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October 21, 2002

HAND DELIVERED

Scott M. Sheplak, P.E. Bureau of Air Regulation Florida Department of Environmental Protection 2600 Blairstone Road Mail Station #5505 Tallahassee, Florida 32399-2400

RECEIVED

OCT 21 2002

Re: Draft Title V Air Operation Permit - Comments

Draft Permit No. 0730003-003-AV Arvah B. Hopkins Generating Station

Facility ID No. 0730003

**BUREAU OF AIR REGULATION** 

Dear Mr. Sheplak:

The City of Tallahassee submits the attached comments to the Florida Department of Environmental Protection regarding Draft Title V Air Operation Permit No. 0730003-003-AV for the Arvah B. Hopkins Generating Station. An electronic copy of the comments is also attached for your review and convenience.

The following comments are submitted within thirty (30) days from the date of publication of the Public Notice of Intent to Issue Title V Air Operation Permit Renewal (Public Notice) pursuant to Rule 62-213.430, Florida Administrative Code (F.A.C.), and as required by the Public Notice.

Permit text requested to be added has been marked in bold red and underlined. Draft permit text requested to be deleted is marked in bold red with strikethrough. These requested revisions will not result in a significant change in the terms or conditions of the Draft permit and therefore will not require the issuance and renoticing of a revised Draft permit pursuant to Rule 62-213.430, F.A.C., and the Public Notice.

An All-America City

Scott Sheplak Page 2 October 21, 2002

Please do not hesitate to contact me at 891-5534, or Jennette Curtis, Environmental Director at 891-8850, if you have any questions or require additional information.

Sincerely

Robert E. McGarrah

Manager of Power Production

Responsible Official

#### **Attachments**

cc: Jonathan Holtom, FDEP

Jennette Curtis, COT Triveni Singh, COT John Powell, COT

Environmental Resources\Air Folders\Correspondence\McGarrah to Sheplak - Ltr re Revisions to Hopkins Draft TV App (10-7-02)

# **STATEMENT OF BASIS**

City of Tallahassee
Arvah B. Hopkins Generating Station
Facility ID No.: 0730003
Leon County

Title V Air Operation Permit Renewal **Permit No.:** 0730003-003-AV

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. 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 permitting authority, in accordance with the terms and conditions of this permit.

This facility consists of two fossil fuel-fired steam generators and two fossil fuel fired combustion turbines. The two steam generators are Phase II Acid Rain Units. Boiler Number 2 is regulated under the Florida Electrical Power Plant Siting Act. The total (nominal) combined electrical generating capacity from the facility is 356.27 megawatts electric (MW), of which, 313 MW are provided by the steam generators and 43.27 MW are provided by the combustion turbines. The fuels used at this facility are natural gas, fuel oil, on-specification used oil, and various any combinations thereof fuel oil. With the issuance of this permit, the Department is formally recognizing the facility's historical ability to utilize liquefied petroleum gas (LPG) as an igniter fuel for the fuel oil during periods of natural gas curtailment. Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Emissions unit number 001 is a Foster-Wheeler Corporation fossil fuel fired steam generator (model number SF-5) designated as "Boiler Number 1". It is rated at a maximum heat input of 903 million Btu per hour (MMBtu/hour) when firing natural gas or fuel oil and a nominal 75 MW and 750,000 pounds of steam per hour.

Emissions unit number 004 is a Babcock & Wilcox steam generator (model number RB-533) designated as "Boiler Number 2". It is rated at a maximum heat input of 2,325 million Btu per hour (MMBtu/hour) when firing fuel oil and 2,500 MMBtu/hour when firing natural gas and a nominal 238 MW and 1,619,000 pounds of steam per hour.

Emissions unit number 002 is a combustion turbine manufactured by Westinghouse (model number W191G) and is designated as "Combustion Turbine Number 1". It is rated at a maximum heat input of 228 million Btu per hour (MMBtu/hour) while being fueled by natural gas and/or No. 2 fuel oil with a maximum fuel oil sulfur content of 0.4%, by weight. Emissions unit number 003 is a combustion turbine manufactured by Westinghouse (model number W251G) and is designated as "Combustion Turbine Number 2". It is rated at a maximum heat input of 446 million Btu per hour (MMBtu/hour) while being fueled by natural gas and/or No. 2 fuel oil with a maximum fuel oil sulfur content of 0.4%, by weight. Combustion Turbine Number 1 runs a nominal 16.47 MW generator and Combustion Turbine Number 2 runs a nominal 26.8 MW generator. Emissions from the combustion turbines are uncontrolled.

Based on the Title V permit renewal application received July 1, 2002, this facility is a major source of hazardous air pollutants (HAPs).

# City of Tallahassee Arvah B. Hopkins Generating Station Facility ID No.: 0730003 Leon County

## Title V Air Operation Permit Renewal

**DRAFT Permit No.: 0730003-003-AV** 

Renewal of Title V Air Operation Permit No.: 0730003-001-AV

## **Permitting Authority**

State of Florida

Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
Title V Section

Mail Station #5505 2600 Blair Stone Road Tallahassee, Florida 32399-2400

> Telephone: 850/488-0114 Fax: 850/922-6979

# Title V Air Operation Permit Renewal

**DRAFT Permit No.:** 0730003-003-AV

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Permittee:

City of Tallahassee 300 South Adams Street Tallahassee, Florida 32301 **DRAFT Permit No.:** 0730003-003-AV

Facility ID No.: 0730003 SIC Nos.: 49, 4911

**Project:** Title V Air Operation Permit Renewal

This permit is for the operation of the Arvah B. Hopkins Generating Station. This facility is located at Route 4, Box 450, 1125 Geddie Road (County Road 1585), Tallahassee, Leon County.

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. 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 permitting authority, in accordance with the terms and conditions of this permit.

#### Referenced attachments made a part of this permit:

Appendix I-1, List of Insignificant Emissions Units and/or Activities
Appendix U-1, List of Unregulated Emissions Units and/or Activities
Phase II Acid Rain Permit Application/Compliance Plan Received July 1, 2002
Appendix SS-1, Stack Sampling Facilities (version dated 10/7/96)
Appendix TV-4, Title V Conditions (version dated 2/12/02)
ASP Number 97-B-01
Scrivener's Order Correcting ASP Number 97-B-01 (dated July 9, 1997)

Effective Date: January 1, 2003

Renewal Application Due Date: July 5, 2007

Expiration Date: December 31, 2007

Howard L. Rhodes, Director,
Division of Air Resource Management

HLR/sms/jh

## Section I. Facility Information.

DRAFT Permit No.: 0730003-003-AV

Facility ID No.: 0730003

#### Subsection A. Facility Description.

This facility consists of two fossil fuel-fired steam generators and two fossil fuel fired combustion turbines. The two steam generators are Phase II Acid Rain Units. Boiler Number 2 is regulated under the Florida Electrical Power Plant Siting Act. The total (nominal) combined electrical generating capacity from the facility is 356.27 megawatts electric (MW), of which, 313 MW are provided by the steam generators and 43.27 MW are provided by the combustion turbines. The fuels used at this facility are natural gas, fuel oil, on-specification used oil, and various any combinations thereof fuel oil. Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Based on the Title V permit renewal application received July 1, 2002, this facility is a major source of hazardous air pollutants (HAPs).

#### Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

#### Regulated Emissions Units:

E.U. ID	
No.	Brief Description
-001	Boiler Number 1: 903 MMBtu/hour (Phase II Acid Rain Unit)
-002	Combustion Turbine Number 1, 228 MMBtu/hour
-003	Combustion Turbine Number 2, 446 MMBtu/hour
-004	Boiler Number 2: 2,325 - 2,500 MMBtu/hour (Phase II Acid Rain Unit)

#### <u>Unregulated emissions Units and/or Activities (See Appendix U-1):</u>

E.U. ID No.	Brief Description
-005 -006	Fugitive VOC Sources - Painting Operations General Purpose Engines
-007	Emergency Generators

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID Number(s). on all correspondence, test report submittals, applications, etc.

#### Subsection C. Relevant Documents.

The following documents are part of this permit:

Appendix I-1, List of Insignificant Emissions Units and/or Activities

Appendix U-1, List of Unregulated Emissions Units and/or Activities

Phase II Acid Rain Permit Application/Compliance Plan Received July 1, 2002

Appendix SS-1, Stack Sampling Facilities (version dated 10/7/96)

Appendix TV-4, Title V Conditions (version dated 2/12/02)

ASP Number 97-B-01

Scrivener's Order Correcting ASP Number 97-B-01 (dated July 9, 1997)

{Permitting Note: The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.}

DRAFT Permit No.: 0730003-003-AV

Facility ID No.: 0730003

These documents are provided to the permittee for information purposes only:

Appendix H-1, Permit History / ID Number Changes

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers (version dated 2/5/97)

Table 1-1, Summary of Air Pollutant Standards and Terms

Table 2-1, Summary of Compliance Requirements

These documents are on file with the permitting authority:

Title V Permit Renewal Application received July 1, 2002

Additional Information regarding insignificant emissions units received September 3, 2002

#### Subsection D. Miscellaneous.

The use of 'Permitting Notes' throughout this permit are for informational purposes <u>only</u> and are not permit conditions.

#### Section II. Facility-wide Conditions.

DRAFT Permit No.: 0730003-003-AV

Facility ID No.: 0730003

#### The following conditions apply facility-wide:

- Appendix TV-4, Title V Conditions (version dated 2/12/02), is a part of this permit. {Permitting note: Appendix TV-1, Title V Conditions is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or otherwise appropriate.}
- Not federally enforceable. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C.]
- Prevention of Accidental Releases (Section 112(r) of CAA).
- a. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:

**RMP** Reporting Center Post Office Box 3346 Merrifield, VA 22116-3346 Telephone: 703/816-4434

and.

- b. The permittee shall submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C. [40 CFR 68]
- Insignificant Exempt Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit. [Rules 62-213.440(1), 62-213.430(6), and 62-4.040(1)(b), F.A.C.]
- Unregulated Emissions Units and/or Activities. Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit. [Rule 62-213.440(1), F.A.C.]
- General Pollutant Emission Limiting Standards. Volatile Organic Compounds Emissions or Organic Solvents Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. Permitting Note: No vapor emission control devices or systems are deemed necessary nor ordered by the Department as of the issuance date of this permit.

[Rule 62-296.320(1)(a), F.A.C.]

7. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and or reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. [Rules 62-296.320(4)(b)1. & 4., F.A.C.]

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Facility ID No.: 0730003

- 8. Not federally enforceable. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:
  - a. Concrete mixing in the portable concrete mixer shall be operated on an as-needed basis. Reasonable precautions include enclosing the activity wherever practical.
  - b. Abrasive blasting activities that are associated with normal maintenance and corrosion control activities shall be enclosed where practical.
  - c. Unconfined emissions associated with the limited on-site traffic shall be controlled by limiting vehicle speeds and unnecessary traffic within the plant grounds.
  - d. Aggregate storage piles occur on a temporary basis associated with miscellaneous construction activities. Water is applied <u>on</u> an as-needed basis to control unconfined emissions from the handling and storage of the aggregate materials where practical.
  - e. Spray applications of surface coatings are associated with normal maintenance and corrosion activities. The activities are enclosed whenever practicable.

[Rule 62-296.320(4)(c)2., F.A.C.; and, proposed by applicant in Title V permit renewal application received July 1, 2002.]

{Permitting note: This condition implements the requirements of Rules 62-296.320(4)(c)1., 3., & 4., F.A.C. (see Condition No. 57. of APPENDIX TV-4, TITLE V CONDITIONS)}

- 9. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one. [Rule 62-213.440, F.A.C.]
- 10. The Department's Northwest District Branch Office (Tallahassee) telephone number for reporting problems, malfunctions or exceedances under this permit is 850/488-3704, day or night, and for emergencies involving a significant threat to human health or the environment is 850/413-9911. The Department's Northwest District Office (Pensacola) telephone number for routine business, including compliance test notifications, is 850/444-8364 during normal working hours.
- 11. The permittee shall submit all compliance-related notifications and reports required of this permit (other than Acid Rain Program Information) to the Department's Northwest District office:

Department of Environmental Protection Northwest District Office 160 Governmental Center Pensacola, Florida 32501-5794 Telephone: 850/595-8364

Fax: 850/595-8096

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Acid Rain Program Information shall be submitted, as necessary, to:

Department of Environmental Protection 2600 Blair Stone Road Mail Station #5510 Tallahassee, Florida 32399-2400 Telephone: 850/488-0114

Fax: 850/922-6979

12. Any reports, data, notifications, certifications, and requests (other than Acid Rain Program Information) required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency, Region 4
Air, Pesticides & Toxics Management Division
Air and EPCRA Enforcement Branch
Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303-8960
Telephone: 404/562-9155; Fax: 404/562-9163

#### Reporting Requirements.

13. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the Department and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C. [Rules 62-213.440(3) and 62-213.900, F.A.C.]

{Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. (see Condition 51. of APPENDIX TV-4, TITLE V CONDITIONS.}"

14. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information.

[Rule 62-213.420(4), F.A.C.]

#### DRAFT Permit No.: 0730003-003-AV Facility ID No.: 0730003

#### **Section III. Emissions Units and Conditions.**

#### Subsection A. This section addresses the following emissions unit.

#### E.U. ID

No. Brief Description

-001 Boiler Number 1 (Phase II Acid Rain Unit)

Emissions unit number 001 is a Foster-Wheeler Corporation fossil fuel fired steam generator (model number SF-5) designated as "Boiler Number 1". It is rated at a maximum heat input of 903 million Btu per hour (MMBtu/hour) when firing natural gas or fuel oil and a nominal 75 megawatt (electric) and 750,000 pounds of steam per hour.

{Permitting notes: This emissions unit is regulated under Acid Rain, Phase II. This emissions unit predates PSD regulations, but is regulated under Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators with more than 250 million Btu per Hour Heat Input. Stack height = 200 f-eet, exit diameter = 11.0 feet, exit temperature = 260.6 °F, actual volumetric flow rate = 223,755 acfm. Emissions from this boiler are uncontrolled. This unit began commercial operation in May of 1971.}

The following specific conditions apply to the emissions unit listed above:

#### Essential Potential to Emit (PTE) Parameters.

#### A.1. Permitted Capacity. The maximum operation heat input rate is as follows:

<u>Unit No.</u>	MMBtu/hr Heat Input	Fuel Type
-001	903	Natural Gas
	903	No. 2 - No. 6 Fuel Oil;
		On-Specification Used Oil

[Rules 62-4.160(2), 62-210.200(203 PTE) and 62-296.405, F.A.C.]

This heat input rate has been placed in this permit to identify the capacity of this unit during testing, to confirm that testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load). See Condition A.23. This rate is not a limit and therefore regular record keeping is not required. Instead the owner or operator is expected to determine the heat input rate whenever testing is required, to demonstrate at what percentage of the rated capacity that the unit is tested. Rule 62-297.310(5), F.A.C., included in this permit, requires measurement of the process variables for emission tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate the average hourly heat input during the test.

# **A.2.** Emissions Unit Operating Rate Limitation After Testing. See specific condition **A.23**. [Rule 62-297.310(2), F.A.C.]

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#### A.3. Methods of Operation.

- a. <u>Fuels</u>. The fuels that are allowed to be burned in this boiler are natural gas and/or new No. 2 through No. 6 fuel oil and/or on-specification used oil (See Specific Condition A.35.). In case of a natural gas curtailment, liquefied petroleum gas (LPG) may be used as an igniter fuel for the fuel oil
- b. Other. Fuel additives typically of a magnesium oxide, hydroxide, sulfonate, or calcium nitrate origin may be used.

[Rule 62-213.410, F.A.C.; and, Applicant's request in Title V permit renewal application dated July 1, 2002.]

**A.4.** Hours of Operation. This emissions unit may operate continuously, i.e. 8,760 hours/year. The permittee shall maintain an operation log available for Department inspection that documents the total hours of annual operation, including a detailed account of the hours operated on each of the allowable fuels

[Rule 62-210.200(203 PTE), F.A.C.; and, Permit No. 0730003-001-AV AO37-242825, Specific Condition A.4 #3.; and, applicant request in the Title V permit renewal application received July 1, 2002.]

#### Emission Limitations and Standards.

{Permitting Note: The attached Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

**Permitting note:** Unless otherwise specified, tThe averaging time for conditions A.5. – A.10. are based on the specified averaging run time of the applicable specified test method.

- A.5. <u>Visible Emissions</u>. Visible emissions shall not exceed 20 percent opacity, except for one two six minute period per hour during which opacity shall not exceed 40 27 percent [Rule 62-296.405(1)(a), F.A.C.]
- A.6. <u>Visible Emissions Soot Blowing and Load Change</u>. Visible emissions shall not exceed 60 percent opacity during the 3-hours in any 24-hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more. [Rule 62-210.700(3), F.A.C.]

A.7. <u>Particulate Matter</u>. Particulate matter emissions shall not exceed 0.1 pound per million Btu heat input, as measured by applicable compliance methods. [Rule 62-296.405(1)(b), F.A.C.]

A.8. Particulate Matter - Soot Blowing and Load Change. Particulate matter emissions shall not exceed an average of 0.3 pound per million Btu heat input during the 3-hours in any 24-hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

[Rule 62-210.700(3), F.A.C.]

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- A.9. <u>Sulfur Dioxide</u>. When burning liquid fuel, sulfur dioxide emissions shall not exceed 1.87 pounds per million Btu heat input, as measured by applicable compliance methods. [Rule 62-296.405(1)(c)1.h., F.A.C.]
- A.10. <u>Sulfur Dioxide</u>. For compliance purposes, the following limit supersedes the limit contained in **Specific Condition A.9.** Sulfur dioxide emissions shall not exceed 0.75 pound per million Btu heat input, as measured by applicable compliance methods. Any calculations used to demonstrate compliance shall be based solely on the heating value, quantities, and the percent sulfur of the liquid and gaseous fuels being burned. (See specific conditions **A.11. & A.21.**)

[Rule 62-204.220 & .240, F.A.C.; Permit No. 0730003-001-AV AO37-242825 specific condition A.10 4 and Applicant's request in Title V permit renewal application received July 1, 2002.]

A.11. Fuel Oil Sulfur. Fuel sulfur content (percent, by weight) shall be determined by a fuel analysis representative of all "as-fired" fuels. Prior to burning any fuels in the boiler pursuant to this permit, receipts of the analyses of the existing fuels shall have been received by the City in order to use their values and calculate a maximum allowable fuel blend of natural gas and fuel oil. Upon subsequent fuel deliveries, if the vendor's delivery receipts indicate that the sulfur content of the delivered fuel is greater than the sulfur content established by the previous analysis, then a new maximum allowable fuel blend shall be calculated using the assumption that any future fuel fired contains the higher sulfur content. The resulting maximum allowable fuel blend shall be adhered to until such time that a more accurate analysis has been provided. If the vendor's delivery receipt indicates that the sulfur content of the delivered fuel is less than the sulfur content previously established, a new analysis is only necessary if the permittee wishes to adjust the previously established maximum allowable fuel blend. (See specific conditions A.10. and A.21.).

[Rules 62-4.070(3) & 62-296.405(1)(c)3., F.A.C.; and, Applicant Requests dated June 18, 1997 & July 1, 2002.]

#### **Excess Emissions.**

A.12. Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24-hour period unless specifically authorized by the Department for longer duration.

[Rule 62-210.700(1), F.A.C.]

A.13. Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.

[Rule 62-210.700(2), F.A.C.]

Excess emissions resulting from fuel switching and fuel oil purging shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized, but in no case exceed three hours in any 24-hour period unless specifically authorized by the Department for longer duration.

[Rule 62-210.700(1),(5), F.A.C.]

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**A.14.** Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.

[Rule 62-210.700(4), F.A.C.]

#### Monitoring of Operations.

{Permitting Note: In accordance with the Acid Rain Phase II requirements, the following continuous monitors are installed on this unit: Gas Fuel Flow, Oil Fuel Flow, NO<sub>X</sub> and CO<sub>2</sub>.}

A.15. <u>Sulfur Dioxide</u>. The permittee elected to demonstrate compliance using fuel sampling and analysis. This protocol is allowed because the emissions unit does not have an operating flue gas desulfurization device. See specific conditions A.11. and A.21. of this permit. [Rule 62-296.405(1)(f)1.b., F.A.C.]

#### A.16. Determination of Process Variables.

- (a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
- (b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

#### Test Methods and Procedures.

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.17. <u>Visible emissions</u>. The test method for visible emissions shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C. A transmissometer may be used and calibrated according to Rule 62-297.520, F.A.C. See specific condition A.18.

[Rule 62-296.405(1)(e)1., F.A.C.]

- **A.18.** DEP Method 9. The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:
  - 1. EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen-second intervals during the required period of observation.

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Facility ID No.: 0730003

- 2. EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g., 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g., percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:
  - a. For the basic part of the standard (i.e., 20 percent opacity), the opacity shall be determined as specified above for a single-valued opacity standard.
  - b. For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the appropriate subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value.

Rule 62-297,401(9)(c), F.A.C.]

A.19. Particulate Matter. The test methods for particulate emissions shall be EPA Methods 17, 5, 5B, or 5F, incorporated by reference in Chapter 62-297, F.A.C. The minimum sample volume shall be 30 dry standard cubic feet. EPA Method 5 may be used with filter temperature no more than 320 degrees Fahrenheit. For EPA Method 17, stack temperature shall be less than 375 degrees Fahrenheit. The owner or operator may use EPA Method 5 to demonstrate compliance. EPA Method 3 or 3A with Orsat analysis shall be used when the oxygen based F-factor, computed according to EPA Method 19, is used in lieu of heat input. Acetone wash shall be used with EPA Method 5 or 17.

[Rules 62-296.405(1)(e)2. and 62-297.401, F.A.C.]

A.20. Sulfur Dioxide. The test methods for sulfur dioxide emissions shall be EPA Methods 6, 6A, 6B, or 6C, incorporated by reference in Chapter 62-297, F.A.C. Fuel sampling and analysis may be used as an alternate sampling procedure if such a procedure is incorporated into the operation permit for the emissions unit. If the emissions unit obtains an alternate procedure under the provisions of Rule 62-297.620, F.A.C., the procedure shall become a condition of the emissions unit's permit. The Department will retain the authority to require EPA Method 6 or 6C if it has reason to believe that exceedances of the sulfur dioxide emissions limiting standard are occurring. Results of an approved fuel sampling and analysis program shall have the same effect as EPA Method 6 test results for purposes of demonstrating compliance or noncompliance with sulfur dioxide standards. The permittee may use the EPA test methods, referenced above, to demonstrate compliance; however, as an alternate sampling procedure authorized by

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permit, the permittee elected to demonstrate compliance by using fuel sampling and analysis. See specific conditions A.11. and A.21.

[Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b. and 62-297.401, F.A.C.; and, Permit No. 0730003-003-AV Specific Condition A.20 AO37-242825.

- **A.21.** The following fuel sampling and analysis protocol shall be used as an alternate sampling procedure authorized by permit to demonstrate compliance with the sulfur dioxide standard and to provide the necessary values needed to calculate a maximum allowable fuel blend:
  - a. Establish and maintain a record of the sulfur content (percent, by weight) of the "as-fired" fuel oil using either ASTM D2622-92, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or equivalent, to analyze a representative sample of the blended fuel following each fuel delivery. This record may be maintained either by;
    - 1) retaining the delivery receipts that are provided by the fuel oil vendor (which indicates that the proper ASTM test methods have been followed) each time a fuel oil delivery is received, or;
    - 2) by "as-fired" sample results provided by the permittee.
  - b. Establish and maintain a record of the sulfur content of the "as-fired" natural gas using either ASTM D1072-90(94)E-1, ASTM D3031-81(86), ASTM D3246-92, ASTM D4084-94, ASTM D5504-94 or equivalent. This record may be maintained either by;
    - 1) retaining delivery receipts provided by the natural gas vendor (which indicates that the proper ASTM test methods have been followed and which shall be provided, at a minimum, each time there is a measurable increase in the sulfur content of the natural gas), or;
    - 2) by on-site sample results provided by the permittee, or;
    - 3) by utilizing the FERC Tariff guaranteed maximum sulfur content of 10 grains per 100 cubic feet of natural gas as a "default value".
  - Establish and maintain a record of either the density (using ASTM D 1298-80, or equivalent), or the mass, and the calorific heat value in Btu per pound (using ASTM D 240-76, or equivalent), of the fuel oil combusted. This record may be maintained either by;
    - 1) retaining the delivery receipts that are provided by the fuel oil vendor (which indicates that the proper ASTM test methods have been followed) each time a fuel oil delivery is received, or;
    - 2) by on-site sample results provided by the permittee, or;
    - 3) by utilizing data provided by a certified continuous mass flow monitor in accordance with 40 CFR 75, Appendix D.
  - d. Record daily the amount of each fuel fired, the sulfur content (percent, by weight) of each fuel, either the density or mass of the fuel oil, and the calorific heat value of each fuel. For all fuels fired, the highest value for any parameter (i.e., density, calorific heat value, etc.) that has been established by the vendor's receipt shall be utilized until an as-fired fuel analysis is received to establish a new value for the parameter in question.
  - Utilize the information in a., b. c. and d., above, to calculate the SO<sub>2</sub> emission rate to ensure compliance at all times.

[Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b. & 62-297.440, F.A.C.; and, Applicant Requests dated July 10, 1997 & July 1, 2002]

#### Compliance Test Requirements.

City of Tallahassee, Electric Department

Arvah B. Hopkins Generating Station

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**A.22.** Required Number of Test Runs. For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five day period allowed for the test, the Secretary or his or her designee may accept the results of the two complete runs as proof of compliance, provided that the arithmetic mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards. [Rule 62-297.310(1), F.A.C.]

- A.23. Operating Rate During Testing. Testing of emissions shall be conducted with the emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

  [Rules 62-297.310(2) & (2)(b), F.A.C.]
- A.24. Operating Conditions During Testing. If particulate matter and visible emissions tests are required, the tests shall be conducted concurrently and shall be performed using the maximum fuel oil to natural gas ratio that can be fired while meeting the standards.

  [Rule 62-4.070(3), F.A.C.; and, Applicant requests dated June 18, 1997 & July 1, 2002.]
- A.25. <u>Calculation of Emission Rate</u>. The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]

#### A.26. Applicable Test Procedures.

#### (a) Required Sampling Time.

- 1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.
- 2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the

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highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

- c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.
- (b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.
- (c) Required Flow Rate Range. For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.
- (d) <u>Calibration of Sampling Equipment</u>. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1.
- (e) Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube.

[Rule 62-297.310(4), F.A.C.]

### TABLE 297.310-1 CALIBRATION SCHEDULE

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ITEM	MINIMUM CALIBRATION FREQUENCY	REFERENCE INSTRUMENT	TOLERANCE
Liquid in glass thermometer	Annually	ASTM Hg in glass ref. thermometer or equivalent, or thermometric points	+/-2%
Bimetallic thermometer	Quarterly	Calib. liq. in glass thermometer	5 degrees F
Thermocouple	Annually	ASTM Hg in glass ref. thermometer, NBS calibrated reference and potentiometer	5 degrees F
Barometer	Monthly	Hg barometer or NOAA station	+/-1% scale
Pitot Tube	When required or when damaged	By construction or measurements in wind tunnel D greater than 16" and standard pitot tube	See EPA Method 2, Fig. 2-2 & 2-3
Probe Nozzles Before	each Micror test or when nicked, dented, or corroded	meter +/-0.00	of at least three readings Max. deviation between readings .004"
Dry Gas Meter and Orifice Meter	1. Full Scale: When received, When 5% change observed, Annually 2. One Point: Semiannually	Spirometer or calibrated wet test or dry gas test meter	2%
	3. Check after each test series	Comparison check	5%
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A.27. Required Stack Sampling Facilities. When a mass emissions stack test is required, the permittee shall comply with the requirements contained in Appendix SS-1, Stack Sampling Facilities, attached to this permit.

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[Rule 62-297.310(6), F.A.C.]

- **A.28.** Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.
- (a) General Compliance Testing.
  - 2. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid for more than 400 hours other than during startup. If required, particulate matter testing shall be conducted no later than 90 days after the end of the federal fiscal year.
  - 3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:
    - a. Did not operate; or
    - b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.
  - 4. During each federal fiscal year (October 1 September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:
    - a. Visible emissions, if there is an applicable standard (See specific condition A.29);
    - b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and
    - c. Each NESHAP pollutant, if there is an applicable emission standard.
  - 5. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid fuel, other than during startup, for a total of more than 400 hours (See specific condition A.30).
  - 9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.
- (b) <u>Special Compliance Tests</u>. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe

that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

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(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.; and, SIP Approved.]

- **A.29.** <u>Visible Emissions Testing Annual</u>. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning:
  - a. only gaseous fuel(s); or,
  - b. gaseous fuel(s) in combination with any amount of liquid fuel(s) for less than 400 hours per year; or,
  - c. only liquid fuel(s) for less than 400 hours per year.

[Rule 62-297.310(7)(a)4., F.A.C.]

- **A.30.** Particulate Matter Testing Annual and Permit Renewal. Annual and permit renewal compliance testing for particulate matter emissions is not required for these emissions units while burning:
  - a. only gaseous fuel(s); or,
  - b. gaseous fuel(s) in combination with any amount of liquid fuel(s) for less than 400 hours per year; or,
  - c. only liquid fuel(s) for less than 400 hours per year.

[Rules 62-297.310(7)(a)3. & 5., F.A.C.; and, ASP Number 97-B-01.]

#### Recordkeeping and Reporting Requirements.

- A.31. The owner or operator shall maintain continuous records of fuel consumption and each analysis that provides the heating value and sulfur content for all fuels fired. These records must be of sufficient detail to determine compliance with the allowable sulfur dioxide emission limitation.

  [Rule 62-4.070(3), F.A.C.]
- A.32. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

  [Rule 62-210.700(6), F.A.C.]

A.33. The owner or operator of facilities for which monitoring is required shall sSubmit to the Department a written report of emissions in excess of emission limiting standards as set forth in Rule 62-296.405(1), F.A.C., for each calendar quarter. The nature and cause of the excess emissions shall be explained. This report does not relieve the owner or operator of the legal liability for violations. All recorded data shall be maintained on file by the Source for a period of five years.

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[Rules 62-213.440 and 62-296.405(1)(g), F.A.C.]

#### A.34. Test Reports.

- (a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.
- (b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.
- (c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:
  - 1. The type, location, and designation of the emissions unit tested.
  - 2. The facility at which the emissions unit is located.
  - 3. The owner or operator of the emissions unit.
  - 4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
  - 5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
  - 6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
  - 7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
  - 8. The date, starting time and duration of each sampling run.
  - 9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
  - 10. The number of points sampled and configuration and location of the sampling plane.
  - 11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
  - 12. The type, manufacturer and configuration of the sampling equipment used.
  - 13. Data related to the required calibration of the test equipment.
  - 14. Data on the identification, processing and weights of all filters used.
  - 15. Data on the types and amounts of any chemical solutions used.
  - 16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
  - 17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.

18. All measured and calculated data required to be determined by each applicable test procedure for each run.

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- 19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
- 20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
- 21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required 'and provided to the person conducting the test are true and correct to his knowledge.

[Rules 62-213.440 and 62-297.310(8), F.A.C.]

#### Miscellaneous Conditions.

- **A.35.** <u>Used Oil.</u> Burning of on-specification used oil is allowed in this emissions unit in accordance with all other conditions of this permit and the following conditions:
  - a. On-specification Used Oil Emissions Limitations. This emissions unit is permitted to burn on-specification used oil, which contains a PCB concentration of less than 50 ppm. On-specification used oil is defined as used oil that meets the specifications of 40 CFR 279 Standards for the Management of Used Oil, listed below. "Off-specification" used oil shall not be burned. Used oil which fails to comply with any of these specification levels is considered "off-specification" used oil.

CONSTITUENT/PROPERTY	ALLOWABLE LEVEL
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Total Halogens	1000 ppm maximum
Flash point	100 degrees F minimum

- b. Quantity Limitation. This emissions unit is permitted to burn "on-specification" used oil that is generated by the City of, not to exceed 10,000 gallons during any calendar year.
- c. <u>PCB Limitation</u>. Used oil containing a PCB concentration of 50 or more ppm shall not be burned at this facility. Used oil shall not be blended to meet this requirement.
- d. Operational Requirements. On-specification used oil with a PCB concentration of 2 to less than 50 ppm shall be burned only at normal source operating temperatures. On-specification used oil with a PCB concentration of 2 to less than 50 ppm shall not be burned during periods of startup or shutdown.

e. <u>Testing Requirements</u>. The owner or operator shall sample and analyze each batch of used oil to be burned for the following parameters:

Arsenic, cadmium, chromium, lead, total halogens, and flash point and PCBs.

If determined to be present, pursuant to 40 CFR 761(20)(e), the owner or operator shall also sample and analyze for PCBs.

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Testing (sampling, extraction and analysis) shall be performed using approved methods specified in EPA Publication SW-846 (Test Methods for Evaluating Solid Waste, Physical/Chemical Methods).

- f. Record Keeping Requirements. The owner or operator shall obtain, make, and keep the following records related to the use of used oil in a form suitable for inspection at the facility by the Department:
  - (1) The gallons of on-specification used oil generated and burned each month. (This record shall be completed no later than the fifteenth day of the succeeding month.)
  - (2) The total gallons of on-specification used oil burned in the preceding consecutive 12-month period. (This record shall be completed no later than the fifteenth day of the succeeding month.)
  - (3) Results of the analyses required above.

[40 CFR 279.61 and 761.20(e)]

g. Reporting Requirements. The owner or operator shall submit to the Northwest District office, within thirty days of the end of each calendar quarter, the analytical results and the total amount of on-specification used oil generated and burned during the quarter.

The owner or operator shall submit, with the Annual Operation Report form, the analytical results required above and the total amount of on-specification used oil placed into inventory to be burned and the total amount of on-specification used oil burned during the previous calendar year.

[Rule 62-4.070(3) and 62-213.440, F.A.C., 40 CFR 279 and 40 CFR 761, unless otherwise noted.]

#### Subsection B. This section addresses the following emissions unit(s).

# E.U. ID No. -004 Brief Description Boiler Number 2, (Phase II Acid Rain Unit)

Emissions unit number 004 is a Babcock & Wilcox steam generator (model number RB-533) designated as "Boiler Number 2". It is rated at a maximum heat input of 2,325 million Btu per hour (MMBtu/hour) when firing fuel oil and 2,500 MMBtu/hour when firing natural gas and a nominal 238 MW and 1,619,000 pounds of steam per hour.

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{Permitting notes: This emissions unit is regulated under Acid Rain, Phase II and the Florida Electrical Power Plant Siting Act (permit number PA 74-03D). This emissions unit pre-dates PSD regulations, but is regulated under Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators with more than 250 million Btu per Hour Heat Input. Stack height = 250 feet, exit diameter = 14.0 feet, exit temperature = 220 - 305°F, actual volumetric flow rate = 636,706 acfm. Emissions from this boiler are uncontrolled. This unit began commercial operation in October of 1977.}

#### The following conditions apply to the emissions unit listed above:

#### **Essential Potential to Emit (PTE) Parameters.**

**B.1.** Permitted Capacity. The maximum operation heat input rate is as follows:

<u>Unit No.</u>	MMBtu/hr Heat Input	Fuel Type
-004	2,500	Natural Gas
	2,325	No. 2 - No. 6 Fuel Oil;
		On-Specification Used Oil

Note: When a blend of fuel oil and natural gas is fired, the allowable heat input is prorated based on the percent heat input of each fuel.

[Rules 62-4.160(2), 62-210.200(203 PTE) & 62-296.405, F.A.C.; and, Applicant request dated June 18, 1997.]

This heat input rate has been placed in this permit to identify the capacity of this unit during testing, to confirm that testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load). See Condition B.25. This rate is not a limit and therefore regular record keeping is not required. Instead the owner or operator is expected to determine the heat input rate whenever testing is required, to demonstrate at what percentage of the rated capacity that the unit is tested. Rule 62-297.310(5), F.A.C., included in this permit, requires measurement of the process variables for emission tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate the average hourly heat input during the test.

**B.2.** Emissions Unit Operating Rate Limitation After Testing. See specific condition **B.25**. [Rule 62-297.310(2), F.A.C.]

#### **B.3.** Methods of Operation.

a. <u>Fuels</u>. The fuels that are allowed to be burned in this boiler are natural gas and/or new No. 2 through No. 6 fuel oil and/or on-specification used oil (See Specific Condition **B.37.**). In case of a natural gas curtailment, liquefied petroleum gas (LPG) may be used as an igniter fuel for the fuel oil

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b. Other. Fuel additives typically of a magnesium oxide, hydroxide, sulfonate, or calcium nitrate origin may be used.

[Rule 62-213.410, F.A.C.; and, Applicant's request in Title V permit renewal application dated July 1, 2002.]

**B.4.** Hours of Operation. This emissions unit may operate continuously, i.e. 8760 hours/year. The permittee shall maintain an operation log available for Department inspection that documents the total hours of annual operation, including a detailed account of the hours operated on each of the allowable fuels.

[Rule 62-210.200(203 PTE), F.A.C.; and, applicant request in Title V permit renewal application received July 1, 2002.]

#### **Emission Limitations and Standards.**

{Permitting Note: The attached Table 1-1, Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

**Permitting note:** Unless otherwise specified, t The averaging time for conditions B.5. – B.10. are based on the specified averaging run time of the applicable specified test method.

- **B.5.** <u>Visible Emissions</u>. Visible emissions shall not exceed 20 percent opacity, except for one <u>six two-minute</u> period per hour during which opacity shall not exceed <u>27</u> 40 percent. [Rule 62-296.405(1)(a), F.A.C.]
- **B.6.** <u>Visible Emissions</u>. Visible emissions shall not exceed 60 percent opacity during the 3-hours in any 24 hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change. [Rule 62-210.700(3), F.A.C.]
- **B.7.** Particulate Matter. Particulate matter emissions shall not exceed 0.1 pound per million Btu heat input, as measured by applicable compliance methods. [Rule 62-296.405(1)(b), F.A.C.]
- **B.8.** Particulate Matter. Particulate matter emissions shall not exceed an average of 0.3 pound per million Btu heat input during the 3-hours in any 24 hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more.

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[Rule 62-210.700(3), F.A.C.]

- **B.9.** Sulfur Dioxide. Sulfur dioxide emissions when burning liquid fuel shall not exceed 1.87 pounds per million Btu heat input, as measured by applicable compliance methods. [Rule 62-296.405(1)(c)1.h., F.A.C.]
- **B.10.** Sulfur Dioxide. For compliance purposes, the following limit supersedes the limit contained in **Specific Condition B.9.** Sulfur dioxide emissions shall not exceed 1.4 pounds per million Btu heat input, as measured by applicable compliance methods. Any calculations used to demonstrate compliance shall be based solely on the heating value, quantities, and the percent sulfur of the liquid and gaseous fuels being burned. (See specific conditions **B.11. & B.23.**)

[Rule 62-204.220 & .240, F.A.C.; Permit No. 0730003-001-AV AO37-242825 specific condition B.10 4; and, Applicant's request in Title V permit renewal application received July 1, 2002.]

- B.11. Fuel Oil Sulfur. Fuel sulfur content (percent, by weight) shall be determined by a fuel analysis representative of all "as-fired" fuels. Prior to burning any fuels in the boiler pursuant to this permit, receipts of the analyses of the existing fuels shall have been received by the City in order to use their values and calculate a maximum allowable fuel blend of natural gas and fuel oil. Upon subsequent fuel deliveries, if the vendor's delivery receipts indicate that the sulfur content of the delivered fuel is greater than the sulfur content established by the previous analysis, then a new maximum allowable fuel blend shall be calculated using the assumption that any future fuel fired contains the higher sulfur content. The resulting maximum allowable fuel blend shall be adhered to until such time that a more accurate analysis has been provided. If the vendor's delivery receipt indicates that the sulfur content of the delivered fuel is less than the sulfur content previously established, a new analysis is only necessary if the permittee wishes to adjust the previously established maximum allowable fuel blend. (See specific conditions B.10. and B.23.)

  [Rules 62-4.070(3) & 62-296.405(1)(c)3., F.A.C.; and, Applicant Requests dated June 18, 1997 & July 1, 2002.]
- **B.12.** Nitrogen Oxide. Nitrogen oxide emissions shall not exceed 0.3 pounds per million Btu heat input, as measured by applicable compliance methods. [Rule 62-296.405(1)(d)3., F.A.C.]

#### **Excess Emissions.**

**B.13.** Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

[Rule 62-210.700(1), F.A.C.]

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**B.14.** Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.

[Rule 62-210.700(2), F.A.C.]

Excess emissions resulting from fuel switching and fuel oil purging shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized, but in no case exceed three hours in any 24-hour period unless specifically authorized by the Department for longer duration.

[Rule 62-210.700(1),(5), F.A.C.]

**B.15.** Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.

[Rule 62-210.700(4), F.A.C.]

## Monitoring of Operations.

{Permitting Note: In accordance with the Acid Rain Phase II requirements, the following continuous monitors are installed on this unit: Gas Fuel Flow, Oil Fuel Flow, NO<sub>x</sub> and CO<sub>2</sub>.} [Rules 62-296.405(1)(f)1.c. & d., 62-214.320 and 62-214.330, F.A.C.; 40 CFR Part 75 Appendix D, Section 2.1]}

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- **B.16.** Sulfur Dioxide. The permittee elected to demonstrate compliance using fuel sampling and analysis. This protocol is allowed because the emissions unit does not have an operating flue gas desulfurization device. See specific conditions **B.11.** and **B.23.** of this permit. [Rule 62-296.405(1)(f)1.b., F.A.C.]
- **B.17.** Nitrogen Oxides. For emission units that are subject to continuous monitoring requirements under 42 U.S.C. sections 7661-7661f or 40 CFR Part 75, compliance with nitrogen oxides emission limits shall be demonstrated based on a 30-day rolling average, except as specifically provided by 40 CFR Parts 60 or 76.

[Rule 62-296.405(1)(e)4., F.A.C.]

#### **B.18.** Determination of Process Variables.

- (a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
- (b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

#### **Test Methods and Procedures.**

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

**B.19.** <u>Visible emissions</u>. The test method for visible emissions shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C. A transmissometer may be used and calibrated according to Rule 62-297.520, F.A.C. See specific condition **B.20**.

[Rule 62-296.405(1)(e)1., F.A.C.]

**B.20.** DEP Method 9. The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:

1. EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.

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- 2. EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g., 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g., 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:
  - a. For the basic part of the standard (i.e., 20 percent opacity), the opacity shall be determined as specified above for a single-valued opacity standard.
  - b. For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the appropriate subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value.

[Rule 62-297.401(9)(c), F.A.C.]

- **B.21.** Particulate Matter. The test methods for particulate emissions shall be EPA Methods 17, 5, 5B, or 5F, incorporated by reference in Chapter 62-297, F.A.C. The minimum sample volume shall be 30 dry standard cubic feet. EPA Method 5 may be used with filter temperature no more than 320 degrees Fahrenheit. For EPA Method 17, stack temperature shall be less than 375 degrees Fahrenheit. The owner or operator may use EPA Method 5 to demonstrate compliance. EPA Method 3 or 3A with Orsat analysis shall be used when the oxygen based F-factor, computed according to EPA Method 19, is used in lieu of heat input. Acetone wash shall be used with EPA Method 5 or 17. [Rules 62-296.405(1)(e)2. and 62-297.401, F.A.C.]
- B.22. Sulfur Dioxide. The test methods for sulfur dioxide emissions shall be EPA Methods 6, 6A, 6B, or 6C, incorporated by reference in Chapter 62-297, F.A.C. Fuel sampling and analysis may be used as an alternate sampling procedure if such a procedure is incorporated into the operation permit for the emissions unit. If the emissions unit obtains an alternate procedure under the provisions of Rule 62-297.620, F.A.C., the procedure shall become a condition of the emissions unit's permit. The Department will retain the authority to require EPA Method 6 or 6C if it has reason to believe that exceedances of the sulfur dioxide emissions limiting standard are occurring. Results of an approved fuel sampling and analysis program shall have the same effect as EPA Method 6 test results for purposes of demonstrating compliance or noncompliance with sulfur dioxide standards. The permittee may use the EPA test methods, referenced above, to demonstrate compliance; however, as an alternate sampling procedure authorized by permit, the permittee elected to demonstrate compliance by using fuel sampling and analysis. See specific conditions B.11. and B.23.

[Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b. and 62-297.401, F.A.C.; and, Permit No. 0730003-001-AV AO37-242825 specific condition B.22.]

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**B.23.** The following fuel sampling and analysis protocol shall be used as an alternate sampling procedure authorized by permit to demonstrate compliance with the sulfur dioxide standard and to provide the necessary values needed to calculate a maximum allowable fuel blend:

- a. Establish and maintain a record of the sulfur content (percent, by weight) of the "as-fired" fuel oil using either ASTM D2622-92, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or equivalent, to analyze a representative sample of the blended fuel following each fuel delivery. This record may be maintained either by;
  - 1) retaining the delivery receipts that are provided by the fuel oil vendor (which indicates that the proper ASTM test methods have been followed) each time a fuel oil delivery is received, or;
  - 2) by "as-fired" sample results provided by the permittee.
- b. Establish and maintain a record of the sulfur content of the "as-fired" natural gas using either ASTM D1072-90(94)E-1, ASTM D3031-81(86), ASTM D3246-92, ASTM D4084-94, ASTM D5504-94 or equivalent. This record may be maintained either by;
  - 1) retaining delivery receipts provided by the natural gas vendor (which indicates that the proper ASTM test methods have been followed and which shall be provided, at a minimum, each time there is a measurable increase in the sulfur content of the natural gas), or;
  - 2) by on-site sample results provided by the permittee, or;
  - 3) by utilizing the FERC Tariff guaranteed maximum sulfur content of 10 grains per 100 cubic feet of natural gas as a "default value".
- c. Establish and maintain a record of either the density (using ASTM D 1298-80, or equivalent), or the mass, and the calorific heat value in Btu per pound (using ASTM D 240-76, or equivalent), of the fuel oil combusted. This record may be maintained either by;
  - 1) retaining the delivery receipts that are provided by the fuel oil vendor (which indicates that the proper ASTM test methods have been followed) each time a fuel oil delivery is received, or;
  - 2) by on-site sample results provided by the permittee, or;
  - 3) by utilizing data provided by a certified continuous mass flow monitor in accordance with 40 CFR 75, Appendix D.
- d. Record daily the amount of each fuel fired, the sulfur content (percent, by weight) of each fuel, either the density or mass of the fuel oil, and the calorific heat value of each fuel. For all fuels fired, the highest value for any parameter (i.e., density, calorific heat value, etc.) that has been established by the vendor's receipt shall be utilized until an as-fired fuel analysis is received to establish a new value for the parameter in question.
- e. Utilize the information in a., b. c. and d., above, to calculate the SO<sub>2</sub> emission rate to ensure compliance at all times.

[Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b. & 62-297.440, F.A.C.; and, Applicant Requests dated July 10, 1997 & July 1, 2002]

#### **Compliance Test Requirements.**

**B.24.** Required Number of Test Runs. For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five day period allowed for the test, the Secretary or his or her designee may accept the results of the two complete runs as proof of compliance, provided that the arithmetic mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.

[Rule 62-297.310(1), F.A.C.]

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- **B.25.** Operating Rate During Testing. Testing of emissions shall be conducted with the emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

  [Rules 62-297.310(2) & (2)(b), F.A.C.]
- **B.26.** Operating Conditions During Testing. If particulate matter and visible emissions tests are required, the tests shall be conducted concurrently and shall be performed using the maximum fuel oil to natural gas ratio that can be fired while meeting the standards.

[Rule 62-4.070(3), F.A.C.; and, Applicant requests dated June 18, 1997 & July 1, 2002.]

**B.27.** Calculation of Emission Rate. The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]

#### **B.28.** Applicable Test Procedures.

- (a) Required Sampling Time.
  - 1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.
  - 2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential

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emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

- c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.
- (b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.
- (c) Required Flow Rate Range. For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.
- (d) <u>Calibration of Sampling Equipment</u>. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1.
- (e) Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube. [Rule 62-297.310(4), F.A.C.]

#### TABLE 297.310-1 CALIBRATION SCHEDULE

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ITEM	MINIMUM CALIBRATION FREQUENCY	REFERENCE INSTRUMENT	TOLERANCE
Liquid in glass thermometer	Annually	ASTM Hg in glass ref. thermometer or equivalent, or thermometric points	+/-2%
Bimetallic thermometer	Quarterly	Calib. liq. in glass thermometer	5 degrees F
Thermocouple	Annually	ASTM Hg in glass ref. thermometer, NBS calibrated reference and potentiometer	5 degrees F
Barometer	Monthly	Hg barometer or NOAA station	+/-1% scale
Pitot Tube	When required or when damaged	By construction or measurements in wind tunnel D greater than 16" and standard pitot tube	See EPA Method 2, Fig. 2-2 & 2-3
Probe Nozzles Before	each Micror test or when nicked, dented, or corroded	meter +/-0.00	of at least three readings Max. deviation between readings .004"
Dry Gas Meter and Orifice Meter	1. Full Scale: When received, When 5% change observed, Annually 2. One Point: Semiannually 3. Check after	Spirometer or calibrated wet test or dry gas test meter  Comparison check	2% 5%
	each test series		

**B.29.** Required Stack Sampling Facilities. When a mass emissions stack test is required, the permittee shall comply with the requirements contained in Appendix SS-1, Stack Sampling Facilities, attached to this permit.

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[Rule 62-297.310(6), F.A.C.]

- **B.30.** Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.
- (a) General Compliance Testing.
  - 2. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid for more than 400 hours other than during startup. If required, particulate matter testing shall be conducted no later than 90 days after the end of the federal fiscal year.
  - 3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:
    - a. Did not operate; or,
    - b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.
  - 4. During each federal fiscal year (October 1 September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:
    - a. Visible emissions, if there is an applicable standard (See specific condition B.31);
    - b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and
    - c. Each NESHAP pollutant, if there is an applicable emission standard.
  - 5. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid fuel, other than during startup, for a total of more than 400 hours (See specific condition B.32).
  - 9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.
- (b) <u>Special Compliance Tests</u>. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe

that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

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(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.; and, SIP Approved.]

- **B.31.** <u>Visible Emissions Testing Annual</u>. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning:
  - a. only gaseous fuel(s); or,
  - b. gaseous fuel(s) in combination with any amount of liquid fuel(s) for less than 400 hours per year; or,
  - c. only liquid fuel(s) for less than 400 hours per year.

[Rule 62-297.310(7)(a)4., F.A.C.]

- **B.32.** Particulate Matter Testing Annual and Permit Renewal. Annual and permit renewal compliance testing for particulate matter emissions is not required for these emissions units while burning:
  - a. only gaseous fuel(s); or,
  - b. gaseous fuel(s) in combination with any amount of liquid fuel(s) for less than 400 hours per year; or.
  - c. only liquid fuel(s) for less than 400 hours per year.

[Rules 62-297.310(7)(a)3. & 5., F.A.C.; and, ASP Number 97-B-01.]

#### Recordkeeping and Reporting Requirements.

- **B.33.** The owner or operator shall maintain continuous records of fuel consumption and each analysis that provides the heating value and sulfur content for all fuels fired. These records must be of sufficient detail to determine compliance with the allowable sulfur dioxide emission limitation. [Rule 62-4.070(3), F.A.C.]
- **B.34.** In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210,700(6), F.A.C.]

**B.35.** The owner or operator of facilities for which monitoring is required shall sSubmit to the Department a written report of emissions in excess of emission limiting standards as set forth in Rule 62-296.405(1), F.A.C., for each calendar quarter. The nature and cause of the excess emissions shall be explained. This report does not relieve the owner or operator of the legal liability for violations. All recorded data shall be maintained on file by the Source for a period of five years.

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# [Rules 62-213.440 and 62-296.405(1)(g), F.A.C.]

## **B.36.** Test Reports.

- (a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.
- (b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.
- (c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:
  - 1. The type, location, and designation of the emissions unit tested.
  - 2. The facility at which the emissions unit is located.
  - 3. The owner or operator of the emissions unit.
  - 4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
  - 5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
  - 6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
  - 7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
  - 8. The date, starting time and duration of each sampling run.
  - 9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
  - 10. The number of points sampled and configuration and location of the sampling plane.
  - 11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
  - 12. The type, manufacturer and configuration of the sampling equipment used.
  - 13. Data related to the required calibration of the test equipment.
  - 14. Data on the identification, processing and weights of all filters used.
  - 15. Data on the types and amounts of any chemical solutions used.
  - 16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
  - 17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.

18. All measured and calculated data required to be determined by each applicable test procedure for each run.

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- 19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
- 20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
- 21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required `and provided to the person conducting the test are true and correct to his knowledge.

[Rules 62-213.440 and 62-297.310(8), F.A.C.]

#### Miscellaneous Conditions.

- **B.37.** Used Oil. Burning of on-specification used oil is allowed in this emissions unit in accordance with all other conditions of this permit and the following conditions:
  - a. On-specification Used Oil Emissions Limitations. This emissions unit is permitted to burn on-specification used oil, which contains a PCB concentration of less than 50 ppm. On-specification used oil is defined as used oil that meets the specifications of 40 CFR 279 Standards for the Management of Used Oil, listed below. "Off-specification" used oil shall not be burned. Used oil which fails to comply with any of these specification levels is considered "off-specification" used oil.

CONSTITUENT/PROPERTY	ALLOWABLE LEVEL
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Total Halogens	1000 ppm maximum
Flash point	100 degrees F minimum

- b. <u>Quantity Limitation</u>. This emissions unit is permitted to burn "on-specification" used oil that is generated by the City of Tallahassee, not to exceed 10,000 gallons during any calendar year.
- c. <u>PCB Limitation</u>. Used oil containing a PCB concentration of 50 or more ppm shall not be burned at this facility. Used oil shall not be blended to meet this requirement.
- d. Operational Requirements. On-specification used oil with a PCB concentration of 2 to less than 50 ppm shall be burned only at normal source operating temperatures. On specification used oil with a PCB concentration of 2 to less than 50 ppm shall not be burned during periods of startup or shutdown.

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e. <u>Testing Requirements</u>. The owner or operator shall sample and analyze each batch of used oil to be burned for the following parameters:

Arsenic, cadmium, chromium, lead, total halogens, and flash point and PCBs.

If determined to be present, pursuant to 40 CFR 761(20)(e), the owner or operator shall also sample and analyze for PCBs.

Testing (sampling, extraction and analysis) shall be performed using approved methods specified in EPA Publication SW-846 (Test Methods for Evaluating Solid Waste, Physical/Chemical Methods).

- f. Record Keeping Requirements. The owner or operator shall obtain, make, and keep the following records related to the use of used oil in a form suitable for inspection at the facility by the Department:
  - (1) The gallons of on-specification used oil generated and burned each month. (This record shall be completed no later than the fifteenth day of the succeeding month.)
  - (2) The total gallons of on-specification used oil burned in the preceding consecutive 12-month period. (This record shall be completed no later than the fifteenth day of the succeeding month.)
  - (3) Results of the analyses required above.

[40 CFR 279.61 and 761.20(e)]

g. Reporting Requirements. The owner or operator shall submit to the Northwest District office, within thirty days of the end of each calendar quarter, the analytical results and the total amount of on-specification used oil generated and burned during the quarter.

The owner or operator shall submit, with the Annual Operation Report form, the analytical results required above and the total amount of on-specification used oil placed into inventory to be burned and the total amount of on-specification used oil burned during the previous calendar year.

[Rule 62-4.070(3) and 62-213.440, F.A.C., 40 CFR 279 and 40 CFR 761, unless otherwise noted.]

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#### Subsection C. This section addresses the following emissions units.

## E.U. ID

No.	<b>Brief Description</b>
-002	Combustion Turbine Number 1
-003	Combustion Turbine Number 2

Emissions unit number 002 is a combustion turbine manufactured by Westinghouse (model number W191G) and is designated as "Combustion Turbine Number 1". It is rated at a maximum heat input of 228 million Btu per hour (MMBtu/hour) while being fueled by natural gas and/or No. 2 fuel oil with a maximum fuel oil sulfur content of 0.4%, by weight. Emissions unit number 003 is a combustion turbine manufactured by Westinghouse (model number W251G) and is designated as "Combustion Turbine Number 2". It is rated at a maximum heat input of 446 million Btu per hour (MMBtu/hour) while being fueled by natural gas and/or No. 2 fuel oil with a maximum fuel oil sulfur content of 0.4%, by weight. Combustion Turbine Number 1 runs a nominal 16.47 MW generator and Combustion Turbine Number 2 runs a nominal 26.8 MW generator. Emissions from the combustion turbines are uncontrolled.

{Permitting notes: These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required. These units are not subject to 40 CFR 60, Subpart GG, Standards of Performance for New Stationary Gas Turbines. Each combustion turbine has its own stack. Combustion Turbine Number 1: Stack height = 29 feet, exit diameter = 9.2 feet, exit temperature = 802.4 °F, actual volumetric flow rate = 456,297.2 acfm. Combustion Turbine Number 2: Stack height = 30 feet, exit diameter = 14.7 feet, exit temperature = 874.4 °F, actual volumetric flow rate = 707,144.2 acfm. Combustion Turbine Number 1 began commercial operation in February of 1970, Combustion Turbine Number 2 began commercial operation in September of 1972.}

#### The following conditions apply to the emissions units listed above:

### Essential Potential to Emit (PTE) Parameters.

#### C.1. Permitted Capacity. The maximum operation heat input rates are as follows:

Unit No.	MMBtu/hr Heat Input	Fuel Type
-002( CT #1)	228 (LHV @ 80 degrees Fahrenheit)	Natural Gas
	228 (LHV @ 80 degrees Fahrenheit)	No. 2 Fuel Oil
-003 (CT #2)	446 (LHV @ 80 degrees Fahrenheit)	Natural Gas
	446 (LHV @ 80 degrees Fahrenheit)	No. 2 Fuel Oil

[Rules 62-4.160(2) and 62-210.200(203 PTE), F.A.C.]

This heat input rate has been placed in this permit to identify the capacity of this unit during testing, to confirm that testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load). See Condition C.13. This rate is not a limit and therefore regular record keeping is not required. Instead the owner or operator is expected to determine the heat input rate whenever testing is required, to demonstrate at what percentage of the

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rated capacity that the unit is tested. Rule 62-297.310(5), F.A.C., included in this permit, requires measurement of the process variables for emission tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate the average hourly heat input during the test.

C.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition C.13. [Rule 62-297.310(2), F.A.C.]

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# C.3. Methods of Operation.

- a. Fuels. Only natural gas and/or new No. 2 fuel oil shall be fired in these turbines.
- b. Other. Fuel additives typically of a magnesium oxide, hydroxide, sulfonate, or calcium nitrate origin may be used.

[Rule 62-213.410, F.A.C.; and, Applicant's request in Title V permit renewal application dated July 1, 2002.]

C.4. <u>Hours of Operation</u>. Combustion Turbine Number 1 may operate 8,491 hours per year. Combustion Turbine Number 2 may operate 7,071 hours per year. The Permittee shall maintain an operation log available for Department inspection that documents the total hours of operation annually. [Rule 62-210.200, F.A.C., (PTE) and <u>Permit No. 0730003-001-AV</u> AO37-242824 specific condition number C.4 3.]

#### **Emission Limitations and Standards.**

{Permitting Note: The attached Table 1-1, Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

C.5. <u>Visible Emissions</u>. Visible emissions from each turbine shall not be equal to or greater than 20 percent opacity.

[Rule 62-296.320(4)(b)1., F.A.C.; and, <u>Permit No. 0730003-001-AV</u> AO37-242824 <u>specific condition</u> C.5. ]

**Permitting note:** Unless otherwise specified, the averaging time for this condition is based on the specified averaging run time of the applicable specified test method.

C.6. Not federally enforceable. Sulfur Dioxide – Fuel Oil Sulfur Content. The sulfur content of the No. 2 fuel oil shall not exceed 0.4 percent, by weight. See specific condition C.12.

[Permit No. 0730003-001-AV specific condition C.6 AO37-242824; and, applicant request in the Title V permit renewal application received July 1, 2002.]

### **Excess Emissions.**

- C.7. Excess emissions from these emissions units resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

  [Rule 62-210.700(1), F.A.C.]
- C.8. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.

[Rule 62-210.700(4), F.A.C.]

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# **Monitoring of Operations.**

C.9. <u>Sulfur Dioxide</u>. The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis provided by the vendor upon each fuel delivery. See specific conditions C.6. and C.12.

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[Rule 62-213.440, F.A.C.]

- C.10. Determination of Process Variables.
  - (a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
  - (b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

#### Test Methods and Procedures.

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

- C.11. <u>Visible emissions</u>. The test method for visible emissions shall be EPA Method 9, adopted and incorporated by reference in Rule 62-204.800, F.A.C., and referenced in Chapter 62-297, F.A.C. [Rules 62-204.800, 62-296.320(4)(b)4.a. and 62-297.401, F.A.C.]
- C.12. Fuel Oil Sulfur Content. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-92, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or equivalent.

[Rules 62-213.440 and 62-297.440, F.A.C.]

C.13. Operating Rate During Testing. Testing of emissions shall be conducted with each emissions unit operating at permitted capacity, which is defined as 90-100 percent of the manufacturer's rated heat input achievable for the average ambient (or conditioned) air temperature during the test. If it is impracticable to test at capacity, then sources may be tested at less than capacity. In such cases, the entire heat input vs. inlet temperature curve will be adjusted by the increment equal to the difference between the design heat input value and 110 percent of the value reached during the test. Data, curves, and calculations necessary to demonstrate the heat input rate correction at both design and test conditions shall be submitted to the Department with the compliance test report.

[Rule 62-297.310(2), F.A.C.]

## C.14. Applicable Test Procedures.

- (a) Required Sampling Time.
  - 2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

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c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

[Rule 62-297.310(4)(a)2., F.A.C.]

C.15. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

## (a) General Compliance Testing.

- 3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:
  - a. Did not operate: or
  - b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours
- 4. During each federal fiscal year (October 1 September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:
  - a. Visible emissions, if there is an applicable standard (See specific condition C.16);
- 8. Any combustion turbine that does not operate for more than 400 hours per year shall conduct a visible emissions compliance test once per each five-year period, coinciding with the term of its air operation permit.
- 9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

(b) <u>Special Compliance Tests</u>. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

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[Rule 62-297.310(7), F.A.C.; Permit No. 0730003-001-AV AO65-242827, Specific Condition C.15(b) #5 (frequency); and, SIP Approved.]

- C.16. <u>Visible Emissions Testing Annual</u>. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning:
  - a. only gaseous fuels; or,
  - b. gaseous fuels in combination with any amount of liquid fuels for less than 400 hours per year; or,
  - c. only liquid fuels for less than 400 hours per year.

[Rules 62-297.310(7)(a)4. & 8., F.A.C.]

### Recordkeeping and Reporting Requirements.

C.17. <u>Malfunction Reporting</u>. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

[Rule 62-210.700(6), F.A.C.]

#### C.18. Test Reports.

- (a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.
- (b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.

[Rule 62-297.310(8), F.A.C.]

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# Section IV. Acid Rain Part.

Operated by: City of Tallahassee

ORIS Code: 0688

Subsection A. This subsection addresses Acid Rain, Phase II.

The emissions units listed below are regulated under Acid Rain, Phase II.

## E.U. ID

No. Description

-001 Boiler Number 1: 903 MMBtu/hour

-004 Boiler Number 2: 2,325 - 2,500 MMBtu/hour

A.1. The Phase II Acid Rain Part application submitted for this facility, as approved by the Department, is a part of this permit. The owners and operators of these Phase II acid rain units must comply with the standard requirements and special provisions set forth in the application listed below:

a. DEP Form No. 62-210.900(1)(a), dated 07/01/02, received 07/01/02.

[Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

A.2. Sulfur dioxide (SO<sub>2</sub>) allowance allocations and nitrogen oxide (NO<sub>X</sub>) requirements for each Acid Rain unit are as follows:

E.U. ID No.	EPA ID	Year	2003	2004	2005	2006	2007
-001	Boiler 1	SO <sub>2</sub> allowances, under Table 2 or 3 of 40 CFR 73	81*	81*	81*	81*	81*
-004	Boiler 2	SO <sub>2</sub> allowances, under Table 2 or 3 of 40 CFR 73	5522*	5522*	5522*	5522*	5522*

<sup>\*</sup> The number of allowances held by an Acid Rain source in a unit account may differ from the number allocated by the USEPA under Table 2, 3, or 4 of 40 CFR 73.

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A.3. Emission Allowances. Emissions from sources subject to the Federal Acid Rain Program (Title IV) shall not exceed any allowances that the source lawfully holds under the Federal Acid Rain Program. Allowances shall not be used to demonstrate compliance with a non-Title IV applicable requirement of the Act.

- 1. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the Federal Acid Rain Program, provided that such increases do not require a permit revision pursuant to Rule 62-213.400(3), F.A.C.
- 2. No limit shall be placed on the number of allowances held by the source under the Federal Acid Rain Program.
- 3. Allowances shall be accounted for under the Federal Acid Rain Program. [Rule 62-213.440(1)(c)1., 2. & 3., F.A.C.]
- A.4. Comments, notes, and justifications: None.

# Appendix I-1, List of Insignificant Emissions Units and/or Activities.

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City of Tallahassee, Electric Utilities Arvah B. Hopkins Generating Station

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining the potential emissions of the facility containing such emissions units. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if they are contained within a Title V source; however, such emissions units and activities shall be considered insignificant for Title V purposes provided they also meet the criteria of Rule 62-213.430(6)(b), F.A.C. No emissions unit shall be entitled to an exemption from permitting under Rule 62.210.300(3)(a), F.A.C., if its emissions, in combination with the emissions of other units and activities at the facility, would cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

The below listed emissions units and/or activities are considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

## Exempt Emissions Related to Steam Generator No. 1

- 1. Deareator Vents
- 2. Air Ejectors
- 3. Oil Vapor Extractors
- 4. Noncondensable Gas Extractors
- 5. Seal Oil Vacuum Pumps
- 6. Lube Oil Tanks (storage)
- 7. Lube/Fuel Oil Drip Pans
- 8. Hydrogen Gas Vents
- 9. Fuel Oil Piping
- 10. Natural Gas Vents
- 11. CO<sub>2</sub> Vents
- 12. City of Tallahassee Electric Utility Generated Non-hazardous Boiler Chemical Cleaning Wastes
- 13. Fuel oil burner purge

# Exempt Emissions Related to Steam Generator No. 2

- 14. Deareator Vents
- 15. Air Ejectors
- 16. Oil Vapor Extractors
- 17. Noncondensable Gas Extractors
- 18. Seal Oil Vacuum Pumps
- 19. Lube Oil Tanks (storage)
- 20. Lube/Fuel Oil Drip Pans
- 21. Hydrogen Gas Vents
- 22. Fuel Oil Piping
- 23. Natural Gas Vents

City of Tallahassee, Electric Department

Arvah B. Hopkins Generating Station

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- 24. CO<sub>2</sub> Vents
- 25. City of Tallahassee Electric Utility Generated Non-hazardous Boiler Chemical Cleaning Wastes
- 26. Fuel oil burner purge

# Appendix I-1, Continued.

# Exempt Emissions Related to Combustion Turbine No. 1

- 27. Diesel Engine (Starter)
- 28. Diesel Tank (#10)
- 29. Oil Vapor Extractor
- Lube Oil Tank 30
- 31 Natural Gas Blowdown
- 32. Fuel Oil Piping

# Exempt Emissions Related to Combustion Turbine No. 2

- 33. Diesel Engine (Starter)
- 34. Diesel Tank (#11)
- 35. Oil Vapor Extractor
- 36. Lube Oil Tank
- 37. Natural Gas Blowdown
- 38. Fuel Oil Piping

# Fuel Storage

- Day Tank (Diesel Tank #12) 39.
- Diesel Fuel Dispensing Operation 40
- Diesel Tank (#13) 41.

#### Fuel Farm

- 42. Diesel Tank #1
- 43. Diesel Tank #2
- 44 Fuel Oil Tank #3
- Fuel Oil Tank #4 45.
- 46. Fuel Oil Piping
- 47. Fuel Oil Transfer Station #1
- 48. Fuel Oil Transfer Station #2
- 49. Diesel Oil Transfer Station
- 50. Diesel Oil Tank Associated With the Hydrant Main

### **Fuel Dispensing Operations**

- 51. Truck Loading/Unloading Station #1
- Truck Loading/Unloading Station #2 52.
- 53. Gasoline Tank
- 54. Gasoline Pump
- 55. Diesel Oil Tank
- 56. Diesel Pump

City of Tallahassee, Electric Department Arvah B. Hopkins Generating Station Organic Liquid Storage 57. Kerosene Tank #7 **58**. Lube Oil Tank #8 59. Lube Oil Tank #9 Appendix I-1, Continued. **Fugitive VOC Emissions** 60. (1-15) Parts Washers - Non-halogenated Solvents **Space Heaters** 61. (1-12) Space Heaters 62. (2) Fresh Water Cooling Towers 63. Central Vacuum System Maintenance Activities 64. Welding Exempt per Rule 62-210.300(3)(a)16, F.A.C. High Temperature Metal Cutting 65. **Plant Operations** Lube Oil Storage Tanks 66. 67. **Propane Storage Tanks** Sulfuric Acid Tank Vent 68. 69. Sodium Hydroxide Tank Vents Demineralizer Degasifier 70. G/C Natural Gas Vent 71. 72. Natural Gas Blowdown

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### **Paved Roads** 73.

- 74. **Unpaved Roads**
- *7*5. **Heavy Construction Activities**

Fugitive PM<sub>10</sub> Emissions

Aggregate Handling & Storage 76.

### Laboratory

- *77*. Laboratory Equipment
- Chemical Usage **78**.
- *7*9. Vacuum Pumps
- Laboratory Fume Hoods 80.

# Appendix U-1, List of Unregulated Emissions Units and/or Activities.

City of Tallahassee, Electric Utilities Arvah B. Hopkins Generating Station **DRAFT Permit No.:** 0730003-003-AV **Facility ID No.:** 0730003

<u>Unregulated Emissions Units and/or Activities</u>. An emissions unit which emits no "emissions-limited pollutant" and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

The below listed emissions units and/or activities are neither 'regulated emissions units' nor 'exempt emissions units'.

# E.U. ID

No.	Brief Description of Emissions Units and/or Activity
-005	Fugitive VOC Sources - Painting Operations
-006	General Purpose Internal Combustion Engines
-007	Emergency Generators
-005	<u>Fugitive VOC Emissions</u> . Fugitive VOC emissions are generated from the painting operations associated with normal plant maintenance. SCC: 4-90-999-98, Miscellaneous Volatile Organic Compound Evaporation.

# -006 General Purpose Internal Combustion Engines.

Located for use at this source is (1) Welding Generator. SCC: 2-03-003-01. Diesel Driven Fire Pump (Associated With the Hydrant Main). SCC: 2-03-001-01. Portable Diesel Pump. SCC: 2-03-001-01.

#### -007 Emergency Generators.

Located for use at this source is (1) Stationary Emergency Generator. SCC: 2-03-001-01.

(3) Portable Emergency Generators. SCC: 2-03-003-01.

# Appendix H-1, Permit History/ID Number Changes

City of Tallahassee Arvah B. Hopkins Generating Station

**DRAFT Permit No.**: 0730003-003-AV

**Facility ID No.:** 0730003

# Permit History (for tracking purposes):

E.U.						
ID No	<u>Description</u>	Permit No.	Issue / Effective	<b>Expiration</b>	Extended	Revised Date(s)
			<u>Date</u>	<u>Date</u>	Date <sup>1,2</sup>	
-001	Boiler Hopkins #1	AO37-242825	03/08/94	03/01/99		
-002	Combustion Turbine Hopkins #1	AO37-242824	03/08/94	12/31/98		06/10/94, 06/24/94
-003	Combustion Turbine Hopkins #2	AO37-242824	03/08/94	12/31/98		06/10/94, 06/24/94
-004	Unit #2 Boiler	PA74-03D	05/20/75			05/18/94, 10/27/86
All	Initial Title V Permit	0730003-001-AV	01/01/98 10/22/97	12/31/02		
All	Admin Correction To Update	0730003-002-AV	01/02/98	12/31/02		
	Appendix TV-1 to TV-2					
All	Title V Permit Renewal	0730003-003-AV	01/01/03	12/31/07		

# **Referenced Attachments**

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Facility ID No.: 0730003

# Phase II Acid Rain Application/Compliance Plan

Appendix A-1, Abbreviations, Definitions, Citations, and Identification Numbers

Appendix SS-1, Stack Sampling Facilities (version dated 10/7/96)

Appendix TV-4, Title V Conditions (version dated 2/12/02)

ASP Number 97-B-01
(With Scrivener's Order Dated July 9, 1997)

Table 1-1, Summary of Air Pollutant Standards and Terms

**Table 2-1, Compliance Requirements** 

# Table 1-1, Summary of Air Pollutant Standards and Terms

City of Tallahassee, Electric Utilities Department Arvah B. Hopkins Generating Station

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Facility ID No.: 0730003

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of the permit.

E. U.	Brief	Pollutant		Hours/	Allowable Emissions		Equivalent Emissions*		Regulatory	See Permit	
ID No.	Description	Name	Fuel(s)	Year	Standard(s)	lbs./hour	TPY	lbs./hour	TPY	Citation(s)	Condition(s)
-001	Boiler #1 (903 MMBtu/hour)	VE	No. 2 - No. 6 F.O.	8760	20%; 27 40% - 1	six two min	. period/hr	N/A	N/A	62-296.405(1)(a)	A.5. & A.6.
	Acid Rain Phase II Unit	<u>l</u>	Natural Gas	8760	0%; <u>27 40% - 1 </u>	six two mir	n. period/ł	N/A	N/A	62-296.405(1)(a)	A.5. & A.6.
		PM	No. 2 - No. 6 F.O.	8760	0.1 lb/MMBtu	N/A	N/A	90.3	395.5	62-296.405(1)(b)	A.7.
			Natural Gas	8760	0.1 lb/MMBtu	N/A	N/A	90.3	395.5	62-296.405(1)(b)	<b>A</b> .7.
		PM - SB	No. 2 - No. 6 F.O.	3 hr/day	0.3 lb/MMBtu	N/A	N/A	270.9	494.4	62-210.700(3)	A.8.
		##	Natural Gas	3 hr/day	0.3 lb/MMBtu	N/A	N/A	270.9	494.4	62-210.700(3)	A.8.
	(75 MW Turbine-generator)	SO <sub>2</sub>	No. 2 - No. 6 F.O.	8760	0.75 lb/MMBtu	N/A	N/A	677.3	2,966.4	Applicant Request	A.10.
	(each unit)		Natural Gas	8760	N/A	N/A	N/A	N/A	N/A	62-296.405(1)(c)	A.10.
-004	Boiler #2	VE	No. 2 - No. 6 F.O.	8760	)%; <u>27_40</u> % - 1 <u>s</u>	six two mir	n. period/ł	N/A	N/A	62-296.405(1)(a)	B.5. & B.6.
	(2,325 MMBtu/hour - Oil)		Natural Gas	8760	)%; <u>27 40</u> % - 1 <u>s</u>	six two mir	n. period/ł	N/A	N/A	62-296.405(1)(a)	B.5. & B.6.
	(2,500 MMBtu/hour - Gas)	PM	No. 2 - No. 6 F.O.	8760	0.1 lb/MMBtu	N/A	N/A	232.5	1,018.4	62-296.405(1)(b)	B.7.
			Natural Gas	8760	0.1 lb/MMBtu	N/A	N/A	232.5	1,018.4	62-296.405(1)(b)	B.7.
		PM - SB	No. 2 - No. 6 F.O.	3 hr/day	0.3 lb/MMBtu	N/A	N/A	697.5	1,272.9	62-210.700(3)	B.8.
	Acid Rain Phase II Unit	**	Natural Gas	3 hr/day	0.3 lb/MMBtu	N/A	N/A	697.5	1,272.9	62-210.700(3)	B.8.
	(238 MW Turbine-generator)	SO <sub>2</sub>	No. 2 - No. 6 F.O.	8760	1.4 lb/MMBtu	N/A	N/A	3,255.0	14,256.9	Applicant Request	B.10.
			Natural Gas	8760	N/A	N/A	N/A	N/A	N/A	62-296.405(1)(c)	B.10.
		NOx	No. 2 - No. 6 F.O.	8760	0.3 lb/MMBtu	N/A	N/A	697.5	3,055.1	62-296.405(1)(d)3.	B. <u>12</u> 41.
			Natural Gas	8760	0.3 lb/MMBtu	N/A	N/A	750.0	3,285.0	62-296.405(1)(d)3.	B. <u>12</u> 11.
-002	Combustion Turbine No. 1	VE	No. 2 F.O.	8491	Less than 20%	N/A	N/A	N/A	N/A	62-296.320(4)(b)	C.5.
	(228 MMBtu/hour)		Natural Gas	8491	Less than 20%	N/A	N/A	N/A	N/A	62-296.320(4)(b)	C.5.
		SO <sub>2</sub>	No. 2 F.O.	8491	0.4% sulfur	N/A	N/A	97.4	413.5	0730003-001-AV AO	C.6.
			Natural Gas	8491	N/A	N/A	N/A	N/A	N/A	N/A	N/A
-003	Combustion Turbine No. 2	VE	No. 2 F.O.	7071	Less than 20%	N/A	N/A	N/A	N/A	62-296.320(4)(b)	C.5.
	(446 MMBtu/hour)		Natural Gas	7071	N/A	N/A	N/A	N/A	N/A	62-296.320(4)(b)	C.5.
		SO2	No. 2 F.O.	7071	0.4% sulfur	N/A	N/A	190.6	673.9	0730003-001-AV AO	C.6.
			Natural Gas	7071	N/A	N/A	N/A	N/A	N/A	N/A	N/A

### Notes:

<sup>\*</sup> The "Equivalent Emissions" listed are for informational purposes.

<sup>\*\*</sup> PM - SB refers to "soot blowing" and "load change".