	DRY LOW NOX BURNERS	BACT-PSD
AL-0120	GENERAL ELECTRIC PLASTICS	BURKVILLE	5/27/98	7/2/98	COMBINED CYCLE (TURBINE AND DUCT BURNER)		0.07 LBS/MMBTU COMBINED	DLN ON TURBINE AND LOW NOX BURNER ON DB	BACT-PSD
AL-0128	ALABAMA POWER COMPANY - THEODORE COGENERATION	THEODORE	3/16/99	4/20/99	170 MW TURBINE W/ DUCT BURNER, HR BOILER, SCR	170 MW	0.013 LB/MMBTU	DLN COMBUSTOR IN CT, LNB IN DUCT BURNER, SCR	BACT-PSD
AL-0128	ALABAMA POWER COMPANY - THEODORE COGENERATION	THEODORE	3/16/99	4/20/99	220 MMBTU/HR BOILER	220 MMBTU/HR	0.053 LB/MMBTU	LNB AND FLUE GAS RECIRCULATION	BACT-PSD
AZ-0010	EL PASO NATURAL GAS		10/25/91	3/24/95	TURBINE, GAS, SOLAR CENTAUR H	5500 HP	84.9 PPM @ 15% O <sub>2</sub>	LEAN BURN	NSPS
AZ-0010	EL PASO NATURAL GAS		10/25/91	3/24/95	TURBINE, GAS, SOLAR CENTAUR H	5500 HP	42 PPM @ 15% O <sub>2</sub>	DRY LOW NOX COMBUSTOR	BACT-PSD
AZ-0011	EL PASO NATURAL GAS		10/25/91	3/24/95	TURBINE, GAS, SOLAR CENTAUR H	5500 HP	85.1 PPM @ 15% O <sub>2</sub>	FUEL SPEC. LEAN FUEL MIX	NSPS
AZ-0011	EL PASO NATURAL GAS		10/25/91	3/24/95	TURBINE, GAS, SOLAR CENTAUR H	5500 HP	42 PPM @ 15% O <sub>2</sub>	DRY LOW NOX COMBUSTOR	BACT-PSD
AZ-0012	EL PASO NATURAL GAS		10/18/91	7/20/94	TURBINE, NAT. GAS TRANSM., GE FRAME 3	12000 HP	225 PPM @ 15% O <sub>2</sub>	LEAN BURN	BACT-PSD
AZ-0012	EL PASO NATURAL GAS		10/18/91	7/20/94	TURBINE, NAT. GAS TRANSM., GE FRAME 3	12000 HP	42 PPM @ 15% O <sub>2</sub>	DRY LOW NOX COMBUSTOR	BACT-PSD
CA-0418	SOUTHERN CALIFORNIA GAS	WHEELER RIDGE	10/29/91	8/4/93	TURBINE, GAS-FIRED	47.64 MMBTU/H	8 PPMVD @ 15% O <sub>2</sub>	HIGH TEMPERATURE SCR	BACT-PSD
CA-0437	KINGSBURG ENERGY SYSTEMS		9/28/89	8/3/93	TURBINE, NATURAL GAS FIRED, DUCT BURNER	34.5 MW	6 PPM @ 15% O <sub>2</sub>	SCR, STEAM INJECTION	BACT-PSD
CA-0441	GRANITE ROAD LIMITED		5/6/91	8/3/93	TURBINE, GAS, ELECTRIC GENERATION	460.9 MMBTU/H*	3.5 PPMVD @ 15% O <sub>2</sub>	SCR, STEAM INJECTION	BACT-PSD
CA-0463	SOUTHERN CALIFORNIA GAS	WHEELER RIDGE	10/29/91	5/31/92	TURBINE, GAS FIRED, SOLAR MODEL H	5500 HP	8 PPM @ 15% O <sub>2</sub>	HIGH TEMP SELECT. CAT. REDUCTION	BACT-PSD
CA-0544	GOAL LINE, LP ICEFLOE	ESCONDIDO	33911	8/4/94	TURBINE, COMBUSTION (NATURAL GAS) (42.4 MW)	386 MMBTU/HR	5 PPMVD @ 15% O <sub>2</sub>	H <sub>2</sub> O INJECT. & SCR W/ AUTOMATIC NH <sub>3</sub> INJECT.	BACT-OTHER
CA-0613	UNOCAL	WILMINGTON	7/18/89	12/5/94	TURBINE, GAS (SEE NOTES)		9 PPM @ 15% O <sub>2</sub>	SCR, WATER INJECTN	BACT-OTHER
CA-0768	NORTHERN CALIFORNIA POWER AGENCY	LODI	10/2/97	3/16/98	GE FRAME 5 GAS TURBINE	325 MMBTU/HR	25 PPMVD @ 15% O <sub>2</sub>	DRY LOW NOX BURNERS	LAER
CA-0774	SOUTHERN CALIFORNIA GAS COMPANY	WHEELER RIDGE	5/14/97	3/16/98	VARIABLE LOAD NATURAL GAS FIRED TURBINE COMPRESSOR	50.1 MMBTU/HR	25 PPMVD @ 15% O <sub>2</sub>	DRY LOW NOX COMBUSTOR	LAER
CA-0793	TEMPO PLASTICS	VISALIA	12/31/96	4/23/98	GAS TURBINE COGENERATION UNIT		0.109 LB/MMBTU	LOW-NOX COMBUSTOR	LAER
CA-0794	CALRESOURCES LLC		1/10/97	3/16/98	SOLAR MODEL 1100 SATURN GAS TURBINE	13.6 MMBTU/HR	69 PPMVD @ 15% O <sub>2</sub>	NO CONTROL	LAER
CA-0845	SACRAMENTO POWER AUTHORITY CAMPBELL SOUP	SACRAMENTO	8/19/94	4/13/99	TURBINE, GAS, COMBINED CYCLE, SIEMENS V84.2	1257 MMBTU/H	3 PPMVD @ 15% O <sub>2</sub>	SCR AND DRY LOW NOX COMBUSTION	BACT
CA-0846	CARSON ENERGY GROUP & CENTRAL VALLEY FINANCING	ELK GROVE	7/23/93	4/13/99	TURBINE, GAS, COMBINED CYCLE, GE LM6000	450 MMBTU/H	5 PPMVD @ 15% O <sub>2</sub>	SCR AND WATER INJECTION	BACT
CA-0846	CARSON ENERGY GROUP & CENTRAL VALLEY FINANCING	ELK GROVE	7/23/93	4/13/99	TURBINE, GAS, SIMPLE CYCLE, GE LM6000	450 MMBTU/H	5 PPMVD @ 15% O <sub>2</sub>	SCR AND WATER INJECTION	BACT
CA-0853	KERN FRONT LIMITED	BAKERSFIELD	1/14/86	4/19/99	TURBINE, GAS, GENERAL ELECTRIC LM-2500	25 MW	96.96 LB/D	WATER INJECTION AND SCR	BACT-OTHER
CA-0858	BEAR MOUNTAIN LIMITED	BAKERSFIELD	8/19/94	4/19/99	TURBINE, GE, COGENERATION, 48 MW	48 MW	3.6 PPMVD @ 15% O <sub>2</sub>	STEAM INJECTION AND SCR	BACT-OTHER
CA-0863	SUNLAW COGEN. (FEDERAL COLD STORAGE COGENERATION)	VERNON	1/15/94	4/19/99	TURBINE, NATURAL GAS FIRED, COMBINED CYCLE AND COG	28 MW	186817 LB/YR	WATER INJECTION AND SCONOX (MOD 2)	BACT-OTHER
CO-0017	THERMO INDUSTRIES, LTD.	FT. LUPTON	2/19/92	3/24/95	TURBINE, GAS FIRED, 5 EACH	246 MMBTU/H	25 PPM @ 15% O <sub>2</sub>	DRY LOW NOX TECH.	BACT-PSD
CO-0018	BRUSH COGENERATION PARTNERSHIP	BRUSH		7/20/94	TURBINE	350 MMBTU/H	25 PPM @ 15% O <sub>2</sub>	DRY LOW NOX BURNER	BACT-PSD
CO-0019	COLORADO POWER PARTNERSHIP	BRUSH		7/20/94	TURBINES, 2 NAT GAS & 2 DUCT BURNERS	385 MMBTU/H EACH TU	42 PPM @ 15% O <sub>2</sub>	WATER INJECTION	BACT-PSD
CO-0020	CIMARRON CHEMICAL	JOHNSTOWN	3/25/91	7/20/94	TURBINE #1, GE FRAME 6	33 MW	25 PPM @ 15% O <sub>2</sub>	WATER INJECTION	OTHER
CO-0020	CIMARRON CHEMICAL	JOHNSTOWN	3/25/91	7/20/94	TURBINE #2, GE FRAME 6	33 MW	9 PPM @ 15% O <sub>2</sub>	SCR	OTHER
CO-0021	NORTHWEST PIPELINE CORPORATION	LA PLATA B* STATION*	5/29/92	7/20/94	TURBINE, SOLAR TAURUS	45 MMBTU/HR	95 PPMVD (UNTIL 11/98)	DRY LOW NOX COMBUSTOR (BY 11/01/98)	BACT-PSD
CO-0023	PHOENIX POWER PARTNERS	GREELEY	5/11/93	3/24/95	TURBINE (NATURAL GAS)	311 MMBTU/HR	22 PPM @ 15% O <sub>2</sub>	DRY LOW NOX COMBUSTION	BACT-OTHER
CO-0037	COLORADO SPRINGS UTILITIES	FOUNTAIN	1/4/99	4/19/99	TURBINE, COMBINE, NATURAL GAS FIRED	30 MW EACH	15 PPMVD ABOVE 70% LOAD	POLLUTION PREVENTION BUILT INTO EQUIPMENT	BACT-PSD
CT-0130	BRIDGEPORT ENERGY, LLC	BRIDGEPORT	6/29/98	1/21/99	TURBINES, COMBUSTION MODEL V84.3A, 2 SIEMES	260 MW/HRSG PER TUR	6 PPM NAT. GAS	DRY LOW NOX BURNER WITH SCR	BACT-PSD
FL-0045	CHARLES LARSEN POWER PLANT	CITY OF OF LAKE LAND	7/25/91	3/24/95	TURBINE, GAS, 1 EACH	80 MW	25 PPM @ 15% O <sub>2</sub>	WET INJECTION	BACT-PSD
FL-0045	CHARLES LARSEN POWER PLANT	CITY OF OF LAKE LAND	33444	3/24/95	TURBINE, GAS, 1 EACH	80 MW	25 PPM @ 15% O <sub>2</sub>	WET INJECTION	BACT-PSD
FL-0052	FLORIDA POWER AND LIGHT	NORTH PALM BEACH	6/5/91	3/24/95	TURBINE, GAS, 4 EACH	400 MW	25 PPM @ 15% O <sub>2</sub>	LOW NOX COMBUSTORS	BACT-PSD
FL-0052	FLORIDA POWER AND LIGHT	NORTH PALM BEACH	6/5/91	3/24/95	TURBINE, CG, 4 EACH	400 MW	42 PPM @ 15% O <sub>2</sub>	LOW NOX COMBUSTORS	BACT-PSD
FL-0052	FLORIDA POWER AND LIGHT	NORTH PALM BEACH	6/5/91	3/24/95	TURBINE, GAS, 4 EACH	400 MW	25 PPM @ 15% O <sub>2</sub>	LOW NOX COMBUSTORS	BACT-PSD
FL-0052	FLORIDA POWER AND LIGHT	NORTH PALM BEACH	6/5/91	3/24/95	TURBINE, CG, 4 EACH	400 MW	42 PPM @ 15% O <sub>2</sub>	LOW NOX COMBUSTORS	BACT-PSD
FL-0053	FLORIDA POWER AND LIGHT	LAVOGROME REPOWERING S	3/14/91	3/24/95	TURBINE, GAS, 4 EACH	240 MW	42 PPM @ 15% O <sub>2</sub>	COMBUSTION CONTROL	BACT-PSD
FL-0053	FLORIDA POWER AND LIGHT	LAVOGROME REPOWERING S	3/14/91	3/24/95	TURBINE, GAS, 4 EACH	240 MW	42 PPM @ 15% O <sub>2</sub>	COMBUSTION CONTROL	BACT-PSD
FL-0054	LAKE COGEN LIMITED	UMATILLA	11/20/91	3/24/95	TURBINE, GAS, 2 EACH	42 MW	25 PPM @ 15% O <sub>2</sub>	COMBUSTION CONTROL	BACT-PSD
FL-0054	LAKE COGEN LIMITED	UMATILLA	11/20/91	3/24/95	TURBINE, GAS, 2 EACH	42 MW	25 PPM @ 15% O <sub>2</sub>	COMBUSTION CONTROL	BACT-PSD
FL-0056	ORLANDO UTILITIES COMMISSION	TITUSVILLE	11/5/91	5/14/93	TURBINE, GAS, 4 EACH	35 MW	42 PPM @ 15% O <sub>2</sub>	WET INJECTION	BACT-PSD
FL-0056	ORLANDO UTILITIES COMMISSION	TITUSVILLE	11/5/91	5/14/93	TURBINE, GAS, 4 EACH	35 MW	42 PPM @ 15% O <sub>2</sub>	WET INJECTION	BACT-PSD
FL-0059	SEMINOLE FERTILIZER CORPORATION	BARTOW	3/17/91	5/14/93	TURBINE, GAS	26 MW	9 PPM @ 15% O <sub>2</sub>	SCR	BACT-PSD
FL-0068	ORANGE COGENERATION LP	BARTOW	12/30/93	1/13/95	TURBINE, NATURAL GAS, 2	368.3 MMBTU/H	15 PPM @ 15% O <sub>2</sub>	DRY LOW NOX COMBUSTOR	BACT-PSD
FL-0072	TIGER BAY LP	FT. MEADE	5/17/93	1/13/95	TURBINE, GAS	1614.8 MMBTU/H	15 PPM @ 15% O <sub>2</sub>	DRY LOW NOX COMBUSTOR	BACT-PSD
FL-0072	TIGER BAY LP	FT. MEADE	5/17/93	1/13/95	TURBINE, GAS	1614.8 MMBTU/H	15 PPM @ 15% O <sub>2</sub>	DRY LOW NOX COMBUSTOR	BACT-PSD
FL-0074	FLORIDA GAS TRANSMISSION	PERRY	9/27/93	4/11/94	TURBINE, GAS	131.59 MMBTU/H	25 PPM @ 15% O <sub>2</sub>	DRY LOW NOX COMBUSTOR	BACT-PSD
FL-0078	KISSIMMEE UTILITY AUTHORITY	INTERCESSION CITY	34066	1/13/95	TURBINE, NATURAL GAS	869 MMBTU/H	15 PPM @ 15% O <sub>2</sub>	DRY LOW NOX COMBUSTOR	BACT-PSD
FL-0078	KISSIMMEE UTILITY AUTHORITY	INTERCESSION CITY	4/7/93	1/13/95	TURBINE, NATURAL GAS	367 MMBTU/H	15 PPM @ 15% O <sub>2</sub>	DRY LOW NOX COMBUSTOR	BACT-PSD
FL-0078	KISSIMMEE UTILITY AUTHORITY	INTERCESSION CITY	4/7/93	1/13/95	TURBINE, NATURAL GAS	869 MMBTU/H	15 PPM @ 15% O <sub>2</sub>	DRY LOW NOX COMBUSTOR	BACT-PSD
FL-0078	KISSIMMEE UTILITY AUTHORITY	INTERCESSION CITY	4/7/93	1/13/95	TURBINE, NATURAL GAS	367 MMBTU/H	15 PPM @ 15% O <sub>2</sub>	DRY LOW NOX COMBUSTOR	BACT-PSD
FL-0080	AUBURNDALE POWER PARTNERS, LP	AUBURNDALE	12/14/92	1/13/95	TURBINE, GAS	1214 MMBTU/H	15 PPMVD @ 15% O <sub>2</sub>	DRY LOW NOX COMBUSTOR	BACT-PSD
FL-0080	AUBURNDALE POWER PARTNERS, LP	AUBURNDALE	12/14/92	1/13/95	TURBINE, GAS	1214 MMBTU/H	15 PPMVD @ 15% O <sub>2</sub>	DRY LOW NOX COMBUSTOR	BACT-PSD
FL-0082	FLORIDA POWER CORPORATION POLK COUNTY SITE	BARTOW	2/25/94	1/13/95	TURBINE, NATURAL GAS (2)	1510 MMBTU/H	12 PPMVD @ 15% O <sub>2</sub>	DRY LOW NOX COMBUSTOR	BACT-PSD
FL-0082	FLORIDA POWER CORPORATION POLK COUNTY SITE	BARTOW	2/25/94	1/13/95	TURBINE, NATURAL GAS (2)	1510 MMBTU/H	12 PPMVD @ 15% O <sub>2</sub>	DRY LOW NOX COMBUSTOR	BACT-PSD
FL-0092	GAINESVILLE REGIONAL UTILITIES	GAINESVILLE	34800	5/29/95	SIMPLE CYCLE COMBUSTION TURBINE, GAS/NO 2 OIL B-UP	74 MW	15 PPM AT 15% O <sub>2</sub>	DRY LOW NOX BURNERS GE FRAME UNIT	BACT-PSD
FL-0092	GAINESVILLE REGIONAL UTILITIES	GAINESVILLE	4/11/95	5/29/95	SIMPLE CYCLE COMBUSTION TURBINE, GAS/NO 2 OIL B-UP	74 MW	15 PPM AT 15% O <sub>2</sub>	DLN	BACT-PSD
FL-0102	PANDA-KATHLEEN, L.P.	LAKE LAND	6/1/95	5/20/96	COMBINED CYCLE COMBUSTION TURBINE (TOTAL 115MW)	75 MW	15 PPM @ 15% O <sub>2</sub>	DRY LOW NOX BURNER	BACT-PSD
FL-0109	KEY WEST CITY ELECTRIC SYSTEM	KEY WEST	9/28/95	5/31/96	TURBINE, EXISTING CT RELOCATION TO A NEW PLANT	23 MW	75 PPM @ 15% O <sub>2</sub>	WATER INJECTION	BACT-PSD
FL-0116	SANTA ROSA ENERGY LLC	NORTHBROOK	12/4/98	4/16/99	TURBINE, COMBUSTION, NATURAL GAS	241 MW	9.8 PPM @ 15% O <sub>2</sub> DB ON	DRY LOW NOX BURNER	BACT-PSD
GA-0052	SAVANNAH ELECTRIC AND POWER CO.		2/12/92	3/24/95	TURBINES, 8	1032 MMBTU/H, NAT GAS	25 PPM @ 15% O <sub>2</sub>	MAX WATER INJECTION	BACT-PSD
GA-0052	SAVANNAH ELECTRIC AND POWER CO.		2/12/92	3/24/95	TURBINES, 8	1032 MMBTU/H, NAT GAS	25 PPM @ 15% O <sub>2</sub>	MAX WATER INJECTION	BACT-PSD
GA-0053	HARTWELL ENERGY LIMITED PARTNERSHIP	HARTWELL	7/28/92	3/24/95	TURBINE, GAS FIRED (2 EACH)	1817 M BTU/HR	25 PPM @ 15% O <sub>2</sub>	MAXIMUM WATER INJECTION	BACT-PSD
GA-0053	HARTWELL ENERGY LIMITED PARTNERSHIP	HARTWELL	7/28/92	3/24/95	TURBINE, GAS FIRED (2 EACH)	1817 M BTU/HR	25 PPM @ 15% O <sub>2</sub>	MAXIMUM WATER INJECTION	BACT-PSD
GA-0056	GEORGIA POWER COMPANY, ROBINS TURBINE PROJECT	ROBINS AIR FORCE BASE	5/13/94	3/24/95	TURBINE, COMBUSTION, NATURAL GAS	80 MW	25 PPM	WATER INJECTION, FUEL SPEC. NATURAL GAS	BACT-PSD
GA-0063	MID-GEORGIA COGEN.	KATHLEEN	4/3/96	8/19/96	COMBUSTION TURBINE (2), NATURAL GAS	116 MW	9 PPMVD	DRY LOW NOX BURNER WITH SCR	BACT-PSD
GA-0063	MID-GEORGIA COGEN.	KATHLEEN	4/3/96	8/19/96	COMBUSTION TURBINE (2), NATURAL GAS	116 MW	9 PPMVD	DRY LOW NOX BURNER WITH SCR	BACT-PSD

Table 5-22. RBLC NO<sub>x</sub> Summary for Natural Gas Fired CTs (Page 2 of 2)

RBLC ID	Facility Name	City	Permit Dates		Process Description	Thruput Rate	Emission Limit	Control System Description	Basis
			Issuance	Update					
LA-0079	ENRON LOUISIANA ENERGY COMPANY	EUNICE	8/5/91	10/30/91	TURBINE, GAS, 2	39.1 MMBTU/H	40 PPM @ 15% O <sub>2</sub>	H <sub>2</sub> O INJECT 0.67 LB/LB	BACT-PSD
LA-0086	INTERNATIONAL PAPER	MANSFIELD	2/24/94	4/17/95	TURBINE/HRSG, GAS COGEN	338 MM BTU/HR TURBIN	25 PPMV 15% O <sub>2</sub> TURBINE	DLN/COMBUSTION CONTROL	BACT
LA-0089	FORMOSA PLASTICS CORPORATION, LOUISIANA	BATON ROUGE	3/2/95	4/17/95	TURBINE/HRSG, GAS COGENERATION	450 MM BTU/HR	9 PPMV	DLN DESIGN AND CONTROL	LAER
LA-0091	GEORGIA GULF CORPORATION	PLAQUEMINE	3/26/96	4/21/97	GENERATOR, NATURAL GAS FIRED TURBINE	1123 MM BTU/HR	25 PPMV CORR TO 15% O <sub>2</sub>	CONTROL NOX USING STEAM INJECTION	BACT-PSD
LA-0093	FORMOSA PLASTICS CORPORATION, BATON ROUGE PLAN	BATON ROUGE	3/17/97	4/28/97	TURBINE/HRSG, GAS COGENERATION	450 MM BTU/HR	9 PPMV	DLN DESIGN AND CONSTRUCTION	BACT-PSD
LA-0096	FORMOSA PLASTICS CORPORATION	HAHNVILLE	9/22/95	5/31/97	GENERATOR, GAS TURBINE	1313 MM BTU/HR	25 PPMV CORR TO 15% O <sub>2</sub>	DRY LOW NOX COMBUSTOR	BACT-PSD
MA-0015	PEABODY MUNICIPAL LIGHT PLANT	PEABODY	11/30/89	3/24/95	TURBINE, 38 MW NATURAL GAS FIRED	412 MMBTU/HR	25 PPM @ 15% O <sub>2</sub>	WATER INJECTION	BACT-OTHER
MA-0015	PEABODY MUNICIPAL LIGHT PLANT	PEABODY	11/30/89	3/24/95	TURBINE, 38 MW NATURAL GAS FIRED	412 MMBTU/HR	25 PPM @ 15% O <sub>2</sub>	WATER INJECTION	BACT-OTHER
MA-0022	BERKSHIRE POWER DEVELOPMENT, INC.	AGAWAM	9/22/97	4/19/99	ENGINES, CHILLER, NATURAL GAS-FIRED, TWO	23.4 MMBTU/H	0.7 LB/H	DLN WITH SCR ADD-ON NOX CONTROL	BACT-PSD
MA-0023	DIGHTON POWER ASSOCIATE, LP	DIGHTON	10/6/97	4/19/99	TURBINE, COMBUSTION, ABB GT11N2	1327 MMBTU/H	17.12 LB/H	DLN WITH SCR ADD-ON NOX CONTROL	BACT-PSD
MD-0017	SOUTHERN MARYLAND ELECTRIC COOPERATIVE (SMECO)	EAGLE HARBOR	10/1/89	3/24/95	TURBINE, NATURAL GAS FIRED ELECTRIC	90 MW	199 LB/HR	WATER INJECTION	BACT-PSD
MD-0017	SOUTHERN MARYLAND ELECTRIC COOPERATIVE (SMECO)	EAGLE HARBOR	10/1/89	3/24/95	TURBINE, NATURAL GAS-FIRED ELECTRIC	90 MW	199 LB/HR	WATER INJECTION	BACT-PSD
MD-0018	PEPCO - CHALK POINT PLANT	EAGLE HARBOR	33049	7/20/94	TURBINE, 105 MW NATURAL GAS FIRED ELECTRIC	105 MW	77 PPM @ 15% O <sub>2</sub>	DRY PREMIX AND WATER INJECTION	BACT-PSD
MD-0018	PEPCO - CHALK POINT PLANT	EAGLE HARBOR	6/25/90	7/20/94	TURBINE, 84 MW NATURAL GAS FIRED ELECTRIC	84 MW	25 PPM @ 15% O <sub>2</sub>	QUIET COMBUSTION AND WATER INJECTION	BACT-PSD
MD-0018	PEPCO - CHALK POINT PLANT	EAGLE HARBOR	6/25/90	7/20/94	TURBINE, 105 MW NATURAL GAS FIRED ELECTRIC	105 MW	77 PPM @ 15% O <sub>2</sub>	DRY PREMIX AND WATER INJECTION	BACT-PSD
MD-0018	PEPCO - CHALK POINT PLANT	EAGLE HARBOR	6/25/90	7/20/94	TURBINE, 84 MW NATURAL GAS FIRED ELECTRIC	84 MW	25 PPM @ 15% O <sub>2</sub>	QUIET COMBUSTION AND WATER INJECTION	BACT-PSD
MD-0019	BALTIMORE GAS & ELECTRIC - PERRYMAN PLANT	PERRYMAN	3/24/95	3/24/95	TURBINE, 140 MW NATURAL GAS FIRED ELECTRIC	140 MW	15 PPM @ 15% O <sub>2</sub>	DRY BURN LOW NOX BURNERS	BACT-PSD
MD-0019	BALTIMORE GAS & ELECTRIC - PERRYMAN PLANT	PERRYMAN	3/24/95	3/24/95	TURBINE, 140 MW NATURAL GAS FIRED ELECTRIC	140 MW	15 PPM @ 15% O <sub>2</sub>	DRY BURN LOW NOX BURNERS	BACT-PSD
MD-0021	PEPCO - STATION A	DICKERSON	5/31/90	7/20/94	TURBINE, 124 MW NATURAL GAS FIRED	125 MW	42 PPM @ 15% O <sub>2</sub>	WATER INJECTION	BACT-PSD
MD-0021	PEPCO - STATION A	DICKERSON	5/31/90	7/20/94	TURBINE, 124 MW NATURAL GAS FIRED	125 MW	42 PPM @ 15% O <sub>2</sub>	WATER INJECTION	BACT-PSD
ME-0018	WESTBROOK POWER LLC	WESTBROOK	12/4/98	4/19/99	TURBINE, COMBINED CYCLE, TWO	528 MW TOTAL	2.5 PPM @ 15% O <sub>2</sub>	SCR AND DRY LOW NOX BURNERS	LAER
ME-0019	CHAMPION INTERNATL CORP. & CHAMP. CLEAN ENERGY	BUCKSPORT	9/14/98	4/19/99	TURBINE, COMBINED CYCLE, NATURAL GAS	175 MW	9 PPMVD @ 15% O <sub>2</sub> GAS	DLN	BACT-OTHER
ME-0020	CASCO RAY ENERGY CO	VEAZIE	7/13/98	4/19/99	TURBINE, COMBINED CYCLE, NATURAL GAS, TWO	170 MW EACH	3.5 PPM @ 15% O <sub>2</sub>	SELECTIVE CATALYTIC REDUCTION	BACT-PSD
MI-0206	KALAMAZOO POWER LIMITED	COMSTOCK	12/3/91	3/23/94	TURBINE, GAS-FIRED, 2, W/ WASTE HEAT BOILERS	1805.9 MMBTU/H	15 PPMV	DRY LOW NOX TURBINES	BACT-PSD
MI-0244	WYANDOTTE ENERGY	WYANDOTTE	2/8/99	4/19/99	TURBINE, COMBINED CYCLE, POWER PLANT	500 MW	4.5 PPM	SCR	BACT
MS-0030	SOUTHERN NATURAL GAS COMPANY	BAY SPRINGS	12/17/96	3/24/97	TURBINE, NATURAL GAS-FIRED	9160 HORSEPOWER	110 PPMV @ 15% O <sub>2</sub> , DRY	PROPER TURBINE DESIGN AND OPERATION	BACT-PSD
NC-0055	DUKE POWER CO. LINCOLN COMBUSTION TURBINE STATI	LOWESVILLE	12/20/91	3/24/95	TURBINE, COMBUSTION	1313 MM BTU/HR	119 LB/HR	MAXIMUM WATER INJECTION	BACT-PSD
NC-0055	DUKE POWER CO. LINCOLN COMBUSTION TURBINE STATI	LOWESVILLE	12/20/91	3/24/95	TURBINE, COMBUSTION	1313 MM BTU/HR	119 LB/HR	MAXIMUM WATER INJECTION	BACT-PSD
NJ-0009	NEWARK BAY COGENERATION PARTNERSHIP	NEWARK	11/1/90	7/7/93	TURBINE, NATURAL GAS FIRED	585 MMBTU/HR	0.033 LB/MMBTU	STEAM INJECTION AND SCR	BACT-PSD
NJ-0010	PEDRICKTOWN COGENERATION LIMITED PARTNERSHIP	OLDMANS TOWNSHIP	2/23/90	4/30/93	TURBINE, NATURAL GAS FIRED	1000 MMBTU/HR	0.044 LB/MMBTU	STEAM INJECTION AND SCR	BACT-PSD
NJ-0011	LINDEN COGENERATION TECHNOLOGY	LINDEN	1/21/92	4/30/93	TURBINE, NATURAL GAS FIRED	50 X E12 BTU/YR	33.8 LB/HR	STEAM INJECTION AND SCR	BACT-PSD
NJ-0013	LAKWOOD COGENERATION, L.P.	LAKWOOD TOWNSHIP	4/1/91	5/29/95	TURBINES (NATURAL GAS) (2)	1190 MMBTU/HR (EACH)	0.033 LB/MMBTU	SCR, DRY LOW NOX BURNER	BACT-OTHER
NJ-0013	LAKWOOD COGENERATION, L.P.	LAKWOOD TOWNSHIP	4/1/91	5/29/95	TURBINES (NATURAL GAS) (2)	1190 MMBTU/HR (EACH)	0.033 LB/MMBTU	SCR, DRY LOW NOX BURNER	BACT-OTHER
NJ-0017	NEWARK BAY COGENERATION PARTNERSHIP, L.P.	NEWARK	6/9/93	5/29/95	TURBINES, COMBUSTION, NATURAL GAS-FIRED (2)	617 MMBTU/HR (EACH)	8.3 PPM DV	SCR	BACT-PSD
NJ-0030	HOFFMAN-LA ROCHE, NUTLEY COGEN FACILITY	NUTLEY	5/8/95	2/2/99	TURBINE, GM LM500	86.6 MMBTU/H	0.34 LB/MMBTU		RACT
NJ-0031	UNIVERSITY OF MEDICINE & DENTISTRY OF NEW JERSEY	NEWARK	6/26/97	2/17/99	COMBUSTION TURBINE COGENERATION UNITS, 3	56 MMBTU/H	0.167 LB/MMBTU NAT GAS		RACT
NM-0021	WILLIAMS FIELD SERVICES CO. - EL CEDRO COMPRESSOR	BLANCO	10/29/93	3/2/94	TURBINE, GAS-FIRED	11257 HP	42 PPM @ 15% O <sub>2</sub>	SOLONOX COMBUSTOR, DLN	BACT-PSD
NM-0021	WILLIAMS FIELD SERVICES CO. - EL CEDRO COMPRESSOR	BLANCO	10/29/93	3/2/94	ENGINE, GAS-FIRED, RECIPROCATING	1000 HP	1.4 G/B-HP-H	CLEAN/LEAN BURN TECHNOLOGY	BACT-PSD
NM-0022	MARATHON OIL CO. - INDIAN BASIN N.G. PLAN	CARLSBAD	1/11/95	4/26/95	TURBINES, NATURAL GAS (2)	5500 HP	7.4 LBS/HR	LEAN-PREMIXED COMBUSTION TECHNOLOGY, DLN	BACT-PSD
NM-0024	MILAGRO, WILLIAMS FIELD SERVICE	BLOOMFIELD	5/29/95	5/29/95	TURBINE/COGEN, NATURAL GAS (2)	900 MMCF/DAY	9 PPM @ 15% O <sub>2</sub>	DLN (GENERAL ELECTRIC MODEL PG6541B)	BACT-PSD
NM-0028	SOUTHWESTERN PUBLIC SERVICE CO/CUNNINGHAM STAT	HOBBS	11/4/96	12/30/96	COMBUSTION TURBINE, NATURAL GAS	100 MW	15 PPM (SEE FAC. NOTES)	DRY LOW NOX COMBUSTION	BACT-PSD
NM-0029	SOUTHWESTERN PUBLIC SERVICE COMPANY/CUNNINGHAM	HOBBS	2/15/97	3/31/97	COMBUSTION TURBINE, NATURAL GAS	100 MW	SEE FACILITY NOTES	DRY LOW NOX COMBUSTION	BACT-PSD
NM-0031	LORDSBURG L.P.	LORDSBURG	6/18/97	9/29/97	TURBINE, NATURAL GAS-FIRED, ELEC. GEN.	100 MW	74.4 LBS/HR	DLN	BACT-PSD
NM-0039	TNP TECHN, LLC (FORMERLY TX-NM POWER CO.)	LORDSBURG	8/7/98	2/10/99	GAS TURBINES	375 MMBTU/H	15 PPM	WATER INJECTION FOLLOWED BY SCR	BACT-PSD
NV-0017	NEVADA POWER COMPANY, HARRY ALLEN PEAKING PLAN	LAS VEGAS	9/18/92	3/24/95	COMBUSTION TURBINE ELECTRIC POWER GENERATION	600 MW (8 UNITS 75 EA	88.6 TPY (EACH TURBINE)	LOW NOX COMBUSTOR	BACT-PSD
NY-0044	BROOKLYN NAVY YARD COGENERATION PARTNERS L.P.	NEW YORK CITY	6/6/95	6/30/95	TURBINE, NATURAL GAS FIRED	240 MW	3.5 PPM @ 15% O <sub>2</sub>	SCR	LAER
NY-0044	BROOKLYN NAVY YARD COGENERATION PARTNERS L.P.	NEW YORK CITY	6/6/95	6/30/95	TURBINE, NATURAL GAS FIRED	240 MW	3.5 PPM @ 15% O <sub>2</sub>	SCR	LAER
NY-0045	SELKIRK COGENERATION PARTNERS, L.P.	SELKIRK	6/18/92	9/13/94	COMBUSTION TURBINES (2) (252 MW)	1173 MMBTU/HR (EACH)	9 PPM GAS	STEAM INJECTION AND SCR	BACT-OTHER
NY-0045	SELKIRK COGENERATION PARTNERS, L.P.	SELKIRK	6/18/92	9/13/94	COMBUSTION TURBINE (79 MW)	1173 MMBTU/HR	25 PPM GAS	STEAM INJECTION	BACT-OTHER
NY-0046	SARANAC ENERGY COMPANY	PLATTSBURGH	7/31/92	9/13/94	TURBINES, COMBUSTION (2) (NATURAL GAS)	1123 MMBTU/HR (EACH)	9 PPM	SCR	BACT-OTHER
NY-0047	PASNY/HOLTSVILLE COMBINED CYCLE PLANT	HOLTSVILLE	9/1/92	9/13/94	GENERATOR, EMERGENCY (NATURAL GAS)	1.5 MMBTU/HR	1.3 LB/MMBTU	LEAN BURN ENGINE	BACT-OTHER
NY-0048	KAMINE/BESICORP CORNING L.P.	SOUTH CORNING	11/5/92	9/13/94	TURBINE, COMBUSTION (79 MW)	653 MMBTU/HR	9 PPM	DRY LOW NOX OR SCR	BACT-OTHER
NY-0050	SITHE/INDEPENDENCE POWER PARTNERS	OSWEGO	11/24/92	9/13/94	TURBINES, COMBUSTION (4) (NATURAL GAS) (1012 MW)	2133 MMBTU/HR (EACH)	4.5 PPM	SCR AND DRY LOW NOX	BACT-OTHER
NY-0080	PROJECT ORANGE ASSOCIATES	SYRACUSE	12/1/93	3/31/95	GE LM-5000 GAS TURBINE	550 MMBTU/HR	25 PPM, 47 LB/HR	STEAM INJECTION, FUEL SPEC: NATURAL GAS ONLY	BACT
OH-0218	CNG TRANSMISSION	WASHINGTON COURT HOUSE	8/12/92	4/5/95	TURBINE (NATURAL GAS) (3)	5500 HP (EACH)	1.6 G/HP-HR*	LOW NOX COMBUSTION	BACT-OTHER
OR-0007	PACIFIC GAS TRANSMISSION	MADRAS	11/3/89	7/20/94	TURBINE, NAT. GAS	14600 HP	42 PPM @ 15% O <sub>2</sub>	LOW NOX BURNERS	BACT-PSD
OR-0009	PACIFIC GAS TRANSMISSION COMPANY	MADRAS	6/19/90	7/20/94	TURBINE GAS, COMPRESSOR STATION	110 MMBTU/HR	199 PPM @ 15% O <sub>2</sub>	LOW NOX BURNER DESIGN	NSPS
OR-0010	PORTLAND GENERAL ELECTRIC CO.	BOARDMAN	5/31/94	8/6/97	TURBINES, NATURAL GAS (2)	1720 MMBTU	4.5 PPM @ 15% O <sub>2</sub>	SCR	BACT-PSD
OR-0011	HERMISTON GENERATING CO.	HERMISTON	34522	1/27/99	TURBINES, NATURAL GAS (2)	1696 MMBTU/H	4.5 PPM @ 15% O <sub>2</sub>	SCR	BACT-PSD
PA-0083	NORTHERN CONSOLIDATED POWER	NORTH EAST	5/3/91	7/20/94	TURBINES, GAS, 2	34.6 KW EACH	25 PPM @ 15% O <sub>2</sub>	STEAM INJECTION/+ SCR IN 1997	OTHER
PA-0099	FLEETWOOD COGENERATION ASSOCIATES	FLEETWOOD	4/22/94	11/22/94	NG TURBINE (GE LM6000) WITH WASTE HEAT BOILER	360 MMBTU/HR	21 LB/HR	SCR WITH LOW NOX COMBUSTORS	BACT-OTHER
PA-0130	PROCTOR AND GAMBLE PAPER PRODUCTS CO. (CHARMIN)	MEHOOPANY	5/31/95	11/27/95	TURBINE, NATURAL GAS	580 MMBTU/HR	55 PPM @ 15% O <sub>2</sub>	STEAM INJECTION	RACT
PA-0148	BLUE MOUNTAIN POWER, LP	RICHLAND	7/31/96	1/12/99	COMBUSTION TURBINE WITH HEAT RECOVERY BOILER	153 MW	4 PPM @ 15% O <sub>2</sub>	DRY LNB WITH SCR WATER INJECTION FOR OIL	LAER
PA-0149	BUCKNELL UNIVERSITY	LEWISBURG	11/26/97	11/30/97	NG FIRED TURBINE, SOLAR TAURUS T-7300S	5 MW	25 PPMV @ 15% O <sub>2</sub>	SOLONOX BURNER, LOW NOX BURNER	BACT-OTHER
PR-0004	ECOELECTRICA, L.P.	PENUELAS	10/1/96	5/6/98	TURBINES, COMBINED-CYCLE COGENERATION	461 MW	60 LB/HR	STEAM/WATER INJECTION AND SCR	BACT-PSD
PR-0004	ECOELECTRICA, L.P.	PENUELAS	10/1/96	5/6/98	TURBINES, COMBINED-CYCLE COGENERATION	461 MW	73 LB/HR	STEAM/WATER INJECTION AND SCR	BACT-PSD
RI-0010	NARRAGANSETT ELECTRIC/NEW ENGLAND POWER CO.	PROVIDENCE	4/13/92	5/31/92	TURBINE, GAS AND DUCT BURNER	1360 MMBTU/H EACH	9 PPM @ 15% O <sub>2</sub> GAS	SCR	BACT-PSD
RI-0012	ALGONQUIN GAS TRANSMISSION CO.	BURRILLVILLE	7/31/91	5/31/92	TURBINE, GAS, 2	49 MMBTU/H	100 PPM @ 15% O <sub>2</sub>	LOW NOX COMBUSTION	BACT-OTHER
SC-0029	SC ELECTRIC AND GAS COMPANY - HAGOOD STATION	CHARLESTON	12/11/89	3/24/95	INTERNAL COMBUSTION TURBINE	110 MEGAWATTS	308 LBS/HR	WATER INJECTION	BACT-PSD
TX-0231	WEST CAMPUS COGENERATION COMPANY	COLLEGE STATION	5/2/94	10/31/94	GAS TURBINES	75.3 MW (TOTAL POWER	200 TPY	INTERNAL COMBUSTION CONTROLS	BACT-PSD
WA-0027	SUMAS ENERGY INC.	SUMAS	6/25/91	8/1/91	TURBINE, NATURAL GAS	88 MW	6 PPM @ 15% O <sub>2</sub>	SCR	BACT-PSD
WA-0274	NORTHWEST PIPELINE COMPANY	SUMAS	8/13/92	4/5/95	TURBINE, GAS-FIRED	12100 HP	196 PPM @ 15% O <sub>2</sub>	ADVANCED DLN (BY 07/01/95)	BACT-PSD
WY-0032	QUESTAR PIPELINE CORP. - RK SPRINGS COMPRESSOR CO	ROCK SPRINGS	9/25/97	2/1/99	TURBINE COMPRESSOR ENGINE, NATURAL GAS FIRED, 2EA	1001 HP	2.8 G/B-HP-H		BACT-PSD
WY-0039	TWO ELK GENERATION PARTNERS, LIMITED PARTNERSHIP	15 MILES SE OF WRIGHT	2/27/98	3/31/99	TURBINE, STATIONARY	33.3 MW	25 PPM @ 15% O <sub>2</sub>	DRY LOW NOX BURNERS	BACT-PSD

Source: RBLC 1999.

Table 5-23. RBLC NO<sub>x</sub> Summary for Distillate/Multiple Fuel Fired CTGs

RBLC ID	Facility Name	City	Permit Dates		Fuel Type	Process Description	Thruput Rate	Emission Limit	Control System Description	Basis
			Issuance	Update						
AL-0069	INTERNATIONAL PAPER CO. RIVERDALE MILL	SELMA	1/11/93	3/24/95	GAS/OIL	TURBINE, STATIONARY (GAS-FIRED) WITH DUCT F	40 MW	0.08 LB/MMBTU (GAS)	STEAM INJECTION INTO THE TURBINE	BACT-PSD
AL-0126	MOBILE ENERGY LLC	MOBILE	1/5/99	4/9/99	GAS/OIL	TURBINE, GAS, COMBINED CYCLE	168 MW	0.019 LB/MMBTU	SCR & DLN COMBUSTORS DURING GAS FIRING. STI	BACT-PSD
CA-0611	BANK OF AMERICA LOS ANGELES DATA CENTER		6/24/93	3/24/95	DIESEL	TURBINE, DIESEL & GENERATOR (SEE NOTES)		163 PPM @ 15% O2	FUEL SPEC: LOW NOX DIESEL FUEL (SEE NOTES)	BACT-OTHER
FL-0045	CHARLES LARSEN POWER PLANT	CITY OF OF LAKELAND	7/25/91	3/24/95	GAS/OIL	TURBINE, OIL, 1 EACH	80 MW	42 PPM @ 15% O2	WET INJECTION	BACT-PSD
FL-0045	CHARLES LARSEN POWER PLANT	CITY OF OF LAKELAND	7/25/91	3/24/95	GAS/OIL	TURBINE, OIL, 1 EACH	80 MW	42 PPM @ 15% O2	WET INJECTION	BACT-PSD
FL-0052	FLORIDA POWER AND LIGHT	NORTH PALM BEACH	6/5/91	3/24/95	GAS/OIL	TURBINE, OIL, 2 EACH	400 MW	65 PPM @ 15% O2	LOW NOX COMBUSTORS	BACT-PSD
FL-0052	FLORIDA POWER AND LIGHT	NORTH PALM BEACH	6/5/91	3/24/95	GAS/OIL	TURBINE, OIL, 2 EACH	400 MW	65 PPM @ 15% O2	LOW NOX COMBUSTORS	BACT-PSD
FL-0053	FLORIDA POWER AND LIGHT	LAVOGROME REPOWERING S	3/14/91	3/24/95	GAS/OIL	TURBINE, OIL, 4 EACH		65 PPM @ 15% O2	COMBUSTION CONTROL	BACT-PSD
FL-0054	LAKE COGEN LIMITED	UMATILLA	11/20/91	3/24/95	GAS/OIL	TURBINE, OIL, 2 EACH	42 MW	42 PPM @ 15% O2	COMBUSTION CONTROL	BACT-PSD
FL-0054	LAKE COGEN LIMITED	UMATILLA	11/20/91	3/24/95	GAS/OIL	TURBINE, OIL, 2 EACH	42 MW	42 PPM @ 15% O2	COMBUSTION CONTROL	BACT-PSD
FL-0056	ORLANDO UTILITIES COMMISSION	TITUSVILLE	11/5/91	5/14/93	GAS/OIL	TURBINE, OIL, 4 EACH	35 MW	65 PPM @ 15% O2	WET INJECTION	BACT-PSD
FL-0056	ORLANDO UTILITIES COMMISSION	TITUSVILLE	11/5/91	5/14/93	GAS/OIL	TURBINE, OIL, 4 EACH	35 MW	65 PPM @ 15% O2	WET INJECTION	BACT-PSD
FL-0057	FLORIDA POWER GENERATION	DEBARY	10/18/91	3/24/95	GAS/OIL	TURBINE, OIL, 6 EACH	92.9 MW	42 PPM @ 15% O2	WET INJECTION	BACT-PSD
FL-0072	TIGER BAY LP	FT. MEADE	5/17/93	1/13/95	GAS/OIL	TURBINE, OIL	1849.9 MMBTU/H	42 PPM @ 15% O2	WATER INJECTION	BACT-PSD
FL-0072	TIGER BAY LP	FT. MEADE	5/17/93	1/13/95	GAS/OIL	TURBINE, OIL	1849.9 MMBTU/H	42 PPM @ 15% O2	WATER INJECTION	BACT-PSD
FL-0078	KISSIMMEE UTILITY AUTHORITY	INTERCESSION CITY	4/7/93	1/13/95	GAS/OIL	TURBINE, FUEL OIL	928 MMBTU/H	42 PPM @ 15% O2	WATER INJECTION	BACT-PSD
FL-0078	KISSIMMEE UTILITY AUTHORITY	INTERCESSION CITY	4/7/93	1/13/95	GAS/OIL	TURBINE, FUEL OIL	371 MMBTU/H	42 PPM @ 15% O2	WATER INJECTION	BACT-PSD
FL-0078	KISSIMMEE UTILITY AUTHORITY	INTERCESSION CITY	4/7/93	1/13/95	GAS/OIL	TURBINE, FUEL OIL	928 MMBTU/H	42 PPM @ 15% O2	WATER INJECTION	BACT-PSD
FL-0078	KISSIMMEE UTILITY AUTHORITY	INTERCESSION CITY	34066	1/13/95	GAS/OIL	TURBINE, FUEL OIL	371 MMBTU/H	42 PPM @ 15% O2	WATER INJECTION	BACT-PSD
FL-0080	AUBURNDALE POWER PARTNERS, LP	AUBURNDALE	12/14/92	1/13/95	GAS/OIL	TURBINE, OIL	1170 MMBTU/H	42 PPMVD @ 15% O2	STEAM INJECTION	BACT-PSD
FL-0080	AUBURNDALE POWER PARTNERS, LP	AUBURNDALE	12/14/92	1/13/95	GAS/OIL	TURBINE, OIL	1170 MMBTU/H	42 PPMVD @ 15% O2	STEAM INJECTION	BACT-PSD
FL-0081	TECO POLK POWER STATION	BARTOW	2/24/94	3/24/95	GAS/OIL	TURBINE, FUEL OIL	1765 MMBTU/H	42 PPMVD @ 15% O2	WET INJECTION	BACT-PSD
FL-0082	FLORIDA POWER CORPORATION POLK COUNTY SITE	BARTOW	2/25/94	1/13/95	GAS/OIL	TURBINE, FUEL OIL (2)	1730 MMBTU/H	42 PPMVD @ 15% O2	WATER INJECTION	BACT-PSD
FL-0082	FLORIDA POWER CORPORATION POLK COUNTY SITE	BARTOW	2/25/94	1/13/95	GAS/OIL	TURBINE, FUEL OIL (2)	1730 MMBTU/H	42 PPMVD @ 15% O2	WATER INJECTION	BACT-PSD
FL-0083	FLORIDA POWER CORPORATION	INTERCESSION CITY	8/17/92	1/13/95	GAS/OIL	TURBINE, OIL	1029 MMBTU/H	42 PPMVD @ 15% O2	WET INJECTION	BACT-PSD
FL-0083	FLORIDA POWER CORPORATION	INTERCESSION CITY	8/17/92	1/13/95	GAS/OIL	TURBINE, OIL	1866 MMBTU/H	42 PPMVD @ 15% O2	WET INJECTION	BACT-PSD
FL-0092	GAINESVILLE REGIONAL UTILITIES	GAINESVILLE	4/11/95	5/29/95	GAS/OIL	OIL FIRED COMBUSTION TURBINE	74 MW	42 PPM AT 15% OXYGEN	WATER INJECTION	BACT-PSD
FL-0092	GAINESVILLE REGIONAL UTILITIES	GAINESVILLE	4/11/95	5/29/95	GAS/OIL	OIL FIRED COMBUSTION TURBINE	74 MW	42 PPM AT 15% OXYGEN	WATER INJECTION	BACT-PSD
FL-0104	SEMINOLE HARDEE UNIT 3	FORT GREEN	1/1/96	5/31/96	GAS/OIL	COMBINED CYCLE COMBUSTION TURBINE	140 MW	15 PPM @ 15% O2	DRY LNB STAGED COMBUSTION	BACT-PSD
FL-0115	CITY OF LAKELAND ELECTRIC AND WATER UTILITIES	LAKELAND	7/10/98	4/16/99	GAS/OIL	TURBINE, COMBUSTION, GAS FIRED W/ FUEL OIL	2174 MMBTU/H	25 PPM @ 15% O2	DLN FOR SIMPLE CYCLE, SCR WHEN COMBINED CY	BACT-PSD
GA-0052	SAVANNAH ELECTRIC AND POWER CO.		2/12/92	3/24/95	GAS/OIL	TURBINES, 8	972 MMBTU/H, #2 OIL	SEE NOTES	MAX WATER INJECTION	BACT-PSD
GA-0052	SAVANNAH ELECTRIC AND POWER CO.		2/12/92	3/24/95	GAS/OIL	TURBINES, 8	972 MMBTU/H, #2 OIL	SEE NOTES	MAX WATER INJECTION	BACT-PSD
GA-0053	HARTWELL ENERGY LIMITED PARTNERSHIP	HARTWELL	7/28/92	3/24/95	GAS/OIL	TURBINE, OIL FIRED (2 EACH)	1840 M BTU/HR	25 PPMVD, FUEL N AFLOW	MAXIMUM WATER INJECTION	BACT-PSD
GA-0053	HARTWELL ENERGY LIMITED PARTNERSHIP	HARTWELL	7/28/92	3/24/95	GAS/OIL	TURBINE, OIL FIRED (2 EACH)	1840 M BTU/HR	25 PPMVD, FUEL N AFLOW	MAXIMUM WATER INJECTION	BACT-PSD
GA-0063	MID-GEORGIA COGEN	KATHLEEN	4/3/96	8/19/96	GAS/OIL	COMBUSTION TURBINE (2), FUEL OIL	116 MW	20 PPMVD	WATER INJECTION WITH SCR	BACT-PSD
GA-0063	MID-GEORGIA COGEN	KATHLEEN	4/3/96	8/19/96	GAS/OIL	COMBUSTION TURBINE (2), FUEL OIL	116 MW	20 PPMVD	WATER INJECTION WITH SCR	BACT-PSD
HI-0013	MAUI ELECTRIC COMPANY, LTD.	MAALAEA	12/3/91	3/24/95	GAS/OIL	TURBINE, FUEL OIL #2	28 MW	42 PPM	WATER INJECTION	BACT-PSD
HI-0014	HAWAII ELECTRIC LIGHT CO., INC.	KEEAU	2/12/92	3/24/95	GAS/OIL	TURBINE, FUEL OIL #2	20 MW	42.3 LB/HR	COMBUSTOR WATER INJECTOR, WATER INJECTION	BACT-PSD
HI-0015	MAUI ELECTRIC COMPANY, LTD./MAALAEA GENERATING	MAUI	7/28/92	3/24/95	GAS/OIL	TURBINE, COMBINED-CYCLE COMBUSTION	28 MW	42.3 LB/HR	WATER INJECTION	BACT-OTHER
KY-0053	KENTUCKY UTILITIES COMPANY	MERCER	3/10/92	3/24/95	GAS/OIL	TURBINE, #2 FUEL OIL/NATURAL GAS (B)	1500 MM BTU/HR (EACH)	42 PPM @ 15% O2, N. GAS	WATER INJECTION	BACT-PSD
KY-0057	EAST KENTUCKY POWER COOPERATIVE		34052	3/24/95	GAS/OIL	TURBINES (5), #2 FUEL OIL AND NAT. GAS FIRED	1492 MMBTU/H (EACH)	42 PPM @ 15% O2 (OIL)	WATER INJECTION	SEE NOTES
MA-0015	PEABODY MUNICIPAL LIGHT PLANT	PEABODY	11/30/89	3/24/95	DIESEL	TURBINE, 38 MW OIL FIRED	412 MMBTU/HR	40 PPM @ 15% O2	WATER INJECTION	BACT-OTHER
MA-0015	PEABODY MUNICIPAL LIGHT PLANT	PEABODY	11/30/89	3/24/95	DIESEL	TURBINE, 38 MW OIL FIRED	412 MMBTU/HR	40 PPM @ 15% O2	WATER INJECTION	BACT-OTHER
MA-0021	MILLENNIUM POWER PARTNER, LP	CHARLTON	2/2/98	4/19/99	GAS/OIL	TURBINE, COMBUSTION, WESTINGHOUSE MODEL	2534 MMBTU/H	0.013 LB/MMBTU	DLN IN CONJUNCTION WITH SCR ADD-ON NOX CON	BACT-PSD
MA-0022	BERKSHIRE POWER DEVELOPMENT, INC.	AGAWAM	9/22/97	4/19/99	GAS/OIL	TURBINE, COMBUSTION, ABB GT24	1792 MMBTU/H	20.3 LB/H	DLN WITH SCR ADD-ON NOX CONTROL	BACT-PSD
MA-0023	DIGHTON POWER ASSOCIATE, LP	DIGHTON	10/6/97	4/19/99	DIESEL	ENGINE, DIESEL, FIRE PUMP	1.5 MMBTU/H	4.41 LB/MMBTU	DLN WITH SCR ADD-ON NOX CONTROL	BACT-PSD
MD-0017	SOUTHERN MARYLAND ELECTRIC COOPERATIVE (SMECO)	EAGLE HARBOR	32782	3/24/95	DIESEL	TURBINE, OIL FIRED ELECTRIC	90 MW	400 LB/HR	WATER INJECTION	BACT-PSD
MD-0017	SOUTHERN MARYLAND ELECTRIC COOPERATIVE (SMECO)	EAGLE HARBOR	10/1/89	3/24/95	DIESEL	TURBINE, OIL FIRED ELECTRIC	90 MW	400 LB/HR	WATER INJECTION	BACT-PSD
MD-0018	PEPCO - CHALK POINT PLANT	EAGLE HARBOR	6/25/90	7/20/94	DIESEL	TURBINE, 105 MW OIL FIRED ELECTRIC	105 MW	25 PPM @ 15% O2	DRY PREMIX BURNER	BACT-PSD
MD-0018	PEPCO - CHALK POINT PLANT	EAGLE HARBOR	6/25/90	7/20/94	DIESEL	TURBINE, 84 MW OIL FIRED ELECTRIC	84 MW	58 PPM @ 15% O2	QUIET COMBUSTION AND WATER INJECTION	BACT-PSD
MD-0018	PEPCO - CHALK POINT PLANT	EAGLE HARBOR	6/25/90	7/20/94	DIESEL	TURBINE, 105 MW OIL FIRED ELECTRIC	105 MW	25 PPM @ 15% O2	DRY PREMIX BURNER	BACT-PSD
MD-0018	PEPCO - CHALK POINT PLANT	EAGLE HARBOR	6/25/90	7/20/94	DIESEL	TURBINE, 84 MW OIL FIRED ELECTRIC	84 MW	58 PPM @ 15% O2	QUIET COMBUSTION AND WATER INJECTION	BACT-PSD
MD-0019	BALTIMORE GAS & ELECTRIC - PERRYMAN PLANT	PERRYMMAN		3/24/95	DIESEL	TURBINE, 140 MW OIL FIRED ELECTRIC	140 MW	65 PPM @ 15% O2	WATER INJECTION	BACT-PSD
MD-0019	BALTIMORE GAS & ELECTRIC - PERRYMAN PLANT	PERRYMMAN		3/24/95	DIESEL	TURBINE, 140 MW OIL FIRED ELECTRIC	140 MW	65 PPM @ 15% O2	WATER INJECTION	BACT-PSD
MD-0021	PEPCO - STATION A	DICKERSON	5/31/90	7/20/94	DIESEL	TURBINE, 124 MW OIL FIRED	125 MW	77 PPM @ 15% O2	WATER INJECTION	BACT-PSD
MD-0021	PEPCO - STATION A	DICKERSON	5/31/90	7/20/94	DIESEL	TURBINE, 124 MW OIL FIRED	125 MW	77 PPM @ 15% O2	WATER INJECTION	BACT-PSD
ME-0016	GORHAM ENERGY LIMITED PARTNERSHIP	GORHAM	12/4/98	4/19/99	GAS/OIL	TURBINE, COMBINED CYCLE	900 MW TOTAL	2.5 PPM @ 15% O2 (NAT G)	SCR. EMISSION IS FROM EACH 300 MW SYSTEM.	LAER
MN-0022	LSP-COTTAGE GROVE, L.P.	COTTAGE GROVE	3/1/95	5/29/95	DIESEL	DIESEL ENGINE-DRIVEN FIRE PUMP	2.7 MMBTU/HR	5 LB/HR	RETARDATION OF ENGINE TIMING, TURBOCHARGE	BACT-PSD
MN-0022	LSP-COTTAGE GROVE, L.P.	COTTAGE GROVE	3/1/95	5/29/95	GAS/OIL	COMBUSTION TURBINE/GENERATOR	1970 MMBTU/HR	4.5 PPM @ 15% O2 GAS	SELECTIVE CATALYTIC REDUCTION (SCR)	BACT-PSD
MN-0035	LSP - COTTAGE GROVE, L.P.	COTTAGE GROVE	11/10/98	4/19/99	DIESEL	ENGINE, DIESEL, EMERGENCY FIRE PUMP	2.7 MMBTU/H	1.85 LB/MMBTU	LIMITED TO BURN DIESEL 150 H/HR	BACT-PSD
MN-0035	LSP - COTTAGE GROVE, L.P.	COTTAGE GROVE	11/10/98	4/19/99	GAS/OIL	GENERATOR, COMBUSTION TURBINE & DUCT BUF	1988 MMBTU/H (CTG)	4.5 PPMVD @ 15% O2 (NG)	SCR WITH A NOX CEM AND A NOX PEM.	BACT-PSD
MO-0013	HIGGINSVILLE MUNICIPAL POWER FACILITY	HIGGINSVILLE	7/27/95	10/6/97	GAS/OIL	ADD OF A DUAL FUEL FIRED TWIN-PAC TURBINE	49.1 MW	75 PPM BY VOL 1 HR AVG	CONTROLS FOR FUEL CONSUMPTION AND WATER	BACT-PSD
MO-0013	HIGGINSVILLE MUNICIPAL POWER FACILITY	HIGGINSVILLE	7/27/95	10/6/97	GAS/OIL	ADD OF A DUAL FUEL FIRED TWIN-PAC TURBINE	49.1 MW	42 PPM BY VOL 1 HR AVG	CONTROLS FOR FUEL CONSUMPTION AND WATER	BACT-PSD
MO-0016	EMPIRE DISTRICT ELECTRIC CO.	JOPLIN	5/17/94	10/6/97	GAS/OIL	INSTALL TWO NEW SIMPLE CYCLE TURBINES	1345 MMBTU/HR	1135 TPY	LOW NOX BURNERS, AND WATER INJECTION	BACT-PSD
MO-0016	EMPIRE DISTRICT ELECTRIC CO.	JOPLIN	5/17/94	10/6/97	GAS/OIL	INSTALL TWO NEW SIMPLE CYCLE TURBINES	1345 MMBTU/HR	25 PPM BY VOL 1 HR AVG	LOW NOX BURNERS, AND WATER INJECTION	BACT-PSD
MO-0017	EMPIRE DISTRICT ELECTRIC CO.	JOPLIN	2/28/95	10/6/97	GAS/OIL	INSTALL TWO NEW SIMPLE CYCLE TURBINES	88.77 MW	360 TPY	WATER INJECTION	BACT-PSD
MO-0043	UNION ELECTRIC CO	WEST ALTON	5/6/79	10/6/97	GAS/OIL	CONSTRUCTION OF A NEW OIL FIRED COMBUSTIC	622 MM BTU/HR	5242 TPY	WATER INJECTION FOR NOX EMISSIONS	BACT-PSD
NC-0055	DUKE POWER CO. LINCOLN COMBUSTION TURBINE STATI	LOWESVILLE	12/20/91	3/24/95	GAS/OIL	TURBINE, COMBUSTION	1247 MM BTU/HR	287 LB/HR	MULTINOZZLE COMBUSTOR, MAXIMUM WATER INJ	BACT-PSD
NC-0055	DUKE POWER CO. LINCOLN COMBUSTION TURBINE STATI	LOWESVILLE	33592	3/24/95	GAS/OIL	TURBINE, COMBUSTION	1247 MM BTU/HR	287 LB/HR	MULTINOZZLE COMBUSTOR, MAXIMUM WATER INJ	BACT-PSD
NC-0059	CAROLINA POWER & LIGHT	GOLDSBORO	4/11/96	8/19/96	GAS/OIL	COMBUSTION TURBINE, 4 EACH	1907.6 MMBTU/HR	158 LB/HR	WATER INJECTION	BACT-PSD
NC-0059	CAROLINA POWER & LIGHT	GOLDSBORO	4/11/96	8/19/96	GAS/OIL	COMBUSTION TURBINE, 4 EACH	1907.6 MMBTU/HR	512.3 LB/HR	WATER INJECTION, FUEL SPEC: 0.04% N FUEL OIL	BACT-PSD
NJ-0009	NEWARK BAY COGENERATION PARTNERSHIP	NEWARK	11/1/90	7/7/93	GAS/OIL	TURBINE, KEROSENE FIRED	585 MMBTU/HR	0.063 LB/MMBTU	STEAM INJECTION AND SCR	BACT-PSD
NJ-0013	LAKEWOOD COGENERATION, L.P.	LAKEWOOD TOWNSHIP	4/1/91	5/29/95	GAS/OIL	TURBINES (#2 FUEL OIL) (2)	1190 MMBTU/HR (EACH)	0.082 LB/MMBTU	SCR AND WATER INJECTION	BACT-OTHER
NJ-0013	LAKEWOOD COGENERATION, L.P.	LAKEWOOD TOWNSHIP	4/1/91	5/29/95	GAS/OIL	TURBINES (#2 FUEL OIL) (2)	1190 MMBTU/HR (EACH)	0.082 LB/MMBTU	SCR AND WATER INJECTION	BACT-OTHER

Table 5-23. RBL NO<sub>x</sub> Summary for Distillate/Multiple Fuel Fired CTGs (Page 2 of 2)

RBL ID	Facility Name	City	Permit Dates		Fuel Type	Process Description	Thruput Rate	Emission Limit	Control System Description	Basis
			Issuance	Update						
NJ-0029	ALGONQUIN GAS TRANSMISSION COMPANY	HANOVER	3/31/95	2/10/99	GAS/OIL	TURBINES COMBUSTION, TWO SOLAR CENTAUR	3.1 MW EACH	NOT APPLICABLE	GOOD COMBUSTION PRACTICE	RACT
NJ-0029	ALGONQUIN GAS TRANSMISSION COMPANY	HANOVER	3/31/95	2/10/99	GAS/OIL	TURBINES COMBUSTION, TWO SOLAR CENTAUR	3.1 MW EACH	43.38 LB/H		BACT
NV-0015	SAGUARO POWER COMPANY	HENDERSON	6/17/91	6/11/93	GAS/OIL	COMBUSTION TURBINE GENERATOR	34.5 MW	16.9 PPH (WINTER)	SELECTIVE CATALYTIC REDUCTION (SCR)	BACT-PSD
NV-0030	MUDDY RIVER L.P.	MOAPA	6/10/94	3/24/95	GAS/OIL	COMBUSTION TURBINE, DIESEL & NATURAL GAS	140 MEGAWATT	303 LB/HR	LOW NOX BURNER	BACT-PSD
NV-0031	CSW NEVADA, INC.	MOAPA	6/10/94	3/24/95	GAS/OIL	COMBUSTION TURBINE, DIESEL & NATURAL GAS	140 MEGAWATT	273 LB/HR	DRY LOW NOX COMBUSTOR	BACT-PSD
NY-0044	BROOKLYN NAVY YARD COGENERATION PARTNERS L.P.	NEW YORK CITY	6/6/95	6/30/95	DIESEL	TURBINE, OIL FIRED	240 MW	10 PPM @ 15% O <sub>2</sub>	SCR	LAER
NY-0044	BROOKLYN NAVY YARD COGENERATION PARTNERS L.P.	NEW YORK CITY	6/6/95	6/30/95	DIESEL	GENERATOR, 3000 KW EMERGENCY	3000 KW	2.6 LB/MMBTU		LAER
NY-0044	BROOKLYN NAVY YARD COGENERATION PARTNERS L.P.	NEW YORK CITY	6/6/95	6/30/95	DIESEL	TURBINE, OIL FIRED	240 MW	10 PPM @ 15% O <sub>2</sub>	SCR	LAER
NY-0044	BROOKLYN NAVY YARD COGENERATION PARTNERS L.P.	NEW YORK CITY	6/6/95	6/30/95	DIESEL	GENERATOR, 3000 KW EMERGENCY	3000 KW	2.6 LB/MMBTU		LAER
NY-0047	PASNY/HOLTSVILLE COMBINED CYCLE PLANT	HOLTSVILLE	9/1/92	9/13/94	DIESEL	FIRE PUMP (DIESEL)	1.3 MMBTU/HR	1.3 LB/MMBTU	LEAN BURN ENGINE	BACT-OTHER
NY-0047	PASNY/HOLTSVILLE COMBINED CYCLE PLANT	HOLTSVILLE	9/1/92	9/13/94	GAS/OIL	TURBINE, COMBUSTION GAS (150 MW)	1146 MMBTU/HR (GAS)*	9 PPM	DRY LOW NOX	BACT-OTHER
NY-0047	PASNY/HOLTSVILLE COMBINED CYCLE PLANT	HOLTSVILLE	9/1/92	9/13/94	GAS/OIL	TURBINE, COMBUSTION GAS (150 MW)	1146 MMBTU/HR (GAS)*	42 PPM	WATER INJECTOR	BACT-OTHER
NY-0049	KAMINE/BESICORP BEAVER FALLS COGENERATION FACIL	BEAVER FALLS	11/9/92	9/13/94	GAS/OIL	TURBINE, COMBUSTION (NAT. GAS & OIL FUEL) (7	650 MMBTU/HR	9 PPM	DRY LOW NOX OR SCR	BACT-OTHER
NY-0049	KAMINE/BESICORP BEAVER FALLS COGENERATION FACIL	BEAVER FALLS	11/9/92	9/13/94	GAS/OIL	TURBINE, COMBUSTION (NAT. GAS & OIL FUEL) (7	650 MMBTU/HR	55 PPM	DRY LOW NOX OR SCR	BACT-OTHER
NY-0057	MEGAN-RACINE ASSOCIATES, INC	CANTON	8/5/89	3/30/95	GAS/OIL	GE LM5000-N COMBINED CYCLE GAS TURBINE	401 LB/MMBTU	42 PPM @ 15% O <sub>2</sub>	WATER INJECTION	BACT
NY-0061	ANITEC COGEN PLANT	BINGHAMTON	7/7/93	4/27/95	GAS/OIL	GE LM5000 COMBINED CYCLE GAS TURBINE EP #	451 MMBTU/HR	25 PPM, 41 LB/HR	NO CONTROLS	BACT-OTHER
NY-0062	FULTON COGEN PLANT	FULTON	34592	4/27/95	GAS/OIL	GE LM5000 GAS TURBINE	500 MMBTU/HR	36 PPM, 65 LB/HR	WATER INJECTION	BACT
NY-0063	TBG COGEN COGENERATION PLANT	BETHPAGE	8/5/90	4/27/95	GAS/OIL	GE LM2500 GAS TURBINE	214.9 MMBTU/HR	75 PPM + FBN CORRECTION	WATER INJECTION	BACT
NY-0064	INDECK-OSWEGO ENERGY CENTER	OSWEGO	10/6/94	4/27/95	GAS/OIL	GE FRAME 6 GAS TURBINE	533 LB/MMBTU	42 PPM, 75.00 LB/HR	STEAM INJECTION	BACT
NY-0065	KAMINE/BESICORP CARTHAGE L.P.	CARTHAGE	1/18/94	4/27/95	GAS/OIL	GE FRAME 6 GAS TURBINE	491 BTU/HR	42 PPM, 76.6 LB/HR	STEAM INJECTION	BACT
NY-0066	INDECK ENERGY COMPANY	SILVER SPRINGS	5/12/93	3/31/95	GAS/OIL	GE FRAME 6 GAS TURBINE EP #00001	491 MMBTU/HR	32 PPM	STEAM INJECTION	BACT
NY-0068	KAMINE/BESICORP NATURAL DAM LP	NATURAL DAM	12/31/91	6/30/95	GAS/OIL	GE FRAME 6 GAS TURBINE	500 MMBTU/HR	42 PPM, 80.1 LB/HR	STEAM INJECTION	BACT
NY-0071	KAMINE SOUTH GLENS FALLS COGEN CO	SOUTH GLENS FALLS	9/10/92	4/27/95	GAS/OIL	GE FRAME 6 GAS TURBINE	498 MMBTU/HR	42 PPM, 76.6 LB/HR	WATER INJECTION	BACT
NY-0072	KAMINE/BESICORP SYRACUSE LP	SOLVAY	12/10/94	4/27/95	DIESEL	DIESEL GENERATOR (EP #00005)	22 MMBTU/HR	1.166 LB/MMBTU, 26.0 LB/HR	NO CONTROLS	BACT-OTHER
NY-0072	KAMINE/BESICORP SYRACUSE LP	SOLVAY	12/10/94	4/27/95	DIESEL	FIRE PUMP (EP #00007)	1.5 MMBTU/HR	4.25 LB/MMBTU, 6.25 LB/HR	NO CONTROLS	BACT-OTHER
NY-0072	KAMINE/BESICORP SYRACUSE LP	SOLVAY	12/10/94	4/27/95	GAS/OIL	SIEMENS V64.3 GAS TURBINE (EP #00001)	650 MMBTU/HR	25 PPM	WATER INJECTION	BACT
NY-0073	LOCKPORT COGEN FACILITY	LOCKPORT	7/14/93	4/27/95	GAS/OIL	(6) GE FRAME 6 TURBINES (EP #S 00001-00006)	423.9 MMBTU/HR	42 PPM	STEAM INJECTION	BACT
NY-0075	PILGRIM ENERGY CENTER	ISLIP	4/27/95	4/27/95	GAS/OIL	(2) WESTINGHOUSE W501D5 TURBINES (EP #S OC	1400 MMBTU/HR	4.5 PPM, 23.6 LB/HR	STEAM INJECTION FOLLOWED BY SCR	BACT
NY-0076	TRIGEN MITCHEL FIELD	HEMPSTEAD	4/16/93	3/31/95	GAS/OIL	GE FRAME 6 GAS TURBINE	424.7 MMBTU/HR	60 PPM, 90 LB/HR	STEAM INJECTION	BACT
NY-0077	INDECK-YERKES ENERGY SERVICES	TONAWANDA	6/24/92	3/31/95	GAS/OIL	GE FRAME 6 GAS TURBINE (EP #00001)	432.2 MMBTU/HR	42 PPM, 74 LB/HR	STEAM INJECTION	BACT
NY-0079	LEDERLE LABORATORIES	PEARL RIVER	4/27/95	4/27/95	GAS/OIL	(2) GAS TURBINES (EP #S 00101&102)	110 MMBTU/HR	42 PPM, 18 LB/HR	STEAM INJECTION	BACT-PSD
NY-0081	LILCO SHOREHAM	HICKSVILLE	5/10/93	3/30/95	DIESEL	(3) GE FRAME 7 TURBINES (EP #S 00007-9)	850 MMBTU/HR	55 PPM + FBN & HEAT RATE	WATER INJECTION	BACT
OK-0027	OKLAHOMA MUNICIPAL POWER AUTHORITY	PONCA CITY	12/17/92	3/24/95	GAS/OIL	TURBINE, COMBUSTION	58 MW	25 PPM @ 15% O <sub>2</sub>	COMBUSTION CONTROLS	BACT-OTHER
OK-0027	OKLAHOMA MUNICIPAL POWER AUTHORITY	PONCA CITY	12/17/92	3/24/95	GAS/OIL	TURBINE, COMBUSTION	58 MW	65 PPM @ 15% O <sub>2</sub>	COMBUSTION CONTROLS	BACT-OTHER
PA-0083	NORTHERN CONSOLIDATED POWER	NORTH EAST	5/3/91	7/20/94	DIESEL	GENERATORS, DIESEL, 2	1135 KW EACH	36 LB/H EACH		OTHER
PA-0098	GRAYS FERRY CO. GENERATION PARTNERSHIP	PHILADELPHIA	11/4/92	7/20/94	GAS/OIL	TURBINE (NATURAL GAS & OIL)	1150 MMBTU	9 PPMVD (NAT. GAS)*	DRY LOW NOX BURNER, COMBUSTION CONTROL	BACT-OTHER
PA-0098	GRAYS FERRY CO. GENERATION PARTNERSHIP	PHILADELPHIA	11/4/92	7/20/94	GAS/OIL	GENERATOR, STEAM	450 MMBTU	9 PPMVD (NAT. GAS)*	DRY LOW NOX BURNER, COMBUSTION CONTROL	BACT-OTHER
PR-0002	PUERTO RICO ELECTRIC POWER AUTHORITY (PREPA)	ARECIBO	7/31/95	5/6/98	GAS/OIL	COMBUSTION TURBINES (3), 83 MW SIMPLE CYCL	248 MW	35 LB/HR AS NO <sub>2</sub>	STEAM INJECTION PLUS SCR. N2 NOT TO EXCEED 1	BACT-PSD
SC-0021	CAROLINA POWER AND LIGHT CO.	DARLINGTON	9/23/91	3/24/95	GAS/OIL	TURBINE, I.C.	80 MW	292 LB/H	WATER INJECTION	BACT-PSD
SC-0036	CAROLINA POWER AND LIGHT	HARTSVILLE	8/31/94	4/29/96	GAS/OIL	STATIONARY GAS TURBINE	1520 MMBTU/H	25 PPMVD @ 15% O <sub>2</sub>	WATER INJECTION	BACT-PSD
SC-0036	CAROLINA POWER AND LIGHT	HARTSVILLE	8/31/94	4/29/96	GAS/OIL	STATIONARY GAS TURBINE	1520 MMBTU/H	62 PPMVD @ 15% O <sub>2</sub>	WATER INJECTION	BACT-PSD
SC-0038	GENERAL ELECTRIC GAS TURBINES	GREENVILLE	4/19/96	8/19/96	GAS/OIL	I.C. TURBINE	2700 MMBTU/HR	885.3 LB/HR	GOOD COMBUSTION PRACTICES TO MINIMIZE EMIS	BACT-PSD
SD-0001	NORTHERN STATES POWER COMPANY	NEAR SIOUX FALLS, SOUTH D	9/2/92	3/24/95	GAS/OIL	TURBINE, SIMPLE CYCLE, 4 EACH	129 MW	24 PPM @ 15% O <sub>2</sub> GAS	WATER INJECTION FOR GAS & DISTILLATION	BACT-PSD
VA-0189	GORDONSVILLE ENERGY L.P.	FAIRFAX	9/25/92	3/24/95	GAS/OIL	TURBINE FACILITY, GAS	1331.13 X10(7) SCFY NAT (	245 TOTAL TPY	SELECTIVE CATALYTIC REDUCTION (SCR) W/ WATE	BACT-PSD
VA-0189	GORDONSVILLE ENERGY L.P.	FAIRFAX	9/25/92	3/24/95	GAS/OIL	TURBINE FACILITY, GAS	7.44 X10(7) GPY FUEL O	245 TOTAL TPY	SELECTIVE CATALYTIC REDUCTION (SCR)	BACT-PSD
VA-0189	GORDONSVILLE ENERGY L.P.	FAIRFAX	9/25/92	3/24/95	GAS/OIL	TURBINES (2) (EACH WITH A SF)	1.51 X10(9) BTU/HR N.G	9 PPMVD/UNIT @ 15% O <sub>2</sub>	SCR WITH WATER INJECTION	BACT-PSD
VA-0189	GORDONSVILLE ENERGY L.P.	FAIRFAX	9/25/92	3/24/95	GAS/OIL	TURBINES (2) (EACH WITH A SF)	1.36 X10(9) BTU/HR #2 OI	66 LBS/HR/UNIT	WATER INJECTION AND SCR	BACT-PSD
VA-0190	BEAR ISLAND PAPER COMPANY, L.P.	ASHLAND	10/30/92	5/7/97	GAS/OIL	TURBINE, COMBUSTION GAS	474 X10(6) BTU/HR N. C	9 PPM	SELECTIVE CATALYTIC REDUCTION (SCR)	BACT-PSD
VA-0190	BEAR ISLAND PAPER COMPANY, L.P.	ASHLAND	10/30/92	5/7/97	GAS/OIL	TURBINE, COMBUSTION GAS	468 X10(6) BTU/HR #2 (	15 PPM	SCR	BACT-PSD
VA-0190	BEAR ISLAND PAPER COMPANY, L.P.	ASHLAND	10/30/92	5/7/97	GAS/OIL	TURBINE, COMBUSTION GAS (TOTAL)		69.7 TPY	SCR	BACT-PSD
VA-0206	PATOWMACK POWER PARTNERS, LIMITED PARTNERSHIP	LEESBURG	9/15/93	5/7/97	GAS/OIL	TURBINE, COMBUSTION, SIEMENS MODEL V84.2.	10.2 X109 SCF/YR NAT	131 LB/HR(GAS), 339 OIL	DRY LOW NOX COMBUSTOR, DESIGN, WATER INJE	BACT-PSD
WA-0280	EEX POWER SYSTEMS, ENCOGEN NW COGENERATION PR	BELLINGHAM	9/26/91	4/16/99	GAS/OIL	TURBINES, COMBINED CYCLE COGEN, GE FRAME	123 MW	7 PPMVD @ 15% O <sub>2</sub> NG	STEAM INJECTION AND SCR	BACT-PSD
WI-0067	WEPCU, PARIS SITE	PARIS	33845	7/20/94	GAS/OIL	TURBINES, COMBUSTION (4)		25 PPM @ 15% O <sub>2</sub>	GOOD COMBUSTION PRACTICES	BACT-PSD
WI-0067	WEPCU, PARIS SITE	PARIS	8/29/92	7/20/94	GAS/OIL	TURBINES, COMBUSTION (4)		65 PPM @ 15% O <sub>2</sub>	GOOD COMBUSTION PRACTICES	BACT-PSD

Source: RBL 1999.