

# Department of Environmental Protection

Lawton Chiles  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

August 25, 1997

Mr. J. M. Parent  
Plant General Manager  
Florida Power & Light Company  
11770 U.S. Highway One  
North Palm Beach, FL 33408

Re: DRAFT Title V Permit No.: 0810010-001-AV  
Manatee Plant

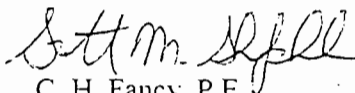
Dear Mr. Parent:

One copy of the DRAFT Title V Air Operation Permit for the Manatee Plant located at 19050 State Road 62, Parrish, Manatee County, is enclosed. The permitting authority's "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" is also included.

The Department will publish the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" as soon as possible. This issue is important in order for you to receive your Title IV Acid Rain permit by January 1, 1998, pursuant to the Clean Air Act and Section 403.0872, Florida Statutes.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to Scott M. Sheplak, P.E., at the above letterhead address. If you have any other questions, please contact Susan DeVore at 850/488-1344.

Sincerely,

*for*   
C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/sd

Enclosures

cc: Ms. Carla E. Pierce, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)  
Ms. Yolanda Adams, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)

8/22/97 Reading File (Title V)  
Clair's Reading File

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Printed on recycled paper.

Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- ☐ Addressee's Address
- ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:  
Mr. J. M. Parent  
Plant General Manager  
Florida Power & Light Company  
11770 U.S. Highway One  
North Palm Beach, Florida 33408

4a. Article Number  
2 127 635 519

- 4b. Service Type
- |   |   |
|---|---|
| <input type="checkbox"/> Registered           | <input type="checkbox"/> Insured                        |
| <input checked="" type="checkbox"/> Certified | <input type="checkbox"/> COD                            |
| <input type="checkbox"/> Express Mail         | <input type="checkbox"/> Return Receipt for Merchandise |

7. Date of Delivery

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

5. Signature (Addressee)

6. Signature (Agent)



Thank you for using Return Receipt Service.

PS Form 3811, December 1991

☆U.S. GPO: 1992-323-402

**DOMESTIC RETURN RECEIPT**

Z 127 635 519

**Receipt for Certified Mail**

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

Sent to Mr. J. M. Parent	Postage	\$
Street and No. 11770 U.S. Highway One	Certified Fee	
P.O., State and ZIP Code North Palm Beach, FL 33408	Special Delivery Fee	
	Restricted Delivery Fee	
	Return Receipt Showing to Whom & Date Delivered	
	Return Receipt Showing to Whom, Date, and Addressee's Address	
	TOTAL Postage & Fees	\$
	Postmark or Date 8/22/97	
	Facility ID#0810010-001-AV	
	FP&L - Manatee County	
	DRAFT PERMIT	

PS Form 3800, March 1993

Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and/or 2 for additional services.
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I also wish to receive the following services (for an extra fee):

- ☐ Addressee's Address
- ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:  
Honorable Joe McClash  
Manatee County Board of County Commissioners  
P.O. Box 1000  
Bradenton, Florida 34206

4a. Article Number  
2 127 635 521

- 4b. Service Type
- |   |   |
|---|---|
| <input type="checkbox"/> Registered           | <input type="checkbox"/> Insured                        |
| <input checked="" type="checkbox"/> Certified | <input type="checkbox"/> COD                            |
| <input type="checkbox"/> Express Mail         | <input type="checkbox"/> Return Receipt for Merchandise |

7. Date of Delivery

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

5. Signature (Addressee)

6. Signature (Agent)



Thank you for using Return Receipt Service.

PS Form 3811, December 1991

☆U.S. GPO: 1992-323-402

**DOMESTIC RETURN RECEIPT**

Z 127 635 521

**Receipt for Certified Mail**

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

Sent to Honorable Joe McClash	Postage	\$
Street and No. P.O. Box 1000	Certified Fee	
P.O., State and ZIP Code Bradenton, Florida 34206	Special Delivery Fee	
	Restricted Delivery Fee	
	Return Receipt Showing to Whom & Date Delivered	
	Return Receipt Showing to Whom, Date, and Addressee's Address	
	TOTAL Postage & Fees	\$
	Postmark or Date 8/22/97	
	Facility ID#0810010-001-AV	
	FP&L - Manatee County	
	DRAFT PERMIT	

PS Form 3800, March 1993



# Department of Environmental Protection

Lawton Chiles  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

## P.E. Certification Statement

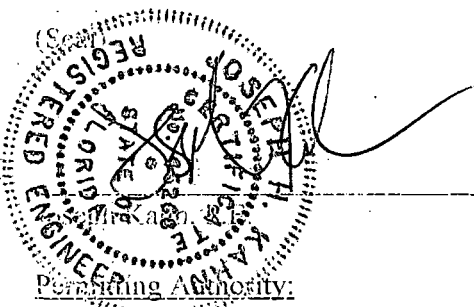
Florida Power and Light Company  
Manatee Plant

DRAFT Permit No.: 0810010-001-AV  
Facility ID No.: 0810010

**Project type:** Initial Title V Air Operation Permit

I **HEREBY CERTIFY** that the engineering features described in the above referenced application and related additional information submittals, if any, and subject to the proposed permit conditions, provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).

This review was conducted by myself and Susan C. DeVora under my responsible supervision.



8/21/97  
Date

Permitting Authority:

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: 850/488-1344  
Fax: 850/922-6979

*"Protect, Conserve and Manage Florida's Environment and Natural Resources"*

Printed on recycled paper.

Is your RETURN ADDRESS completed on the reverse side?

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- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
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I also wish to receive the following services (for an extra fee):

- ☐ Addressee's Address
- ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:  
Mr. William M. Reichel  
Florida Power & Light Company  
11770 U.S. Highway One  
North Palm Beach, Florida 33408

4a. Article Number  
2 127 635 520

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

7. Date of Delivery

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

5. Signature (Addressee)

6. Signature (Agent)

PS Form 3811, December 1991

U.S. GPO: 1992-323-402

**DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service.

Z 127 635 520



**Receipt for Certified Mail**

No Insurance Coverage Provided  
Do not use for International Mail  
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Sent to	
Mr. William M. Reichel	
Street and No.	
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P.O., State and ZIP Code	
North Palm Beach, FL 33408	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	
8/22/97	
Facility ID#0810010-001-AV	
FP&L - Manatee County	
DRAFT PERMIT	

PS Form 3800, March 1993

In the Matter of an  
Application for Permit by:

Florida Power & Light Company  
11770 U.S. Highway One  
North Palm Beach, FL 33408

---

DRAFT Permit No.: 0810010-001-AV  
Manatee Plant  
Manatee County

### **INTENT TO ISSUE TITLE V AIR OPERATION PERMIT**

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit (copy of DRAFT Permit enclosed) for the Title V source detailed in the application specified above, for the reasons stated below.

The applicant, Florida Power & Light Company, applied on June 12, 1996, to the permitting authority for a Title V air operation permit for the Manatee Plant located at 19050 State Road 62, Parrish, Manatee County.

The permitting authority has permitting jurisdiction 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. This source is not exempt from Title V permitting procedures. The permitting authority has determined that a Title V air operation permit is required to commence or continue operations at the described facility.

The permitting authority intends to issue this Title V air operation permit based on the belief that reasonable assurances have been provided to indicate that operation of the source will not adversely impact air quality, and the source will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

Pursuant to Sections 403.815 and 403.0872, F.S., and Rules 62-103.150 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT." However, the Department will publish the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" as soon as possible. This issue is important in order for you to receive your Title IV Acid Rain permit by January 1, 1998, pursuant to the Clean Air Act and Section 403.0872, Florida Statutes.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the enclosed Title V DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT." Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

The permitting authority will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. Mediation under Section 120.573, F.S., will not be available for this proposed action.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions filed by

the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any other person must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207, F.A.C.

A petition must contain the following information:

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number, and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the permitting authority's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the permitting authority's action or proposed action;

(d) A statement of the material facts disputed by the petitioner, if any;

(e) A statement of the facts that the petitioner contends warrant reversal or modification of the permitting authority's action or proposed action;

(f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the permitting authority's action or proposed action; and,

(g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the permitting authority to take with respect to the action or proposed action addressed in this notice of intent.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

(a) The name, address, and telephone number of the petitioner;

(b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;

(c) Each rule or portion of a rule from which a variance or waiver is requested;

(d) The citation to the statute underlying (implemented by) the rule identified in (c) above;

(e) The type of action requested;

(f) The specific facts that would justify a variance or waiver for the petitioner;

(g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and,

(h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

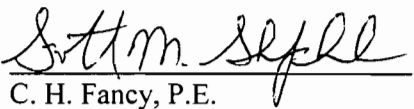
The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at 410 M. Street, SW, Washington, D.C. 20460.

Executed in Tallahassee, Florida.

**STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION**

for   
C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT (including the DRAFT permit) and all copies were sent by certified mail before the close of business on 8/22/97 to the person(s) listed:

Mr. J. M. Parent, FPL

Mr. William M. Reichel, FPL

Hon. Joe McClash, Manatee County Board of County Commissioners

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT (including the DRAFT permit) were sent by U.S. mail, unless otherwise indicated, on the same date to the person(s) listed:

Mr. Kennard F. Kosky, P.E., Golder Associates

Mr. Ronnie L. Adams, P.E., FPL

Mr. Richard G. Piper, FPL

Mr. Bill Thomas, P.E., DEP Southwest District, Air Section

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency Clerk, receipt of which is hereby acknowledged.

Barbara J. Pontwell 8/22/97  
(Clerk) (Date)



**PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT**

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Title V DRAFT Permit No.: 0810010-001-AV  
Manatee Plant  
Manatee County

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit to Florida Power & Light Company for the Manatee Plant located at 19050 State Road 62, Parrish, Manatee County. The applicant's name and address are: Florida Power & Light Company, 11770 U.S. Highway One, North Palm Beach, FL 33408.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the Title V DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Title V DRAFT Permit issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

The permitting authority will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, Florida Statutes (F.S.). Mediation under Section 120.573, F.S., will not be available for this proposed action.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of the notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the applicable time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207 of the Florida Administrative Code.

A petition must contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number, and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the permitting authority's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the permitting authority's action or proposed action;
- (d) A statement of the material facts disputed by the petitioner, if any;

(e) A statement of the facts that the petitioner contends warrant reversal or modification of the permitting authority's action or proposed action;

(f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the permitting authority's action or proposed action; and,

(g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the permitting authority to take with respect to the action or proposed action addressed in this notice of intent.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at 410 M. Street, SW, Washington, D.C. 20460.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Permitting Authority:

Department of Environmental Protection  
Bureau of Air Regulation  
111 South Magnolia Drive, Suite 4  
Tallahassee, Florida 32301  
Telephone: 850/488-1344  
Fax: 850/922-6979

Affected District/Local Program:

Department of Environmental Protection  
Southwest District Office  
8407 Laurel Fair Circle  
Tampa, FL 33619  
Telephone: 813/744-6100  
Fax: 813/744-6458

The complete project file includes the DRAFT Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Scott M. Sheplak, P.E., at the above address, or call 850/488-1344, for additional information.

Florida Power & Light Company  
Manatee Plant

**Facility ID No.:** 0810010  
Manatee County

Initial Title V Air Operation Permit  
**DRAFT Permit No.:** 0810010-001-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: 850/488-1344  
Fax: 850/922-6979

August 18, 1997

Initial Title V Air Operation Permit  
**DRAFT Permit No.: 0810010-001-AV**

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# Department of Environmental Protection

Lawton Chiles  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

**Permittee:**

Florida Power & Light Company

**DRAFT Permit No.:** 0810010-001-AV

**Facility ID No.:** 0810010

**SIC Nos.:** 49, 4911

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

This permit is for the operation of the Manatee Plant. This facility is located at 19050 State Road 62, Parrish, Manatee County; UTM Coordinates: Zone 17, 367.250 km East and 3054.150 km North; Latitude: 27° 36' 21" North and Longitude: 82° 20' 44" West.

**STATEMENT OF BASIS:** 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 U-1, List of Unregulated Emissions Units and/or Activities

Appendix E-1, List of Exempt Emissions Units and/or Activities

Appendix TV-1, Title V Conditions (version dated 8/11/97)

Appendix SS-1, Stack Sampling Facilities (version dated 10/07/96)

Table 297.310-1, Calibration Schedule (version dated 10/07/96)

Phase II Acid Rain Application/Compliance Plan received 12/6/95

Alternate Sampling Procedure: ASP Number 97-B-01

Order Granting Reduced Sampling Frequency, OGC Case Nos. 83-0580  
and 83-0581, Order dated April 24, 1984

**Effective Date:** January 1, 1998

**Renewal Application Due Date:** July 5, 2002

**Expiration Date:** December 31, 2002

---

Howard L. Rhodes, Director  
Division of Air Resources  
Management

HLR/sms/sd

**Section I. Facility Information.**

**Subsection A. Facility Description.**

This facility consists of two fossil fuel steam generators, Unit 1 and Unit 2, each rated at 800 megawatts (MW) (900 MW gross capacity) output. The steam generators each burn a variable combination of No. 6 fuel oil, No. 2 fuel oil, propane, and used oil from FPL operations, discharging pollutants through a stack 499 feet above ground level. Each unit is a Foster-Wheeler oil fired steam generator, equipped with multiple cyclones with fly ash reinjection, a flue gas recirculation system and staged combustion. Each operates a Westinghouse tandem compound, reheat-type extraction turbine.

Also included in this permit are miscellaneous unregulated/exempt emissions units and/or activities.

Based on the initial Title V permit application received June 12, 1996, this facility is a major source of hazardous air pollutants (HAPs).

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

E.U. ID No.	Brief Description
001	Fossil Fuel Steam Generator, Unit 1
002	Fossil Fuel Steam Generator, Unit 2

Unregulated Emissions Units and/or Activities	
003	Emergency Diesel Generator, Miscellaneous Mobile Equipment and Internal Combustion Engines
004	Painting of Plant Equipment and Non-halogenated Solvent Cleaning Operations

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

**Subsection C. Relevant Documents.**

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

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

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

Appendix H-1, Permit History/ID Number Changes

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:

Initial Title V Permit Application received June 12, 1996

Additional Information Request dated May 13, 1997

Additional Information Response received August 15, 1997

## Section II. Facility-wide Conditions.

### The following conditions apply facility-wide:

1. APPENDIX TV-1, TITLE V CONDITIONS, 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 a copy when requested or otherwise appropriate.}

2. **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.]

3. **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 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.

[Rule 62-296.320(4)(b)1. & 4, F.A.C.]

4. **Prevention of Accidental Releases (Section 112(r) of CAA).** If required by 40 CFR 68, the permittee shall submit to the implementing agency:

- a. a risk management plan (RMP) when, and if, such requirement becomes applicable; and
- b. certification forms and/or RMPs according to the promulgated rule schedule.

[40 CFR 68]

5. **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.]

6. **Exempt Emissions Units and/or Activities.** Appendix E-1, List of Exempt 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.]

7. **General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions.** The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The owner or operator shall:

- a. Tightly cover or close all VOC or OS containers when they are not in use.
- b. Tightly cover all open tanks which contain VOC or OS when they are not in use.
- c. Maintain all pipes, valves, fittings, etc., which handle VOC or OS in good operating condition.
- d. Immediately confine and clean up VOC or OS spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.

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

**8. Not Federally Enforceable.** No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

- a. The facility shall construct temporary sandblasting enclosures when necessary, in order to perform sandblasting on fixed plant equipment.
- b. Maintenance of paved areas as needed.
- c. Regular mowing of grass and care of vegetation.
- d. Limiting access to plant property by unnecessary vehicles.
- e. Bagged chemical products are stored in concrete block buildings until they are used.
- f. Spills of powdered chemical products are cleaned up as soon as practicable.

[Rule 62-296.320(4)(c)2., F.A.C., proposed by the applicant in the initial Title V permit application received June 12, 1996]

**9.** When appropriate, any recording, monitoring or reporting requirements that are time-specific shall be in accordance with the effective date of this permit, which define day one.

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

**10. Submittals.** All reports, tests, notifications or other submittals required by this permit shall be submitted to the Department's Southwest District, Air Section:

Department of Environmental Protection  
Southwest District Office  
3804 Coconut Palm Drive  
Tampa, FL 33619-8218  
Telephone: 813/744-6100  
Fax: 813/744-6458

Any reports, data, notifications, certifications and requests 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  
Operating Permits Section  
61 Forsyth Street  
Atlanta, GA 30303  
Phone: 404/562-9099  
Fax: 404/562-9095



### Section III. Emissions Unit(s) and Conditions.

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

E.U. ID No.	Brief 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 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, the maximum heat input for each boiler is 8650 mmBtu per hour.

Each emissions unit consists of a boiler which drives a turbine generator. Emissions are controlled with multiple cyclones with ash reinjection, a flue gas recirculation system and staged combustion. Each unit is equipped with a 499 foot stack.

{Permitting note(s): 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.}

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

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

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

Unit No.	mmBtu/hr Heat Input	Fuel Type
1	8650	No. 2 or 6 Fuel Oil
2	8650	No. 2 or 6 Fuel Oil

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

A.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition A.26 and A.27 of this permit.

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

A.3. Methods of Operation. Fuels.

- Startup: The only fuels allowed to be burned are any combination of No. 6 fuel oil, No. 2 fuel oil and propane.
- Normal: The only fuels allowed to be burned are any combination of No. 6 fuel oil, No. 2 fuel oil, propane and on-specification used oil from FPL operations.

[Rule 62-213.410, F.A.C.]

**A.4. Hours of Operation.** The emissions units may operate continuously, i.e., 8,760 hours/year. [Rule 62-210.200(PTE), F.A.C.]

**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.}

**A.5. Visible Emissions.** Visible emissions shall not exceed 40 percent opacity. Emissions units governed by this visible emissions standard shall compliance test for particulate matter emissions annually.

[Rule 62-296.405(1)(a), F.A.C.; and OGC Case Nos. 83-0580 & 83-0581, Order dated April 24, 1984.]

**A.6. Visible Emissions - Soot Blowing and Load Change.** 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.

Visible emissions above 60 percent opacity shall be allowed for not more than 4, six (6)-minute periods, during the 3-hour period of excess emissions allowed by this condition.

[Rule 62-210.700(3), F.A.C., Note: these units have operational continuous opacity monitors.]

**A.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.]

**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.]

**A.9. Sulfur Dioxide.** When burning liquid fuel, sulfur dioxide emissions shall not exceed 1.1 pounds per million Btu heat input, as measured by applicable compliance methods. **Any calculations used to demonstrate compliance shall be based solely on the Btu value and the percent sulfur of the liquid fuel being burned.**

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

{Note: Specific conditions **A.9, A.15, A.23 and A.24** of this permit effectively limit the sulfur content of liquid fuels burned to a maximum of 1.0 percent by weight, **as fired.**}

**A.10. Nitrogen Oxides.** Nitrogen oxides emissions shall not exceed 0.30 pounds per million Btu heat input. Compliance shall be demonstrated based on a 30-day rolling average as measured by a continuous emission monitoring system (CEMS). The CEMS must meet the performance specifications contained in 40 CFR 75.

[Rules 62-296.405(1)(d)2. and (1)(d)4., F.A.C., AO 41-204804 and AO 41-219341, Issued August 30, 1993]

### **Excess Emissions**

**A.11.** 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.12.** 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.]

**A.13.** 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**

**A.14. Annual Tests Required.** Except as provided in specific conditions **A.17** through **A.19** of this permit, emission testing for particulate emissions and visible emissions shall be performed annually, no later than July of each year, except for units that are not operating because of scheduled maintenance outages and emergency repairs, which will be tested within thirty days of returning to service.  
[Rules 62-4.070(3) and 62-213.440, F.A.C.]

**A.15. 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 **A.9, A.23 and A.24** 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.]

**A.17. 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 fuel for more than 400 hours other than during startup.

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;
- 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.

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) **Special Compliance Tests.** 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.

(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., SIP approved]

**A.18. When VE Tests Not Required.** 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.19. When PM Tests Not Required.** 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.]

### **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.20. Visible emissions.** 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.21** of this permit. VE testing shall be conducted in accordance with the requirements of specific condition **A.27** of this permit.  
[Rule 62-296.405(1)(e)1., F.A.C.]

**A.21. 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.
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, F.A.C.]

**A.22. 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. Particulate testing shall be conducted in accordance with the requirements of specific conditions **A.26** and **A.27** of this permit.

[Rules 62-213.440, 62-296.405(1)(e)2., and 62-297.401, F.A.C.]

**A.23. 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 exceedences 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 using fuel sampling and analysis.** See specific conditions **A.9** and **A.24** of this permit.

[Rules 62-213.440, 62-296.405(1)(e)3. and 62-297.401, F.A.C.]

**A.24.** For each emissions unit, 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:

- a. Determine and record the **as-fired** fuel sulfur content, percent by weight, for liquid fuels using either ASTM D2622-94, ASTM D4294-90 (95), ASTM D1552-95, ASTM D1266-91, or both ASTM D4057-88 and ASTM D129-95 (or latest editions) to analyze a **representative sample of the blended fuel** following each fuel delivery.
- b. Record daily the amount of each fuel fired, the density of each fuel, the Btu value, and the percent sulfur content by weight of each fuel.

c. Utilize the information in a. and b., above, to demonstrate compliance with the sulfur limitation at all times.

[Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b. and 62-297.440, F.A.C.]

**A.25. 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.26. Operating Rate During Testing.** Testing of emissions shall be conducted with each 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.27. Operating Conditions During Testing - PM and VE.** When required, testing for particulate matter and visible emissions shall be conducted while firing No. 6 fuel oil at the maximum allowable rate of 8650 million Btu per hour, except as provided below. Particulate and visible emissions shall be conducted under both sootblowing and non-sootblowing conditions, and shall be conducted while injecting the maximum quantity of additives approved by the Department.

Testing may be conducted while firing No. 6 fuel oil at less than 90 percent of the maximum allowable rate; however, subsequent emissions unit operation is limited as described in specific condition A.26 of this permit.

[Rules 62-4.070(3) and 62-213.440 F.A.C., AO 41-204804 Specific Condition 5, AO 41-219341 Specific Condition 5]

**A.28. 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.]

**A.29. 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 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) Calibration of Sampling Equipment.** Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1 (attached to this permit).

**(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.]

**A.30. 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.

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

**Record Keeping and Reporting Requirements**

**A.31. Excess Emissions - Malfunctions.** In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department's Southwest District, Air Section, 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's Southwest District, Air Section.

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

**A.32. Excess Emissions - Reports.** Submit to the Department's Southwest District, Air Section, a written report of emissions in excess of emission limiting standards for opacity and sulfur dioxide 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.

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



**A.33. 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's Southwest District, Air Section, on the results of each such test.
- (b) The required test report shall be filed with the Department's Southwest District, Air Section, 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's Southwest District, Air Section, 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.
  - 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.]

**A.34. Sulfur Dioxide Emission Report.** The owner or operator shall, by the thirtieth day following each calendar quarter, submit to the Department's Southwest District, Air Section, a summary report of the daily averages of fuel sulfur content and sulfur dioxide emissions, for each month of the preceding calendar quarter. The report shall identify the quantity of each fuel burned and document the heating value, the density or specific gravity, and the percent sulfur content by weight of each fuel burned, and the sulfur dioxide emission in pounds per hour and pounds per million Btu heat input.

[Rule 62-4.070(3) and 62-213.440, F.A.C., AO 41-204804 Specific Condition 6, AO 41-219341 Specific Condition 6]

#### **Miscellaneous Conditions**

**A.35. Used Oil.** Burning of on-specification used oil is allowed at this facility in accordance with all other conditions of this permit and the following additional conditions:

- a. **On-specification Used Oil Allowed as Fuel:** This permit allows the burning of used oil fuel meeting EPA "on-specification" used oil specifications, with a PCB concentration of less than 50 ppm, originating from FPL operations. Used oil that does not meet the specifications for on-specification used oil shall not be burned at this facility.

On-specification used oil shall meet the following specifications: [40 CFR 279, Subpart B.]

Arsenic shall not exceed 5.0 ppm;  
Cadmium shall not exceed 2.0 ppm;  
Chromium shall not exceed 10.0 ppm;  
Lead shall not exceed 100.0 ppm;  
Total halogens shall not exceed 1000 ppm;  
Flash point shall not be less than 100 degrees F.

- b. **Quantity Limited:** The maximum total quantity of used oil that may be burned in both emissions units is 40,000 gallons in any consecutive 12-month period.
- c. **Used Oil Containing PCBs Not Allowed:** 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. **PCB Concentration of 2 to less than 50 ppm:** 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. Testing Required: 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, flash point, 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), latest edition.

Split samples of the used oil shall be retained for three months after analysis for further testing if necessary.

[AO 41-204804 Specific Condition 9, and AO 41-219341 Specific Condition 9]

- f. Record Keeping Required: 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: [40 CFR 279.61 and 761.20(e)]
- (1) The gallons of on-specification used oil received 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.
- g. Reporting Required: The owner or operator shall submit to the Department's Southwest District, Air Section, within thirty days of the end of each calendar month in which used oil is burned, the analytical results and the total amount of on-specification used oil burned during the previous calendar month

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

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

**Section IV. This section is the Acid Rain Part.**

**Operated by:** Florida Power and Light Company  
**ORIS code:** 6042

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

The emissions unit(s) listed below are regulated under Acid Rain, Phase II.

<b>E.U. ID No.</b>	<b>Brief Description</b>
001	Fossil Fuel Steam Generator, Unit 1
002	Fossil Fuel Steam Generator, Unit 2

**A.1.** The Phase II permit application(s) 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 unit(s) must comply with the standard requirements and special provisions set forth in the application(s) listed below:

a. DEP Form No. 62-210.900(1)(a), dated July 1, 1995.  
[Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

**A.2.** Sulfur dioxide (SO<sub>2</sub>) allowance allocations for each Acid Rain unit are as follows:

<b><u>E.U. ID</u> No.</b>	<b>EPA ID</b>	<b>Year</b>	<b>2000</b>	<b>2001</b>	<b>2002</b>
001	ID No. 01 PMT1	<b>SO2 allowances, under Table 2 or 3 of 40 CFR Part 73</b>	13654*	13654*	13654*
002	ID No. 02 PMT2	<b>SO2 allowances, under Table 2 or 3 of 40 CFR Part 73</b>	12581*	12581*	12581*

\* 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 or 3 of 40 CFR 73.

**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 increase 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), F.A.C.]

**A.4. Statement of Compliance.** The annual statement of compliance pursuant to Rule 62-213.440(3), F.A.C., shall be submitted within 60 (sixty) days after the end of the calendar year. {See condition No. 51., Appendix TV-1, Title V Conditions}  
[Rule 62-214.420(11), F.A.C.]

**A.5. Comments, notes, and justifications:** None.

**Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers**  
**(version dated 02/05/97)**

**Abbreviations and Acronyms:**

°F: Degrees Fahrenheit  
**BACT:** Best Available Control Technology  
**CFR:** Code of Federal Regulations  
**DEP:** State of Florida, Department of Environmental Protection  
**DARM:** Division of Air Resource Management  
**EPA:** United States Environmental Protection Agency  
**F.A.C.:** Florida Administrative Code  
**F.S.:** Florida Statute  
**ISO:** International Standards Organization  
**LAT:** Latitude  
**LONG:** Longitude  
**MMBtu:** million British thermal units  
**MW:** Megawatt  
**ORIS:** Office of Regulatory Information Systems  
**SOA:** Specific Operating Agreement  
**UTM:** Universal Transverse Mercator

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**Citations:**

*The following examples illustrate the methods used in this permit to abbreviate and cite the references of rules, regulations, guidance memorandums, permit numbers, and ID numbers.*

**Code of Federal Regulations:**

*Example:* **[40 CFR 60.334]**

Where:	40	reference to	Title 40
	CFR	reference to	Code of Federal Regulations
	60	reference to	Part 60
	60.334	reference to	Regulation 60.334

**Florida Administrative Code (F.A.C.) Rules:**

*Example:* **[Rule 62-213, F.A.C.]**

Where:	62	reference to	Title 62
	62-213	reference to	Chapter 62-213
	62-213.205	reference to	Rule 62-213.205, F.A.C.

**ISO:** International Standards Organization refers to those conditions at 288 degrees K, 60 percent relative humidity, and 101.3 kilopascals pressure.

**Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers  
(continued)**

**Identification Numbers:**

Facility Identification (ID) Number:

*Example:* Facility ID No.: 1050221

*Where:*

105 = 3-digit number code identifying the facility is located in Polk County  
0221 = 4-digit number assigned by state database.

Permit Numbers:

*Example:* 1050221-002-AV, or  
1050221-001-AC

*Where:*

AC = Air Construction Permit  
AV = Air Operation Permit (Title V Source)  
105 = 3-digit number code identifying the facility is located in Polk County  
0221 = 4-digit number assigned by permit tracking database  
001 or 002 = 3-digit sequential project number assigned by permit tracking database

*Example:* PSD-FL-185  
PA95-01  
AC53-208321

*Where:*

PSD = Prevention of Significant Deterioration Permit  
PA = Power Plant Siting Act Permit  
AC = old Air Construction Permit numbering

**Appendix E-1, List of Exempt Emissions Units and/or Activities**

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Full 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 whether a facility containing such emissions units or activities would be subject to any applicable requirements. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., are also exempt from the permitting requirements of Chapter 62-213, F.A.C., provided such emissions units and activities also meet the exemption criteria of Rule 62-213.430(6)(b), F.A.C. The below listed emissions units and/or activities are hereby exempt pursuant to Rule 62-213.430(6), F.A.C.

Brief Description of Emissions Units and/or Activities	
1.	Spent boiler chemical cleaning liquid evaporation.
2.	Propane relief valves
3.	Hydrazine mixing tank an relief valves.
4.	Fuel oil storage tanks and related equipment.
5.	Lube oil tank vents and extraction vents
6.	Oil/water separators and related equipment
7.	Miscellaneous mobile vehicle operation (cars, light trucks, heavy-duty trucks, backhoes, tractors, forklifts, cranes, etc.)



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

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**Permit History (for tracking purposes):**

E.U. ID No.	Description	Permit No.	Issue Date	Expiration Date	Extended Date <sup>1, 2</sup>	Revised Date(s)
001	Fossil Fuel Steam Generator, Unit 1	AO41-204804*	08/30/93	01/14/97		05/27/97
002	Fossil Fuel Steam Generator, Unit 2	AO41-219341*	08/30/93	01/14/97		05/27/97

\* These permits were partially revised by Operation Permit Amendments, 0810010-002-AO.

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**ID Number Changes (for tracking purposes):**

From: **Facility ID No.:** 40MAN410010

To: **Facility ID No.:** 0810010

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Notes:

1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.

2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.

{Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate under existing valid permits}

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

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Unregulated Emissions Units and/or Activities. 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’.

<b>E.U. ID No.</b>	<b>Brief Description of Emissions Units and/or Activity</b>
003	Emergency Diesel Generator, Miscellaneous Mobile Equipment and Internal Combustion Engines
004	Painting of Plant Equipment and Non-halogenated Solvent Cleaning Operations

Appendix S  
Permit Summary Tables

Table 1-1, Summary of Air Pollutant Emission Standards

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

Emissions Unit		Brief Description							
001		Fossil Fuel Steam Generator, Unit 1, heat input of 8650 mmBtu/hr on fuel oil							
002		Fossil Fuel Steam Generator, Unit 2, heat input of 8650 mmBtu/hr on fuel oil							
Pollutant	Fuel(s)	Hours per Year	Allowable Emissions			Equivalent Emissions <sup>1</sup>		Regulatory Citations	See Permit Condition(s)
			Standard(s)	lb/hour	TPY	lb/hour	TPY		
<b>VE</b> Steady State	Oil, Propane	8760	40% opacity					Rule 62-296.405(1)(a), F.A.C.	<b>A.5</b>
<b>VE</b> Soot Blowing or Load Change	Oil, Propane	8760	60 % opacity (>60% opacity for not more than 4, six- minute periods					Rule 62-210.700(3), F.A.C.	<b>A.6</b>
<b>PM</b> Steady State	Oil, Propane	8760	0.1 lb/mmBtu			865, 904	3,789, 3,960	Rule 62-296.405(1)(b), F.A.C.	<b>A.7</b>
<b>PM</b> Soot Blowing or Load Change	Oil, Propane	8760	0.3 lb/mmBtu			2,595, 2,712	11,366, 11,879	Rule 62-210.700(3), F.A.C.	<b>A.8</b>

Appendix S  
Permit Summary Tables

Table 1-1, Summary of Air Pollutant Emission Standards, Continued

Emissions Unit		Brief Description							
001		Fossil Fuel Steam Generator, Unit 1, heat input of 8650 mmBtu/hr on fuel oil							
002		Fossil Fuel Steam Generator, Unit 2, heat input of 8650 mmBtu/hr on fuel oil							
Pollutant	Fuel(s)	Hours per Year	Allowable Emissions			Equivalent Emissions <sup>1</sup>		Regulatory Citations	See Permit Condition(s)
			Standard(s)	lb/hour	TPY	lb/hour	TPY		
SO <sub>2</sub>	Oil, Propane	8760	1.1 lb/mmBtu			9,515 (oil)	41,676 (oil)	Rules 62-213.440 & 62-296.405(1)(c)1.g., F.A.C.	A.9
NO <sub>x</sub>	Oil, Propane	8760	0.3 lb/mmBtu			2,595, 2,712	11,366, 11,879	Rules 62-296.405(1)(d)2., F.A.C.	A.10

Notes:

<sup>1</sup> The "Equivalent Emissions" listed are for informational purposes only.

**Appendix S**  
**Permit Summary Tables**

**Table 2-1, Summary of Compliance Requirements**

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

<b>Emissions Unit</b>	<b>Brief Description</b>
001	Fossil Fuel Steam Generator, Unit 1
002	Fossil Fuel Steam Generator, Unit 2

<b>Pollutant or Parameter</b>	<b>Fuel(s)</b>	<b>Compliance Method</b>	<b>Testing Frequency</b>	<b>Frequency Base Date<sup>1</sup></b>	<b>Minimum Compliance Test Duration</b>	<b>CMS<sup>2</sup></b>	<b>See Permit Condition(s)</b>
<b>SO<sub>2</sub></b>	Oil	Fuel sampling & analysis	As fired			Yes	<b>A.9, A.15, A.23 &amp; A.24</b>
<b>NO<sub>x</sub></b>	Oil, Propane	Continuous Emissions Monitor	Continuous			Yes	<b>A.10</b>
<b>PM</b>	Oil, Propane	Rule 62-296.405(1)(e)2	Annual	July	3 hours		<b>A.22, A.26 &amp; A.27</b>
<b>VE</b>	Oil, Propane	DEP Method 9	Annual	July	1 hour	Yes	<b>A.20, A.21 &amp; A.27</b>
<b>On-spec. Used Oil</b>		Record Keeping and Analysis	As fired				<b>A.35</b>

Notes:

<sup>1</sup> Frequency base date established for planning purposes only; see Rule 62-297.310, F.A.C.

<sup>2</sup> CMS = continuous monitoring system

Appendix TV-1, the Title V Core Conditions, has been provided only to the applicant. The most recent version of these conditions may be obtained from the Department's Internet Web site at:

<http://www.dep.state.fl.us/air/>

If you do not have access to the Internet and would like a copy of Appendix TV, please contact Susan DeVore, Department of Environmental Protection, Division of Air Resources Management, Bureau of Air Regulation, Mail Station 5505, 2600 Blair Stone Road, Tallahassee, FL 32399-2400, 850/488-1344.

An electronic version of this permit is also available from the Department's Internet Web site above.

## APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/07/96)

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Stack Sampling Facilities Provided by the Owner of an Emissions Unit. This section describes the minimum requirements for stack sampling facilities that are necessary to sample point emissions units. Sampling facilities include sampling ports, work platforms, access to work platforms, electrical power, and sampling equipment support. Emissions units must provide these facilities at their expense. All stack sampling facilities must meet any Occupational Safety and Health Administration (OSHA) Safety and Health Standards described in 29 CFR Part 1910, Subparts D and E.

(a) Permanent Test Facilities. The owner or operator of an emissions unit for which a compliance test, other than a visible emissions test, is required on at least an annual basis, shall install and maintain permanent stack sampling facilities.

(b) Temporary Test Facilities. The owner or operator of an emissions unit that is not required to conduct a compliance test on at least an annual basis may use permanent or temporary stack sampling facilities. If the owner chooses to use temporary sampling facilities on an emissions unit, and the Department elects to test the unit, such temporary facilities shall be installed on the emissions unit within 5 days of a request by the Department and remain on the emissions unit until the test is completed.

(c) Sampling Ports.

1. All sampling ports shall have a minimum inside diameter of 3 inches.
2. The ports shall be capable of being sealed when not in use.
3. The sampling ports shall be located in the stack at least 2 stack diameters or equivalent diameters downstream and at least 0.5 stack diameter or equivalent diameter upstream from any fan, bend, constriction or other flow disturbance.
4. For emissions units for which a complete application to construct has been filed prior to December 1, 1980, at least two sampling ports, 90 degrees apart, shall be installed at each sampling location on all circular stacks that have an outside diameter of 15 feet or less. For stacks with a larger diameter, four sampling ports, each 90 degrees apart, shall be installed. For emissions units for which a complete application to construct is filed on or after December 1, 1980, at least two sampling ports, 90 degrees apart, shall be installed at each sampling location on all circular stacks that have an outside diameter of 10 feet or less. For stacks with larger diameters, four sampling ports, each 90 degrees apart, shall be installed. On horizontal circular ducts, the ports shall be located so that the probe can enter the stack vertically, horizontally or at a 45 degree angle.

5. On rectangular ducts, the cross sectional area shall be divided into the number of equal areas in accordance with EPA Method 1. Sampling ports shall be provided which allow access to each sampling point. The ports shall be located so that the probe can be inserted perpendicular to the gas flow.

(d) Work Platforms.

1. Minimum size of the working platform shall be 24 square feet in area. Platforms shall be at least 3 feet wide.

2. On circular stacks with 2 sampling ports, the platform shall extend at least 110 degrees around the stack.

3. On circular stacks with more than two sampling ports, the work platform shall extend 360 degrees around the stack.

4. All platforms shall be equipped with an adequate safety rail (ropes are not acceptable), toeboard, and hinged floor-opening cover if ladder access is used to reach the platform. The safety rail directly in line with the sampling ports shall be removable so that no obstruction exists in an area 14 inches below each sample port and 6 inches on either side of the sampling port.

(e) Access to Work Platform.

APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/07/96)  
(continued)

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1. Ladders to the work platform exceeding 15 feet in length shall have safety cages or fall arresters with a minimum of 3 compatible safety belts available for use by sampling personnel.

2. Walkways over free-fall areas shall be equipped with safety rails and toeboards.

(f) Electrical Power.

1. A minimum of two 120-volt AC, 20-amp outlets shall be provided at the sampling platform within 20 feet of each sampling port.

2. If extension cords are used to provide the electrical power, they shall be kept on the plant's property and be available immediately upon request by sampling personnel.

(g) Sampling Equipment Support.

1. A three-quarter inch eyebolt and an angle bracket shall be attached directly above each port on vertical stacks and above each row of sampling ports on the sides of horizontal ducts.

a. The bracket shall be a standard 3 inch x 3 inch x one-quarter inch equal-legs bracket which is 1 and one-half inches wide. A hole that is one-half inch in diameter shall be drilled through the exact center of the horizontal portion of the bracket. The horizontal portion of the bracket shall be located 14 inches above the centerline of the sampling port.

b. A three-eighth inch bolt which protrudes 2 inches from the stack may be substituted for the required bracket. The bolt shall be located 15 and one-half inches above the centerline of the sampling port.

c. The three-quarter inch eyebolt shall be capable of supporting a 500 pound working load. For stacks that are less than 12 feet in diameter, the eyebolt shall be located 48 inches above the horizontal portion of the angle bracket. For stacks that are greater than or equal to 12 feet in diameter, the eyebolt shall be located 60 inches above the horizontal portion of the angle bracket. If the eyebolt is more than 120 inches above the platform, a length of chain shall be attached to it to bring the free end of the chain to within safe reach from the platform.

2. A complete monorail or dualrail arrangement may be substituted for the eyebolt and bracket.

3. When the sample ports are located in the top of a horizontal duct, a frame shall be provided above the port to allow the sample probe to be secured during the test.

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



STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the matter of:

Florida Electric Power Coordinating Group, Inc., )

Petitioner. )

ASP No. 97-B-01

ORDER ON REQUEST  
FOR  
ALTERNATE PROCEDURES AND REQUIREMENTS

Pursuant to Rule 62-297.620, Florida Administrative Code (F.A.C.), the Florida Electric Coordinating Group, Incorporated, (FCG) petitioned for approval to: (1) Exempt fossil fuel steam generators which burn liquid and/or solid fuel for less than 400 hours during the federal fiscal year from the requirement to conduct an annual particulate matter compliance test; and, (2) Exempt fossil fuel steam generators which burn liquid and/or solid fuel for less than 400 hours during the federal fiscal year from the requirement to conduct an annual particulate matter compliance test during the year prior to renewal of an operation permit. This Order is intended to clarify particulate testing requirements for those fossil fuel steam generators which primarily burn gaseous fuels including, but not necessarily limited to natural gas.

Having considered the provisions of Rule 62-296.405(1), F.A.C., Rule 62-297.310(7), F.A.C., and all supporting documentation, the following Findings of Fact, Conclusions of Law, and Order are entered:

FINDINGS OF FACT

1. The Florida Electric Power Coordinating Group, Incorporated, petitioned the Department to exempt those fossil fuel steam generators which have a heat input of more than 250 million Btu per hour and burn solid and/or liquid fuel less than 400 hours during the year from the requirement to conduct an annual particulate matter compliance test. [Exhibit 1]
2. Rule 62-296.405(1)(a), F.A.C., applies to those fossil fuel steam generators that are not subject to the federal standards of performance for new stationary sources (NSPS) in 40 CFR 60 and which have a heat input of more than 250 million Btu per hour.
3. Rule 62-296.405(1)(a), F.A.C., limits visible emissions from affected fossil fuel steam generators to, "20 percent opacity except for either one six-minute period per hour during which

not exceed 40 percent. The option selected shall be specified in the emissions unit's construction and operation permits. Emissions units governed by this visible emission limit shall test for particulate emission compliance annually and as otherwise required by Rule 62-297, F.A.C."

4. Rule 62-296.405(1)(a), F.A.C., further states, "Emissions units electing to test for particulate matter emission compliance quarterly shall be allowed visible emissions of 40 percent opacity. The results of such tests shall be submitted to the Department. Upon demonstration that the particulate standard has been regularly complied with, the Secretary, upon petition by the applicant, shall reduce the frequency of particulate testing to no less than once annually."

5. Rule 297.310(7)(a)1., F.A.C., states, "The owner or operator of a new or modified emissions unit that is subject to an emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining an operation permit for such emissions unit."

6. Rule 297.310(7)(a)2., F.A.C., states, "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."

7. Rule 297.310(7)(a)3., F.A.C., further states, "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 and/or solid fuel for a total of no more than 400 hours."

8. Rule 297.310(7)(a)4., F.A.C., states, "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; 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..."

9. Rule 297.310(7)(a)5., F.A.C., states, "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 and/or solid fuel, other than during startup, for a total of more than 400 hours."

10. Rule 297.310(7)(a)6., F.A.C., states, "For fossil fuel steam generators on a semi-annual particulate matter emission compliance testing schedule, a compliance test shall not be

required for any six-month period in which liquid and/or solid fuel is not burned for more than 200 hours other than during startup."

11. Rule 297.310(7)(a)7., F.A.C., states, "For emissions units electing to conduct particulate matter emission compliance testing quarterly pursuant to Rule 62-296.405(2)(a), F.A.C., a compliance test shall not be required for any quarter in which liquid and/or solid fuel is not burned for more than 100 hours other than during startup." [Note: The reference should be to Rule 62-296.405(1)(a), F.A.C., rather than Rule 62-296.405(2)(a), F.A.C.]

12. The fifth edition of the U. S. Environmental Protection Agency's Compilation of Air Pollutant Emission Factors, AP-42, that emissions of filterable particulate from gas-fired fossil fuel steam generators with a heat input of more than about 10 million Btu per hour may be expected to range from 0.001 to 0.006 pound per million Btu. [Exhibit 2]

13. Rule 62-296.405(1)(b), F.A.C. and the federal standards of performance for new stationary sources in 40 CFR 60.42, Subpart D, limit particulate emissions from uncontrolled fossil fuel fired steam generators with a heat input of more than 250 million Btu to 0.1 pound per million Btu.

#### CONCLUSIONS OF LAW

1. The Department has jurisdiction to consider the matter pursuant to Section 403.061, Florida Statutes (F.S.), and Rule 62-297.620, F.A.C.

2. Pursuant to Rule 62-297.310(7), F.A.C., the Department may require Petitioner to conduct compliance tests that identify the nature and quantity of pollutant emissions, if, after investigation, it is believed that any applicable emission standard or condition of the applicable permits is being violated.

3. There is reason to believe that a fossil fuel steam generator which does not burn liquid and/or solid fuel (other than during startup) for a total of more than 400 hours in a federal fiscal year and complies with all other applicable limits and permit conditions is in compliance with the applicable particulate mass emission limiting standard.

#### ORDER

Having considered the requirements of Rule 62-296.405, F.A.C., Rule 62-297.310, F.A.C., and supporting documentation, it is hereby ordered that:

1. 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 and/or solid fuel, other than during startup, for a total of more than 400 hours;

2. For fossil fuel steam generators on a semi-annual particulate matter emission compliance testing schedule, a compliance test shall not be required for any six-month period in which liquid and/or solid fuel is not burned for more than 200 hours other than during startup;

3. For emissions units electing to conduct particulate matter emission compliance testing quarterly pursuant to Rule 62-296.405(1)(a), F.A.C., a compliance test shall not be required for any quarter in which liquid and/or solid fuel is not burned for more than 100 hours other than during startup;

4. 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 particulate matter emission compliance test results for any fossil fuel steam generator emissions unit that burned liquid and/or solid fuel for a total of no more than 400 hours during the year prior to renewal.

5. Pursuant to Rule 62-297.310(7), F.A.C., owners of affected fossil fuel steam generators may be required to conduct compliance tests that identify the nature and quantity of pollutant emissions, if, after investigation, it is believed that any applicable emission standard or condition of the applicable permits is being violated.

6. Pursuant to Rule 62-297.310(8), F.A.C., owners of affected fossil fuel steam generators shall submit the compliance test report to the District Director of the Department district office having jurisdiction over the emissions unit and, where applicable, the Air Program Administrator of the appropriate Department-approved local air program within 45 days of completion of the test.

#### PETITION FOR ADMINISTRATIVE REVIEW

The Department will take the action described in this Order unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 of the Florida Statutes, or a party requests mediation as an alternative remedy under section 120.573 before the deadline for filing a petition. Choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement. The procedures for petitioning for a hearing are set forth below, followed by the procedures for requesting mediation.

A person whose substantial interests are affected by the Department's proposed decision may petition for an administrative hearing in accordance with sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000. Petitions must be filed within 21 days of receipt of this Order. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition (or a request for mediation, as discussed below) within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 of

the Florida Statutes, or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207 of the Florida Administrative Code.

A petition must contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department File Number, and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by each petitioner, if any;
- (e) A statement of facts that the petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement identifying the rules or statutes each petitioner contends require reversal or modification of the Department's action or proposed action; and,
- (g) A statement of the relief sought by each petitioner, stating precisely the action each petitioner wants the Department to take with respect to the Department's action or proposed action in the notice of intent.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this Order. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A person whose substantial interests are affected by the Department's proposed decision, may elect to pursue mediation by asking all parties to the proceeding to agree to such mediation and by filing with the Department a request for mediation and the written agreement of all such parties to mediate the dispute. The request and agreement must be filed in (received by) the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, by the same deadline as set forth above for the filing of a petition.

A request for mediation must contain the following information:

(a) The name, address, and telephone number of the person requesting mediation and that person's representative, if any;

(b) A statement of the preliminary agency action;

(c) A statement of the relief sought; and

(d) Either an explanation of how the requester's substantial interests will be affected by the action or proposed action addressed in this notice of intent or a statement clearly identifying the petition for hearing that the requester has already filed, and incorporating it by reference.

The agreement to mediate must include the following:

(a) The names, addresses, and telephone numbers of any persons who may attend the mediation;

(b) The name, address, and telephone number of the mediator selected by the parties, or a provision for selecting a mediator within a specified time;

(c) The agreed allocation of the costs and fees associated with the mediation;

(d) The agreement of the parties on the confidentiality of discussions and documents introduced during mediation;

(e) The date, time, and place of the first mediation session, or a deadline for holding the first session, if no mediator has yet been chosen;

(f) The name of each party's representative who shall have authority to settle or recommend settlement; and

(g) The signatures of all parties or their authorized representatives.

As provided in section 120.573 of the Florida Statutes, the timely agreement of all parties to mediate will toll the time limitations imposed by sections 120.569 and 120.57 for requesting and holding an administrative hearing. Unless otherwise agreed by the parties, the mediation must be concluded within sixty days of the execution of the agreement. If mediation results in settlement of the administrative dispute, the Department must enter a final order incorporating the agreement of the parties. Persons whose substantial interests will be affected by such a modified final decision of the Department have a right to petition for a hearing only in accordance with the requirements for such petitions set forth above. If mediation terminates without settlement of the dispute, the Department shall notify all parties in writing that the administrative hearing processes under sections 120.569 and 120.57 remain available for disposition of the dispute, and the notice will

specify the deadlines that then will apply for challenging the agency action and electing remedies under those two statutes.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under section 120.542 of the Florida Statutes. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000.

The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
- (c) Each rule or portion of a rule from which a variance or waiver is requested;
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
- (e) The type of action requested;
- (f) The specific facts that would justify a variance or waiver for the petitioner;
- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver, when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in section 120.542(2) of the Florida Statutes, and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner. Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully

each of those terms is defined in section 120.542(2) of the Florida Statutes, and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner. Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

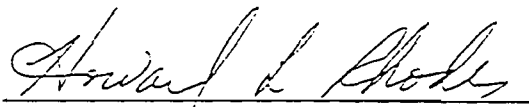
This Order constitutes final agency action unless a petition is filed in accordance with the above paragraphs. Upon timely filing of a petition, this Order will not be effective until further Order of the Department.

#### RIGHT TO APPEAL

Any party to this Order has the right to seek judicial review of the Order pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000; and, by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Notice of Agency Action is filed with the Clerk of the Department.

DONE AND ORDERED this 17 day of March, 1997 in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION



HOWARD L. RHODES, Director  
Division of Air Resources Management  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400  
(904) 488-0114



CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that a copy of the foregoing was mailed to Rich Piper, Chair, Florida Power Coordinating Group, Inc., 405 Reo Street, Suite 100, Tampa, Florida 33609-1004, on this 18<sup>th</sup> day of March 1997.

Clerk Stamp

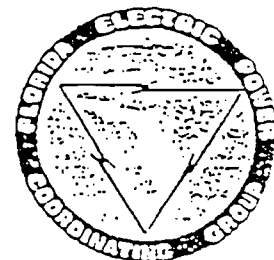
FILING AND ACKNOWLEDGMENT

FILED, on this date, pursuant to §120.52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Martha M. Wise 3-18-97  
Clerk Date

**BEST AVAILABLE COPY**

FLORIDA ELECTRIC POWER COORDINATING GROUP, INC. (FCG)  
405 REG STREET, SUITE 100 • (813) 289-5644 • FAX (813) 289-5645  
TAMPA, FLORIDA 33609-1004



January 28, 1997

Clair H. Fancy, P.E.  
Chief, Bureau of Air Regulation  
Florida Department of Environmental Protection  
2600 Blair Stone Road, MS 5505  
Tallahassee, FL 32301

**RECEIVED**

JAN 28 1997

BUREAU OF  
AIR REGULATION

RE: Comments Regarding Draft Title V Permits

Dear Mr. Fancy:

The Florida Electric Power Coordinating Group, Inc. (FCG), which is made up of 36 utilities owned by investors, municipalities, and cooperatives, has been following the implementation of Title V in Florida and recently submitted comments to you on draft Title V permit conditions by letter dated December 4, 1996. As indicated in that letter, representatives from the FCG would like to meet with you and other members of your air permitting staff to discuss some significant concerns that FCG member companies have regarding conditions that may be included in Title V permits issued by your office. While we will be discussing these issues with you and your staff in greater detail at that meeting, we would like to explain some of our concerns in this letter.

Primarily, the FCG members are concerned that the Title V permits may contain conditions that are much different in important respects than those conditions currently included in existing air permits. During the rulemaking workshops and seminars conducted by the Department to discuss the rules implementing the Title V permitting program, representations were made on several occasions that industry could expect to see permit conditions that were substantively similar to existing permit conditions and that primarily the format was changing. Representations were also made to industry that Title V did not impose additional substantive requirements beyond what was already required under the Department's rules. Based on the first draft Title V permit that we have reviewed, we are concerned that there may be some attempt to change the substantive requirements on existing facilities through the Title V permitting process, and we would like to discuss this with you at the meeting we have scheduled for January 30, 1997.

1. Federal Enforceability--The FCG has long been concerned about the designation of non-federally enforceable permit terms and conditions. We are concerned about this issue because the Department's first draft Title V permits have included language stating that *all* terms and conditions would become federally enforceable once the permit is issued. This approach is consistent with the Department's guidance memorandum dated September 13, 1996 (DARM-PER/V-18), but we understand that the Department may now intend to remove all references to

Clair H. Fancy, P.E.  
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Florida Department of Environmental Protection  
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the federal enforceability of permit terms and conditions. We are also concerned about this approach because a Title V permit is generally federally enforceable and, without any designation of non-federally enforceable terms and conditions, the entire permit could be interpreted to be federally enforceable. As we stated in the December 4 letter as well as our letter dated October 11, 1996, all terms and conditions in a Title V permit do *not* become enforceable by the U.S. Environmental Protection Agency and citizens under the Clean Air Act simply by inclusion in a Title V permit. To make it clear which provisions in a Title V permit are not federally enforceable (which are being included because of state or local requirements only), it is very important to specifically designate those conditions as having no federally enforceable basis. Such a designation is actually required under the federal Title V rules, which provide that permitting agencies are to "specifically designate as not being federally enforceable under the Act any terms and conditions included in the permit that are not required under the Act or under any of its applicable requirements." 40 CFR § 70.6(b). We would like to discuss with you our concerns about this issue and to again specifically request that when Title V permits are issued by the Department, conditions having no federally enforceable basis clearly be identified as such.

2. PM Testing on Gas--The FCG understands that the Department may attempt to require annual particulate matter compliance testing while firing natural gas to determine compliance with the 0.1 lb/mmBtu emission limit established under Rule 62-296.405(1)(b), F.A.C. The FCG member companies feel strongly that compliance testing for particulate matter should not be required while firing natural gas. The Department has not historically required particulate matter compliance testing while firing natural gas, it is not required under the current permits for these units, and it should not be necessary since natural gas is such a clean fuel. Typically only *de minimis* amounts of particulate matter would be expected from the firing of natural gas, so compliance testing would not provide meaningful information to the Department, and the expense to conduct such tests is not justified. We understand that Department representatives suggested that industry could pursue an alternative test procedure under Rule 62-297.620, F.A.C., to allow a visible emissions test to be used in lieu of a stack test for determining compliance with the particulate matter limit. While certainly a visible emissions test would be preferable over a stack test, neither of these tests should be needed to demonstrate compliance with the particulate matter limit of 0.1 lb/mmBtu while burning natural gas. The FCG strongly urges that the Department reconsider its position on this issue and clarify that compliance testing for particulate matter while firing natural gas is not required.

3. Excess Emissions--By letter dated December 5, 1996, the U.S. Environmental Protection Agency (EPA) submitted a letter commenting on a draft Title V permit that had been issued by the Department and indicated some concern regarding excess emission provisions included in conditions that were quoted from Rule 62-210.700, F.A.C. Because the permit conditions cited simply quote the applicable provisions of the Department's rules regarding

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Chief, Bureau of Air Regulation  
Florida Department of Environmental Protection  
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excess emissions and because these rules have been approved as part of Florida's State Implementation Plan, the permit conditions are appropriate to be included in the permit. We understand that the Department intends to include as applicable requirements in Title V permit conditions the provisions of Rule 62-210.700, F.A.C. If the Department receives any further adverse comments regarding the excess emissions rule under 62-210.700, F.A.C., we would appreciate your contacting us. Because this issue is so important to us, we would like to discuss it with you in greater detail at our meeting on January 30.

4. Compliance Testing for Combustion Turbines--While the Department's November 22, 1995, guidance regarding the compliance testing requirements for combustion turbines clearly states that the use of heat input curves based on ambient temperatures and humidities is to be included as a permit condition *only* if requested by a permittee, we understand that the Department may intend to include this requirement in Title V permits for all combustion turbines. As we are sure you recall, the FCG worked over a period of several months with the Department on the development of the guidance memorandum and it was clearly understood by FCG members that the heat input curves would not be mandated but would remain voluntary for any existing combustion turbine. It was also understood by FCG members that the requirement to conduct testing at 95 to 100 percent of capacity would be required only if the permit applicant requested the use of heat input curves. We understand that the Department may be interpreting the requirement to use heat input curves and to test at 95 to 100 percent of permitted capacity to be mandatory for all combustion turbines. We would like to clarify this with you during our meeting. Also, we would like to confirm that, regardless of whether a combustion turbine uses heat input curves or tests at 95 to 100 percent of permitted capacity, it is necessary to test at four load points and correct to ISO *only* to determine compliance with the nitrogen oxides (NOx) standard under New Source Performance Standard Subpart GG under 40 CFR § 60.532 and not annually thereafter.

5. Test Methods--The FCG is concerned about the possibility of the Department requiring a full permit revision to authorize the use of an approved test method not specifically identified in a Title V permit, even though the Department may have separately approved the use of the particular test method for a unit (i.e., through a compliance test protocol). It is the FCG's position that language should be included in all Title V permits indicating that other test methods approved by the Department may be used. Further, a full permit revision (including public notice) should *not* be necessary when a test method not previously identified in the permit is approved for use by a unit. The Department's subsequent approval of test methods should simply be included in the next permit renewal cycle. The FCG understands that the Department planned to confirm this approach with the U.S. Environmental Protection Agency Region IV, and we would like to discuss this issue with you at the January 30 meeting to learn of the agency's response.

Clair H. Fancy, P.E.  
Chief, Bureau of Air Regulation  
Florida Department of Environmental Protection  
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6. Quarterly Reports--The FCG understands that the Department may be interpreting the quarterly reporting requirements under Rule 62-296.405(1)(g), F.A.C., to apply regardless of whether continuous emissions monitors were required under the preceding Rule 62-296.405(1)(f), F.A.C. It is the FCG's position that quarterly reports are required under Rule 62-296.405(1)(g) only when continuous emissions monitors are required under the preceding paragraph (f). While this may not be entirely clear from the language of the rules, paragraphs (f) and (g) were originally included in a separate rule on "continuous emission monitoring requirements" where it was very clear that the requirements of paragraph (g) applied *only* if continuous emission monitoring was required under paragraph (f). Research indicates that Rule 17-2.710, F.A.C. (copy attached), where these provisions were originally located, was first transferred to Rule 17-297.500, F.A.C. (which later became Rule 62-297.500), later repealed in November of 1994, and ultimately replaced with what is now Rule 62-296.405(1)(f) and (g), F.A.C. To the extent that an emissions unit is not subject to Rule 62-296.405(1)(f) and is not required to install and operate continuous emissions monitors (e.g., oil- and gas-fired units), the quarterly reporting requirements of paragraph (g) should not apply.

7. Trivial Activities--As you may recall, in May of 1996, the FCG submitted to the Department a list of small, *de minimis* emissions units and activities that it considered to be "trivial," consistent with the list developed by EPA as part of the Title V "White Paper" and incorporated by reference by the Department in its March 15, 1996, guidance memorandum (DARM-PER/V-15-Revised). We never received a response from the Department and now understand that the Department may not have made a determination as to whether any of the emission units or activities on the list should qualify as "trivial." This is an important issue to the FCG because only "trivial" activities can be omitted from the Title V permit application and permit, and ultimately omitted from emission estimates in the annual air operation reports under Rule 62-210.370(3), F.A.C. The FCG remains hopeful that the Department will consider its request to determine that most, if not all, of the emission units and activities on the May, 1996, list to be "trivial." We would like to discuss a possible resolution of this issue with you and your staff at the January 30 meeting.

8. Permit Shield--The FCG continues to be concerned about the language in Conditions 5 and 20 of Appendix TV-1, Title V Conditions, which circumvents the permit shield provisions under Section 403.0872(15), Florida Statutes, and Rule 62-213.460, F.A.C. The FCG believes that these conditions should be deleted in their entirety. To the extent that the Department attempt to caveat the applicability of those conditions, the FCG believes that it is important to cite to not only the regulatory citation for the permit shield but the statutory citation as well.

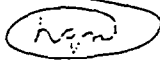
Thank you again for considering the FCG's comments on the draft Title V permits. We very much appreciate the cooperation we have received from the Department throughout the

Clair H. Fancy, P.E.  
Chief, Bureau of Air Regulation  
Florida Department of Environmental Protection  
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Title V implementation process, and we look forward to our meeting later this week. If you have any questions in the meantime, please call me at 561-625-7661.

Sincerely,

*Rich Piper*

Rich Piper, Chair   
FCG Air Subcommittee

Enclosures

cc: Howard L. Rhodes, DEP  
John Brown, DEP  
Pat Comer, DEP OGC  
Scott M. Sheplak, DEP  
Edward Svec, DEP  
FCG Air Subcommittee  
Angela Morrison, HGSS

AP-42  
FIFTH EDITION  
JANUARY 1995

COMPILATION  
OF  
AIR POLLUTANT  
EMISSION FACTORS

VOLUME I:  
STATIONARY POINT  
AND AREA SOURCES

Office Of Air Quality Planning And Standards  
Office Of Air And Radiation  
U. S. Environmental Protection Agency  
Research Triangle Park, NC 27711

January 1995

Exhibit 2

## 1.4 Natural Gas Combustion

### 1.4.1 General<sup>1-2</sup>

Natural gas is one of the major fuels used throughout the country. It is used mainly for industrial process steam and heat production; for residential and commercial space heating; and for electric power generation. Natural gas consists of a high percentage of methane (generally above 80 percent) and varying amounts of ethane, propane, butane, and inerts (typically nitrogen, carbon dioxide, and helium). Gas processing plants are required for the recovery of liquefiable constituents and removal of hydrogen sulfide before the gas is used (see Section 5.3, Natural Gas Processing). The average gross heating value of natural gas is approximately 8900 kilocalories per standard cubic meter (1000 British thermal units per standard cubic foot), usually varying from 8000 to 9200 kcal/scm (900 to 1100 Btu/scf).

### 1.4.2 Emissions And Controls<sup>3-5</sup>

Even though natural gas is considered to be a relatively clean-burning fuel, some emissions can result from combustion. For example, improper operating conditions, including poor air/fuel mixing, insufficient air, etc., may cause large amounts of smoke, carbon monoxide (CO), and organic compound emissions. Moreover, because a sulfur-containing mercaptan is added to natural gas to permit leak detection, small amounts of sulfur oxides will be produced in the combustion process.

Nitrogen oxides (NO<sub>x</sub>) are the major pollutants of concern when burning natural gas. Nitrogen oxide emissions depend primarily on the peak temperature within the combustion chamber as well as the furnace-zone oxygen concentration, nitrogen concentration, and time of exposure at peak temperatures. Emission levels vary considerably with the type and size of combustor and with operating conditions (particularly combustion air temperature, load, and excess air level in boilers).

Currently, the two most prevalent NO<sub>x</sub> control techniques being applied to natural gas-fired boilers (which result in characteristic changes in emission rates) are low NO<sub>x</sub> burners and flue gas recirculation. Low NO<sub>x</sub> burners reduce NO<sub>x</sub> by accomplishing the combustion process in stages. Staging partially delays the combustion process, resulting in a cooler flame which suppresses NO<sub>x</sub> formation. The three most common types of low NO<sub>x</sub> burners being applied to natural gas-fired boilers are staged air burners, staged fuel burners, and radiant fiber burners. Nitrogen oxide emission reductions of 40 to 85 percent (relative to uncontrolled emission levels) have been observed with low NO<sub>x</sub> burners. Other combustion staging techniques which have been applied to natural gas-fired boilers include low excess air, reduced air preheat, and staged combustion (e. g., burners-out-of-service and overfire air). The degree of staging is a key operating parameter influencing NO<sub>x</sub> emission rates for these systems.

In a flue gas recirculation (FGR) system, a portion of the flue gas is recycled from the stack to the burner windbox. Upon entering the windbox, the gas is mixed with combustion air prior to being fed to the burner. The FGR system reduces NO<sub>x</sub> emissions by two mechanisms. The recycled flue gas is made up of combustion products which act as inerts during combustion of the fuel/air mixture. This additional mass is heated in the combustion zone, thereby lowering the peak flame temperature and reducing the amount of NO<sub>x</sub> formed. To a lesser extent, FGR also reduces NO<sub>x</sub> formation by lowering the oxygen concentration in the primary flame zone. The amount of flue gas recirculated is a key operating parameter influencing NO<sub>x</sub> emission rates for these systems. Flue gas



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recirculation is normally used in combination with low  $\text{NO}_x$  burners. When used in combination, these techniques are capable of reducing uncontrolled  $\text{NO}_x$  emissions by 60 to 90 percent.

Two post-combustion technologies that may be applied to natural gas-fired boilers to reduce  $\text{NO}_x$  emissions by further amounts are selective noncatalytic reduction and selective catalytic reduction. These systems inject ammonia (or urea) into combustion flue gases to reduce inlet  $\text{NO}_x$  emission rates by 40 to 70 percent.

Although not measured, all particulate matter (PM) from natural gas combustion has been estimated to be less than 1 micrometer in size. Particulate matter is composed of filterable and condensable fractions, based on the EPA sampling method. Filterable and condensable emission rates are of the same order of magnitude for boilers; for residential furnaces, most of the PM is in the form of condensable material.

The rates of CO and trace organic emissions from boilers and furnaces depend on the efficiency of natural gas combustion. These emissions are minimized by combustion practices that promote high combustion temperatures, long residence times at those temperatures, and turbulent mixing of fuel and combustion air. In some cases, the addition of  $\text{NO}_x$  control systems such as FGR and low  $\text{NO}_x$  burners reduces combustion efficiency (due to lower combustion temperatures), resulting in higher CO and organic emissions relative to uncontrolled boilers.

Emission factors for natural gas combustion in boilers and furnaces are presented in Tables 1.4-1, 1.4-2, and 1.4-3.<sup>6</sup> For the purposes of developing emission factors, natural gas combustors have been organized into four general categories: utility/large industrial boilers, small industrial boilers, commercial boilers, and residential furnaces. Boilers and furnaces within these categories share the same general design and operating characteristics and hence have similar emission characteristics when combusting natural gas. The primary factor used to demarcate the individual combustor categories is heat input.

Table 1.4-1 (Metric And English Units). EMISSION FACTORS FOR PARTICULATE MATTER (PM)  
FROM NATURAL GAS COMBUSTION<sup>a</sup>

Combustor Type (Size, 10 <sup>6</sup> Btu/hr Heat Input) (SCC) <sup>b</sup>	Filterable PM <sup>c</sup>			Condensable PM <sup>d</sup>		
	kg/10 <sup>6</sup> m <sup>3</sup>	lb/10 <sup>6</sup> ft <sup>3</sup>	RATING	kg/10 <sup>6</sup> m <sup>3</sup>	lb/10 <sup>6</sup> ft <sup>3</sup>	RATING
Utility/large industrial boilers (> 100) (1-01-006-01, 1-01-006-04)	16 - 80	1 - 5	B	ND	ND	NA
Small industrial boilers (10 - 100) (1-02-006-02)	99	6.2	B	120	7.5	D
Commercial boilers (0.3 - < 10) (1-03-006-03)	72	4.5	C	120	7.5	C
Residential furnaces (< 0.3) (No SCC)	2.8	0.18	C	180	11	D

<sup>a</sup> References 9-14. All factors represent uncontrolled emissions. Units are kg of pollutant/10<sup>6</sup> cubic meters natural gas fired and lb of pollutant/10<sup>6</sup> cubic feet natural gas fired. Based on an average natural gas higher heating value of 8270 kcal/m<sup>3</sup> (1000 Btu/scf). The emission factors in this table may be converted to other natural gas heating values by multiplying the given emission factor by the ratio of the specified heating value to this average heating value. ND = no data. NA = not applicable.

<sup>b</sup> SCC = Source Classification Code.

<sup>c</sup> Filterable PM is that particulate matter collected on or prior to the filter of an EPA Method 5 (or equivalent) sampling train.

<sup>d</sup> Condensable PM is that particulate matter collected using EPA Method 202, (or equivalent). Total PM is the sum of the filterable PM and condensable PM. All PM emissions can be assumed to be less than 10 micrometers in aerodynamic equivalent diameter (PM-10).

Table 1.4-2 (Metric And English Units). EMISSION FACTORS FOR SULFUR DIOXIDE (SO<sub>2</sub>), NITROGEN OXIDES (NO<sub>x</sub>), AND CARBON MONOXIDE (CO) FROM NATURAL GAS COMBUSTION<sup>a</sup>

Combustor Type (Size, 10 <sup>6</sup> Btu/hr Heat Input) (SCC) <sup>b</sup>	SO <sub>2</sub> <sup>c</sup>			NO <sub>x</sub> <sup>d</sup>			CO <sup>e</sup>		
	kg/10 <sup>6</sup> m <sup>3</sup>	lb/10 <sup>6</sup> ft <sup>3</sup>	RATING	kg/10 <sup>6</sup> m <sup>3</sup>	lb/10 <sup>6</sup> ft <sup>3</sup>	RATING	kg/10 <sup>6</sup> m <sup>3</sup>	lb/10 <sup>6</sup> ft <sup>3</sup>	RATING
Utility/large Industrial Boilers (> 100) (1-01-006-01, 1-01-006-04)									
Uncontrolled	9.6	0.6	A	8800	550 <sup>f</sup>	A	640	40	A
Controlled - Low NO <sub>x</sub> burners	9.6	0.6	A	1300	81 <sup>f</sup>	D	ND	ND	NA
Controlled - Flue gas recirculation	9.6	0.6	A	850	53 <sup>f</sup>	D	ND	ND	NA
Small Industrial Boilers (10 - 100) (1-02-006-02)									
Uncontrolled	9.6	0.6	A	2240	140	A	560	35	A
Controlled - Low NO <sub>x</sub> burners	9.6	0.6	A	1300	81 <sup>f</sup>	D	980	61	D
Controlled - Flue gas recirculation	9.6	0.6	A	480	30	C	590	37	C
Commercial Boilers (0.3 - < 10) (1-03-006-03)									
Uncontrolled	9.6	0.6	A	1600	100	B	330	21	C
Controlled - Low NO <sub>x</sub> burners	9.6	0.6	A	270	17	C	425	27	C
Controlled - Flue gas recirculation	9.6	0.6	A	580	36	D	ND	ND	NA
Residential Furnaces (< 0.3) (No SCC)									
Uncontrolled	9.6	0.6	A	1500	94	B	640	40	B

<sup>a</sup> Units are kg of pollutant/10<sup>6</sup> cubic meters natural gas fired and lb of pollutant/10<sup>6</sup> cubic feet natural gas fired. Based on an average natural gas fired higher heating value of 8270 kcal/m<sup>3</sup> (1000 Btu/scf). The emission factors in this table may be converted to other natural gas heating values by multiplying the given emission factor by the ratio of the specified heating value to this average heating value. ND = no data. NA = not applicable.

<sup>b</sup> SCC = Source Classification Code.

<sup>c</sup> Reference 7. Based on average sulfur content of natural gas, 4600 g/10<sup>6</sup> Nm<sup>3</sup> (2000 gr/10<sup>6</sup> scf).

Table 1.4-2 (cont.).

- <sup>d</sup> References 10,15-19. Expressed as  $\text{NO}_2$ . For tangentially fired units, use  $4400 \text{ kg}/10^6 \text{ m}^3$  ( $275 \text{ lb}/10^6 \text{ ft}^3$ ). At reduced loads, multiply factor by load reduction coefficient in Figure 1.4-1. Note that  $\text{NO}_x$  emissions from controlled boilers will be reduced at low load conditions.
- <sup>e</sup> References 9-10,16-18,20-21.
- <sup>f</sup> Emission factors apply to packaged boilers only.

Table 1.4-1 (Metric And English Units). EMISSION FACTORS FOR CARBON DIOXIDE (CO<sub>2</sub>) AND TOTAL ORGANIC COMPOUNDS (TOC) FROM NATURAL GAS COMBUSTION<sup>a</sup>

Combustor Type (Size, 10 <sup>6</sup> Btu/hr Heat Input) (SCC) <sup>b</sup>	CO <sub>2</sub> <sup>c</sup>			TOC <sup>d</sup>		
	kg/10 <sup>6</sup> m <sup>3</sup>	lb/10 <sup>6</sup> ft <sup>3</sup>	RATING	kg/10 <sup>6</sup> m <sup>3</sup>	lb/10 <sup>6</sup> ft <sup>3</sup>	RATING
Utility/large industrial boilers (> 100) (1-01-006-01, 1-01-006-04)	ND <sup>e</sup>	ND	NA	28 <sup>f</sup>	1.7 <sup>f</sup>	C
Small industrial boilers (10 - 100) (1-02-006-02)	1.9 E+06	1.2 E+05	D	92 <sup>g</sup>	5.8 <sup>g</sup>	C
Commercial boilers (0.3 - < 10) (1-03-006-03)	1.9 E+06	1.2 E+05	C	128 <sup>h</sup>	8.0 <sup>h</sup>	C
Residential furnaces (No SCC)	2.0 E+06	1.3 E+05	D	180 <sup>h</sup>	11 <sup>h</sup>	D

<sup>a</sup> All factors represent uncontrolled emissions. Units are kg of pollutant/10<sup>6</sup> cubic meters and lb of pollutant/10<sup>6</sup> cubic feet. Based on an average natural gas higher heating value of 8270 kcal/m<sup>3</sup> (1000 Btu/scf). The emission factors in this table may be converted to other natural gas heating values by multiplying the given factor by the ratio of the specified heating value to this average heating value.

NA = not applicable.

<sup>b</sup> SCC = Source Classification Code.

<sup>c</sup> References 10,22-23.

<sup>d</sup> References 9-10,18.

<sup>e</sup> ND = no data.

<sup>f</sup> Reference 8: methane comprises 17% of organic compounds.

<sup>g</sup> Reference 8: methane comprises 52% of organic compounds.

<sup>h</sup> Reference 8: methane comprises 34% of organic compounds.

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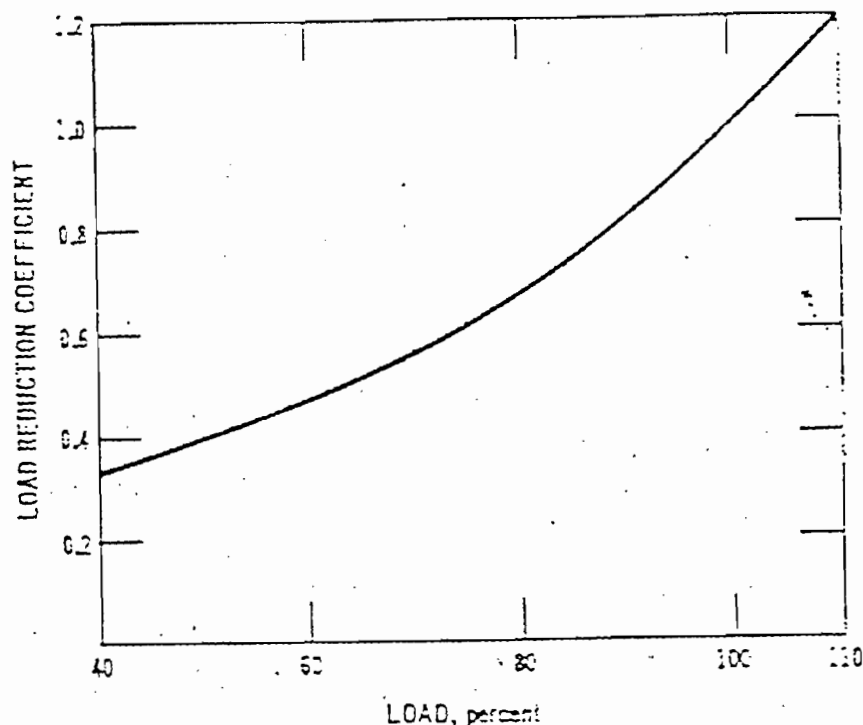


Figure 1.4-1. Load reduction coefficient as a function of boiler load.  
(Used to determine  $\text{NO}_x$  reductions at reduced loads in large boilers.)

References For Section 1.4

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2. *Chemical Engineers' Handbook, Fourth Edition*, J. H. Perry, Editor, McGraw-Hill Book Company, New York, NY, 1963.
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4. *Background Information Document For Small Steam Generating Units*, EPA-450/3-87-000, U. S. Environmental Protection Agency, Research Triangle Park, NC, 1987.
5. *Fine Particulate Emissions From Stationary and Miscellaneous Sources in the South Coast Air Basin*, California Air Resources Board Contract No. A6-191-30, KVB, Inc., Tustin, CA, February 1979.
6. *Emission Factor Documentation for AP-42 Section 1.4 - Natural Gas Combustion (Draft)*, Technical Support Division, Office of Air Quality Planning and Standards, U. S. Environmental Protection Agency, Research Triangle Park, NC, April 1993.
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8. *Compilation of Air Pollutant Emission Factors, Fourth Edition*, AP-42, U. S. Environmental Protection Agency, Research Triangle Park, NC, September 1985.

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11. N. F. Suprenant, et al., *Emissions Assessment of Conventional Stationary Combustion Systems, Volume I: Gas and Oil Fired Residential Heating Sources*, EPA-600/7-79-029b, U. S. Environmental Protection Agency, Washington, DC, May 1979.
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14. N. F. Suprenant, et al., *Emissions Assessment of Conventional Stationary Combustion Systems, Volume V: Industrial Combustion Sources*, EPA Contract No. 68-02-2197, GCA Corporation, Bedford, MA, October 1980.
15. *Emissions Test on 200 HP Boiler at Kaiser Hospital in Woodland Hills*, Energy Systems Associates, Tustin, CA, June 1986.
16. *Results From Performance Tests: California Milk Producers Boiler No. 5*, Energy Systems Associates, Tustin, CA, November 1984.
17. *Source Test For Measurement of Nitrogen Oxides and Carbon Monoxide Emissions From Boiler Exhaust at GAF Building Materials*, Pacific Environmental Services, Inc., Baldwin Park, CA, May 1991.
18. J. P. Kesselring and W. V. Krill, "A Low-NO<sub>x</sub> Burner For Gas-Fired Firetube Boilers", *Proceedings: 1985 Symposium on Stationary Combustion NO<sub>x</sub> Control, Volume 2*, EPRI CS-4360, Electric Power Research Institute, Palo Alto, CA, January 1986.
19. *NO<sub>x</sub> Emission Control Technology Update*, EPA Contract No. 68-01-6558, Radian Corporation, Research Triangle Park, NC, January 1984.
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21. *Evaluation of the Pollutant Emissions From Gas-Fired Forced Air Furnaces: Research Report No. 1503*, American Gas Association Laboratories, Cleveland, OH, May 1975.
22. *Thirty-day Field Tests of Industrial Boilers: Site 5 - Gas-fired Low-NO<sub>x</sub> Burner*, EPA-600/7-81-095a, U. S. Environmental Protection Agency, Research Triangle Park, NC, May 1981.
23. Private communication from Kim Black (Industrial Combustion) to Ralph Harris (MR), Independent Third Party Source Tests, February 7, 1992.

# Phase II Permit Application

Page 1

For more information, see instructions and refer to 40 CFR 72.30 and 72.31 and Chapter 214, F.A.C.

This submission is: ☒ New ☐ Revised

**STEP 1**  
Identify the source by  
plant name, State, and  
ORIS code from NADB

Plant Name	Manatee Plant	FL State	6042 ORIS Code
------------	---------------	-------------	-------------------

## Compliance Plan

**STEP 2**  
Enter the boiler ID#  
from NADB for each  
affected unit, and  
indicate whether a  
repowering plan is  
being submitted for  
the unit by entering  
"yes" or "no" at  
column c. For new  
units, enter the re-  
quested information  
in columns d and e

a Boiler ID#	b Unit Will Hold Allow- ances in Accordance with 40 CFR 72.9(c)(1)	c Repowering Plan	d New Units  Commence Operation Date	e New Units  Monitor Certification Deadline
PMT1	Yes	N/A	N/A	N/A
PMT2	Yes	N/A	N/A	N/A
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			

**STEP 3**  
Check the box if the  
response in column c  
of Step 2 is "Yes"  
for any unit

☐ For each unit that will be repowered, the Repowering Extension Plan form is included and the Repowering Technology Petition form has been submitted or will be submitted by June 1, 1997



Plant Name (from Step 1)

**STEP 4**

Read the standard requirements and certification, enter the name of the designated representative, and sign and date

**Standard Requirements****Permit Requirements.**

- (1) The designated representative of each Acid Rain source and each Acid Rain unit at the source shall:
  - (i) Submit a complete Acid Rain part application (including a compliance plan) under 40 CFR part 72, Rules 62-214.320 and 330, F.A.C. in accordance with the deadlines specified in Rule 62-214.320, F.A.C.; and
  - (ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain part application and issue or deny an Acid Rain permit;
- (2) The owners and operators of each Acid Rain source and each Acid Rain unit at the source shall:
  - (i) Operate the unit in compliance with a complete Acid Rain part application or a superseding Acid Rain part issued by the permitting authority; and
  - (ii) Have an Acid Rain Part.

**Monitoring Requirements.**

- (1) The owners and operators and, to the extent applicable, designated representative of each Acid Rain source and each Acid Rain unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75, and Rule 62-214.420, F.A.C.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

**Sulfur Dioxide Requirements.**

- (1) The owners and operators of each source and each Acid Rain unit at the source shall:
  - (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and
  - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An Acid Rain unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
  - (i) Starting January 1, 2000, an Acid Rain unit under 40 CFR 72.6(a)(2); or
  - (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an Acid Rain unit under 40 CFR 72.6(a)(3).
- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1)(i) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or the written exemption under 40 CFR 72.7 and 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

**Nitrogen Oxides Requirements.** The owners and operators of the source and each Acid Rain unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

**Excess Emissions Requirements.**

- (1) The designated representative of an Acid Rain unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
- (2) The owners and operators of an Acid Rain unit that has excess emissions in any calendar year shall:
  - (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
  - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

**Recordkeeping and Reporting Requirements.**

- (1) Unless otherwise provided, the owners and operators of the source and each Acid Rain unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:
  - (i) The certificate of representation for the designated representative for the source and each Acid Rain unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with Rule 62-214.350, F.A.C.; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
  - (ii) All emissions monitoring information, in accordance with 40 CFR part 75;
  - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and

Plant Name (from Step 1)

Recordkeeping and Reporting Requirements (cont.)

(iv) Copies of all documents used to complete an Acid Rain part application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.

(2) The designated representative of an Acid Rain source and each Acid Rain unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability.

(1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain part application, an Acid Rain part, or a written exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.

(2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.

(3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.

(4) Each Acid Rain source and each Acid Rain unit shall meet the requirements of the Acid Rain Program.

(5) Any provision of the Acid Rain Program that applies to an Acid Rain source (including a provision applicable to the designated representative of an Acid Rain source) shall also apply to the owners and operators of such source and of the Acid Rain units at the source.

(6) Any provision of the Acid Rain Program that applies to an Acid Rain unit (including a provision applicable to the designated representative of an Acid Rain unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one Acid Rain unit shall not be liable for any violation by any other Acid Rain unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.

(7) Each violation of a provision of 40 CFR parts 72, 73, 75, 77, and 78 by an Acid Rain source or Acid Rain unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities. No provision of the Acid Rain Program, an Acid Rain part application, an Acid Rain part, or a written exemption under 40 CFR 72.7 or 72.8 shall be construed as:

(1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an Acid Rain source or Acid Rain unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;

(2) Limiting the number of allowances a unit can hold; provided, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act;

(3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudency review requirements under such State law;

(4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,

(5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

Certification

I am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

(There are no attachments to this document)

Name William M. Reichel	
Signature <i>William M. Reichel</i>	Date 12/4/95

and FINDS identification  
numbers, if known

DATE
FINDS

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STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of:

Petition for Reduction in Quarterly  
Particulate Emissions Compliance  
Testing;  
FLORIDA POWER AND LIGHT COMPANY,  
  
Petitioner.

OGC Case Nos.: 83-0578  
83-0577, 83-0576,  
83-0585, 83-0586,  
83-0587, 83-0588  
83-0581, 83-0580

ORDER GRANTING PETITION FOR REDUCED  
FREQUENCY OF PARTICULATE TESTING

On September 16, 1983, the Petitioner, FLORIDA POWER AND  
LIGHT COMPANY, filed a Petition for Reduction in Quarterly  
Particulate Emissions Compliance Testing pursuant to Florida  
Administrative Code Rule 17-2.600(5)(b)1 for the following fossil  
fuel steam generating units:

Port Everglades Plant Unit No. 2  
Port Everglades Plant Unit No. 3  
Port Everglades Plant Unit No. 4  
Turkey Point Plant Unit No. 1  
Turkey Point Plant Unit No. 2  
Riveria Plant Unit No. 3  
Riveria Plant Unit No. 4  
Manatee Plant Unit No. 1  
Manatee Plant Unit No. 2

Each of the units has a heat input exceeding 250 million Btu per  
hour.

The petition and supporting documentation submitted by the  
Petitioner indicate that between August 1979 and July 21, 1983,  
these units were afforded relief from the particulate standard  
contained in Florida Administrative Code Rule 17-2.600(5)(b)2  
under the terms of a Department-issued variance. During the same  
period of time the Company elected to test quarterly as permitted  
under Rule 17-2.600(5)(b)1. Despite the existence of the  
variance, the tests results submitted during the last two years  
reveal that each of the above-listed units met the particulate  
emissions limitations contained in Rule 17-2.600(5)(b)2 of 0.1  
pounds per million Btu heat input.

Florida Administrative Code Rule 17-2.600(5)(b)1 specifically  
provides that I may reduce the frequency of particulate testing

Post-It™ brand fax transmittal memo 7671		# of pages > 3
To Scott Sheplak	From RICH PIPER	
Cc.	Cc.	
Dist.	Phone #	
Fax #	Fax #	

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upon a demonstration that the particulate standard has been regularly met. The particulate standard referred to is the general standard found in the rule--0.1 parts per million Btu heat input--not a relaxed emission limit established by a variance.

The intent of Rule 17-2.600(5)(b)1 is to ensure that before the frequency of particulate testing is reduced, the source has established a record of complying with the requirements of Florida Administrative Code Chapter 17-2 relating to particulate matter emissions. Petitioner has documented that each of these units has a history of regularly complying with the particulate matter standard applicable to them.

IT IS ORDERED that the present petition is GRANTED. Under the terms of Rule 17-2.600(5)(b)1, Petitioner may reduce the frequency of particulate testing to an annual basis for each of the units named in this Order. If, however, any of the units fails to comply with the applicable particulate or visible emission standard, this Order will terminate upon written notice by the Department.

The Petitioner may request a hearing in accordance with Section 120.57, Florida Statutes, and Florida Administrative Code Chapters 17-1 and 28-5. The request for hearing must be filed (received) in the Office of General Counsel of the Department, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within (14) days of receipt of this Order. Failure to file a request for hearing within this time shall constitute a waiver of Petitioner's right to request a hearing under Section 120.57, Florida Statutes.

DONE and ORDERED this 24 day of April, 1984.

## FILING AND ACKNOWLEDGEMENT

FILED on this date pursuant to §120.52 (9), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

\_\_\_\_\_  
Clerk

8.1.1984  
Date

*Victoria J. Tschinkel*  
VICTORIA J. TSCHINKEL  
Secretary

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION  
2600 Blair Stone Road  
Tallahassee, Florida 32301  
(904)488-4805

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00095

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Order Denying  
Petition for Reduced Frequency of Particulate Testing and the  
Order Granting Petition for Reduced Frequency of Particulate  
Testing have been furnished by U.S. Mail to Peter C. Cunningham,  
Esquire, Hopping Boyd Green and Sams, Post Office Box 6526,  
Tallahassee, Florida 32314 this 25th day of April, 1984.

*Nancy E. Wright*

NANCY E. WRIGHT

Assistant General Counsel

State of Florida Department  
of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32301  
904/488-9730



# Department of Environmental Protection

Lawton Chiles  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

July 9, 1997

Certified Mail - Return Receipt Requested

Mr. Rich Piper, Chair  
Florida Power Coordinating Group, Inc.  
405, Reo Street, Suite 100  
Tampa, Florida 33609-1004

Dear Mr. Piper:

Enclosed is a copy of a Scrivener's Order correcting an error in the Order concerning particulate matter testing of natural gas fired boilers.

If you have any questions concerning the above, please call Yogesh Manocha at 904/488-6140, or write to me.

Sincerely,

M. D. Harley, P.E., DEE  
P.E. Administrator  
Emissions Monitoring Section  
Bureau of Air Monitoring and  
Mobile Sources

MDH:ym

cc: Dotty Diltz, FDEP  
Pat Comer, FDEP

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the matter of:

Florida Electric Power Coordinating Group, Inc.,

Petitioner.

)  
)  
)  
)  
)

ASP No. 97-B-01

ORDER CORRECTING SCRIVENER'S ERROR

The Order which authorizes owners of natural gas fired fossil fuel steam generators to forgo particulate matter compliance testing on an annual basis and prior to renewal of an operation permit entered on the 17th day of March, 1997, is hereby corrected on page 4, paragraph number 4, by deleting the words "pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C.":

4. 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 particulate matter emission compliance test results for any fossil fuel steam generator emissions unit that burned liquid and/or solid fuel for a total of no more than 400 hours during the year prior to renewal.

DONE AND ORDERED this 2 day of July, 1997 in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION



HOWARD L. RHODES, Director  
Division of Air Resources Management  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400  
(904) 488-0114



### CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that a copy of the foregoing was mailed to Rich Piper, Chair, Florida Power Coordinating Group, Inc., 405 Reo Street, Suite 100, Tampa, Florida 33609-1004, on this 10<sup>th</sup> day of July 1997.

Clerk Stamp

#### **FILING AND ACKNOWLEDGMENT**

**FILED**, on this date, pursuant to §120.52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Martha J. Wells 7/10/97  
Clerk Date

Date: 8/22/97 4:16:11 PM  
From: Elizabeth Walker TAL  
Subject: New posting  
To: See Below

There is a new posting available on Florida's website.



Florida Power  
Manatee Plant 0810010001AV Draft

The notification letter is encoded and attached. If you have any questions, please let me know.

Thanks  
Elizabeth

## MEMORANDUM

TO: Scott M. Sheplak, P.E.

FROM:  Joseph Kahn, P.E., Susan C. DeVore 

DATE: August 19, 1997

RE: Intent package for DRAFT Permit No.: 0810010-001-AV  
Florida Power and Light Company  
Manatee Plant

8/25/97

**Permit Clock:** Today is ARMS Day 5  
**Default Date (Day 90):** November 13, 1997

This permit is for the initial Title V air operation permit for the subject facility which is a municipal power plant with two boilers regulated under 62-296.405. Unregulated emissions units include painting, mobile equipment and a diesel generator.

Additional information was requested. A response was received on August 15, 1997. This application was complete on date the response was received, August 15, 1997. Written comments were not received from the SW District, but we did discuss the compliance status by telephone.

This facility reported that each emissions unit was in compliance at the time of the application.

The facility had AO permits that allowed the co-firing of natural gas with fuel oil to meet the SO<sub>2</sub> limitation of 1.1 lb/mmBtu, even though the plant has no connection to a natural gas source. This was changed in the Title V permit to delete the reference to firing natural gas. The facility does have the capability to fire propane, which is used primarily as an ignition fuel. The draft permit conditions require that compliance with the SO<sub>2</sub> limitation be demonstrated based solely on the sulfur content of the fuel oil.

We recommend that this Intent to Issue be sent out as attached.

## **Florida's DRAFT Permit Electronic Notification Cover Memorandum**

**TO:** Yolanda Adams, U.S. EPA Region 4  
**CC:** Carla E. Pierce, U.S. EPA Region 4  
**THRU:** Scott M. Sheplak, P.E., Tallahassee Title V Section  
**FROM:** Susan C. DeVore, Permit Engineer  
**DATE:** August 19, 1997  
**RE:** U.S. EPA Region 4 DRAFT Title V Operation Permit Review

The following DRAFT Title V operation permits and associated documents have been posted on the DEP World Wide Web Internet site for your review. Please provide any comments via Internet E-mail, to Scott M. Sheplak, P.E., at "Sheplak\_S@dep.state.fl.us".

<u>Applicant Name</u> <u>Name(s)</u>	<u>County</u>	<u>Method of Transmittal</u>	<u>Electronic File</u>
Florida Power & Light Manatee Plant	Manatee	INTERNET	0810010d.zip

This zipped file contains the following electronic files:

0810010.sob  
0810010i.doc  
0810010d.doc  
etc.

# **STATEMENT OF BASIS**

Title V DRAFT Permit No.: 0810010-001-AV  
Florida Power and Light Company  
Manatee Plant  
Manatee 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.

This facility consists of two fossil fuel steam generators, Unit 1 and Unit 2, each rated at 800 megawatts (MW) (900 MW gross capacity) output. The steam generators each burn a variable combination of No. 6 fuel oil, No. 2 fuel oil, propane, and used oil from FPL operations, discharging pollutants through a stack 499 feet above ground level. Propane is utilized primarily for ignition of the main fuel. When firing fuel oil, the maximum heat input for each boiler is 8650 mmBtu per hour. Each unit is a Foster-Wheeler oil fired steam generator, equipped with multiple cyclones with fly ash reinjection, a flue gas recirculation system and staged combustion. Each operates a Westinghouse tandem compound, reheat-type extraction turbine.

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.

Also included in this permit are miscellaneous unregulated/exempt emissions units and/or activities.

Based on the initial Title V permit application received June 12, 1996, this facility is a major source of hazardous air pollutants (HAPs).