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W. ROBERT FOKES

June 30, 1994

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

RECEIVED

JUN 30 1994

Bureau of
Air Regulation

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

Dear Mr. Fancy:

I am writing on behalf of the City of Vero Beach (the City) to request amendment of the referenced air construction permit for the 60MW combined cycle Unit 5 at its Municipal Power Plant. The primary reasons for the requested amendments are: 1) to update permit conditions to reflect that Dry Low NOx combustors have been installed; 2) to revise certain figures based on the original Unit design to reflect the Dry Low NOx combustor configuration; 3) to allow limited operation in "peak load" mode firing natural gas.

The construction permit for Unit 5, issued June 28, 1991, imposed emission limitations and other conditions based on the original design for the General Electric Frame 6 combustion turbine. 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, with more stringent NOx emission limits in effect thereafter. For the low NOx combustor alternative, the NOx emission limit is 25 ppm on natural gas, and either 42 ppm or 65 ppm on No. 2 fuel oil. Oil use depends upon the NOx emission rate achieved during oil firing, with the annual capacity factor on oil limited to 25 percent unless the 42 ppm NOx emission rate is met, in which case the annual oil capacity factor is raised to 33 percent.

Dry Low NOx (DLN) combustors were installed in the Unit 5 combustion turbine in the fall of 1993. This is one of the first retrofit applications of GE's DLN combustor technology in a Frame 6 machine. Emissions compliance testing of Unit 5 with the DLN combustors was

concluded in January 1994, and test reports demonstrating NOx emissions below 25 ppm on gas and 42 ppm on oil, and compliance with all other applicable emission limits, were forwarded to the Department on February 25, 1994. Continuous emission monitoring system data indicate Unit 5 is operating with NOx emissions below the 25 ppm limit on an continuous basis.

Retrofit of the DLN combustors has resulted in changes in several basic design parameters as compared to the original design on which the current air construction permit was based. For example, with the original design, maximum permitted heat input (reflecting "peak load" operation) was 446 MMBtu/hr (gas) and 443 MMBTU/hr (oil) at ISO conditions, as reflected in Specific Condition 7. of the permit. With DLN combustors, maximum heat input in "base load" operation is 414 MMBtu/hr (gas) and 455 MMBtu/hr (oil), and, for the "peak load" mode, 442 MMBtu (gas). While NOx emissions during "base load" operation have been demonstrated to comply with the permit emission limits (25 ppm on gas, 42 ppm on oil), General Electric projects a NOx emission rate of up to 60 ppm in the "peak load" mode, due to the increase in firing temperatures above the normal design parameters for the DLN combustors.

"Peak load" operation results in an additional 3 megawatts of generation for short periods of time. "Peak load" operation also causes the machine to deteriorate at a much faster rate than "base load", effectively shortening the life of the combustion turbine. It is neither desirable nor economically advantageous to operate at "peak load." In fact, General Electric does not endorse "peak load" operation in the City's Frame 6 machine because of potential effects on integrity and durability.

As discussed at a June 1, 1994 meeting with Preston Lewis, Teresa Herron and Doug Beason, the City would like to have the authority to operate Unit 5 in the "peak load" mode only during "emergency conditions." The City has an obligation to its customers and the other generating utilities in the Statewide grid system to provide reliable power at all times. The City feels that there are three critical circumstances that justify "peak load" operation:

1. Natural disasters such as a hurricanes and severe winter storms which could result in either City or Statewide brownouts or rolling blackouts.

2. Equipment failures, such as the loss of transmission lines within the City's territory or a forced outage of another generating unit, which would result in a brownout or blackout situation for City customers.

3. The loss of transmission lines into the State (the State imports thousands of megawatts daily from the State of Georgia) or within the State which would result in a brownout or blackout situation for City customers or possibly another utility within the State.

"Peak load" operation is to be used as an emergency measure to provide electrical power when all other measures are insufficient to meet load conditions and the City is unable to fulfill obligations to its customers, especially in times of extreme cold or heat, which could place many customers in jeopardy. Conceivably, the City may never have to utilize this mode of operation, but power generation is an unpredictable business. All emergencies that may require "peak load" operation will not be of Statewide nature but will still pose sufficient danger to warrant that option. In the case of a natural disaster, there may not be sufficient time and communication channels to allow pre-approval from the State for "peak load" operation. It should be noted that "peak load" will not be used for economic reasons or due to poor planning in advance for sufficient generation.

As discussed at the June 1st meeting, the City is prepared to accept a decrease in annual oil use (from 33 percent annual capacity factor to 25 percent annual capacity factor) if up to 400 hours of operation in the "peak load" mode is allowed under "emergency conditions." Maximum annual emissions under this scenario would decrease for all pollutants compared to current permit limits, as shown on Attachment "A". Moreover, the projected 60 ppm NOx emission rate for "peak load" is below the 65 ppm rate currently allowed in the permit for oil operation with a 25 percent capacity factor.

The City would be willing to conduct a compliance test on the CT at "peak load" to determine NOx emissions levels. Following the initial compliance test, the City proposes that if "peak load" is not utilized for more than 400 hours in a federal fiscal year, testing at "peak load" conditions should not be required. If the 400 hours were exceeded in any fiscal year, the City would test at "peak load" for NOx emissions during the next scheduled annual compliance test. Even if the 400 hours are not exceeded during any year over the five term year of an air operation permit, the City would be willing to test at "peak load" for NOx emissions prior to operation permit renewal. If a Department representative were to visit to the facility, the inspector would be able to see if the CT were at "Base Load", "Peak Load", Partial Load or even off line by observing the main screen used by plant staff to operate the CT.

All revisions to the Unit 5 air construction permit requested by the City are listed in Attachment "B", along with the rationale for each suggested change. The new "Table 1", replacing current Tables 1 through 4, would allow up to 400 hours of "peak load" operation while reducing maximum annual emissions.

Provided herewith as the air construction permit amendment fee is our firm's check no. 13122 in the amount of $7,500.

The Department's continued consideration with respect to this permit is greatly appreciated. Should you or members of your staff have any questions regarding the requested permit amendments, please do not hesitate to call Mike Siefert at (407)562-7231, Gary Perko or me.

Sincerely,

Peter C. Cunningham
Gary V. Perko

PCC/jam
Enclosure

cc: Preston Lewis, DARM/BAR
Teresa Heron, DARM/BAR
Chuck Collins, DEP Central District
Doug Beason, OGC
Shuler Massey, City of Vero Beach
Mike Siefert, City of Vero Beach
C. Holladay
G. Harper, EPA
G. Bumpass, NPS

ATTACHMENT "A"

CITY OF VERO BEACH
AC 31-184928

COMPARISON

Pollutant	Old Table 2, 3 Combined TPY	New Table 1[(a)(b)(c)] TPY
NOx	278.8 (T2)	239
SO2	173.6 (T3)	135
PM	21.79	20.6
VOC	21.9	20.9
CO	43.8	41.8
Mercury (Hg)	0.0019 (T3)	0.0015
Lead (Pb)	0.018 (T3)	0.014
Beryllium (Be)	0.0016 (T3)	0.0013
Sulfuric Acid Mist	5.2 (T3)	4.04

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

(b) Tons per year figures based on 400 hours Peak Load operation on gas annually.

(c) Based on following heat input rates:
Based Load (gas) : 414 MMBtu/hr
Peak Load (gas) : 442 MMBtu/hr
Base Load (oil) : 455 MMBtu/hr

June 29, 1994

ATTACHMENT "B"

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 NOx (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 455 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, except during "Peak Load" operation as allowed during "emergency conditions" pursuant to Specific Condition 6.

- Maximum heat input during "Peak Load" operation shall not exceed 442 MMBtu/hr (gas), 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. Provides heat input rate for limited operation in "Peak Load" mode on gas.

NEW SPECIFIC CONDITION 6

Requested Change: Add new Specific Condition 6 to read as follows:

6. Operation of the Unit 5 combustion turbine in the "Peak Load" mode shall be allowed for up to 400 hours per year only during demonstrated "emergency conditions." "Emergency conditions" exist in the following circumstances when "Peak Load" operation is necessary to provide electrical power and all other measures are insufficient to meet load conditions:

a. Natural disasters such as a hurricanes and severe winter storms which could result in either City or statewide brownouts or rolling blackouts.

b. Equipment failures, such as the loss of transmission lines within the City's territory or a forced outage of another generation unit, which would result in a brownout or blackout situation for City customers.

c. The loss of transmission lines into the State or within the State which would result in a brownout or blackout situation for City customers or another utility within the State.

Rationale: See discussion in Peter Cunningham's letter to Clair Fancy dated June 29, 1994

SPECIFIC CONDITIONS 8 & 9

Requested Change: Renumber as Specific Conditions 7 & 8.

SPECIFIC CONDITION 10

Requested Change: Renumber as Specific Condition 9 and revise to read as follows:

9. Initial (I) compliance tests shall be performed on the CT using both fuels. Initial (I) NOx compliance testing shall also be performed with the CT firing in the "Peak Load" mode within 180 days after issuance of the permit amendment authorizing "Peak Load" operation. 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 and in the "Peak Load" mode during any federal fiscal year, in which the CT operates in that mode. 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 NOx (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 provides for "Peak Load" testing 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 10 & 11.

SPECIFIC CONDITION 13

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

> 12. 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 13 and revise as follows:

> 13. 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 14 and revise as follows:

> 14. 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 15 and revise to read as follows:

> 15. 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 16.

SPECIFIC CONDITION 19

Requested Change: Renumber as Specific Condition 17 and revise to read as follows:

> 17. 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 NOx control when the combustion turbine is firing natural gas. The fully-certified CEMS for NOx 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 18 & 19.

SPECIFIC CONDITION 22

Requested Change: Renumber as Specific Condition 20 and revise to read as follows:

> 20. 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 21 & 22.

TABLES 1, 2, 3 & 4

Requested Change: Replace with new Table 1.

Rationale: See Peter Cunningham's letter to Clair Fancy dated June 29, 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)(c)]	Basis
	Gas Firing	No. 2 Fuel Oil Firing		
NOx - Base Load[(d)]	25 ppmvd at 15% oxygen on a dry basis	42 ppmvd at 15% oxygen on a dry basis	239	BACT
NOx - Peak Load	60 ppmvd at 15% oxygen on a dry basis	NA		
SO_2	Natural gas as fuel	0.25 percent S by weight	135	BACT
PM	0.006 lb/MMBtu	0.025 lb/MMBtu	20.6	BACT
VOC	0.0112 lb/MMBtu	0.0113 lb/MMBtu	20.9	BACT
CO	0.0224 lb/MMBtu	0.0226 lb/MMBtu	41.8	BACT
Mercury (Hg)		3.0×10^{-6} lbs/MMBtu	0.0015	Est. by Appl.
Lead (Pb)		2.8×10^{-5} lbs/MMBtu	0.014	Est. by Appl.
Beryllium (be)		2.5×10^{-6} lbs/MMBtu	0.0013	BACT
Sulfuric Acid Mist	Natural gas as fuel	8.1×10^{-3} lbs/MMBtu	4.04	BACT

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

(b) Tons per year figures based on 400 hours Peak Load operation on gas annually.

(c) Based on following heat input rates:
Based Load (gas) : 414 MMBtu/hr
Peak Load (gas) : 442 MMBtu/hr
Base Load (oil) : 455 MMBtu/hr

(d) 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

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June 30, 1994

BY HAND DELIVERY

RECEIVED

JUN 30 1994

Bureau of
Air Regulation

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

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

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 17-4.080(3) F.A.C. The current expiration date for the permit is June 30, 1994, in accordance with Division Director Rhodes' letter of April 5, 1994. By separate letter of today's date, the City is requesting amendment of the construction permit to clarify and simplify certain of the permit conditions. Representatives of the City met with Preston Lewis, Teresa Herron and Doug Beason on June 1, 1994 to discuss the proposed amendments.

The City hereby requests a further extension of the permit expiration date until September 30, 1994, to allow sufficient time for consideration of the proposed amendments. A check in the amount of fifty dollars ($50.00) is enclosed, pursuant to Rule 17-4.050(4)(q)3, F.A.C.

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. The City recognizes that all current construction permit conditions will remain in effect if the expiration date extension is approved. As discussed in our recent meeting, resolution of the construction permit issues will help to facilitate issuance of a mutually acceptable air operation permit for Unit 5.

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 me.

Sincerely,

Peter C. Cunningham
Gary V. Perko

cc: Mr. Preston Lewis
Ms. Teresa Herron
Mr. Charles Collins
Mr. Doug Beason, Esq.
Mr. Shuler Massey
Mr. Mike Siefert
C. Holladay
J. Harper
J. Bunyak