

FLORIDA POWER  
CORPORATION  
AVON PARK FACILITY

TITLE V  
AIR OPERATING  
PERMIT APPLICATION

*Submitted to:*

**Florida Department of  
Environmental Protection**

*Prepared by:*



KBN Engineering and Applied Sciences, Inc.  
Gainesville, Florida



Letter of Transmittal

Date: 06/14/96

Project No.: 14426-1200

To: Scott Sheplak  
Florida Dept. of Environmental Prot.  
2600 Blair Stone Road  
Tallahassee, Florida 32399

Re: FLORIDA POWER CORPORATION  
Avon Park Facility

ID# 055 0003

**RECEIVED**  
JUN 14 1996  
BUREAU OF  
AIR REGULATION

The following items are being sent to you:  with this letter  under separate cover

<u>Copies</u>	<u>Description</u>
<u>4</u>	<u>Title V Air Operating Permit Application (Hard Copy)</u>
<u> </u>	<u> </u>
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These are transmitted:

- As requested
- For review
- For review and comment
- For approval
- For your information
- See Below

Remarks: As indicated on the enclosed bulletin, we will be submitting the above referenced application electronically after June 15, 1996

RECEIVED BY: \_\_\_\_\_

DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

14422Y/F1/WP/ALL-LOT-12 (06/14/96)





Letter of Transmittal

Date: 06/26/96

Project No.: 14426-1200

To: Scott Sheplak
Florida Dept. of Environmental Prot.
2600 Blair Stone Road
Tallahassee, Florida 32399

Re: FLORIDA POWER CORPORATION
Title V: Avon Park Facility

RECEIVED
JUN 27 1996
BUREAU OF AIR REGULATION

The following items are being sent to you: [X] with this letter [ ] under separate cover

Table with 2 columns: Copies, Description. Row 1: 1, Page 1 of Form hardcopy for verification. Row 2: 4, Air Operating Permit Application (Electronic Submittal ELSA 1.3b)

These are transmitted:

- As requested, For approval, For review, For your information, For review and comment, [X] For Electronic Submittal

Remarks: This is an electronic submittal of the permit application represented by page 1 of the form (attached). As indicated by the bulletin accompanying the previously submitted hard copy, original signature pages are not enclosed. They were provided with the hardcopy submittal. These disks were created using the submittal program included in ELSA 1.3b. If you have any questions, please contact Teresa Franklin or Jane Burnette.

Sender: Teresa Franklin for Bob McCann

cc: Scott Osbourn, File(2)

14422Y/F1/WP/2.LOT (06/26/96)

6241 Northwest 23rd Street Suite 500 Gainesville, Florida 32653-1500 352-336-5600 FAX 352-336-6603

5405 West Cypress Street Suite 215 Tampa, Florida 33607 813-287-1717 FAX 813-287-1716

1801 Clint Moore Road Suite 105 Boca Raton, Florida 33487 407-994-9910 FAX 407-994-9393

7785 Baymeadows Way Suite 105 Jacksonville, Florida 32256 904-739-5600 FAX 904-739-7777

1616 'P' Street NW Suite 350 Washington, DC 20036 202-462-1100 FAX 202-462-2270

# Department of Environmental Protection

## DIVISION OF AIR RESOURCES MANAGEMENT

### APPLICATION FOR AIR PERMIT - LONG FORM

See Instructions for Form No. 62-210.900(1)

#### I. APPLICATION INFORMATION

This section of the Application for Air Permit form identifies the facility and provides general information on the scope and purpose of this application. This section also includes information on the owner or authorized representative of the facility (or the responsible official in the case of a Title V source) and the necessary statements for the applicant and professional engineer, where required, to sign and date for formal submittal of the Application for Air Permit to the Department. If the application form is submitted to the Department using ELSA, this section of the Application for Air Permit must also be submitted in hard-copy.

#### Identification of Facility Addressed in This Application

Enter the name of the corporation, business, governmental entity, or individual that has ownership or control of the facility; the facility site name, if any; and the facility's physical location. If known, also enter the facility identification number.

1. Facility Owner/Company Name: <b>Florida Power Corporation</b>	
2. Site Name: <b>Avon Park Plant</b>	
3. Facility Identification Number: <b>0550003</b> [ ] Unknown	
4. Facility Location Information: Street Address or Other Locator: <b>1415 S Highlands Ave.</b> City: <b>Avon Park</b> County: <b>Highlands</b> Zip Code: <b>33825</b>	
5. Relocatable Facility? [ ] Yes [x] No	6. Existing Permitted Facility? [x] Yes [ ] No

#### Application Processing Information (DEP Use)

1. Date of Receipt of Application:	6/14/96
2. Permit Number:	0550003-001-AV
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

**Owner/Authorized Representative or Responsible Official**

1. Name and Title of Owner/Authorized Representative or Responsible Official:

**W. Jeffrey Pardue, Director, Env Services Dept**

2. Owner/Authorized Representative or Responsible Official Mailing Address:

Organization/Firm: **Florida Power Corporation**

Street Address: **3201 34th Street South**

City: **St. Petersburg**

State: **FL**

Zip Code: **33711**

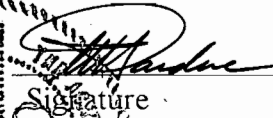
3. Owner/Authorized Representative or Responsible Official Telephone Numbers:

Telephone: **(813) 866-5151**

Fax: **(813) 866-4926**

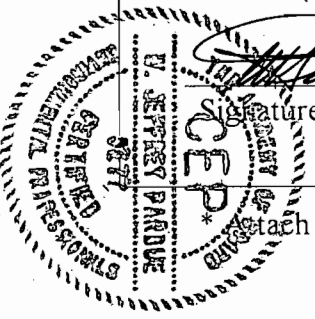
4. Owner/Authorized Representative or Responsible Official Statement:

*I, the undersigned, am the owner or authorized representative\* of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., 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.*

  
Signature

6-12-96

Date



Attach letter of authorization if not currently on file.

**Scope of Application**

This Application for Air Permit addresses the following emissions unit(s) at the facility. An Emissions Unit Information Section (a Section III of the form) must be included for each emissions unit listed.

<b>Emissions Unit ID</b>	<b>Description of Emissions Unit</b>	<b>Permit Type</b>
--------------------------	--------------------------------------	--------------------

<b>Unit #</b>	<b>Unit ID</b>	
1R	*	Gas Turbine Peaking Units No. 1 and No. 2
2		Facility-Wide Fugitive/De Minimis Emissions

See individual Emissions Unit (EU) sections for more detailed descriptions.  
Multiple EU IDs indicated with an asterisk (\*). Regulated EU indicated with an "R".

**Purpose of Application and Category**

Check one (except as otherwise indicated):

**Category I: All Air Operation Permit Applications Subject to Processing Under Chapter 62-213, F.A.C.**

This Application for Air Permit is submitted to obtain:

- Initial air operation permit under Chapter 62-213, F.A.C., for an existing facility which is classified as a Title V source.
- Initial air operation permit under Chapter 62-213, F.A.C., 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: \_\_\_\_\_

- Air operation permit renewal under Chapter 62-213, F.A.C., for a Title V source.

Operation permit to be renewed: \_\_\_\_\_

- Air operation permit revision for a Title V source to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number: \_\_\_\_\_

Operation permit to be renewed: \_\_\_\_\_

- Air operation permit revision or administrative correction for a Title V source to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. Also check Category III.

Operation permit to be revised/corrected: \_\_\_\_\_

\_\_\_\_\_

- Air operation permit revision for a Title V source 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 to be revised: \_\_\_\_\_

Reason for revision: \_\_\_\_\_

\_\_\_\_\_



**Category II: All Air Construction Permit Applications Subject to Processing Under Rule 62-210.300(2)(b),F.A.C.**

This Application for Air Permit is submitted to obtain:

- Initial air operation permit under Rule 62-210.300(2)(b), F.A.C., for an existing facility seeking classification as a synthetic non-Title V source.

Current operation/construction permit number(s): \_\_\_\_\_  
\_\_\_\_\_

- Renewal air operation permit under Rule 62-210.300(2)(b), F.A.C., for a synthetic non-Title V source.

Operation permit to be renewed: \_\_\_\_\_

- Air operation permit revision for a synthetic non-Title V source. Give reason for revision; e.g.; to address one or more newly constructed or modified emissions units.

Operation permit to be revised: \_\_\_\_\_

Reason for revision: \_\_\_\_\_  
\_\_\_\_\_

**Category III: All Air Construction Permit Applications for All Facilities and Emissions Units.**

This Application for Air Permit is submitted to obtain:

- Air construction permit to construct or modify one or more emissions units within a facility (including any facility classified as a Title V source).

Current operation permit number(s), if any: \_\_\_\_\_  
\_\_\_\_\_

- Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.

Current operation permit number(s): \_\_\_\_\_  
\_\_\_\_\_

- Air construction permit for one or more existing, but unpermitted, emissions units.

**Application Processing Fee**

Check one:

[  ] Attached - Amount: \$ \_\_\_\_\_ [  ] Not Applicable.

**Construction/Modification Information**

1. Description of Proposed Project or Alterations:
2. Projected or Actual Date of Commencement of Construction :
3. Projected Date of Completion of Construction :

**Professional Engineer Certification**

1. Professional Engineer Name: <b>Kennard F. Kosky</b> Registration Number: <b>14996</b>
2. Professional Engineer Mailing Address: Organization/Firm: <b>KBN Eng and Applied Sciences</b> Street Address: <b>6241 NW 23rd Street, Suite 500</b> City: <b>Gainesville</b> State: <b>FL</b> Zip Code: <b>32653-1500</b>
3. Professional Engineer Telephone Numbers: Telephone: <b>(352) 336-5600</b> Fax: <b>(352) 336-6603</b>

4. Professional Engineer's 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.*

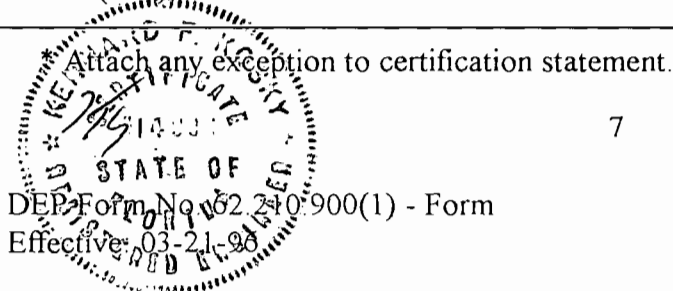
*If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [  ] if so), I further certify that, with the exception of any changes detailed as part of this application, each such 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.*

*Harold F. Kirby*

Signature  
(seal)

*6/9/96*

Date



6/7/96

14426Y/F1/TVAI

**Application Contact**

1. Name and Title of Application Contact: <b>Scott Osbourn, Senior Environmental Engineer</b>
2. Application Contact Mailing Address:  Organization/Firm: <b>Florida Power Corporation</b> Street Address: <b>3201 34th Street South</b> City: <b>St. Petersburg</b> State: <b>FL</b> Zip Code: <b>33711</b>
3. Application Contact Telephone Numbers:  Telephone: <b>(813) 866-5158</b> Fax: <b>(813) 866-4926</b>

**Application Comment**

<b>See Attachment AP-AI-AC</b>
--------------------------------

**ATTACHMENT AP-AI-AC**  
**APPLICATION COMMENT**

**ATTACHMENT AP-AI-AC**

This Title V application is for the Avon Park Facility. The application's structure is as follows:

	Gas Turbines	Facility Wide
General	2 peaking units (EU1)	Deminimis Emissions (EU2)
Emission Points	1 stack per turbine	Fugitive
Segments	No.2 fuel oil	Various
Pollutants	SO <sub>2</sub>	N/A
VE Emissions	VE limits applicable	N/A
CEM	none	N/A
PSD	Existing Baseline Sources	Existing Baseline Sources

## II. FACILITY INFORMATION

### A. GENERAL FACILITY INFORMATION

#### Facility Location and Type

1. Facility UTM Coordinates: Zone: 17                      East (km): 451.4                      North (km): 3050.5			
2. Facility Latitude/Longitude: Latitude (DD/MM/SS): 27 / 34 / 45                      Longitude: (DD/MM/SS): 81 / 29 / 33			
3. Governmental Facility Code: 0	4. Facility Status Code: A	5. Facility Major Group SIC Code: 49	6. Facility SIC(s):
7. Facility Comment (limit to 500 characters): <b>The Avon Park Facility consists of 2 gas turbine peaking units fired with No. 2 fuel oil or natural gas.</b>			

#### Facility Contact

1. Name and Title of Facility Contact: <b>J.J. Murphy, Plant Manager</b>			
2. Facility Contact Mailing Address: Organization/Firm: <b>Florida Power Corporation</b> Street Address: <b>1415 S. Highlands Ave.</b> City: <b>Avon Park</b> State: <b>FL</b> Zip Code: <b>33825</b>			
3. Facility Contact Telephone Numbers: Telephone: <b>(941) 453-4759</b> Fax: <b>(941) 453-8180</b>			





**B. FACILITY REGULATIONS**

**Rule Applicability Analysis** (Required for Category II applications and Category III applications involving non Title-V sources. See Instructions.)

[Empty rectangular box for Rule Applicability Analysis]

**List of Applicable Regulations** (Required for Category I applications and Category III applications involving Title-V sources. See Instructions.)

**See Attachment AP-FE-B**

## C. FACILITY POLLUTANTS

### Facility Pollutant Information

1. Pollutant Emitted	2. Pollutant Classification
SO2 Sulfur Dioxide	A
PM10 Particulate Matter - PM10	A
NOx Nitrogen Oxides	A
CO Carbon Monoxide	A
SAM	A

## D. FACILITY POLLUTANT DETAIL INFORMATION

### Facility Pollutant Detail Information:

1. Pollutant Emitted:		
2. Requested Emissions Cap:	(lb/hr)	(tons/yr)
3. Basis for Emissions Cap Code:		
4. Facility Pollutant Comment (limit to 400 characters):		

### Facility Pollutant Detail Information:

1. Pollutant Emitted:		
2. Requested Emissions Cap:	(lb/hr)	(tons/yr)
3. Basis for Emissions Cap Code:		
4. Facility Pollutant Comment (limit to 400 characters):		

**E. FACILITY SUPPLEMENTAL INFORMATION**

**Supplemental Requirements for All Applications**

1. Area Map Showing Facility Location: <input checked="" type="checkbox"/> Attached, Document ID: <u>AP-FE-1</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Facility Plot Plan: <input checked="" type="checkbox"/> Attached, Document ID: <u>AP-FE-2</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Process Flow Diagram(s): <input checked="" type="checkbox"/> Attached, Document ID(s): <u>AP-FE-3</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: <input checked="" type="checkbox"/> Attached, Document ID: <u>AP-FE-4</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Fugitive Emissions Identification: <input checked="" type="checkbox"/> Attached, Document ID: <u>AP-FE-5</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
6. Supplemental Information for Construction Permit Application: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

**Additional Supplemental Requirements for Category I Applications Only**

7. List of Proposed Exempt Activities: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
8. 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 checked="" type="checkbox"/> Not Applicable
9. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

11. Identification of Additional Applicable Requirements:

- Attached, Document ID: \_\_\_\_\_  
 Not Applicable

12. Compliance Assurance Monitoring Plan:

- Attached, Document ID: AP-FE-12  
 Not Applicable

13. Risk Management Plan Verification:

- Plan Submitted to Implementing Agency - Verification Attached  
Document ID: \_\_\_\_\_  
 Plan to be Submitted to Implementing Agency by Required Date  
 Not Applicable

14. Compliance Report and Plan

- Attached, Document ID: AP-FE-14  
 Not Applicable

15. Compliance Statement (Hard-copy Required)

- Attached, Document ID: AP-FE-15  
 Not Applicable

**ATTACHMENT AP-FE-B**  
**LIST OF APPLICABLE REGULATIONS**

## ATTACHMENT AP-FE-B

### Applicable Requirements Listing - Power Plants

FACILITY: FPC Avon Park Plant

#### FDEP Rules:

##### General Permits:

62-4.030

62-4.040(1)(a)

- Exemptions from permitting

62-4.040(1)(b)

- Exemptions from permitting

62-4.100

62-4.130

##### Asbestos NESHAP:

62-204.800(8)(b)8.(State Only)

- Asbestos Removal

62-204.800(8)(d) (State Only)

- General Provisions (Asbestos)

##### Stationary Sources-General:

62-210.300(2)

##### Exemptions - Plant Specific:

62-210.300(3)(a)4.

- comfort heating < 1 mmBtu/hr

62-210.300(3)(a)5.

- mobile sources

62-210.300(3)(a)7.

- non-industrial vacuum cleaning

62-210.300(3)(a)8.

- refrigeration equipment

62-210.300(3)(a)9.

- vacuum pumps for labs

62-210.300(3)(a)10.

- steam cleaning equipment

62-210.300(3)(a)11.

- sanders < 5 ft<sup>2</sup>

62-210.300(3)(a)12.

- space heating equip.; (non-boilers)

62-210.300(3)(a)14.

- bakery ovens

62-210.300(3)(a)15.

- lab equipment

62-210.300(3)(a)16.

- brazing, soldering or welding

62-210.300(3)(a)17.

- laundry dryers

62-210.300(3)(a)20.

- emergency generators < 32,000 gal/yr

62-210.300(3)(a)21.

- general purpose engines < 32,000 gal/yr

62-210.300(3)(a)22.

- fire and safety equipment

62-210.300(3)(a)23.

- surface coating > 5% VOC; 6 gal/month

62-210.300(3)(a)24.

- surface coating < 5% VOC



- 62-210.300(3)(b) - Temporary Exemptions
- 62-210.370(3) - AORs
- 62-210.900(5) - AOR Form

Title V Permits:

- 62-213.205(1)(a) - Fees
- 62-213.205(1)(b)
- 62-213.205(1)(c)
- 62-213.205(1)(e)
- 62-213.205(1)(f)
- 62-213.205(1)(g)
- 62-213.205(1)(i)
- 62-213.205(1)(j)
- 62-213.400 - Permits/Revisions
- 62-213.410 - Changes without permit revisions
- 62-213.420.(1)(b)2. - Permits-allows continued operation
- 62-213.420.(1)(b)3. - Permits-additional information
- 62-213.460 - Permit Shield
- 62-213.900(1) - Fee Form

Open Burning:

- 62-256.300 - Prohibitions
- 62-256.500 - Land Clearing
- 62-256.700 - Open burning Allowed

Asbestos Removal:

- 62-257.301 - Notification and Fee
- 62-257.400 - Fee Schedule
- 62-257.900 - Form

Stationary Sources-Emission Standards:

- 62-296.320(2) (State Only) - Odor
- 62-296.320(3)(b)(State Only) - Emergency Open Burning
- 62-296.320(4)(b) - General VE Standard
- 62-296.320(4)(c) - Unconfined Emissions of Particulate Matter

Stationary Sources-Emission Monitoring

- 62-297.310(7)(a)10. - Exemption of annual VE for 210.300(3)(a) sources/Gen. Per.

Federal Regulations:

Asbestos Removal:

40 CFR 61.05

40 CFR 61.12(b)

40 CFR 61.14

40 CFR 61.19

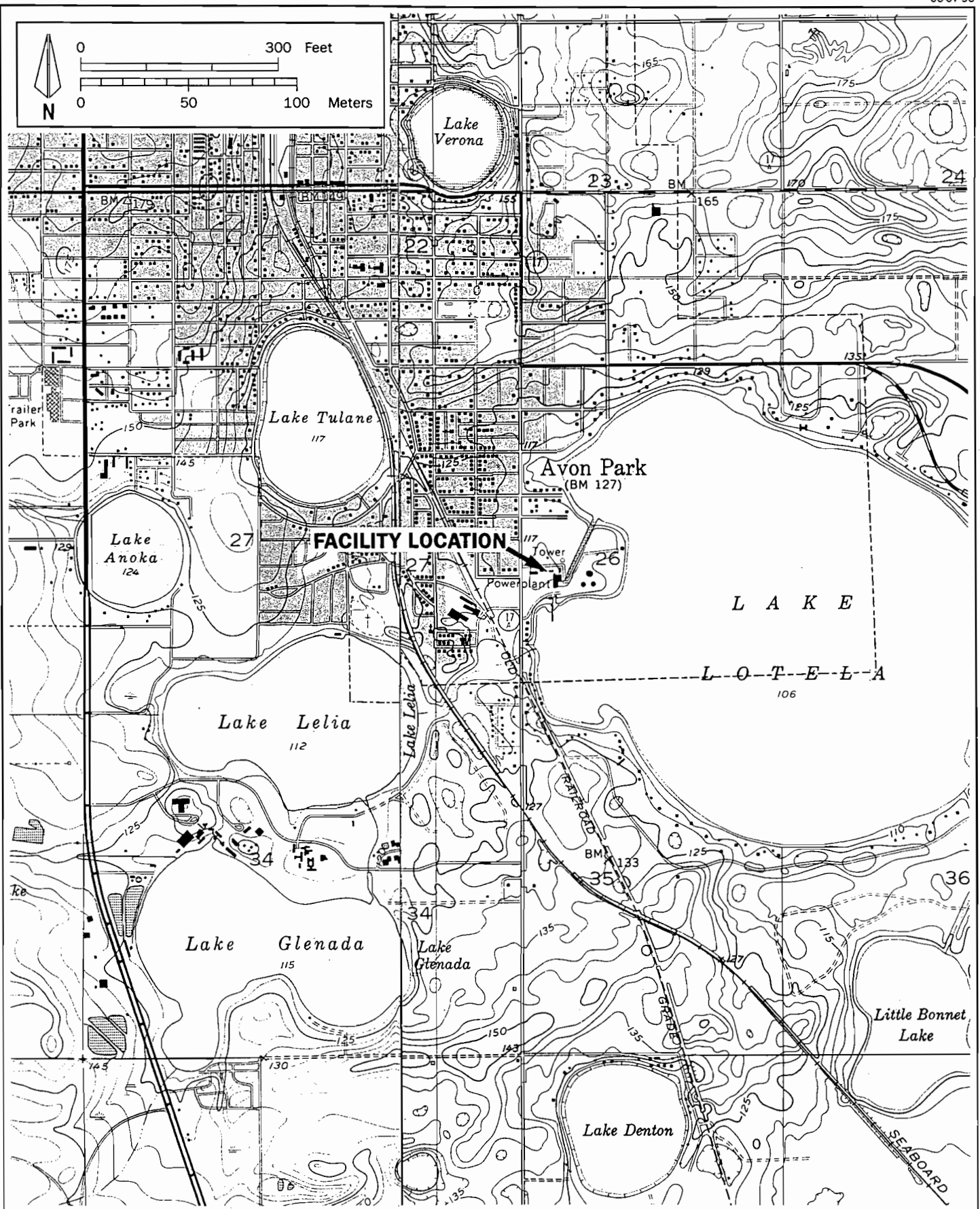
40 CFR 61.145

40 CFR 61.148

- Prohibited Activities
- Compliance with work practice standard
- Monitoring Requirements (if required)
- Circumvention
- Demolition and Renovation
- Standard for Insulating Material

**ATTACHMENT AP-FE-1**

**AREA MAP**



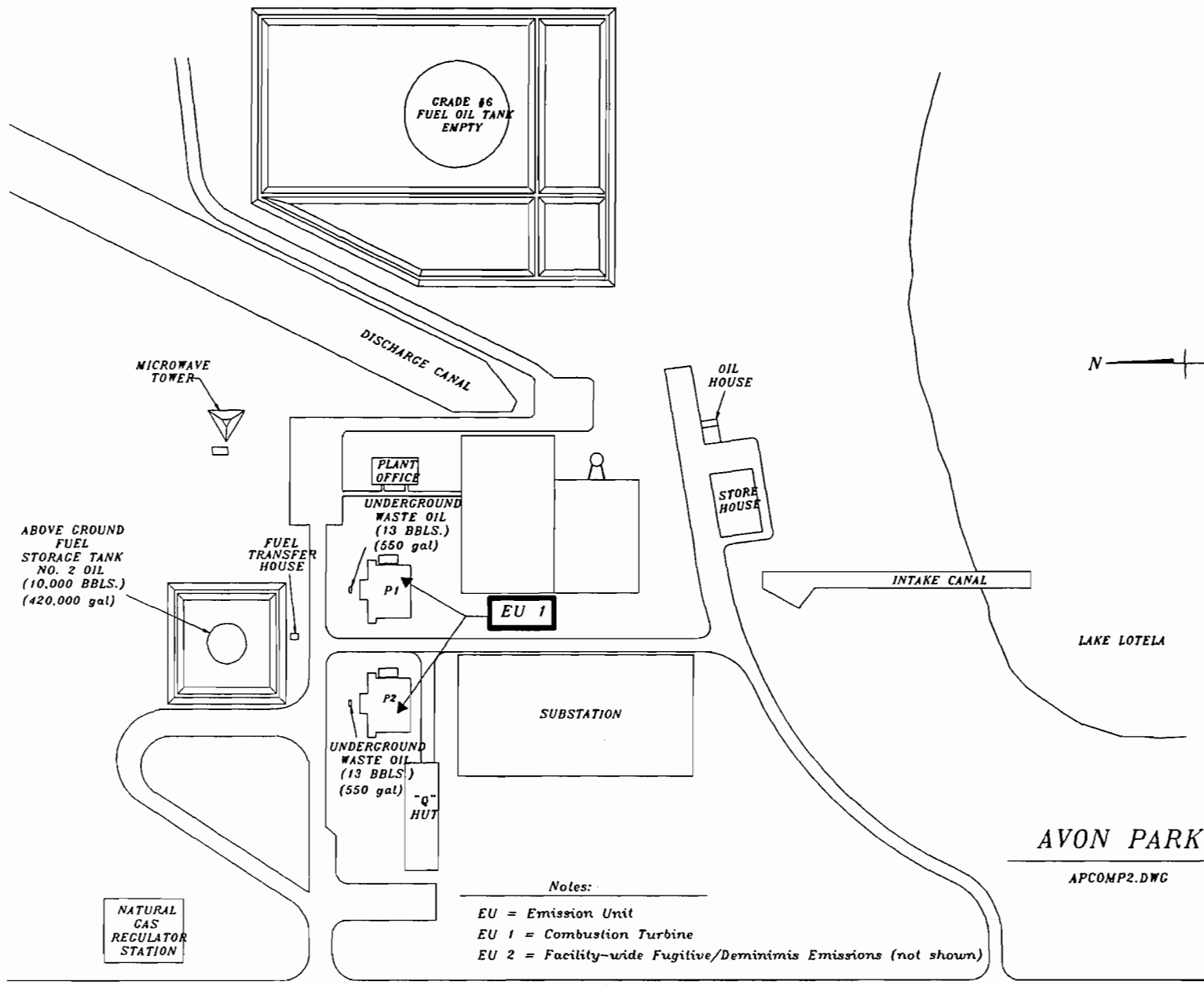
Attachment AP-FE-1  
 Area Map Showing Facility Location

Sources: USGS, 1987 and 1993; KBN, 1996.



**ATTACHMENT AP-FE-2**

**FACILITY PLOT PLAN**



ABOVE GROUND  
FUEL  
STORAGE TANK  
NO. 2 OIL  
(10,000 BBLs.)  
(420,000 gal)

NATURAL  
GAS  
REGULATOR  
STATION

GRADE #6  
FUEL OIL TANK  
EMPTY

DISCHARGE CANAL

MICROWAVE  
TOWER

FUEL  
TRANSFER  
HOUSE

PLANT  
OFFICE

UNDERGROUND  
WASTE OIL  
(13 BBLs.)  
(550 gal)

P1

EU 1

OIL  
HOUSE

STORE  
HOUSE

INTAKE CANAL

N

LAKE LOTELA

UNDERGROUND  
WASTE OIL  
(13 BBLs.)  
(550 gal)

P2

"Q"  
HUT

SUBSTATION

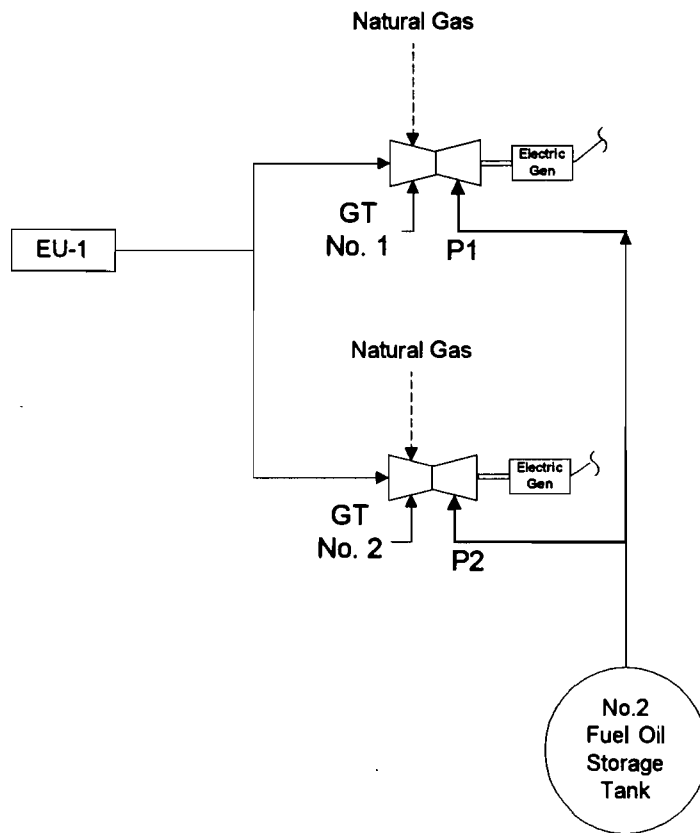
Notes:

- EU = Emission Unit
- EU 1 = Combustion Turbine
- EU 2 = Facility-wide Fugitive/Deminimis Emissions (not shown)

AVON PARK

APCOMP2.DWG

**ATTACHMENT AP-FE-3**  
**PROCESS FLOW DIAGRAM**



**Note:**  
 GT = Gas Turbine  
 EU = Emission Unit Number  
 See segment section for the operating rate of each emission unit.

<b>Process Flow Legend</b> 	<b>Florida Power Corporation, Avon Park Process Flow Diagram</b>	<i>Emission Unit:</i> Overall Plant <i>Process Area:</i> Overall Plant <i>Filename:</i> FPCAP.VSD <i>Latest Revision Date:</i> 6/5/96 04:44 PM	
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**ATTACHMENT AP-FE-4**

**PRECAUTIONS TO PREVENT EMISSIONS OF UNCONFINED PARTICULATE  
MATTER**

## ATTACHMENT AP-FE-4

### PRECAUTIONS TO PREVENT EMISSIONS OF UNCONFINED PARTICULATE MATTER

The facility has negligible amounts of unconfined particulate matter as a result of the operation of the facility. Potential examples of particulate matter include:

- Fugitive dust from paved and unpaved roads, and
- Fugitive particulates from the use of bagged chemical products.

Operational measures are undertaken at the facility which also minimize particulate emissions, in accordance with 62-296.310(3), F.A.C.:

- Maintenance of paved areas as needed,
- Regular mowing of grass and care of vegetation, and
- Limiting access to plant property by unnecessary vehicles.

**ATTACHMENT AP-FE-5**  
**FUGITIVE EMISSIONS IDENTIFICATION**

## ATTACHMENT AP-FE-5 FUGITIVE EMISSIONS IDENTIFICATION

Many fugitive emissions at the plant site have been classified as "trivial activities" (as presented in EPA's memorandum, "White Paper for Streamlined Development of Part 70 Permit Applications," July 10, 1995). As a result, these activities are not included as part of this permit application. For example, emissions from general plant maintenance and upkeep activities at the facility would be considered fugitive emissions, but have been judged to be trivial since these activities are not conducted as part of a manufacturing process, not related to the source's primary business activity, and do not otherwise trigger a permit modification.

Fugitive emissions that may result from the operation of activities that are not trivial at the facility are addressed in Emission Unit No. 2. This emission unit contains information on fugitive emissions that occur on a facility-wide basis. A summary of potential fugitive/*de minimis* emission sources at the facility is presented in the following sections.

### **Criteria and Precursor Air Pollutants**

FPC has not identified fugitive emission of sulfur dioxide, nitrogen oxides, carbon monoxide, or lead compounds which would exceed the thresholds defined in the permit application instructions.

### **Volatile Organic Compounds (VOCs)**

Fugitive/*de minimis* emissions of VOCs include those resulting from the use of cleaners and solvents for maintenance and operation. VOCs are also emitted by the various fuel oil storage tanks on the plant property, and generator and turbine lube oil vents.

### **Fugitive HAPs Emissions**

The following hazardous air pollutants are or may be present on the facility property and are potential sources of fugitive HAPs emissions:

- asbestos
- methyl ethyl ketone
- toluene
- xylene

**Asbestos** - Present in gasket material, pipe insulation, and various other locations. The facility complies with the federal NESHAPS (40 CFR 61 Subpart M) and state rules (62-257, F.A.C.) governing the abatement of asbestos-containing materials. No releases of asbestos are expected for the facility.

**Methyl Ethyl Ketone, Toluene, Xylene** - The facility uses paint thinners and solvents (which may contain MEK, toluene, or xylene) for use in plant maintenance activities. These containers are kept closed and are stored in weather-tight buildings. These emissions as a whole are addressed in the VOC section (preceding page).

**Regulated Toxic or Flammable Substances**

The following regulated toxic or flammable substances are or may be present at the FPC facility:

**Acetylene** - Present on the facility property in 100-lb cylinders which are used for plant maintenance (welding and cutting).

**ATTACHMENT AP-FE-12**  
**COMPLIANCE ASSURANCE MONITORING PLAN**

**ATTACHMENT AP-FE-12**

Compliance Assurance Monitoring Plan is to be submitted to the implementing agency by the required date.

**ATTACHMENT AP-FE-14**  
**COMPLIANCE REPORT AND PLAN**



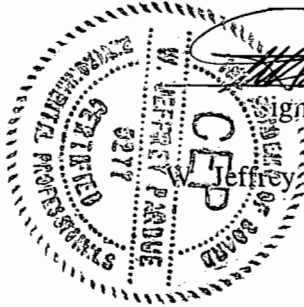
## COMPLIANCE REPORT AND PLAN

The facility and emissions units identified in this application are in compliance with the Applicable Requirements identified in Sections B and D of the application form and attachments referenced in Section E. 11. and L. 12. (if included). Compliance is certified as of the date this application and is submitted to the Florida Department of Environmental Regulation as required in Rule 62-213.420(1)(a) F.A.C. Compliance will be certified no less frequently than annually or as required by the applicable requirement.

**ATTACHMENT AP-FE-15**  
**COMPLIANCE STATEMENT**

ATTACHMENT AP-FE-15  
COMPLIANCE STATEMENT

I, the undersigned, am the responsible official as defined in Chapter 62-213, F.A.C., of the Title V source for which this report is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and data contained in this report are true, accurate, and complete.



*Jeffrey Pardue*

\_\_\_\_\_  
Signature, Responsible Official

Jeffrey Pardue, C.E.P., Director, Environmental Services Department

6-12-96  
Date

**III. EMISSIONS UNIT INFORMATION**

A separate Emissions Unit Information Section (including subsections A through L 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. Some of the subsections comprising the Emissions Unit Information Section of the form are intended for regulated emissions units only. Others are intended for both regulated and unregulated emissions units. Each subsection is appropriately marked.

**A. TYPE OF EMISSIONS UNIT  
(Regulated and Unregulated Emissions Units)****Type of Emissions Unit Addressed in This Section**

1. Regulated or Unregulated Emissions Unit? Check one:

] The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

] The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

2. Single Process, Group of Processes, or Fugitive Only? Check one:

] 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).

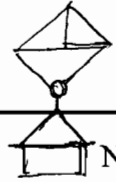
] This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

] 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.

**B. GENERAL EMISSIONS UNIT INFORMATION**  
**(Regulated and Unregulated Emissions Units)**

Emissions Unit Description and Status

*ev 003 EU 004*

1. Description of Emissions Unit Addressed in This Section (limit to 60 characters): <b>Gas Turbine Peaking Units No. 1 and No. 2</b>		
		
2. Emissions Unit Identification Number: <input type="checkbox"/> No Corresponding ID <input type="checkbox"/> Unknown		
3. Emissions Unit Status Code: <b>A</b>	4. Acid Rain Unit? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	5. Emissions Unit Major Group SIC Code: <b>49</b>
6. Emissions Unit Comment (limit to 500 characters): <b>ARMS Identification Nos.: 003, 004.</b>		

**Emissions Unit Control Equipment Information**

**A.**

1. Description (limit to 200 characters):
2. Control Device or Method Code:

**B.**

1. Description (limit to 200 characters):
2. Control Device or Method Code:

**C.**

1. Description (limit to 200 characters):
2. Control Device or Method Code:

**C. EMISSIONS UNIT DETAIL INFORMATION  
(Regulated Emissions Units Only)**

**Emissions Unit Details**

1. Initial Startup Date:	<b>20 Dec 1968</b>	
2. Long-term Reserve Shutdown Date:		
3. Package Unit:		
Manufacturer: <b>Westinghouse</b>	Model Number:	
4. Generator Nameplate Rating:	<b>34 MW</b>	
5. Incinerator Information:		
Dwell Temperature:	°F	
Dwell Time:	seconds	
Incinerator Afterburner Temperature:	°F	

**Emissions Unit Operating Capacity**

1. Maximum Heat Input Rate:	<b>563</b>	mmBtu/hr
2. Maximum Incineration Rate:	lbs/hr	tons/day
3. Maximum Process or Throughput Rate:		
4. Maximum Production Rate:		
5. Operating Capacity Comment (limit to 200 characters):		
<p><b>Max Heat Input Rate = 562.6 (rounded to 563). Maximum heat input based on permit limit firing No. 2 fuel oil. Max. heat input rate is a function of ambient temperature.</b></p>		

**Emissions Unit Operating Schedule**

1. Requested Maximum Operating Schedule:		
	<b>24</b> hours/day	<b>7</b> days/week
	<b>52</b> weeks/yr	<b>8,760</b> hours/yr

**D. EMISSIONS UNIT REGULATIONS  
(Regulated Emissions Units Only)**

**Rule Applicability Analysis** (Required for Category II Applications and Category III applications involving non Title-V sources. See Instructions.)

**Not Applicable**



**List of Applicable Regulations** (Required for Category I applications and Category III applications involving Title-V sources. See Instructions.)

See Attachment AP-E01-D

**E. EMISSION POINT (STACK/VENT) INFORMATION  
(Regulated Emissions Units Only)**

**Emission Point Description and Type**

1. Identification of Point on Plot Plan or Flow Diagram: EU1	
2. Emission Point Type Code: <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4	
3. Descriptions of Emissions Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): <b>Gas turbine gases exhaust through a single stack per turbine unit</b>	
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: <b>Not Applicable</b>	
5. Discharge Type Code: <input type="checkbox"/> D <input type="checkbox"/> F <input type="checkbox"/> H <input type="checkbox"/> P <input type="checkbox"/> R <input checked="" type="checkbox"/> V <input type="checkbox"/> W	
6. Stack Height:	<b>55</b> feet
7. Exit Diameter:	<b>10</b> feet
8. Exit Temperature:	<b>850</b> °F

9. Actual Volumetric Flow Rate:	2,000,000 acfm	
10. Percent Water Vapor:	%	
11. Maximum Dry Standard Flow Rate:	dscfm	
12. Nonstack Emission Point Height:	feet	
13. Emission Point UTM Coordinates:		
Zone: 17	East (km): 451.4	North (km): 3050.5
14. Emission Point Comment (limit to 200 characters):		
<b>Information for each turbine.</b>		

**F. SEGMENT (PROCESS/FUEL) INFORMATION**  
**(Regulated and Unregulated Emissions Units)**

**Segment Description and Rate:** Segment 1 of 2

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters):  <b>Internal Combustion Electric Generation Dist. Oil/Diesel Turbine</b>	
2. Source Classification Code (SCC):  <b>2-01-001-01</b>	
3. SCC Units: <b>Thousand Gallons Burned</b>	
4. Maximum Hourly Rate:  <b>4.077</b>	5. Maximum Annual Rate:  <b>35,713</b>
6. Estimated Annual Activity Factor:	
7. Maximum Percent Sulfur:  <b>0.5</b>	8. Maximum Percent Ash:  <b>0.1</b>
9. Million Btu per SCC Unit:  <b>138</b>	
10. Segment Comment (limit to 200 characters):  <b>1. Maximum annual rate is based on 8,760 hr/yr. 2. Heat content-HHV</b>	

**Segment Description and Rate:** Segment  2  of  2

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters): <b>Internal Combustion Electric Generation, Natural Gas</b>	
2. Source Classification Code (SCC): <b>2-01-002-01</b>	
3. SCC Units: <b>Million Cubic Feet Burned</b>	
4. Maximum Hourly Rate: <b>0.56</b>	5. Maximum Annual Rate: <b>4,906</b>
6. Estimated Annual Activity Factor:	
7. Maximum Percent Sulfur:	8. Maximum Percent Ash:
9. Million Btu per SCC Unit: <b>1,000</b>	
10. Segment Comment (limit to 200 characters): <b>1. Maximum sulfur content of natural gas is 1.0 grain per 100 cf. 2. Heat content-HHV.</b>	

**G. EMISSIONS UNIT POLLUTANTS  
(Regulated and Unregulated Emissions Units)**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
SO <sub>2</sub>			EL
PM			NS
PM <sub>10</sub>			NS
NO <sub>x</sub>			NS
CO			NS

**H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION  
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)****Pollutant Detail Information:**

1. Pollutant Emitted: <b>SO2</b>		
2. Total Percent Efficiency of Control:		<b>0 %</b>
3. Potential Emissions:	<b>577 lb/hour</b>	<b>2,527 tons/year</b>
4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
5. Range of Estimated Fugitive/Other Emissions:		
[ <input type="checkbox"/> ] 1    [ <input type="checkbox"/> ] 2    [ <input type="checkbox"/> ] 3    _____ to _____ tons/yr		
6. Emission Factor:		<b>1 %sulfur</b>
Reference: <b>BACT</b>		
7. Emissions Method Code:		
<input checked="" type="checkbox"/> 0    [ <input type="checkbox"/> ] 1    [ <input type="checkbox"/> ] 2    [ <input type="checkbox"/> ] 3    [ <input type="checkbox"/> ] 4    [ <input type="checkbox"/> ] 5		
8. Calculation of Emissions (limit to 600 characters):		
<b>See Attachment AP-E01-H8</b>		
9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):		
—		

Emissions Unit Information Section 1 of 2  
Allowable Emissions (Pollutant identified on front page)

A.

1. Basis for Allowable Emissions Code: <b>OTHER</b>		
2. Future Effective Date of Allowable Emissions:		
3. Requested Allowable Emissions and Units: <b>1 percent sulfur</b>		
4. Equivalent Allowable Emissions:	<b>577 lb/hour</b>	<b>2,527 tons/year</b>
5. Method of Compliance (limit to 60 characters): <b>Fuel oil analysis during compliance test</b>		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters): <b>Permit limit (BACT)</b>		

B.

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. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters):		



**I. VISIBLE EMISSIONS INFORMATION**  
**(Regulated Emissions Units Only)**

**Visible Emissions Limitations:** Visible Emissions Limitation 1 of 2

1.	Visible Emissions Subtype: <b>VE20</b>
2.	Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input 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 Method 9, annual compliance test</b>
5.	Visible Emissions Comment (limit to 200 characters): <b>Rule 62-296.310(2)(a). No VE test &lt; 400 hr/yr except for period of one year preceeding permit renewal date. Rule 62-297.310(7)(a)8.</b>

**Visible Emissions Limitations:** Visible Emissions Limitation 2 of 2

1.	Visible Emissions Subtype: <b>VE</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</b> min/hour
4.	Method of Compliance: <b>Best operational practice</b>
5.	Visible Emissions Comment (limit to 200 characters): <b>1. Rule 62-210.700(1); excess emissions from startup, shutdown and malfunction, not to exceed 2 hr in 24 hr</b>

**J. CONTINUOUS MONITOR INFORMATION  
(Regulated Emissions Units Only)**

**Continuous Monitoring System** Continuous Monitor \_\_\_\_\_ of \_\_\_\_\_

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement: [ ] Rule [ ] Other	
4. Monitor Information: Monitor Manufacturer: Model Number: Serial Number:	
5. Installation Date:	
6. Performance Specification Test Date:	
7. Continuous Monitor Comment (limit to 200 characters):	

**Continuous Monitoring System** Continuous Monitor \_\_\_\_\_ of \_\_\_\_\_

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement: [ ] Rule [ ] Other	
4. Monitor Information: Monitor Manufacturer: Model Number: Serial Number:	
5. Installation Date:	
6. Performance Specification Test Date:	
7. Continuous Monitor Comment (limit to 200 characters):	

**K. PREVENTION OF SIGNIFICANT DETERIORATION (PSD) INCREMENT  
TRACKING INFORMATION  
(Regulated and Unregulated Emissions Units)**

**PSD Increment Consumption Determination**

1. Increment Consuming for Particulate Matter or Sulfur Dioxide?

If the emissions unit addressed in this section emits particulate matter or sulfur dioxide, answer the following series of questions to make a preliminary determination as to whether or not the emissions unit consumes PSD increment for particulate matter or sulfur dioxide. Check the first statement, if any, that applies and skip remaining statements.

- ] The emissions unit is undergoing PSD review as part of this application, or has undergone PSD review previously, for particulate matter or sulfur dioxide. If so, emissions unit consumes increment.
- ] The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after January 6, 1975. If so, baseline emissions are zero, and the emissions unit consumes increment.
- ] The facility addressed in this application is classified as an EPA major source and the emissions unit began initial operation after January 6, 1975, but before December 27, 1977. If so, baseline emissions are zero, and the emissions unit consumes increment.
- ] For any facility, the emissions unit began (or will begin) initial operation after December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.
- ] None of the above apply. If so, the baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

2. Increment Consuming for Nitrogen Dioxide?

If the emissions unit addressed in this section emits nitrogen oxides, answer the following series of questions to make a preliminary determination as to whether or not the emissions unit consumes PSD increment for nitrogen dioxide. Check first statement, if any, that applies and skip remaining statements.

- The emissions unit addressed in this section is undergoing PSD review as part of this application, or has undergone PSD review previously, for nitrogen dioxide. If so, emissions unit consumes increment.
- The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after February 8, 1988. If so, baseline emissions are zero, and the source consumes increment.
- The facility addressed in this application is classified as an EPA major source and the emissions unit began initial operation after February 8, 1988, but before March 28, 1988. If so, baseline emissions are zero, and the source consumes increment.
- For any facility, the emissions unit began (or will begin) initial operation after March 28, 1988. If so, baseline emissions are zero, and the emissions unit consumes increment.
- None of the above apply. If so, baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

3.	Increment Consuming/Expanding Code:			
	PM	<input type="checkbox"/> C	<input type="checkbox"/> E	<input checked="" type="checkbox"/> Unknown
	SO <sub>2</sub>	<input type="checkbox"/> C	<input type="checkbox"/> E	<input checked="" type="checkbox"/> Unknown
	NO <sub>2</sub>	<input type="checkbox"/> C	<input type="checkbox"/> E	<input checked="" type="checkbox"/> Unknown
4.	Baseline Emissions:			
	PM	lb/hour		tons/year
	SO <sub>2</sub>	lb/hour		tons/year
	NO <sub>2</sub>			tons/year
5.	PSD Comment (limit to 200 characters):			
	<b>Baseline emissions not known.</b>			

**L. EMISSIONS UNIT SUPPLEMENTAL INFORMATION  
(Regulated Emissions Units Only)**

**Supplemental Requirements for All Applications**

1.	Process Flow Diagram	<input checked="" type="checkbox"/> Attached, Document ID: <u>AP-E01-L1</u>	<input type="checkbox"/> Waiver Requested
		<input type="checkbox"/> Not Applicable	
2.	Fuel Analysis or Specification	<input checked="" type="checkbox"/> Attached, Document ID: <u>AP-E01-L2</u>	<input type="checkbox"/> Waiver Requested
		<input type="checkbox"/> Not Applicable	
3.	Detailed Description of Control Equipment	<input type="checkbox"/> Attached, Document ID: _____	<input type="checkbox"/> Waiver Requested
		<input checked="" type="checkbox"/> Not Applicable	
4.	Description of Stack Sampling Facilities	<input type="checkbox"/> Attached, Document ID: _____	<input type="checkbox"/> Waiver Requested
		<input checked="" type="checkbox"/> Not Applicable	
5.	Compliance Test Report	<input checked="" type="checkbox"/> Attached, Document ID: <u>AP-E01-L5</u>	<input type="checkbox"/> Not Applicable
		<input type="checkbox"/> Previously Submitted, Date: _____	
6.	Procedures for Startup and Shutdown	<input checked="" type="checkbox"/> Attached, Document ID: <u>AP-E01-L6</u>	<input type="checkbox"/> Not Applicable
7.	Operation and Maintenance Plan	<input type="checkbox"/> Attached, Document ID: _____	<input checked="" type="checkbox"/> Not Applicable
8.	Supplemental Information for Construction Permit Application	<input type="checkbox"/> Attached, Document ID: _____	<input checked="" type="checkbox"/> Not Applicable
9.	Other Information Required by Rule or Statute	<input type="checkbox"/> Attached, Document ID: _____	<input checked="" type="checkbox"/> Not Applicable

**Additional Supplemental Requirements for Category I Applications Only**

10. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Identification of Additional Applicable Requirements <input checked="" type="checkbox"/> Attached, Document ID: <u>AP-E01-L12</u> <input type="checkbox"/> Not Applicable
13. Compliance Assurance Monitoring Plan <input checked="" type="checkbox"/> Attached, Document ID: <u>AP-E01-L13</u> <input type="checkbox"/> Not Applicable
14. Acid Rain Permit 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 checked="" type="checkbox"/> Not Applicable

**ATTACHMENT AP-E01-D**  
**EMISSION UNIT REGULATIONS**

## ATTACHMENT AP-E01-D

### Master Applicable Requirements Listing - Power Plants

EMISSION UNIT: EU1/2: Peaking Units Gas Turbines 1-2- FPC Avon Park Plant

#### FDEP Rules:

##### Stationary Sources-General:

- 62-210.700(1)
- 62-210.700(4) - maintenance
- 62-210.700(6)

##### Stationary Sources-Emission Standards:

- 62-296.320(4)(b) - General VE Standard
- 62-296.320(4)(c) - Unconfined Emission of Particulate Matter

##### Stationary Sources-Emission Monitoring:

- 62-297.310(2)(a) - Operating Rate; Reserved for CTs
- 62-297.310(4)(a)2. - Applicable Test Procedures; Sampling time
- 62-297.310(5) - Determination of Process Variables
- 62-297.310(7)(a)3. - Permit Renewal Test Required
- 62-297.310(7)(a)4.
- 62-297.310(7)(a)8. - CTs; Exempts Test < 400hrs/yr; 1 per 5 yr
- 62-297.310(7)(a)9. - FDEP Notification - 15 days
- 62-297.310(8) - Test Reports



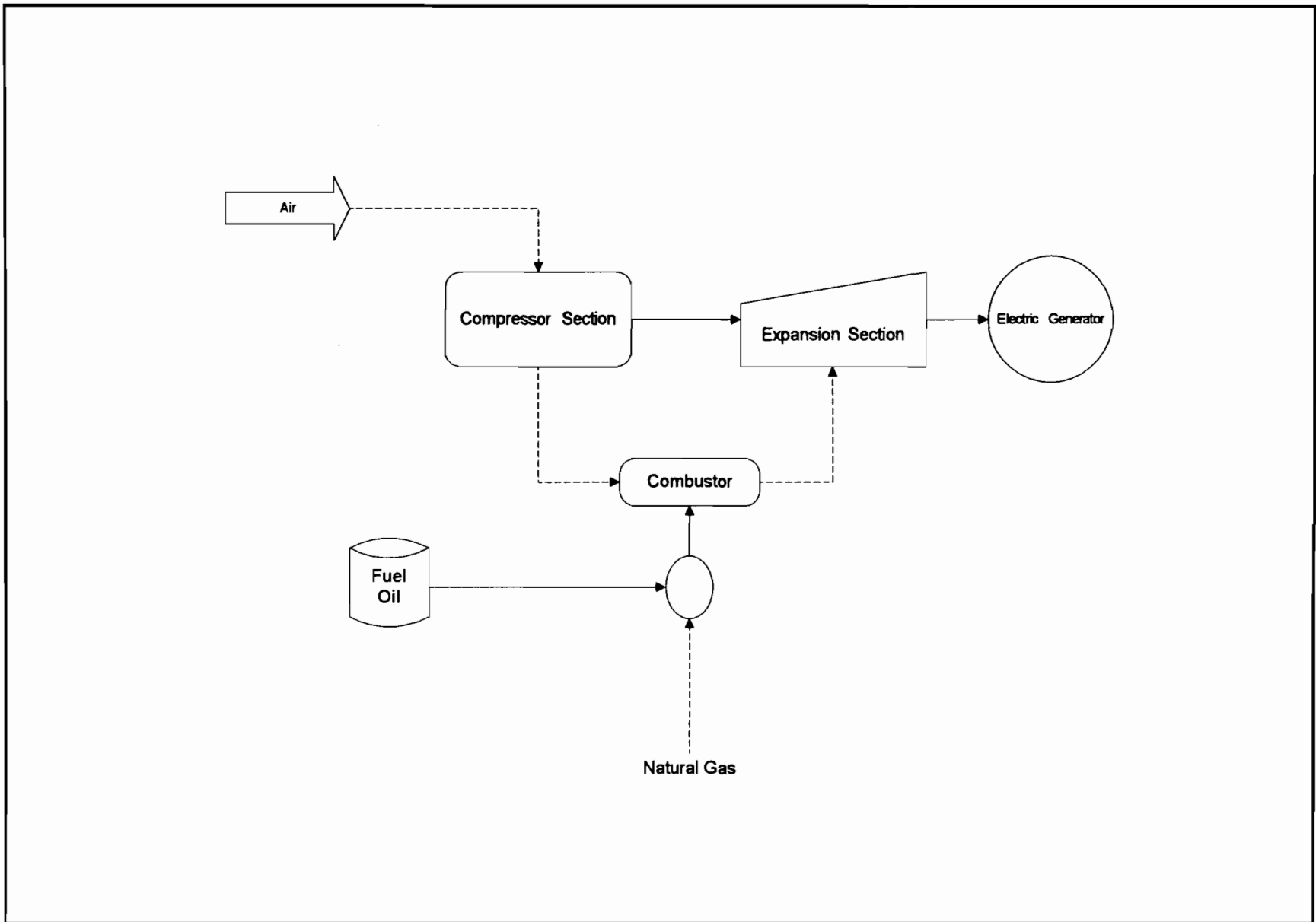
**ATTACHMENT AP-E01-H8**  
**CALCULATION OF EMISSIONS**

## Attachment AP-E01-H8. Maximum Estimated Emissions for Emissions Limited Pollutants, FPC Avon Park Plant, Gas Turbine Peaking Units.

Pollutant/Units	Gas Turbine	
	P-1	P-2
Hours of Operation	8,760	8,760
Annual Capacity Factor (%)	100	100
Sulfur Dioxide (lb/hr) = Fuel oil (lb/hr) x sulfur content(fraction) x (lb SO <sub>2</sub> /lb S)		
Basis	AO Permit	AO Permit
Fuel Usage (lb/hr)	28,851	28,851
Sulfur content (%)	1.0	1.0
lb SO <sub>2</sub> /lb S (64/32)	2.0	2.0
Emission rate (lb/hr)	577	577
(TPY)	2,527	2,527
HIR	562.6	
Btu/lb	19,500	

Source: FDEP Permit AO25-202500;

**ATTACHMENT AP-E01-L1**  
**PROCESS FLOW DIAGRAM**



<b>Process Flow Legend</b> -----> Steam Flow - - - - -> Gas Flow ———> Solid / Liquid Flow	<b>Florida Power Corporation, Avon Park</b> <b>Process Flow Diagram</b>	<i>Emission Unit:</i> Peaking Gas Turbine No. 1 and 2 <i>Process Area:</i> Overall Plant <i>Filename:</i> FPCAP.VSD <i>Latest Revision Date:</i> 6/5/96 04:04 PM	

**ATTACHMENT AP-E01-L2**  
**FUEL ANALYSIS OR SPECIFICATION**

**ATTACHMENT AP-E01-L2**

**FUEL ANALYSIS**

**Natural gas analysis**

<u>Parameter</u>	<u>Typical Value</u>	<u>Max Value</u>
Relative density	0.58 (compared to air)	
heat content	950 - 1140 Btu/cu ft.	
% sulfur	0.43 grains/CCF <sup>1</sup>	1 grain/100 CF
% nitrogen	0.8% by volume	
% ash	negligible	

Note: The values listed are "typical" values based upon information supplied to FPC by Florida Gas Transmission (FGT). However, analytical results from grab samples of fuel taken at any given point in time may vary from those listed.

☺

<sup>1</sup> Data from laboratory analysis

## ATTACHMENT AP-E01-L2

## FUEL ANALYSIS

## No. 6 Fuel Oil

<u>Parameter</u>	<u>Typical Value</u>	<u>Max Value</u>
API gravity @ 60 F	30 <sup>1</sup>	-
Relative density	7.1 lb/gal <sup>2</sup>	
Heat content	19,500 Btu / lb (HHV)	
% sulfur	0.12 <sup>2</sup>	1.0 <sup>3</sup>
% nitrogen	0.025 - 0.030	
% ash	negligible	0.1 <sup>1</sup>

Note: The values listed are "typical" values based upon 1) information gathered by laboratory analysis, and 2) FPC's fuel purchasing specifications. However, analytical results from grab samples of fuel taken at any given point in time may vary from those listed.

<sup>1</sup> Data taken from the FPC fuel procurement specification

<sup>2</sup> Data from laboratory analysis

<sup>3</sup> Data from current air permit.

**ATTACHMENT AP-E01-L5**  
**COMPLIANCE TEST REPORT**



**ATTACHMENT AP-E01-L5**

**COMPLIANCE TEST REPORT**

*according to ARMS  
last test  
March 17, 1992  
passed*

Compliance test for visible emissions waived since the turbine fired fuel oil during the last 12 months for 400 hours or less and is expected to fire fuel during the next 12 months for 400 hours or less.

**ATTACHMENT AP-E01-L6**  
**PROCEDURES FOR STARTUP AND SHUTDOWN**

**ATTACHMENT AP-E01-L6**  
**PROCEDURES FOR STARTUP/SHUTDOWN**

Startup for the gas turbine begins with an electric control system using a switch to initiate the unit startup cycle. The unit generator is synchronized with the grid and can be "on line" (electrical power production) within 5 minutes from startup.

The gas turbine has no emission controls. If excess emissions are encountered during startup or shutdown, the nature and cause of any malfunction is identified, along with the corrective action taken or preventative measures adopted. Corrective actions may include switching the unit from automatic (remote) to local control. Best Operating Practices are adhered to and all efforts to minimize both the level and duration of excess emissions are undertaken.

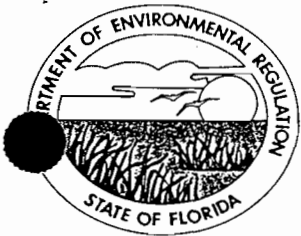
Shutdown is performed by reducing the unit load (electrical production) to a minimum level, opening the breaker (which disconnects the unit generator from the system electrical grid), shutting off the fuel, and coasting to a stop.

**ATTACHMENT AP-E01-L12**

**IDENTIFICATION OF ADDITIONAL APPLICABLE REQUIREMENTS**

### **ADDITIONAL APPLICABLE REQUIREMENTS**

Applicable Requirements as defined in Rule 62-210.200(29) not identified in Section D of this emission unit section are included in this attachment of the application. Any air operation permit issued by the Department (or local program designee) and included in this attachment is provided for information purposes. The specific conditions of the operating permit are not Applicable Requirements as defined in Rule 62-210.200(29) unless implementing a specific Applicable Requirement of the Department's rules (e.g., emission limitations).



# Florida Department of Environmental Regulation

South District

2269 Bay Street

Fort Myers, Florida 33901-2896

Lawton Chiles, Governor

Carol M. Browner, Secretary

RECEIVED

OCT 14 1991

Environmental Svcs  
Department

**PERMITTEE:**

W. Jeffrey Pardue, Manager  
Environmental Programs  
Florida Power Corporation  
Post Office Box 14042  
St. Petersburg, Florida 33733

I.D.No: 52/28/0003/03-04  
Permit/Certification  
Number: A028-202500  
Date of Issue: October 10, 1991  
Expiration Date: October 10, 1996  
County: Highlands  
Latitude: 27° 34' 42" N  
Longitude: 81° 29' 34" W  
Section/Town/Range: 26/33S/28E  
Project: Florida Power Corp.  
Avon Park Peaking Unit 1  
and Unit 2

This permit is issued under the provisions of Chapter 403.087, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Rules 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Operate 2 gas turbine electric generation units each with a rated capacity of 33.8 MW, fueled by jet or #2 fuel oil, or natural gas that has a maximum heat input of 562.6 million Btu per hour.

Plant is located at 1415 South Highlands Avenue, Avon Park, Florida.

PERMITTEE:  
Florida Power Corporation

I.D. No.: 52/28/0003/03-04  
Permit/Cert. No.: A028-202500  
Date of Issue: October 10, 1991  
Expiration Date: October 10, 1996

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5) F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement 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.

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 any order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of

PERMITTEE:  
Florida Power Corporation

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GENERAL CONDITIONS:

credential or other documents as may be required by law, and at reasonable times, access to the premises where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under 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.

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 non-compliance, 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 revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the Department, may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Section 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 17-3.051, shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.



PERMITTEE:  
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GENERAL CONDITIONS:

11. This permit is transferable only upon Department approval in accordance with F.A.C. Rules 17-4.120 and 17-30.300, F.A.C. as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
  - (a) Determination of Best Available Control Technology (BACT)
  - (b) Determination of Prevention of Significant Deterioration (PSD)
  - (c) Certification of compliance with State Water Quality Standards (Section 401, PL 92-500)
  - (d) Compliance with New Source Performance Standards
14. The permittee shall comply with the following:
  - (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically, unless otherwise stipulated by the Department.
  - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
  - (c) Records of monitoring information shall include:
    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;
    6. the results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the 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.

PERMITTEE:  
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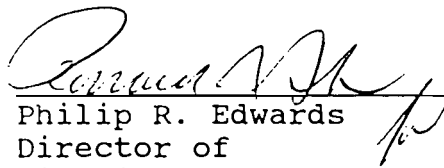
SPECIFIC CONDITIONS:

1. Visible emission tests are required to show continuing compliance with the standards of the Department. The test results must provide reasonable assurance that the unit is capable of compliance at the permitted maximum operating rate. Test shall be conducted in accordance with EPA Method 9 as published in 40 CFR-60, Appendix A, or State approved equivalent method. Such tests shall be conducted once per year commencing prior to October, 1992. Results shall be submitted to the Department within 45 days after testing. The Department shall be notified at least 15 days prior to testing to allow witnessing.
2. Sulfur content in fuel shall not exceed 1%.
3. Visible emissions shall not exceed 20% opacity under normal operation except for up to 2 minutes in any one hour at not more than 40% opacity.
4. All fugitive dust generated at this site shall be adequately controlled.
5. An annual operation report (DER Form 17-1.202(6) attached) shall be submitted by March 1st each year. The attached form shall be reproduced by the permittee and used for future annual submittals.
6. There shall be no discharges of liquid effluents or contaminated runoff from the plant site.
7. In the event the turbine does not operate more than 400 hours during the year the owner or operator is not required to conduct a visible emission compliance test for that year.

NOTE: In the event of an emergency the permittee shall contact the Department by calling (904) 488-1320. During normal business hours, the permittee shall call (813) 332-6975.

Issued this 10th day of October, 1991.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

  
Philip R. Edwards  
Director of  
District Management

PRE/AEL/jw

8 Pages Attached

**ATTACHMENT AP-E01-L13**  
**COMPLIANCE ASSURANCE MONITORING PLAN**

**ATTACHMENT AP-E01-L13**

Compliance Assurance Monitoring Plan to be submitted to implementing agency by required date.

**III. EMISSIONS UNIT INFORMATION**

A separate Emissions Unit Information Section (including subsections A through L 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. Some of the subsections comprising the Emissions Unit Information Section of the form are intended for regulated emissions units only. Others are intended for both regulated and unregulated emissions units. Each subsection is appropriately marked.

**A. TYPE OF EMISSIONS UNIT  
(Regulated and Unregulated Emissions Units)****Type of Emissions Unit Addressed in This Section**

1. Regulated or Unregulated Emissions Unit? Check one:

The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

2. Single Process, Group of Processes, or Fugitive Only? Check one:

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).

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.

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.

**B. GENERAL EMISSIONS UNIT INFORMATION  
(Regulated and Unregulated Emissions Units)****Emissions Unit Description and Status**

1. Description of Emissions Unit Addressed in This Section (limit to 60 characters): <b>Facility-Wide Fugitive/De Minimis Emissions</b>		
2. Emissions Unit Identification Number: [ <input checked="" type="checkbox"/> ] No Corresponding ID [ <input type="checkbox"/> ] Unknown		
3. Emissions Unit Status Code: <b>A</b>	4. Acid Rain Unit? [ <input type="checkbox"/> ] Yes [ <input checked="" type="checkbox"/> ] No	5. Emissions Unit Major Group SIC Code: <b>49</b>
6. Emissions Unit Comment (limit to 500 characters): <b>See Attachment AP-E02-B6</b>		

**Emissions Unit Control Equipment Information**

**A.**

1. Description (limit to 200 characters):
2. Control Device or Method Code:

**B.**

1. Description (limit to 200 characters):
2. Control Device or Method Code:

**C.**

1. Description (limit to 200 characters):
2. Control Device or Method Code:

**F. SEGMENT (PROCESS/FUEL) INFORMATION  
(Regulated and Unregulated Emissions Units)**

**Segment Description and Rate:** Segment  1  of  2

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters):  <b>Petroleum Product Storage - Fugitive Emissions(Storage)</b>	
2. Source Classification Code (SCC):  <b>4-03-888-01</b>	
3. SCC Units:  <b>Thousands gallons stored</b>	
4. Maximum Hourly Rate:	5. Maximum Annual Rate:
6. Estimated Annual Activity Factor:  <b>420</b>	
7. Maximum Percent Sulfur:	8. Maximum Percent Ash:
9. Million Btu per SCC Unit:	
10. Segment Comment (limit to 200 characters):  <b>Segment refers to combined storage capacity of various petroleum product storage tanks contained in emission unit at time permit appl. submittal. See Attachment AP-E06-B6 for list.</b>	



**Segment Description and Rate:** Segment  2  of  2

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters): <b>Petroleum Product Storage - Fugitive Emissions(Throughput)</b>	
2. Source Classification Code (SCC): <b>4-03-999-99</b>	
3. SCC Units: <b>Thousand Gallons Throughput</b>	
4. Maximum Hourly Rate:	5. Maximum Annual Rate:
6. Estimated Annual Activity Factor: <p style="text-align: center;"><b>35</b></p>	
7. Maximum Percent Sulfur:	8. Maximum Percent Ash:
9. Million Btu per SCC Unit:	
10. Segment Comment (limit to 200 characters): <b>Est. Ann. Act. Fact.= 35.2 (rounded to 35). Seg. refers to combined throughput of var. petroleum product stg. tanks contained in EU at time permit appl. submittal. See Att. AP-E02-B6 for list.</b>	

**G. EMISSIONS UNIT POLLUTANTS  
(Regulated and Unregulated Emissions Units)**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code

**K. PREVENTION OF SIGNIFICANT DETERIORATION (PSD) INCREMENT  
TRACKING INFORMATION  
(Regulated and Unregulated Emissions Units)**

**PSD Increment Consumption Determination**

1. Increment Consuming for Particulate Matter or Sulfur Dioxide?

If the emissions unit addressed in this section emits particulate matter or sulfur dioxide, answer the following series of questions to make a preliminary determination as to whether or not the emissions unit consumes PSD increment for particulate matter or sulfur dioxide. Check the first statement, if any, that applies and skip remaining statements.

- ] The emissions unit is undergoing PSD review as part of this application, or has undergone PSD review previously, for particulate matter or sulfur dioxide. If so, emissions unit consumes increment.
- ] The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after January 6, 1975. If so, baseline emissions are zero, and the emissions unit consumes increment.
- ] The facility addressed in this application is classified as an EPA major source and the emissions unit began initial operation after January 6, 1975, but before December 27, 1977. If so, baseline emissions are zero, and the emissions unit consumes increment.
- ] For any facility, the emissions unit began (or will begin) initial operation after December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.
- ] None of the above apply. If so, the baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

2. Increment Consuming for Nitrogen Dioxide?

If the emissions unit addressed in this section emits nitrogen oxides, answer the following series of questions to make a preliminary determination as to whether or not the emissions unit consumes PSD increment for nitrogen dioxide. Check first statement, if any, that applies and skip remaining statements.

- ] The emissions unit addressed in this section is undergoing PSD review as part of this application, or has undergone PSD review previously, for nitrogen dioxide. If so, emissions unit consumes increment.
- ] The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after February 8, 1988. If so, baseline emissions are zero, and the source consumes increment.
- ] The facility addressed in this application is classified as an EPA major source and the emissions unit began initial operation after February 8, 1988, but before March 28, 1988. If so, baseline emissions are zero, and the source consumes increment.
- ] For any facility, the emissions unit began (or will begin) initial operation after March 28, 1988. If so, baseline emissions are zero, and the emissions unit consumes increment.
- ] None of the above apply. If so, baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

3.	Increment Consuming/Expanding Code:			
	PM	<input type="checkbox"/> ] C	<input type="checkbox"/> ] E	<input checked="" type="checkbox"/> ] Unknown
	SO <sub>2</sub>	<input type="checkbox"/> ] C	<input type="checkbox"/> ] E	<input checked="" type="checkbox"/> ] Unknown
	NO <sub>2</sub>	<input type="checkbox"/> ] C	<input type="checkbox"/> ] E	<input checked="" type="checkbox"/> ] Unknown
4.	Baseline Emissions:			
	PM	lb/hour		tons/year
	SO <sub>2</sub>	lb/hour		tons/year
	NO <sub>2</sub>			tons/year
5.	PSD Comment (limit to 200 characters):			
	<b>Baseline emissions not known.</b>			

**ATTACHMENT AP-E02-B6**  
**EMISSIONS UNIT COMMENT**

### **TRIVIAL ACTIVITIES**

The trivial activities identified in this application are provided for information only and are identified as examples of, but not limited to, the trivial activities identified by the Division of Air Resources Management's (DARM's) guidance. It is understood that such activities do not have to be included in with the Title V Application. The trivial activities identified herein are consistent, in terms of amounts of emissions and types, with those activities listed in DARM's guidance.

### **NOTIFICATION OF TEMPORARY EXEMPTIONS**

Pursuant to Rule 62-210.300(3)(b)1., notice is herein provide that the emissions units listed below are not subject to a permit issued by the Department of Environmental Protection and are exempt from permitting until a final determination is made under the Title V permitting requirements (Rule 62-213 F.A.C.). These units would not have triggered review under Rules 62-212.400 or 62-212.500 or any new source performance standard listed in Rule 62-204.800 F.A.C.

Attachment AP-E02-B6  
General Emissions Unit Information for Unregulated Emissions Unit

Table 1. FPC, Avon Park Plant, Unregulated Emissions Unit

Area	Emission Unit Description	Status
Maintenance shop	Sand blaster, drill press, welding, lathes	ER/TR
	Cabinets with solvents, oils, flammables, etc.	TR
	Parts washer- light oil	TR
	Cylinders (acetylene, etc.)	TR
Gas Turbine 1 & 2	Lube oil vent with demister	UR
	Lube oil storage tank (underground)- 2600 gal.	UR
	Waste oil storage tank- 550 gal.	UR
	Turbine cooling- 175 gal. 50% glycol/50% water mix.	TR
Fuel Storage and Associated Areas	Tank No. CT5- No. 2 Fuel Oil (10,000 bbls)	UR
	Turbine lube oil tank (800 gal)	UR
General Site	Oil water separators	TR
Substation	Transformers and Associated Equipment	TR

Note: ER = Exempt by Rule 62-210.300(3)(a); TR = Trivial; UR = Unregulated.

Attachment AP-E02-B6  
General Emissions Unit Information

Table 2. FPC, Avon Park Plant, Petroleum Product Storage and Throughput Operations

FPC Tank No.	Storage Product	Storage Tank Size (gallons)	Potential Annual Throughput (gallons)
C.T. 6	Waste oil (below ground)	550	100
C.T. 7	Waste oil (below ground)	550	100
C.T. #05	Fuel oil (No. 2)	420,000	35,200
	TOTAL	421,100	35,400