



July 23, 2002

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BUREAU OF AIR REGULATION

Jeff Koerner – Permit Engineer
Bureau of Air Regulation
State of Florida
Department of Environmental Protection
2600 Blair Stone Road
Mail Station #5505
Tallahassee, FL 32399-2400

Re: Manatee Plant Draft Air Construction Permit No. 0810010-007-AC

Dear Mr. Koerner:

FPL would like to provide you with comments to the Draft Air Construction Permit referenced above. Our general comments follow in prose form, followed by a marked-up copy of the permit [Attachment No.1] with the suggested language that we believe is consistent with our comments. Deletions in the marked-up version are indicated by strikethrough, added language is indicated by underline.

Our first comment concerns the threshold issue of whether an Air Construction Permit is required to authorize the addition of natural gas as a fuel for Manatee Units 1 and 2. As stated in our May 2, 2002 application for revision of the Manatee Plant Title V permit, FPL does not believe an air construction permit is required in this case. We find the rationale advanced in the "Technical Evaluation and Preliminary Determination" on this point to be problematic.

FPL's request for revision of the Title V permit explained, and the Department has accepted, that addition of natural gas as a permitted fuel for Manatee Units 1 and 2 is not likely to result in an increase in actual emissions, and thus does not constitute a "modification" of these existing emission units under Rule 62-210.200(169), F.A.C. We would suggest that any work necessary to enable the burning of natural gas should not, therefore, require an air construction permit under Rule 62-210.300(1)(a), F.A.C. In our view, that rule establishes the need for a construction permit in two circumstances: 1) "Construction" of a proposed new emissions unit; and 2) "modification" of an existing emissions unit (which by definition would result in an increase in actual emissions). It would seem that the basis for the Department's preliminary determination that a construction permit is required in this case is that some activity falling within the definition of "construction" is associated with the addition of gas at existing Manatee Units 1 and 2. We cannot agree with this premise, as it would apparently mean that virtually any work at an existing permitted facility, even if the work would not result in an emissions increase and even if the work is not on an emissions unit, would nonetheless require an air construction permit. At a facility such as the Manatee Plant, with a 9,500-acre plant site, where some such work is ongoing almost all of the time, this interpretation would be untenable. If it were feasible for facility owners to apply for construction permits under

such circumstances, the Department would be swamped by applications for work that does not involve emissions units or emissions increases. This would expend substantial Department resources in a manner at variance from Secretary Struhs' stated principle of "less process, more protection". It would also be inconsistent with past Department practice.

While FPL does not believe a construction permit is warranted in connection with the addition of natural gas at Manatee Units 1 and 2, we do not intend to proceed with the work necessary to connect the units to the gas supply until this issue has been resolved. If the Draft Construction Permit provisions addressed below can be resolved expeditiously, we recognize it may be more practical in these circumstances to bypass the threshold issue and accept a corrected construction permit. Given that possibility, and without conceding the need for a construction permit, we offer our comments on the Department's draft permit below.

Specific Condition No. 1: This condition should, at most, reference construction on the emissions units (Units 1 and 2) as discussed above.

Specific Condition No. 3: We are not aware of any rule basis for restricting the sulfur content of natural gas in this case. Other FPL dual-fuel fossil steam boilers do not have a separate sulfur limit for natural gas, nor do they have record keeping requirements to demonstrate gas sulfur quantity. FPL and the Department have worked closely in the past to achieve consistency in the permit language and requirements where appropriate. At most, this condition should require that sulfur content of the natural gas fuel shall be consistent with "pipeline quality" natural gas. The sentence reading "When available, the Department strongly encourages the permittee to fire natural gas as a clean-burning alternative to fuel oil" should be deleted, as it is not an enforceable requirement.

Specific Condition No. 5: The language has been changed to include the use of fuel oil along with natural gas.

Specific Condition No. 6: Include reference to 0.3 lbs. per MBTU heat input allowance for soot blowing/load changing.

Specific Condition No. 10: Punctuation and language has been added to clarify the distinction between EPA methods 3 and 3A which are analyzer methods for determining O₂, and the Orsat analysis method for determining O₂.

Specific Conditions Nos. 11, 14 and renumbered 17: Testing for particulate matter while burning natural gas - FPL believes that testing for particulate matter while firing natural gas is unnecessary due to the miniscule amounts of ash and sulfur contained in the fuel. The Department's Technical Evaluation and Preliminary Determination also recognizes that distinction. . This requirement is inconsistent with the other dual-fueled fossil steam boilers in the FPL system, which are not required to perform particulate tests while burning natural gas in order to demonstrate compliance to the standard. Past experience indicates that so little particulate matter exists, the sampling duration must be at least trebled in order to gather enough sample catch to measure.

During the "Initial Compliance Tests" on natural gas, FPL proposes to test for carbon monoxide and volatile organic compounds in addition to opacity, which we believe, will provide the Department reasonable assurance that the particulate standard is being met.

Initial Compliance Tests - FPL proposes to use Initial Compliance Test results to calculate the emissions of carbon monoxide and volatile organic compounds for reporting the "future actual annual emissions" via the AOR. This is consistent with the methodology used to determine the "past actual" emissions. The AP-42 emission factor will be used to determine the particulate emissions while burning natural gas and will be reported via the AOR. "Future actual annual" emissions of NO_x and SO₂ will be CEM based, determined by the EPA Scorecard values from the Acid Rain Reporting. Language in the referenced Specific Conditions has been changed to reflect the absence of particulate testing while burning natural gas and the use of the actual annual fuel combustion (heat input) and the AOR values for determining the "future actual annual" emissions of CO, VOC and PM. As a result, Specific Condition No. 14 is not necessary.

Specific Condition renumbered 17: The EPA Scorecard values are not published by March 1st, therefore the annual report submission date has been changed to August 1st.

Specific Condition renumbered 17a: The "past actual emissions" for nitrogen oxides using the EPA Scorecard value from the Acid Rain Reporting is 8,762 tons (2000 and 2001 annual average). Year 2000 was 8,381 tons. Year 2001 was 9,143 tons [Refer E-mail correspondence from EPA – Attachment No.2].

Comments regarding corresponding changes to the Draft Title V Permit revisions will be submitted by separate letter.

Thank you for your consideration in this matter. If you should have any questions, please feel free to contact me at (941) 776-5211, or Kevin Washington at (561) 691-2877.

Sincerely yours,



Paul Plotkin

Manatee Plant General Manager

Attachment: 2

C.c.s: Clair Fancy
Al Linero

J. Kiesel, SWD
B. Owen, DEP
G. Worley, EPA
J. Burroughs, NPS

Att. 1

DRAFT PERMIT

PERMITTEE:

Florida Power and Light
19050 State Road 62
Parrish, FL 34219

Authorized Representative:

Mr. Paul Plotkin, Plant General Manager

FPL Manatee Power Plant Air Permit No. 0810010-007-AC Facility ID No. 0810010 SIC No. 4911 Permit Expires: July 1, 2003

PROJECT AND LOCATION

Florida Power and Light owns and operates the Manatee Plant, which is an electrical power plant located at 19050 State Road 62 in Parrish (Manatee County), Florida. The UTM coordinates are: Zone 17, 367.25 km East, and 3054.15 km North (Latitude: 27° 36' 21" and Longitude: 82° 20' 44").

This permit authorizes the construction of natural gas facilities for existing fossil fuel fired steam generator Units 1 and 2. This permit supplements any previously issued air construction and operation permits for these units.

STATEMENT OF BASIS

The Department issues this air pollution construction permit under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The Department authorizes the permittee to install the proposed equipment in accordance with the conditions of the permit and as described in the application, approved drawings, plans, and other documents on file with the Department.

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- Section I. General Information
- Section II. Administrative Requirements
- Section III. Emissions Units Specific Conditions
- Section IV. Appendices

(DRAFT)

Howard L. Rhodes, Director
Division of Air Resources Management

(Date)

SECTION I. GENERAL INFORMATION (DRAFT)

FACILITY AND PROJECT DESCRIPTION

The existing facility is a steam-electric power plant consisting of the following emissions units.

EU ID	Emissions Unit Description
001	Unit 1 - Foster Wheeler fossil fuel fired steam generator (863 MW)
002	Unit 2 - Foster Wheeler fossil fuel fired steam generator (863 MW)
003	Emergency diesel generator and miscellaneous mobile equipment and internal combustion engines
004	Painting of plant equipment and non-halogenated solvent cleaning

This permit authorizes the construction of the infrastructure necessary to support the firing of natural gas for existing fossil fuel fired steam generator Units 1 and 2. Only Emissions Units 001 and 002 are affected by this permit.

REGULATORY CLASSIFICATION

Title III: The facility is a major source of hazardous air pollutants (HAP).

Title IV: The facility operates emissions units subject to the acid rain provisions of the Clean Air Act.

Title V: The facility is Title V major source of air pollution.

PSD: The facility is a major source of air pollution with respect to the requirements of the Prevention of Significant Deterioration (PSD) of Air Quality Program, Rule 62-212.400, F.A.C.

RELEVANT DOCUMENTS

The documents listed below are not a part of this permit, but are specifically related to the permitting action and are on file with the Department.

- Application Nos. 0810010-007-AC and 0810010-008-AV received on 05/10/02; complete.
- Title V Air Operation Permit No. 0810010-001-AV, which became effective on January 1, 1999.

SECTION II. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting Authority: Applications for permits to construct or operate shall be submitted to the Department's Bureau of Air Regulation at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. Copies of all such applications shall also be submitted to the Department's Southwest District Office and the Manatee County Environmental Management Department at the addresses listed below.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Department's Southwest District Office at 3804 Coconut Palm Drive in Tampa, Florida 33619-8218. Copies of all such documents shall also be submitted to the Manatee County Environmental Management Department at 202 Sixth Avenue East, Bradenton, FL 34208.
3. Appendices: The permit includes the following appendices:
 - Appendix CF - Formats used to cite applicable rules, regulations, and previous permitting actions;
 - Appendix GC - General conditions applicable to all state permits; and
 - Appendix SC: Standard conditions compiled from applicable state regulations.
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of each emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The terms used in this permit have specific meanings as defined in the applicable chapters of the Florida Administrative Code. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Modifications: No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department, prior to beginning such construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A revision to the Title V operation permit is required to authorize regular operation of the regulated emissions units. The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the Department's Bureau of Air Regulation with copies to the Compliance Authority. {Permitting Note: This condition was satisfied by the submittal of an application for a concurrent Title V revision.} [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. UNITS 1 AND 2

This permit affects the following existing emissions units.

EU ID	Emissions Unit Description
001	Fossil Fuel Steam Generator, Unit 1
002	Fossil Fuel Steam Generator, Unit 2

Fossil fuel fired steam generators Unit 1 and Unit 2 are each nominal 800 megawatt (900 MW gross capacity, electric) steam generators designated as Manatee Plant Unit 1 and Unit 2. The emissions units are fired on a variable combination of natural gas, No. 6 fuel oil, No. 2 fuel oil, propane, and used oil from FPL operations. Propane is utilized primarily for ignition of the main fuel. When firing fuel oil (or combinations of authorized fuels), the maximum heat input for each boiler is 8650 MMBtu per hour. When firing natural gas alone, the maximum heat input for each boiler is 5670 MMBtu per hour.

Each emissions unit consists of a boiler that drives a turbine generator. Emissions are controlled with multiple cyclones, a flue gas recirculation system, and staged combustion. The twin register low-NOx burners (ABB Combustion Services, Ltd.) are dual fuel with mechanical atomization for oil firing. Each unit is equipped with a 499-foot stack and systems to continuously monitor and record emissions of nitrogen oxides and opacity.

{Permitting Note: These emissions units are regulated under Acid Rain, Phase II; and Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators with More than 250 million Btu per Hour Heat Input. Fossil fuel fired steam generator Unit 1 began commercial operation in 1976 and fossil fuel fired steam generator Unit 2 began commercial operation in 1977. These emissions units may inject additives such as magnesium oxide, magnesium hydroxide and related compounds into each boiler.}

CONSTRUCTION

1. Natural Gas Supply: The permittee is authorized to construct the natural gas supply lines and infrastructure necessary to support gas-fired operation of both Units 1 and 2. The existing burners for each unit are twin register low NOx burners manufactured by ABB Combustion Services, Ltd. (formerly International Combustion Limited). The low-NOx burner design incorporates air and fuel staging to reduce emissions of nitrogen oxides when firing either fuel oil or natural gas. Mechanical atomization is used to reduce droplet size for the efficient combustion of fuel oil. This permit authorizes the addition of natural gas as an allowable fuel for Units 1 and 2. It supplements all previously issued air construction and operation permits for these units. [Applicant Request]
2. Unconfined Particulate Emissions: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

OPERATIONAL REQUIREMENTS

3. Authorized Fuel: Each unit is authorized to fire "pipeline quality" natural gas, ~~containing no more than 10 grains of sulfur per 100 standard cubic feet of natural gas.~~ Natural gas may be fired alone or in combination with other authorized fuels. When available, the Department strongly encourages the permittee to fire natural gas as a clean-burning alternative to fuel oil. [Applicant Request; Rule 62-210.200(PTE), F.A.C.]
4. Permitted Capacity: When firing natural gas alone, the maximum heat input rate to each unit shall not exceed 5670 MMBtu per hour. When a blend of fuel oil and natural gas is fired, the maximum heat input to each unit shall not exceed 8650 MMBtu per hour. *{Permitting Note: The heat input limitation has been placed in the permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110*

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. UNITS 1 AND 2

percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability.) [Applicant Request; Rule 62-210.200(PTE), F.A.C.]

5. Hours of Operation: The units may operate continuously on natural gas, #6 fuel oil, or a combination of both (8760 hours per year). [Rule 62-210.200(PTE), F.A.C.]

EMISSIONS LIMITING STANDARDS

[Permitting Note: The following standards apply to each emissions unit.]

6. Particulate Matter: ~~When firing natural gas, emissions~~ Emissions of particulate matter shall not exceed 0.1 pounds per million Btu heat input steady state, nor 0.3 pounds per million Btu heat input when sootblowing as determined by EPA Methods 5, 5B, 5F, or 17, incorporated by reference in Chapter 62-297, F.A.C. [Rule 62-296.405(1)(b), F.A.C.]
7. Nitrogen Oxides: When firing natural gas, emissions of nitrogen oxides (NO_x) shall not exceed 0.30 lb per million Btu. Compliance shall be demonstrated based on a 30-day rolling average as measured by the continuous emission monitoring system (CEMS). The CEMS must meet the performance specifications contained in 40 CFR 75. [Rule 62-296.405(1)(d), F.A.C.]
8. Sulfur Dioxide: Emissions of sulfur dioxide are limited by the fuel specification in Condition No. 3 to 1.1 pounds per million Btu heat input. The blending of natural gas shall not be used to demonstrate compliance with the sulfur dioxide standard for "liquid fuel" in Rule 62-296.405(c), F.A.C. [Rule 62-4.070(3), F.A.C.]
9. Visible Emissions: When firing natural gas or co-firing natural gas in combination with other authorized fuels, visible emissions shall not exceed 40 percent opacity as determined by DEP Method 9 and incorporated by reference in Chapter 62-297, F.A.C. [Rule 62-296.405(1)(a), F.A.C.]

TESTING AND MONITORING

10. Test Methods: All required tests shall be performed in accordance with the following reference methods.

Method	Description of Method and Comments
EPA 5, 5B, 5F, or 17	Determination of Particulate Matter Emissions from Stationary Sources 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 or 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.
DEP 9	Visual Determination of the Opacity of Emissions from Stationary Sources
EPA 10	Determination of Carbon Monoxide Emissions from Stationary Sources
EPA 18	Measurement of Gaseous Organic Compound Emissions by Gas Chromatography {Note: EPA Method 18 may be used (optional) concurrently with EPA Method 25A to deduct emissions of methane and ethane from the measured VOC emissions.}
EPA 25 or 25A	Determination of Volatile Organic Concentrations

EPA methods are described in 40 CFR 60, Appendix A, and are adopted by reference in Rule 62-204.800, F.A.C. DEP Method 9 is specified in Rule 62-297.401, F.A.C. No other methods may be used for testing unless prior written approval is received from the Department. [Rules 62-204.800 and 62-297.100, F.A.C.; 40 CFR 60, Appendix A]

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. UNITS 1 AND 2

11. Initial Compliance Tests: When firing 100% natural gas, the permittee shall conduct initial compliance tests to determine the emissions of carbon monoxide, volatile organic compounds, ~~particulate matter~~ and level of opacity from Units 1 and 2. Test results shall demonstrate compliance with the applicable standards. A transmissometer calibrated in accordance with Rule 62-297.520, F.A.C., may also be used to demonstrate compliance with the visible emissions standard. Initial tests shall be conducted within 60 days after completing shakedown for each unit, but not later than 180 days after first fire on natural gas. These tests shall be used to document the emission rates of these pollutants for use in the reports required by Condition No. 17. [Rule 62-296.405(1)(e)1, F.A.C.]
12. Continuous Emissions Monitoring Systems: The permittee shall use the existing Continuous Emissions Monitoring Systems (CEMS) to report emissions of nitrogen oxides (NO_x) and sulfur dioxide (SO₂). Compliance with the standard for nitrogen oxides shall be demonstrated based on data collected by the NO_x CEMS. The NO_x and SO₂ CEMS shall meet the performance specifications contained in 40 CFR 75. [Rule 62-4.070(3), F.A.C.]
13. Natural Gas: The permittee shall install, operate, and maintain a system to continuously monitor and record the amount of natural gas consumption and heat input. This system shall be designed to interact with the existing continuous emissions monitors. ~~Compliance with the fuel-sulfur limit for natural gas shall be demonstrated by keeping monthly reports obtained from the vendor indicating the average sulfur content of the natural gas being supplied from the pipeline for each month of operation. Methods for determining the sulfur content of the natural gas shall be the most recent versions of ASTM methods D4084-82, D3246-81 or other equivalent methods approved by the Department.~~ [Rule 62-4.070(3), F.A.C.]
- ~~14. Tests for Reporting Annual Emissions: When firing natural gas, the permittee shall conduct performance tests to determine the emissions of carbon monoxide, particulate matter, and volatile organic compounds from Units 1 and 2. These tests shall be used to document the emission rates of these pollutants for use in the reports required by Condition No. 18. Tests shall be conducted at least once during each year the reports are required.~~ [Rules 62-210.200(11)(d), 62-212.400(2)(d), and 62-297.100, F.A.C.]

NOTIFICATIONS

- ~~15.~~14. Construction Notifications: Within 15 days of beginning construction, the permittee shall notify the Compliance Authority that construction has commenced. Within 15 days of completing construction, the permittee shall notify the Compliance Authority that construction has concluded. Each notification shall include an updated proposed schedule of activities through the initial shakedown period and the firing of natural gas. [Rule 62-4.070(3), F.A.C.]
- ~~16.~~15. Test Notifications: At least 15 days prior to the date on which each required test is to begin, the permittee shall notify the Compliance Authority of the date, time, and place of each test. The notification shall also include the name and phone number of the contact person who will be responsible for coordinating and having the tests conducted. [Rule 62-4.297.310(7)(a)9, F.A.C.]

REPORTS

- ~~17.~~16. Emissions Performance Test Reports: A report indicating the results of any required emissions performance test shall be submitted to each Compliance Authority no later than 45 days after completion of the last test run. The test report shall provide sufficient detail on the tested emission unit and the procedures used to allow the Department to determine if the test was properly conducted and if the test results were properly computed. At a minimum, the test report shall provide the applicable information listed in Rule 62-297.310(8)(c), F.A.C. [Rule 62-297.310(8), F.A.C.]

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. UNITS 1 AND 2

18-17. **PSD Applicability Report:** Before ~~March~~ August 1st of each year, the permittee shall submit a report to the Bureau of Air Regulation and the Compliance Authority summarizing actual annual emissions for the previous year. The reports shall be used to verify the permittee's predictions of future representative actual annual emissions. The reports shall be submitted for five separate years that are representative of normal post-change operations after completing construction of the natural gas project. The reports shall begin during the first year that natural gas is fired and continue for five years. Reports are subject to the following conditions.

- a. The Department determines the "past actual emissions" for Units 1 and 2 as follows:

Pollutant	Past Actual Emissions Two-Year Average Tons per Year	Future Representative Actual Annual Emissions Calculation Methods
Carbon Monoxide (CO)	18,987	AOR (oil), <u>Initial</u> Performance Test (gas)
Nitrogen Oxides (NOx)	8179 <u>8762</u>	CEMS, <u>EPA Scorecard value</u> , Acid Rain Reporting
Particulate Matter (PM)	2384	Performance Tests (oil) <u>AOR</u> and (gas)
Sulfur Dioxide (SO ₂)	31,753	CEMS, <u>EPA Scorecard value</u> , Acid Rain Reporting
Volatile Organic Compounds (VOC)	149	AOR (oil), <u>Initial</u> Performance Test (gas)

"Past actual annual emissions" are based on: the two-year average for operation during 2000 and 2001; annual CO, PM, and VOC emissions reported in the certified Annual Operating Reports submitted by the permittee; and data collected by the Continuous Emissions Monitoring Systems for NOx and SO₂ emissions as reported EPA Scorecard values for the Acid Rain Program. "Future actual annual emissions" shall be based on: actual annual fuel combustion (heat input) rates; tested emission rates for CO (gas), PM (oil) ~~and gas~~, and VOC (gas); certified Annual Operating Report data for CO (oil), ~~and~~ VOC (oil), ~~and~~ PM (gas); and data collected by the Continuous Emissions Monitoring Systems for NOx and SO₂ emissions as reported EPA Scorecard values for the Acid Rain Program. The calculation methodology shall remain consistent from year to year.

- b. In accordance with 40 CFR 52.21(b)(33)(ii), the permittee shall, "Exclude, in calculating any increase in emissions that results from the particular physical change or change in the method of operation at an electric utility steam generating unit, that portion of the unit's emissions following the change that could have been accommodated during the representative baseline period and is attributable to an increase in projected capacity utilization at the unit that is unrelated to the particular change, including any increased utilization due to the rate of electricity demand growth for the utility system as a whole." The permittee shall identify and quantify the excluded emissions and present a justification for the exclusion.
- c. Each report shall compare the actual emissions for the given year with the past actual annual emissions as described above. If the difference between the current actual annual emissions and the past actual annual emissions defined above is greater than the PSD significant emission rates defined in Table 212.400-2 of Chapter 62-212, F.A.C., then Units 1 and 2 shall be subject to a full PSD review at that time. This review shall include a determination of the Best Available Control Technology (BACT) for each PSD-significant pollutant.

[Rules 62-204.800, 62-210.200(11) and 62-212.400, F.A.C.; 40 CFR 52.21(b)(33)(ii)]

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. UNITS 1 AND 2

Att. 2



Patel.Ketan@epamail.
epa.gov

07/11/02 10:26 AM

To: mszybinski@fpl.com
cc:

Subject: 2001 Emissions and heat input data for Manatee (ORISPL 6042)

Mr. Szybinski,

Please find below a table summarizing the FINAL 2001 emissions and heat input values for Manatee (ORISPL 6042), units PMT1 and PMT2.

ORISPL	Unit ID	SO2 (tons)	CO2 (tons)	NOxRate	(lbs/mmBtu) NOx (tons)	(mmBtu) Heat Input
6042	PMT1	18,124	3,052,997	0.24	4,605	34,369,487
6042	PMT2	16,471	2,730,668	0.25	4,538	30,823,660

Feel free to contact me if you have any questions or concerns.

Thanks,

Ketan D. Patel
U.S. Environmental Protection Agency (6204N)
Clean Air Markets Division
patel.ketan@epa.gov
202.564.9144