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January 30, 1995

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BY HAND DELIVERY

Mr. Clair E. Fancy, P.E.
Bureau of Air Regulation
Department of Environmental Protection
111 South Magnolia Street, Suite 29
Tallahassee, Florida 32399-2400

RECEIVED

JAN 30 1995

RE: Vero Beach Municipal Power Plant, Unit 5
Request for Extension of Air Construction
Permit No. AC 31-184928, PSD-FL-152

Bureau of
Air Regulation

Dear Mr. Fancy:

I am writing on behalf of the City of Vero Beach to request extension of the referenced air construction permit for Unit 5 at the City's Municipal Power Plant in Indian River County, pursuant to Rule 62-4.080(3) F.A.C. The current expiration date for the permit is January 31, 1995, in accordance with Division Director Rhodes' letter of October 4, 1994. By letter dated June 30, 1994, the City requested amendment of certain conditions in the construction permit, including those rendered obsolete by the installation of Dry Low NOx burners in Unit 5. Since that time, the City has responded to the Department's request for additional information and representatives of the City have met with Department officials regarding the requested amendments. Currently, the City is awaiting the Department's final action on the request. As discussed in our meeting regarding the requested amendments, resolution of the construction permit issues will help to facilitate issuance of a mutually acceptable air operation permit.

The City hereby requests a further extension of the permit expiration date until February 28, 1995, to allow sufficient time for the Department to take final action on the proposed amendments. A check in the amount of fifty dollars (\$50.00) is enclosed, pursuant to Rule 62-4.050(4)(q)3, F.A.C.

Initial emissions compliance testing of Unit 5 with the Dry Low NOx combustors has been completed and test reports demonstrating compliance with applicable limits were forwarded to the Department on February 25, 1994. In addition, annual compliance testing was conducted in accordance with the current provisions of the construction permit on or about January 11,

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FOR THE YEAR

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Mr. Clair E. Fancy, P.E.
January 30, 1995
Page 2

1994. Test reports of the the annual compliance testing will be forward to the Department upon receipt from the City's testing contractor.

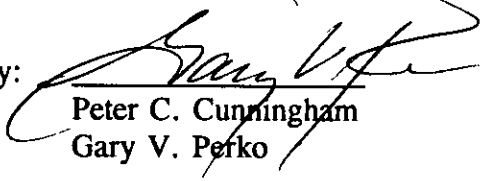
The City recognizes that all current construction permit conditions will remain in effect if the expiration date extension is approved. Accordingly, the City has demonstrated reasonable assurances that, upon completion, the extended permit will comply with the standards and conditions required by applicable regulation.

Your consideration in this matter is very much appreciated. If there are any questions regarding the City's request, please do not hesitate to call.

Sincerely,

HOPPING BOYD GREEN & SAMS

By:



Peter C. Cunningham
Gary V. Perko

Attorneys for CITY OF VERO BEACH

cc: Mr. Charles Logan (DEP/BAR)
Mr. Charles Collins (DEP/Central District)
Mr. Doug Beason, Esq. (DEP/OGC)
Mr. Mike Siefert (CVB)



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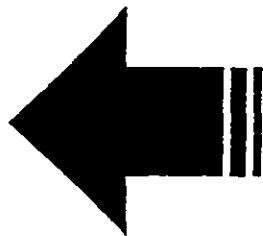
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OF COUNSEL
W. ROBERT FOKES

December 7, 1994

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BY HAND DELIVERY

Clair H. Fancy, P.E., Chief
Bureau of Air Regulation
Department of Environmental Protection
111 South Magnolia Street, Suite 29
Tallahassee, Florida 32399-2400

Bureau of
Air Regulation

RE: Vero Beach Municipal Power Plant, Unit 5
Request to Amend Construction Permit
DEP Permit No. AC 31-184928, PSD-FL-152

Dear Mr. Fancy:

On behalf of the City of Vero Beach (City), we are writing to follow-up on our meeting of November 18, 1994, regarding the City's pending request to amend the air construction permit for Unit 5 at the Vero Beach Municipal Power Plant. As you recall, the construction permit imposed emission limitations and other conditions based on the original design for the GE Frame 6 combustion turbine. In accordance with the Department's BACT determination, the permit also required the City to install either low NOx combustors or an SCR system within one year of the commencement of commercial operation. As explained in our letter of June 30, 1994, the primary reasons for the requested permit amendments were: (1) to update permit conditions to reflect that Dry Low NOx (DLN) combustors have been installed; (2) to revise certain figures, including heat input rates, based on the original unit design to reflect the DLN combustor configuration; and (3) to authorize limited operation in "peak load" mode firing natural gas.

Based on the discussions at our recent meeting, the City has decided to withdraw its request for permit conditions authorizing peak load operation. However, the City still requests the other permit amendments unrelated to peak load authorization. In that regard, all amendments requested by the City are listed in Attachment "A", along with the rationale for each suggested change. In addition, we have attached a new "Table 1", which would replace

Clair H. Fancy, P.E.
December 7, 1994
Page 2

Tables 1 through 4 of the current permit. As you can see, the allowable emissions listed in Table 1 reflect the City's decision to accept a decrease in annual oil use from 33 to 25 percent, with the corresponding NOx limit of 65 ppm contemplated in Table 2 of the current permit.

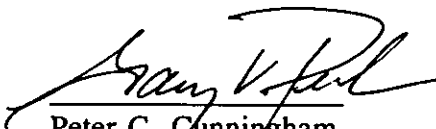
The city's decision to forego permit language authorizing peak load operation should resolve any questions about the applicability of PSD review to the City's pending request. Although the installation of DLN combustors changed certain unit characteristics, those changes were necessary to the DLN conversion, which was expressly required by the existing construction permit. Moreover, the City's request involves no increase in allowable or potential emissions. As indicated in Attachment "B", allowable emissions in the new Table 1 are equal to or slightly less than those set forth in Table 2 of the existing permit. Additionally, as indicated in Attachment "C", when compared to the standard combustor design, heat input rates and exhaust flow rates for both gas and oil firing modes are lower under the City's request. Thus, the request does not implicate PSD review.

The City appreciates the Department's cooperation in this matter. We hope that this submittal will allow the Department to take action on the City's request before the construction permit's expiration date of January 31, 1995. If you have any questions, please do not hesitate to call us or Mike Siefert at the Vero Beach Municipal Power Plant (407/562-7231). Moreover, we are more than willing to schedule another meeting with the Department if you believe it would expedite action on the pending request.

Sincerely,

HOPPING BOYD GREEN & SAMS

By:


Peter C. Cunningham
Gary V. Perko

cc: Bruce Mitchell (DEP)
Charles Logan (DEP)
Mike Siefert (CVB)

December 7, 1994

ATTACHMENT "A"

Amendments to DEP Air Construction Permit No. AC 31-184928 requested by the City of Vero Beach.

SPECIFIC CONDITION 1

Requested Change: Delete.

Rationale: Unnecessary because Dry Low NO_x (DLN) combustors have been installed and Unit 5 has demonstrated compliance with all emission limits with the DLN configuration.

SPECIFIC CONDITION 2

Requested Change: Renumber as Specific Condition 1 and revise to read as follows:

1. The maximum allowable emissions from Unit 5 shall not exceed the emission limitations listed in Table 1.

Rationale: References to the initial year of operation and to SCR are unnecessary now that the Unit 5 combustion turbine has been retrofitted with DLN combustors. The reference to "Table 1" is to the new Table 1 (attached) that would replace current Tables 1 through 4.

SPECIFIC CONDITION 3

Requested Change: Delete.

Rationale: Based on our June 1, 1994 meeting, the City understands that the Department no longer believes inclusion of "acceptable ambient air concentrations (AAC)" in air permits is appropriate.

SPECIFIC CONDITIONS 4-6

Requested Change: Renumber as Specific Conditions 2-4.

SPECIFIC CONDITION 7

Requested Change: Renumber as Specific Condition 5 and revise to read as follows:

5. The permitted materials and utilization rates for the combined cycle gas turbine shall not exceed the values as follows:

- Maximum No. 2 fuel oil consumption shall not exceed 7,500,000 gals/yr.
- Maximum annual firing using No. 2 fuel oil shall not exceed 25% of the annual capacity factor.
- Maximum sulfur(s) content in the oil shall not exceed 0.25 percent by weight.
- Maximum heat input during "Base Load" operation shall not exceed 414 MMBtu/hr (gas) or 438 MMBtu/hr (oil), based on sea level pressure at 59°F ambient dry bulb temperatures, 60% relative humidity (ISO conditions) and lower heating value (LHV) of the fuel being fired.

Rationale: Deletes unnecessary restriction on gallons per hour of fuel oil (redundant given the maximum hourly heat input rate limits) and updates language to reflect installation of DLN combustors. Reduces annual oil use by limiting annual capacity factor on oil to 25 percent. Updates "Base Load" heat input rates to reflect DLN combustor design parameters.

SPECIFIC CONDITIONS 8 & 9

Requested Change: Renumber as Specific Conditions 6 & 7.

SPECIFIC CONDITION 10

Requested Change: Renumber as Specific Condition 8 and revise to read as follows:

8. Initial (I) compliance tests shall be performed on the CT using both fuels. Annual (A) compliance tests shall be performed on the CT in the "Base Load" mode with the fuels used for more than 400 hours during the federal fiscal year. Tests shall be conducted using the following EPA reference methods in accordance with the November 2, 1989 version of 40 CFR 60 Appendix A:

- a. 5 or 17 for PM (I; A for oil only)
- b. 10 for CO (I)
- c. 9 for VE (I;A)
- d. 20 for NO_x (I;A)

- e. 25A for VOC (I; no stack test required provided CO stack test demonstrates compliance with CO emission limit)
- f. same as e. in current permit
- g. same as f. in current permit

Other DEP methods may be used for compliance testing after prior Department approval.

Rationale: Corrects current references to "each CT" and adds VOC test method but allows use of CO stack test data in place of VOC testing.

SPECIFIC CONDITIONS 11 & 12

Requested Change: Renumber as Specific Conditions 9 & 10.

SPECIFIC CONDITION 13

Requested Change: Renumber as Specific Condition 11 and revise to read as follows:

11. During performance tests required under 40 CFR 60, Subpart GG, to determine compliance with the NOx emission limit applicable under 40 CFR § 60.332, measured NOx emissions at 15 percent oxygen will be adjusted to ISO ambient atmospheric conditions by the following correction factor:

[No change to formula]

Rationale: This revision clarifies that the correction formula must be used for performance tests conducted pursuant to the Subpart GG NSPS to demonstrate compliance with the NOx emission limit imposed under 40 CFR §60.332, but is not required for stack test data used in demonstrating whether the GE Frame 6 DLN machine is in compliance with the BACT-based NOx limits in the permit.

SPECIFIC CONDITION 14

Requested Change: Renumber as Specific Condition 12 and revise as follows:

12. Test results will be the average of 3 valid runs. The Central District will be notified at least 30 days in advance of any initial performance tests and at least 15 days prior to any annual compliance test. The source shall operate between 90% and 100% of permitted capacity (for the average ambient temperature during the test) during the compliance test. If it is impracticable to test at 90-100% of the maximum heat input rate, the CT may be tested at less than 90% of the maximum heat input. In this case,

subsequent operation is limited to 110% of the tested heat input rate (corrected for average ambient temperature) until a new test is conducted. If the CT is so limited, operation at higher capacity is allowed for no more than 15 days for purposes of additional compliance testing to regain the maximum heat input rate. Compliance test results shall be submitted to the Central District office no later than 45 days after completion.

Rationale: Clarifies that the heat input rate measured during compliance testing is to be corrected for ambient conditions for comparison with maximum permitted heat input rate (which is based upon ISO conditions). Provides traditional approach under which testing at less than 90 percent of maximum heat input rate is valid but results in new heat input limit at 110 percent of tested rate.

SPECIFIC CONDITION 15

Requested Change: Delete.

Rationale: No longer needed because DLN combustors have been installed and compliance testing for NOx (and all other pollutants) has been completed.

SPECIFIC CONDITION 16

Requested Change: Renumber as Specific Condition 13 and revise as follows:

13. A continuous monitoring system shall be installed to monitor and record the fuel oil consumption and water/fuel ratio when firing 100% fuel oil. Continuous monitoring shall also be installed, operated, and maintained in accordance with 40 CFR 60, Appendix F or 40 CFR 75, to monitor nitrogen oxides emissions from the combined cycle unit.

a. The continuous emission monitoring system (CEMS) shall meet performance specifications of 40 CFR 60, Appendix B or 40 CFR 75.

b - d no changes.

e. For purposes of reports required under this permit, excess emissions are defined as any one hour period during which the average emissions of all readings collected during a continuous 60 minute period exceed the applicable emission limit in Specific Condition 1. Quarterly excess emission reports, in accordance with the July 1, 1992, edition of 40 CFR 60.7 and 40 CFR 60.13, shall be submitted to DEP's Central District offices. The continuous emission monitor system (CEMS) shall comply with 40 CFR 60 Appendix F - Quality Assurance Procedure and 40 CFR 60 Appendix D - Performance Specification 2 or

analogous provisions of 40 CFR 75. Method 7E or equivalent shall be used as the Reference Method for the Determination of Nitrogen Oxide Emissions.

Rationale: Clarifies that monitoring and recording of fuel consumption (and water/fuel ration) is required only when 100% fuel oil is fired. Adds references to Title IV CEMS provisions (40 CFR 75) and incorporate language regarding excess emissions reporting, as revised by DEP letter of October 6, 1993, into paragraph e.

SPECIFIC CONDITION 17

Requested Change: Renumber as Specific Condition 14 and revise to read as follows:

14. Sulfur, nitrogen content and lower heating value of the fuel oil being fired in the gas turbine shall be recorded daily. The records of fuel oil usage will be kept by the company for a two-year period; available for regulatory agency's inspection.

Rationale: Clarifies that records should refer only to fuel oil, as there is no justification for daily recording of sulfur, nitrogen content and lower heating value for natural gas.

SPECIFIC CONDITION 18

Requested Change: Renumber as Specific Condition 15.

SPECIFIC CONDITION 19

Requested Change: Renumber as Specific Condition 16 and revise to read as follows:

16. This source shall comply with all requirements of 40 CFR 60, Subpart GG and F.A.C. Rule 17-296.800, standards of performance for Stationary Gas Turbines. Continuous emission monitoring system (CEMS) data may be used in lieu of monitoring of water/fuel ratio except when 100% fuel oil is fired.

Rationale: With the DLN combustors, no water or steam injection is utilized for NO_x control when the combustion turbine is firing natural gas. The fully-certified CEMS for NO_x provide far superior monitoring data and the Subpart GG NSPS do not preclude this approach.

SPECIFIC CONDITION 20 & 21

Requested Change: Renumber as Specific Conditions 17 & 18.

SPECIFIC CONDITION 22

Requested Change: Renumber as Specific Condition 19 and revise to read as follows:

19. Pursuant to F.A.C. Rule 17-2.210(2), Air Operating Permits, the permittee is required to submit annual reports on the actual operating rate and emissions from the facility. These reports shall include, but are not limited to, the following: sulfur, nitrogen content and lower heating value of the fuel oil being fired, fuel usage, hours of operation, air emissions limits, etc. Annual reports shall be sent to the Department's Central District office.

Rationale: Clarifies that reporting should refer only to fuel oil, as there is no justification for daily recording of sulfur, nitrogen content and lower heating value for natural gas.

SPECIFIC CONDITIONS 23 & 24

Requested Change: Renumber as Specific Conditions 20 & 21.

TABLES 1, 2, 3 & 4

Requested Change: Replace with new Table 1.

Rationale: See letter to Clair Fancy dated December 7, 1994.

IN GENERAL

Requested Change: Update all Chapter 17-2 citations to reflect renumbering of 17-200 series Rules. Update all references to "Department of Environmental Regulation" to reflect change to "Department of Environmental Protection".

TABLE 1
ALLOWABLE EMISSION LIMITS

Pollutant	Standards		Gas Turbine and HRSG Tons Per Year ^{(a)(b)}	Basis
	Gas Firing	No. 2 Fuel Oil Firing		
NOx ^(c)	25 ppmvd at 15% oxygen on a dry basis	65 ppmvd at 15% oxygen on a dry basis	278.8	BACT
SO ₂	Natural gas as fuel	0.25 percent S by weight	130	BACT
PM	0.006 lb/MMBtu	0.025 lb/MMBtu	19.1	BACT
VOC	0.0112 lb/MMBtu	0.0113 lb/MMBtu	20.7	BACT
CO	0.0224 lb/MMBtu	0.0226 lb/MMBtu	43.4	BACT
Mercury (Hg)		3.0 x 10 ⁻⁶ lbs/MMBtu	0.0015	Est. by Appl.
Lead (Pb)		2.8 x 10 ⁻⁵ lbs/MMBtu	0.014	Est. by Appl.
Beryllium (be)		2.5 x 10 ⁻⁶ lbs/MMBtu	0.0012	BACT
Sulfuric				
Acid Mist	Natural gas as fuel	8.1 x 10 ⁻³ lbs/MMBtu	3.9	BACT

(a) Tons per year figures based on 75 percent capacity factor for gas-firing; 25 percent capacity factor for oil firing.

(b) Based on following heat input rates:

Based Load (gas): 414 MMBtu/hr

Base Load (oil): 438 MMBtu/hr

(c) The following equation shall be used to determine the emission limit applicable during co-firing of natural gas and No. 2 fuel oil:

$$\text{Emission limit} = \frac{(A1 \times A2) + (B1 \times B2)}{A2 + B2}$$

Where:

A1 = Emission Stand for Natural Gas Firing

A2 = Heat Input of Natural Gas

B1 = Emission Standard for No. 2 Fuel Oil Firing

B2 = Heat Input of No. 2 Fuel Oil

ATTACHMENT "B"

**CITY OF VERO BEACH
AC 31-184928**

COMPARISON

Pollutant	Old Table 2^{(a)(b)} TPY	New Table 1^{(a)(c)} TPY	Change TPY
NOx	278.8	278.8	0
SO2	131.9	130	-1.9
PM	19.16	19.1	-0.06
VOC	21.9	20.7	-1.2
CO	43.8	43.4	-0.04
Mercury (Hg)	0.0015	0.0015	0
Lead (Pb)	0.014	0.014	0
Beryllium (Be)	0.0012	0.0012	0
Sulfuric Acid Mist	3.939	3.9	-0.039

(a) Tons per year figures based on 75 percent capacity factor for gas-firing; 25 percent capacity factor for oil firing.

(b) Based on following heat input rates:
Based Load (gas) : 446 MMBtu/hr
Base Load (oil) : 443 MMBtu/hr

(c) Based on following heat input rates:
Based Load (gas) : 414 MMBtu/hr
Base Load (oil) : 438 MMBtu/hr

ATTACHMENT "C"

CITY OF VERO BEACH
AC 31-184928

COMPARISON

Design Parameter	Current Permit (Standard Combustors)	Revised (DLN combustors)	Net Change
Heat Input	Gas: 446 MMBtu/hr Oil: 443 MMBtu/hr	Gas: 414 MMBtu/hr Oil: 438 MMBtu/hr	Decrease Decrease
Exhaust Flow	Gas: 1,121,000 lbs/hr Oil: 1,125,000 lbs/hr	Gas: 1,100,000 lbs/hr Oil: 1,119,000 lbs/hr	Decrease Decrease

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 PSD-FL-152
 Unit #5, Vero Beach Power Plant

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 City of Vero Beach
 Municipal Power Plant
 R.O. Box 1389
 Vero Beach, FL 32961

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7. Date of Delivery
10-24-94

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

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George Young

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Secretary

October 20, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Mike Siefert
City of Vero Beach
Municipal Power Plant
Post Office Box 1389
Vero Beach, Florida 32961

RE: Request to Amend Construction Permit
AC 31-184928 (PSD-FL-152)
Vero Beach Municipal Power Plant, Unit #5

Dear Mr. Siefert:

The Department has reviewed your response (received September 20, 1994) to our July 27, 1994 letter. Subsequent to our review of the responses and to complete our review of the subject request, please provide the following information:

- 1) Can the newly installed dry low NO_x burners (DLNB's) fire more distillate fuel oil and natural gas (i.e., gals/hr and cf/hr) than the original installed burners? If so, please describe and provide the details as to why the DLNB's can fire more fuel.
- 2) Is the combustion chamber that was recently installed with the DLNB larger than the one that was originally installed. If so, please describe and provide dimensional information.
- 3) If the answer is yes to #1 and/or #2 above, please calculate the potential pollutant emissions to reflect these changes.
- 4) If the answer is yes to #1 and/or #2 above, please have a new certification of completion submitted by the PE of record denoting all modifications made to the emission unit.
- 5) If the answer is yes to #1 and/or #2 above, the new information must be submitted on an application form and the processing fee is to be based on the net change between the original actuals and future potential/allowables, with a minimum of \$250.
- 6) In addition to #5 above, to acquire higher allowable emission rates and heat input will require the Department to re-evaluate the Technical Evaluation, BACT, and the permit with regard to the emissions review requirements and permitting requirements.

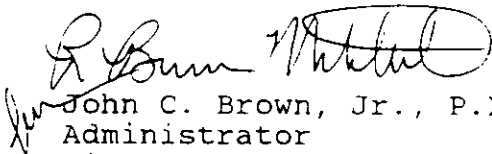
Mr. Mike Siefert
October 20, 1994
Page 2 of 3

In order to obtain federally enforceable permit limitations, an Intent package will require Public Notice. Therefore, and again, the Department will require the submittal of an application and processing fee for the proposed agency action.

- 7) Were NO_x and PM the only pollutant concentrations determined during the compliance test on January 1994? If not, provide the test results for all the pollutants specified in Specific Conditions No. 10 and No. 12. Provide all emission calculations, including assumptions and operating parameters (i.e., fuel consumption in cu. ft./hr and gals/hr and total hours at these consumption rates, volumetric flow rate(s), velocities and etc.), used to derive the emission values. If different from the permitted firing rate, provide data for firing distillate fuel oil and natural gas at the maximum consumption rate with the installation of the DLNB's.
- 8) Provide a detailed description of the DLNB's, new water injection system, and associated piping/ducts. Are the DLNB's capable of firing more fuel (natural gas and distillate fuel oil) at higher consumption rates? If so, provide a comparison, based on actuals, between the new and old burners. What process and chemicals, if any, are used to emulsify the water and distillate fuel oil for injection?

If you have questions concerning these comments, please direct them to Charles Logan at (904) 488-1344 or write to me at the above address..

Sincerely,


John C. Brown, Jr., P.E.
Administrator
Air Permitting and Standards

JCB/CL/bb

cc: C. Collins, CD
D. Beason, Esq., DEP
J. Harper, EPA
J. Bunyak, NPS
P. Cunningham, Esq., HBG&S
G. Perko, Esq., HBG&S

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- 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:
 Mr. Mike Siefert
 City of Vero Beach
 Municipal Power Plant
 Post Office Box 1389
 Vero Beach, Florida 32961

4a. Article Number
 R Z 751 859 986

4b. Service Type
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

7. Date of Delivery
 10-11-94

5. Signature (Addressee)

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

6. Signature (Agent)
George Young

PS Form 3811, December 1991 *U.S. GPO: 1992-323-402

DOMESTIC RETURN RECEIPT

Thank you for using Return Receipt Service.

Z 751 859 986



Receipt for Certified Mail

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

PS Form 3800, March 1993

Sent to Mr. Mike Siefert	
Street and No. Post Office Box 1389	
P.O., State and ZIP Code Vero Beach, FL 32961	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date Mailed: 10/07/94 AC 31-184928, PSD-FL-152	