

**BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

CITY OF VERO BEACH, Municipal)	
Power Plant, Unit 5,)	
)	
Petitioner,)	
)	
vs.)	OGC CASE NO. 93-4099
)	
STATE OF FLORIDA DEPARTMENT OF)	
ENVIRONMENTAL PROTECTION,)	
)	
Respondent.)	
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REQUEST FOR EXTENSION OF TIME

Petitioner, CITY OF VERO BEACH ("City"), by and through undersigned counsel, hereby requests an extension of time, through and until September 30, 1994, to file a petition for formal administrative proceedings in accordance with Section 120.57(1), Florida Statutes, in response to a proposed air operation permit for Unit 5, a 60 MW combined cycle gas turbine located at the Vero Beach Municipal Power Plant in Indian River County [Permit No. A031-227564]. This request for an extension of time is filed pursuant to Rule 17-103.070, Florida Administrative Code. In support of the request, the City states:

1. On or about October 14, 1993, the City received the Department's Notice of Permit Issuance for the above-referenced permit. By Order dated April 13, 1994, the Department extended the deadline for filing a petition for formal administrative proceedings on the proposed permit to June 30, 1994.

2. The above-referenced permit contains thirty-one (31) specific conditions, several of which appear to require

modification or clarification. Among other things, several permit conditions have been rendered obsolete by installation of new low-NOx burners in accordance with the construction permit issued for the Unit 5 on June 28, 1991. [Permit No. AC 31-184928].

3. Additional time is needed to allow representatives of the City and the Department to confer about revisions to the existing construction permit and proposed operation permit, including those rendered necessary by the recent installation of the low NOx burner system. In that regard, the City has applied for an extension of the construction permit through and until September 30, 1994, to allow the parties to develop mutually acceptable permit language.

4. This request is filed simply as a protective measure to avoid waiver of the City's right to challenge the objectionable permit conditions. Grant of this request will not prejudice either party, but will further their mutual interest and likely avoid the need to initiate formal administrative proceedings.

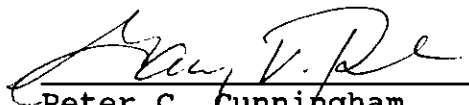
5. I hereby certify that I have conferred with W. Douglas Beason of the Department's Office of General Counsel, and have been authorized to state that Mr. Beason does not object to the requested extension.

WHEREFORE, Petitioner respectfully requests that the Department enter an order granting it through and until September 30, 1994, to file a petition for formal administrative proceedings regarding the Department's Air Operation Permit No. A031-227564.

Respectfully submitted this 30th day of June, 1994.

HOPPING BOYD GREEN & SAMS

BY:



~~Peter C. Cunningham~~
Gary V. Perko
Post Office Box 6526
123 South Calhoun Street
Tallahassee, FL 32314

Attorneys for Petitioner, CITY OF
VERO BEACH.

CERTIFICATE OF SERVICE

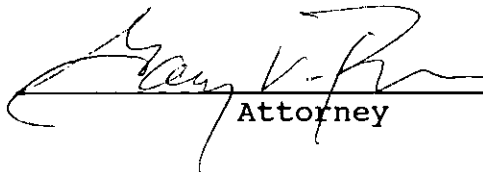
I HEREBY CERTIFY that the original and one true and correct copy of the foregoing motion was hand-delivered to Kathy Carter, Clerk, Department of Environmental Protection, 2600 Blair Stone Road, Room 672, Tallahassee, Florida 32399-2400, and a true and correct copy was sent to the following this 30th day of June, 1994.

BY HAND-DELIVERY

Douglas Beason, Esquire
Office of General Counsel
Department of Environmental Protection
2600 Blair Stone Road, Room 668C
Tallahassee, Florida 32399-2400

BY U.S. MAIL

Alex Alexander, P.E.
Director of District Management
Department of Environmental Protection
Central Florida District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803



Attorney

Vero Beach

6/1/94

<u>Name</u>	<u>Representing</u>	<u>Telephone</u>
Preston Lewis	FDEP - AIR	(904) 488-1344
Teresa Heron	FDEP - AIR	(904) 488-1344
MIKE ZIEFERT	CITY of VERO BEACH	(407) 562-7231
PETER CUNNINGHAM	HSBS/VERO BEACH	(904) 222-7500
Shuler W. Moore	City of Vero Beach, FL.	(407) 562-7231
W. DALLAS BROWN	DEP/OBC	(904) 488-9730

**NEW TABLE 1
ALLOWABLE EMISSION LIMITS**

Pollutant	Standards		Gas Turbine and HRSG Tons Per Year ^(a)	Basis
	Gas Firing	No. 2 Fuel Oil Firing		
NO _x - Base Load	25 ppmvd at 15% oxygen on a dry basis	42 ppmvd at 15% oxygen on a dry basis	239	BACT
NO _x - 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 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	0.0013	BACT
Sulfuric Acid Mist	Natural gas as fuel	8.1 x 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

COMPARISON

75% CF

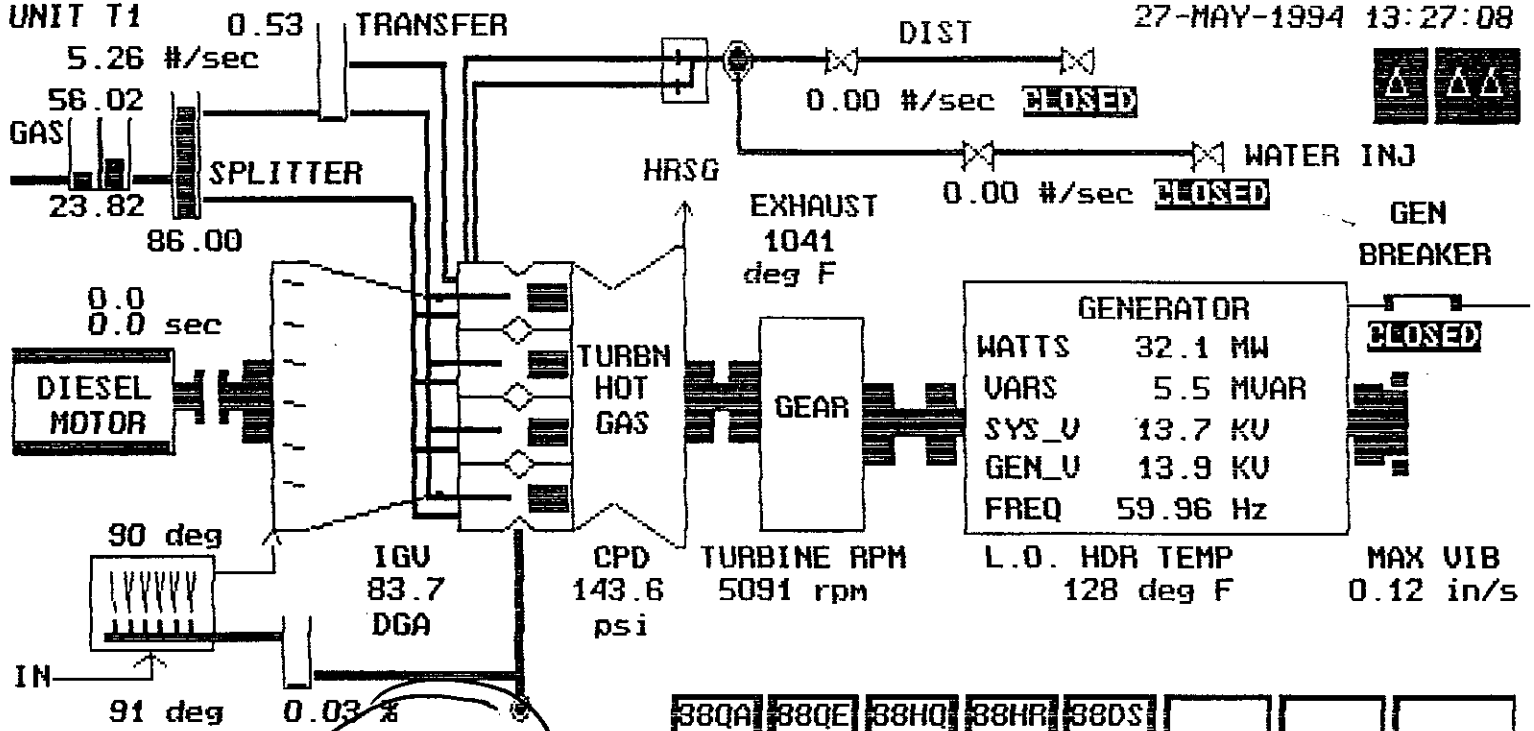
Pollutant	Old Table 2, 3 Combined TPY	New Table 1 TPY
NOx	278.8 (T2)	239
SO2	173.6 (T3)	135
PM	21.79	20.6
VOC	21.9	20.9
CO	43.8	41.8
Mercury (Hg)	0.0019 (T3)	0.0015
Lead (Pb)	0.018 (T3)	0.014
Beryllium (Be)	0.0016 (T3)	0.0013
Sulfuric Acid Mist	5.2 (T3)	4.04

- (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

VERO BEACH
UNIT T1

City of Vero Beach

27-MAY-1994 13:27:08



NORMAL	RUN STATUS
SELECT2	BASE LOAD
STATUS_FLD	#E#F#G#H
FSR_CONTROL	PRMIX STEADY STATE
FLAME	2008 deg F
FLAME_S	46 deg F
SPEED_LVL	99.95 %
DLN_MODE	%
FIRING_TEMP	
EXH_SPREAD	
TURB_SPEED	
FSR	
MSG_FLD1	
MSG_FLD2	
MSG_FLD3	
FX1	%SPLT

38QA	38QE	38HQ	38HR	38DS			
MASTER SELECT							27.0
OFF	CRANK	FIRE			PRESELECT LOAD		
LOAD CONTROL				MASTER CONTROL			
PRESEL LOAD		PEAK LOAD		START	FAST START	STOP	
FUEL SELECTION				MASTER RESET			
		DIST		MASTER RESET			
SPEED/LOAD CONTROL				GOVERNOR MODE			
RAISE		LOWER				ISOCH	

EXIT	MORE OPTIONS	HOT SPOTS	SAVE IMAGE	PRINT IMAGE	ALARM DISPLAY	MAIN DISPLAY
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