



Environmental Consulting & Technology, Inc.

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BUREAU OF AIR REGULATION

Mr. A.A. Linero, P.E.
Administrator, New Source Review Section
Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road, MS #5505
Tallahassee, FL 32399-2400

**Re: El Paso Merchant Energy Company
DEP File No. 0810199-001-AC (PSD-FL-318)
Manatee Glade Energy Center
Comments on Draft Permit**

Dear Mr. Linero:

On behalf of El Paso Merchant Energy Company (EPMEC), comments on the Department's draft Prevention of Significant Deterioration (PSD) permit for the Manatee Energy Center are attached for your consideration. To facilitate your review, a marked up electronic version of the Department's draft PSD permit showing the requested revisions are also being sent to you via electronic mail.

Your review of these comments and continued processing of the EPMEC Manatee Energy Center PSD permit application is appreciated. Please contact Mr. Krish Ravishankar at (713) 420-5563 or the undersigned at (352) 332-6230, Ext. 351 if there are any questions regarding these comments.

ENVIRONMENTAL CONSULTING & TECHNOLOGY, INC.

Thomas W. Davis, P.E.
Principal Engineer

Attachments

cc: Mr. Krish Ravishankar

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PERMITTEE:

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Authorized Representative:
William Mack, Sr., Managing Director

Facility Name: Manatee Energy Center
Project No. 0810199-001-AC
Air Permit No. PSD-FL-318
Facility ID No. 0810199
SIC No. 4911
Expires: December 1, 2004

PROJECT AND LOCATION

This permit authorizes the construction of a new nominal 600-megawatt electrical generating plant, the Manatee Energy Center, to be located 1 mile northeast of Buckeye Road and US Highway 41 near, Piney Point in Manatee County. UTM coordinates are: Zone 17; 349.1 km East; 3,057.6 km North. The plant will consist of one combined cycle gas turbine, two simple cycle gas turbines, and associated equipment.

STATEMENT OF BASIS

This PSD air pollution construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.) and Title 40, Part 52, Section 21 of the Code of Federal Regulations. Specifically, this permit is issued pursuant to the requirements for the Prevention of Significant Deterioration (PSD) of Air Quality, Rule 62-212.400, F.A.C. The permittee is authorized to install the proposed equipment in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department.

CONTENTS

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

(DRAFT)

Howard L. Rhodes, Director
Division of Air Resources Management

(Date)

SECTION I. GENERAL INFORMATION

FACILITY DESCRIPTION

The proposed project is for a new electrical power plant, the Manatee Energy Center, which will generate a nominal 600 MW of electricity. The plant will consist of one combined cycle gas turbine unit (250 MW, total) and two simple cycle gas turbine units (175 MW, each).

NEW EMISSIONS UNITS

This permit authorizes construction and installation of the following new emissions units.

ID	Emission Unit Description
001	Combined Cycle Unit No. CC-1 consists of a natural gas fired 175 MW General Electric Model PG7241FA gas turbine-electrical generator set, an unfired heat recovery steam generator, and a separate steam turbine-electrical generator.
002	Simple Cycle Unit No. SC-1 consists of a natural gas fired General Electric Model PG7241FA gas turbine-electrical generator set with a nominal capacity of 175 MW.
003	Simple Cycle Unit No. SC-2 consists of a natural gas fired General Electric Model PG7241FA gas turbine-electrical generator set with a nominal capacity of 175 MW.
004	Cooling Tower consisting of one 5-cell freshwater mechanical draft freshwater cooling tower.
005	Other Emissions Units include one 2600-hp diesel generator, one 250-hp diesel fire pump, a 12.8 MMBtu/hr (HHV) gas-fired fuel heater, an aqueous ammonia storage tank, and small diesel storage tanks.

REGULATORY CLASSIFICATION

Title III: Based on available data, the new facility is not a major source of hazardous air pollutants (HAP).

Title IV: The new gas turbines are subject to the acid rain provisions of the Clean Air Act.

Title V: Because potential emissions of at least one regulated pollutant exceed 100 tons per year, the new facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C. Regulated pollutants include pollutants such as carbon monoxide (CO), nitrogen oxides (NOx), particulate matter (PM/PM₁₀), sulfur dioxide (SO₂), and volatile organic compounds (VOC).

PSD: The project is located in an area designated as "attainment" or "unclassifiable" for each pollutant subject to a National Ambient Air Quality Standard. The facility is considered a "fossil fuel fired steam electric plant of more than 250 million BTU per hour of heat input", which is one of the 28 PSD source categories with the lower PSD applicability threshold of 100 tons per year. Potential emissions of at least one regulated pollutant exceed 100 tons per year. Therefore, the facility is classified as a major source of air pollution with respect to Rule 62-212.400, F.A.C, the Prevention of Significant Deterioration (PSD) of Air Quality.

NSPS: The new gas turbines are subject to the New Source Performance Standards of 40 CFR 60, Subpart GG. The gas fired fuel heater is subject to the New Source Performance Standards of 40 CFR 60, Subpart Dc.

NESHAP: No emission units are identified as being subject to a National Emissions Standards for Hazardous Air Pollutants (NESHAP).

SITING: The project is not subject to Section 403.501-518, F.S., Florida Electrical Power Plant Siting Act, based on information regarding gross electrical power generated from the steam (Rankine) cycle submitted by the applicant and reviewed by the Department.

SECTION I. GENERAL INFORMATION

PERMITTING AUTHORITY

All documents related to applications for permits to construct, operate or modify an emissions unit shall be submitted to the Bureau of Air Regulation of the Florida Department of Environmental Protection (DEP) at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400.

COMPLIANCE AUTHORITIES

All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Air Quality Division of the DEP Southwest District Office, 3804 Coconut Palm Dr, Tampa, FL 33619-8218. Copies of all such documents shall be submitted to the Air Section of the Manatee County Environmental Management Department, 202 Sixth Avenue East, Bradenton, Florida 34208..

APPENDICES

The following Appendices are attached as part of this permit.

- Appendix BD. Final BACT Determinations and Emissions Standards
- Appendix GC. General Conditions
- Appendix GG. NSPS Subpart GG Requirements for Gas Turbines
- Appendix SC. Standard Conditions
- Appendix XS. Continuous Monitor Systems Semi-Annually Report

RELEVANT DOCUMENTS

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

- Permit application received on 03/28/01 and all related completeness correspondence.
- Draft permit package issued on 09/11/01.
- Comments received from the public, the applicant, the EPA Region 4 Office, and the National Park Service.

SECTION II. ADMINISTRATIVE REQUIREMENTS

1. General Conditions: The owner and operator are subject to, and shall operate under, the attached General Conditions listed in Appendix GC of this permit. General Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]
2. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403 of the Florida Statutes (F.S.); Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.); and the Title 40, Parts 51, 52, 60, 72, 73, and 75 of the Code of Federal Regulations (CFR), adopted by reference in Rule 62-204.800, F.A.C. The terms used in this permit have specific meanings as defined in the applicable chapters of the Florida Administrative Code. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
3. PSD Expiration: Approval to construct shall become invalid if construction is not commenced within 18 months after receipt of such approval, or if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. The Department may extend the 18-month period upon a satisfactory showing that an extension is justified. [40 CFR 52.21(r)(2)]
4. Completion of Construction: The permit expiration date is December 1, 2004. Physical construction shall be completed by September 1, 2004. The additional time provides for testing, submittal of results, and submittal of the Title V permit application to the Department.
5. Permit Expiration: For good cause, the permittee may request that this PSD air construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation at least sixty (60) days prior to the expiration of this permit. [Rules 62-4.070(4), 62-4.080, and 62-210.300(1), F.A.C.]
6. BACT Determination: In conjunction with an extension of the 18-month period to commence or continue construction, phasing of the project, or an extension of the permit expiration date, the permittee may be required to demonstrate the adequacy of any previous determination of Best Available Control Technology (BACT) for the source. [Rule 62-212.400(6)(b), F.A.C. and 40 CFR 51.166(j)(4)]
7. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
8. Modifications: No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
9. Application for Title IV Permit: At least 24 months before the date on which the new unit begins serving an electrical generator greater than 25 MW, the permittee shall submit an application for a Title IV Acid Rain Permit to the Department's Bureau of Air Regulation in Tallahassee and a copy to the Region 4 Office of the U.S. Environmental Protection Agency in Atlanta, Georgia. [40 CFR 72]
10. Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the Department's Bureau of Air Regulation, and copies to each Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

A. COMBINED CYCLE GAS TURBINE

This section of the permit addresses the following new emissions unit.

Emissions Unit 001: Combined Cycle Gas Turbine No. CC-1

Description: The combined cycle unit consists of a General Electric Model PG7241FA gas turbine-electrical generator set with a nominal capacity of 175 MW, an unfired heat recovery steam generator (HRSG), and a separate steam turbine-electrical generator set. Ancillary equipment includes an automated gas turbine control system, an inlet air filtration system, and an evaporative inlet air-cooling system.

Fuel: The combined cycle unit is fired exclusively with pipeline-quality natural gas.

Capacity: At a compressor inlet air temperature of 35° F, the combined cycle gas turbine produces approximately 180 MW when firing approximately 1700 MMBtu (LHV) per hour of natural gas.

Controls: The efficient combustion of pipeline-quality natural gas at high temperatures minimizes emissions of CO, PM/PM₁₀, SAM, SO₂, and VOC. A selective catalytic reduction (SCR) system combined with Dry Low-NO_x (DLN) combustion technology reduces NO_x emissions.

Stack Parameters: When operating at 100% load and at an inlet temperature of 35° F, exhaust gases exit a 135 feet tall stack that is 19.0 feet in diameter with a flow rate of approximately 1,040,000 acfm at 187° F.

APPLICABLE STANDARDS AND REGULATIONS

1. **BACT Determinations:** The emissions standards specified for this unit represent Best Available Control Technology (BACT) determinations for carbon monoxide (CO), nitrogen oxides (NO_x), particulate matter (PM/PM₁₀), sulfuric acid mist (SAM), and sulfur dioxide (SO₂). See Appendix BD of this permit for a summary of the final BACT determinations. [Rule 62-212.400(BACT), F.A.C.]

EQUIPMENT

2. **Combined Cycle Gas Turbine:** The permittee is authorized to install, tune, maintain and operate a new combined cycle unit consisting of a General Electric Model PG7241FA gas turbine-electrical generator set, an unfired heat recovery steam generator (HRSG), and a steam turbine-electrical generator set. The combined cycle unit shall be designed as a system to generate a nominal 175 MW of shaft-driven electrical power and less than 75 MW of steam-generated electrical power. Ancillary equipment includes an automated gas turbine control system, an inlet air filtration system, an evaporative inlet air cooling system, a single exhaust stack that is 135 feet tall and 19.0 feet in diameter, and associated support equipment. ~~A separate bypass stack and damper may be installed to facilitate startup of the steam cycle while operating the combustion turbine in Low Emissions Modes 5, 5Q, and 6Q.~~ [Applicant Request; Design]

EPMEC Comment: EPMEC does not consider a bypass stack system to be a cost-effective BACT approach for reducing emissions during startups. Detailed comments on this issue will be provided to the Department at a later date.

3. **DLN Combustion Technology:** The permittee shall tune, maintain and operate the General Electric DLN-2.6 combustion system to control NO_x emissions from the combined cycle gas turbine. Prior to the initial emissions performance tests for each gas turbine, the DLN combustors and automated gas turbine control system shall be tuned to reduce NO_x emissions. Thereafter, each system shall be maintained and tuned in accordance with the manufacturer's recommendations. [Design; Rule 62-212.400(BACT), F.A.C.]
4. **(SCR) System:** The permittee shall install, tune, maintain and operate a selective catalytic reduction (SCR) system to control NO_x emissions from the combined cycle gas turbine. The SCR system consists of an

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

A. COMBINED CYCLE GAS TURBINE

ammonia injection grid, catalyst, aqueous ammonia storage, monitoring and control system, and electrical, piping and other auxiliary equipment. The SCR system shall be designed to reduce NO_x emissions and ammonia slip below the permitted levels. [Rule 62-212.400(BACT), F.A.C.]

PERFORMANCE RESTRICTIONS

5. Permitted Capacity: The maximum heat input rate to the combined cycle gas turbine shall not exceed 1742 MMBtu per hour based on a compressor inlet air temperature of 35° F, the lower heating value (LHV) of natural gas, and 100% load. Heat input rates will vary depending upon gas turbine characteristics, ambient conditions, alternate methods of operation, and evaporative cooling. The permittee shall provide manufacturer's performance curves (or equations) that correct for site conditions to the Permitting and Compliance Authorities within 45 days of completing the initial compliance testing. Operating data may be adjusted for the appropriate site conditions in accordance with the performance curves and/or equations on file with the Department. [Rule 62-210.200(PTE), F.A.C.]
6. Authorized Fuel: The combined cycle gas turbine shall fire only pipeline-quality natural gas with a maximum of 1.5 grains of sulfur per 100 standard cubic feet of natural gas. [Applicant Request; Rules 62-210.200(PTE) and 62-212.400(BACT), F.A.C.]
7. Restricted Operation: The hours of operation for the combined cycle gas turbine are not limited (8760 hours per year). [Rules 62-210.200(PTE) and 62-212.400(BACT), F.A.C.]
8. Power Augmentation: As an alternate method of operation, the permittee may inject steam into the combined cycle gas turbine for power augmentation. ~~Power augmentation is permitted 2000 hours per 12-consecutive months and is not limited if oxidation catalyst is installed. The 2000 hour limit may be revised at the request of the applicant based upon review of actual performance and control equipment cost-effectiveness following proper public notice.~~ [Rule 62-212.400 (BACT), F.A.C.]

EPMEC Comment: The 2,000 hour per year limit on steam mass flow augmentation may be insufficient to meet plant operational objectives. The March 2001 Air Construction Permit Application submitted to the Department requested up to 8,760 hours per year of steam mass flow augmentation. EPMEC will provide additional comments on this issue to the Department at a later date.
9. Power Generated Limitation: Electrical power from the steam-electrical generator shall be limited to 74.9 MW (gross) on an hourly basis. The owner or operator shall be capable of demonstrating to the Department, continuous compliance with the 74.9 MW limit by the stored information in the power plant's electronic data system. [Applicant Request]

EMISSIONS STANDARDS

{Permitting Note: The following standards apply to the combined cycle gas turbine. Unless otherwise noted, the mass emission limits are based a compressor inlet temperature of 35° F and 100% load. For comparison to the standard, actual measured concentrations shall be corrected to this compressor inlet temperature with manufacturer's data on file with the Department. Emissions standards with continuous monitoring requirements apply at all loads. Appendix BD provides a summary of the emissions standards of this permit.}

10. Ammonia Slip: Ammonia slip shall not exceed 5 ppmvd corrected to 15% oxygen based on a 3-hour test average as determined by EPA Method CTM-027. [Rule 62-4.070(3), F.A.C.]

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

A. COMBINED CYCLE GAS TURBINE

11. Carbon Monoxide (CO)

- a. *Initial Test, Standard Operation:* When not operating in the power augmentation mode, CO emissions shall not exceed 31.0 pounds per hour nor 8.0 ppmvd corrected to 15% oxygen based on a 3-hour test average as determined by an initial performance test conducted in accordance with EPA Method 10.
- b. *Continuous Compliance, Standard Operation:* When not operating in the power augmentation mode, CO emissions shall not exceed 8.0 ppmvd corrected to 15% oxygen based on a 3-hour block average as determined by valid data collected from the certified CEM system.
- c. *Initial Test, Power Augmentation:* When injecting steam for power augmentation and a compressor inlet temperature of 59° F, CO emissions shall not exceed ~~48.0~~ 48.4 pounds per hour nor 12.0 ppmvd corrected to 15% oxygen based on a 3-hour test average as determined by an initial performance test conducted in accordance with EPA Method 10.

EPMEC Comment: Requested limit represents maximum hourly CO emission rate at 100% load and steam augmentation; reference Appendix C, Table C-2A of the March 2001 Air Construction Permit Application.

- d. *Continuous Compliance, Power Augmentation:* When injecting steam for power augmentation, CO emissions shall not exceed 12.0 ppmvd corrected to 15% oxygen based on a 3-hour block average as determined by valid data collected from the certified CEM system. [Rule 62-212.400(BACT), F.A.C.]

12. Nitrogen Oxides (NO_x)

- a. *Initial Test:* NO_x emissions shall not exceed ~~17.0~~ 23.8 pounds per hour nor ~~2.5~~ 3.5 ppmvd corrected to 15% oxygen based on a 3-hour test average as determined by EPA Method 7E.
- b. *Continuous Compliance:* NO_x emissions shall not exceed ~~2.5~~ 3.5 ppmvd corrected to 15% oxygen based on a 24-hour block average as determined by valid data collected from the certified CEM system.

NO_x emissions are defined as oxides of nitrogen expressed as NO₂. [Rule 62-212.400(BACT), F.A.C.]

EPMEC Comment: Draft NO_x emission limits are inconsistent with limits requested in the March 2001 Air Construction Permit Application. Reconsideration by the Department of the draft NO_x limits is requested. EPMEC will provide the Department with additional comments on this issue at a later date.

13. Particulate Matter (PM/PM₁₀): The fuel specifications established in Condition No. 6 of this section combined with the efficient combustion design and operation of the combined cycle gas turbine represent the Best Available Control Technology (BACT) requirements for PM/PM₁₀ emissions. Compliance with the fuel specifications, CO standards, and visible emissions standards shall serve as indicators of good combustion. {Permitting Note: Particulate matter emissions are expected to be less than 11 pounds per hour as determined by EPA Method 5, front-half catch only.} [Rule 62-212.400(BACT), F.A.C.]
14. Sulfuric Acid Mist (SAM) and Sulfur Dioxide (SO₂): The fuel sulfur specification established in Condition No. 6 of this section effectively limits the potential emissions of SAM and SO₂ from the combined cycle gas turbine. Compliance with the fuel sulfur specification shall be demonstrated by the sampling, analysis, record keeping and reporting requirements established in Section III.C of this permit. [Rule 62-212.400(BACT), F.A.C.]
15. Visible Emissions: As determined by EPA Method 9, visible emissions shall not exceed 10% opacity based on a 6-minute average. Except as allowed by Condition No. 17 of this section, this standard applies to all loads. [Rule 62-212.400(BACT), F.A.C.]
16. Volatile Organic Compounds (VOC): The efficient combustion of clean fuels and good operating practices for the combined cycle gas turbine represent the Best Available Control Technology (BACT) requirements

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

A. COMBINED CYCLE GAS TURBINE

for VOC emissions. Compliance with the fuel specification and CO standards shall serve as indicators of good combustion. {Permitting Note: VOC emissions are expected to be less than 3 3.4 pounds per hour and 1.3 1.5 ppmvd corrected to 15% oxygen as determined by EPA Method 25A measured and reported as methane.} [Design; Rule 62-4.070(3), F.A.C.]

EPMEC Comment: Revised values represents maximum hourly VOC emission rate with steam augmentation; reference Appendix C, Table C-2A of the March 2001 Air Construction Permit Application.

EXCESS EMISSIONS

17. Excess Emissions Defined: The following permit conditions allow excess emissions or the exclusion of monitoring data for specifically defined periods of startup, shutdown, and malfunction of the combined cycle gas turbine. These conditions apply only if operators employ the best operational practices to minimize the amount and duration of excess emissions during such episodes.
- a. *Visible Emissions*: For startups and shutdowns in a calendar day, visible emissions shall not exceed 10% opacity except for up to ten, 6-minute averaging periods, which shall not exceed 20% opacity.
 - b. *Work Practice BACT*: ~~The unit(s) will reach Mode 5Q (i.e. five burners plus quaternary pegs in operation) within 15 minutes following gas turbine ignition and crossfire.~~
 - e.b. *Low-Load Restriction*: Except for startup and shutdown, operation under DLN Modes 1, 2, 3, and 4 is prohibited.
 - d.c. *CEM System Data Exclusion*: ~~Except for combined cycle cold startups, no more than two hourly average emission rate values in a calendar day shall be excluded from the continuous NO_x and CO compliance demonstrations due to startup, shutdown, or documented unavoidable malfunction. No more than four hourly average emission rate values in a calendar day shall be excluded from the continuous NO_x and CO compliance demonstrations due to combined cycle cold startups. No more than a total of four hourly average emission rate values shall be excluded from the continuous NO_x and CO compliance demonstrations for all such episodes in any calendar day. A "combined cycle cold startup" is defined as startup after the combined cycle gas turbine has been shutdown for 48 hours or more. A "documented unavoidable malfunction" is a malfunction beyond the control of the operator that is documented within 24 hours of occurrence by contacting each Compliance Authority by telephone or facsimile transmittal.~~

[Design; Rules 62-4.070(3), 62-4.130, 62-210.700, and 62-212.400 (BACT), F.A.C.]

EPMEC Comment: Draft Condition 17.b. and d. requires the installation of a bypass stack system and does not allow for multiple daily startups. As noted previously, EPMEC does not consider a bypass stack system to be a cost-effective BACT approach for reducing emissions during startups. Detailed comments on this issue will be provided to the Department at a later date.

EMISSIONS PERFORMANCE TESTING

{Permitting Note: Performance test methods are specified in Gas Turbine Common Conditions, Section III.C.}

18. Initial Compliance Tests: The combined cycle gas turbine shall be tested initially and upon permit renewal to demonstrate compliance with the emission standards for CO, NO_x, visible emissions and ammonia slip. The tests shall be conducted within 60 days after achieving at least 90% of the maximum permitted capacity, but not later than 180 days after initial operation of the combined cycle gas turbine. With appropriate flow measurements, certified CEM system data may be used to demonstrate compliance with the CO and NO_x standards. NO_x emissions recorded by the CEM system shall be reported for each ammonia slip test run. [Rule 62-297.310(7)(a)1., F.A.C.]

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

A. COMBINED CYCLE GAS TURBINE

19. Annual Compliance Tests: During each federal fiscal year (October 1st to September 30th), the combined cycle gas turbine shall be tested to demonstrate compliance with the emission standards for NO_x, CO, ammonia slip and visible emissions. NO_x emissions recorded by the CEM system shall be reported for each ammonia slip test run. Annual compliance with the applicable NO_x and CO emissions standards can also be demonstrated with valid data collected by the required annual RATA at permitted capacity. {Permitting Note: Continuous compliance with the CO and NO_x standards shall be demonstrated with certified CEMS system data.} [Rules 62-212.400 (BACT) and 62-297.310(7)(a)4., F.A.C.]

CONTINUOUS MONITORING REQUIREMENTS

20. CEM Systems: The permittee shall install, calibrate, maintain, and operate continuous emission monitoring (CEM) systems to measure and record the emissions of CO and NO_x from the combined cycle gas turbine in a manner sufficient to demonstrate continuous compliance with the emission standards of this section. The CEM systems shall comply with the general monitoring requirements specified under "Gas Turbine Common Conditions" in Section III.C.
- a. The CO monitor shall have a span of no more than 25 ppmvd corrected to 15% oxygen. For purposes of determining compliance with the CEM emission standards of this permit, missing or excluded data shall not be substituted. Instead, the next valid hourly emission rate value (within the same period of operation) shall be used to complete the 3-hour block average for CO. Each monitoring system shall be installed, calibrated, and properly functioning prior to the initial performance tests and shall be used to demonstrate continuous compliance with the corresponding CO emissions standards specified in this section. [Rule 62-212.400(BACT), F.A.C.]
- b. The NO_x monitor shall have a span of no more than 10 ppmvd corrected to 15% oxygen. Compliance with the continuous NO_x emissions standards shall be based on a 24-hour block average starting at midnight of each operating day. The 24-hour block average shall be calculated from 24 consecutive hourly average emission rate values. If a unit operates less than 24 hours during the block, the 24-hour block average shall be the average of available valid hourly average emission rate values for the 24-hour block. For purposes of determining compliance with the CEM emission standards of this permit, missing (or excluded) data shall not be substituted. Instead the block average shall be determined using the remaining hourly data in the 24-hour block. Each monitoring system shall be installed, calibrated, and properly functioning prior to the initial performance tests and shall be used to demonstrate continuous compliance with the corresponding NO_x emissions standards specified in this section. [Rule 62-212.400(BACT), F.A.C.]

EPMEC Comment: The procedure for determining NO_x compliance when data is missing or excluded appears to differ than the procedure described in Condition 20.a. for CO compliance. Clarification of these CEM compliance procedures is requested from the Department.

21. Ammonia Monitoring Requirements: In accordance with the manufacturer's specifications, the permittee shall install, calibrate, maintain and operate an ammonia flow meter to measure and record the ammonia injection rate to the SCR system. The permittee shall document the general range of ammonia flow rates required to meet permitted emissions levels over the range of load conditions allowed by this permit by comparing NO_x emissions recorded by the CEM system with ammonia flow rates recorded using the ammonia flow meter. During NO_x monitor downtimes or malfunctions, the permittee shall operate at the ammonia flow rate that is consistent with the documented flow rate for the combustion turbine load. [Rules 62-4.070(3) and 62-212.400(BACT), F.A.C.]

OTHER REQUIREMENTS

The combined cycle gas turbine is also subject to the "Gas Turbine Common Conditions" specified in Section III.C as well as the "Standard Conditions" included as Appendix SC in Section IV.

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

B. SIMPLE CYCLE GAS TURBINES

This section of the permit addresses the following new emissions units.

Emissions Units 002, and 003: Simple Cycle Gas Turbine Nos. SC-1 and SC-2

Description: Each simple cycle unit consists of a General Electric Model PG7241FA gas turbine-electrical generator set with a nominal capacity of 175 MW. Ancillary equipment includes an automated gas turbine control system, an inlet air filtration system, and an evaporative inlet air-cooling system.

Fuel: Each simple cycle unit is fired exclusively with pipeline-quality natural gas.

Capacity: At a compressor inlet air temperature of 35° F and firing approximately 1700 MMBtu (LHV) per hour of natural gas, each unit produces approximately 180 MW.

Controls: Emissions of CO, PM/PM₁₀, SAM, SO₂, and VOC are minimized by the efficient combustion of pipeline-quality natural gas at high temperatures. NO_x emissions are reduced by Dry Low-NO_x (DLN) combustion technology.

Stack Parameters: When operating at 100% load and at an inlet temperature of 35° F, exhaust gases exit a 135 feet tall stack that is 19.0 feet in diameter with a flow rate of approximately 2,500,000 acfm at 1092° F.

APPLICABLE STANDARDS AND REGULATIONS

1. **BACT Determinations:** The emissions standards specified for these emissions units represent Best Available Control Technology (BACT) determinations for carbon monoxide (CO), nitrogen oxides (NO_x), particulate matter (PM/PM₁₀), sulfuric acid mist (SAM), and sulfur dioxide (SO₂). See Appendix BD of this permit for a summary of the final BACT determinations. [Rule 62-212.400(BACT), F.A.C.]

EQUIPMENT

2. **Simple Cycle Gas Turbines:** The permittee is authorized to install, tune, maintain and operate two new General Electric Model PG7241(FA) gas turbine-electrical generator sets. Each simple cycle unit shall be designed and operated to generate a nominal 175 MW of shaft-driven electrical power. Ancillary equipment includes an automated gas turbine control system, an inlet air filtration system, a compressor inlet air evaporative cooling system, a single exhaust stack that is 135 feet tall and 19.0 feet in diameter, and associated support equipment. [Applicant Request; Design]
3. **DLN Combustion Technology:** The permittee shall tune, maintain and operate the General Electric DLN 2.6 combustion system to control NO_x emissions from each simple cycle gas turbine. Prior to the initial emissions performance tests for each gas turbine, the DLN combustors and automated gas turbine control system shall be tuned to reduce NO_x emissions. Thereafter, each system shall be maintained and tuned in accordance with the manufacturer's recommendations. [Design; Rule 62-212.400(BACT), F.A.C.]

PERFORMANCE REQUIREMENTS

4. **Simple Cycle Operation Only:** Each gas turbine shall operate only in simple cycle mode. This restriction is based on the permittee's request, which formed the basis of the CO and NO_x BACT determinations and resulted in the emission standards specified in this permit. Specifically, the CO and NO_x BACT determinations eliminated several control alternatives based on technical considerations due to the elevated temperatures of the exhaust gas as well as costs related to restricted operation. Any request to convert these units to combined cycle operation or increase the allowable hours of operation shall be accompanied by a revised CO and NO_x BACT analysis (as if never constructed) and the approval of the Department through a permit modification in accordance with Chapters 62-210 and 62-212, F.A.C. The results of this analysis

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

B. SIMPLE CYCLE GAS TURBINES

may validate the initial BACT determinations or result in the submittal of a full PSD permit application, new control equipment, and new emissions standards.

[Applicant Request; Rules 62-210.300 and 62-212.400, F.A.C.]

5. Permitted Capacity: The maximum heat input rate to each simple cycle gas turbine shall not exceed 1743 MMBtu per hour based on a compressor inlet air temperature of 35° F, the lower heating value (LHV) of natural gas, and 100% load. Heat input rates will vary depending upon gas turbine characteristics, ambient conditions, and evaporative cooling. The permittee shall provide manufacturer's performance curves (or equations) that correct for site conditions to the Permitting and Compliance Authorities within 45 days of completing the initial compliance testing. Operating data may be adjusted for the appropriate site conditions in accordance with the performance curves and/or equations on file with the Department.
[Design; Rule 62-210.200(PTE), F.A.C.]
6. Fuel Specifications: Each simple cycle gas turbine shall fire only pipeline-quality natural gas with a maximum of 1.5 grains of sulfur per 100 standard cubic feet of natural gas.
[Applicant Request; Rules 62-210.200(PTE) and 62-212.400(BACT), F.A.C.]
7. Restricted Operation: ~~The two combustion turbines shall operate no more than an average of 5,000 hours per installed unit during any consecutive 12-month period.~~ Each simple cycle gas turbine shall fire no more than 8,500,000 MMBtu of natural gas (LHV) during any consecutive 12-month period. {Permitting Note: This is approximately equivalent to 5000 hours of operation at 100% load.}
[Applicant Request; Rules 62-212.400(BACT) and 62-210.200(PTE), F.A.C.]

EPMEC Comment: Deletion of the limitation on annual hours is requested since it is a redundant requirement and unnecessarily limits operational flexibility.]

EMISSIONS STANDARDS

{Permitting Note: The following standards apply to each simple cycle gas turbine. Unless otherwise noted, the mass emission limits are based a compressor inlet temperature of 35° F and 100% load. For comparison to the standard, actual measured concentration shall be corrected to this compressor inlet temperature with manufacturer's data on file with the Department. Emissions standards with continuous monitoring requirements apply at all loads. Appendix BD provides a summary of the emissions standards of this permit.}

8. Carbon Monoxide (CO): CO emissions from each simple cycle gas turbine shall not exceed 31.0 pounds per hour nor 8.0 ppmvd corrected to 15% oxygen based on a 3-hour test average as determined by EPA Method 10. [Rule 62-212.400(BACT), F.A.C.]
9. Nitrogen Oxides (NO_x)
 - a. Initial Performance Test: NO_x emissions from each simple cycle gas turbine shall not exceed 61.0 pounds per hour nor 9.0 ppmvd corrected to 15% oxygen based on a 3-hour test average conducted at base load as determined by EPA Method 7E.
 - b. CEM System: NO_x emissions shall not exceed 9.0 ppmvd corrected to 15% oxygen based on a 24-hour block average as determined by valid data collected from the certified NO_x CEM system.
NO_x emissions are defined as oxides of nitrogen expressed as NO₂. [Rule 62-212.400(BACT), F.A.C.]
10. Particulate Matter (PM/PM₁₀): The fuel specifications established in Condition No. 6 of this section combined with the efficient combustion design and operation of the combined cycle gas turbine represent the Best Available Control Technology (BACT) requirements for particulate matter emissions. Compliance with the fuel specifications, CO standards, and visible emissions standards shall serve as

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

B. SIMPLE CYCLE GAS TURBINES

indicators of good combustion. Particulate matter emissions are expected to be less than 9 pounds per hour as determined by EPA Method 5, front-half catch only. [Rule 62-212.400(BACT), F.A.C.]

11. Sulfuric Acid Mist (SAM) and Sulfur Dioxide (SO₂): The fuel sulfur specification established in Condition No. 6 of this section effectively limits the potential emissions of SAM and SO₂ from each simple cycle gas turbine. Compliance with the fuel sulfur specification shall be demonstrated by the sampling, analysis, record keeping and reporting requirements established in Section III.C of this permit. [Rule 62-212.400(BACT), F.A.C.]

12. Volatile Organic Compounds (VOC)

- a. *Initial Performance Test*: VOC emissions from each simple cycle gas turbine shall not exceed 3.0 pounds per hour nor 1.3 ppmvd corrected to 15% oxygen based on a 3-hour test average at base load as determined by EPA Method 25A, measured and reported in terms of methane. Optionally, EPA Method 18 may be used concurrently with EPA Method 25A to deduct emissions of methane and ethane from the measured VOC emissions. [Rule 62-4.070, F.A.C.; To Avoid Rule 62-212.400(BACT), F.A.C.]
- b. *After Initial Performance Test*: The efficient combustion of a clean fuel and good operating practices minimize VOC emissions from each simple cycle gas turbine. Compliance with the fuel specifications and CO standards of this section shall serve as indicators of good combustion. Subsequent VOC emissions performance tests shall only be required when the Department has good reason to believe that a VOC emission standard is being violated pursuant to Rule 62-297.310(7)(b), F.A.C. [Rule 62-4.070, F.A.C.]

EXCESS EMISSIONS

13. Excess Emissions Defined: The following permit conditions allow excess emissions or the exclusion of monitoring data for specifically defined periods of startup, shutdown, and malfunction of each simple cycle gas turbine. These conditions apply only if operators employ the best operational practices to minimize the amount and duration of excess emissions during such episodes.
- a. *Visible Emissions*: For startups and shutdowns in a calendar day, visible emissions shall not exceed 10% opacity except for up to ten, 6-minute averaging periods, which shall not exceed 20% opacity.
- b. *Work Practice BACT*: The unit(s) will reach Mode 5Q (i.e. five burners plus quaternary pegs in operation) within 15 minutes following gas turbine ignition and crossfire.
- c. *Low-Load Restriction*: Except for startup and shutdown, operation under DLN Modes 1, 2, 3, and 4 is prohibited.
- d. *CEM System NO_x Data Exclusion*: No more than two hourly average emission rate values shall be excluded from the continuous NO_x compliance demonstrations due to startup, shutdown, or documented unavoidable malfunction. No more than a total of three hourly average emission rate values shall be excluded from the continuous NO_x compliance demonstrations for such periods in any calendar day. A "documented unavoidable malfunction" is a malfunction beyond the control of the operator that is documented within 24 hours of occurrence by contacting each Compliance Authority by telephone or facsimile transmittal.

[Design; Rules 62-210.700, 62-4.130, and 62-212.400 (BACT), F.A.C.]

EPMEC Comment: Condition 13.b. and c. requires operation in DLN pre-mix mode within 15 minutes of commencement of gas turbine fuel ignition. EPMEC will review this requirement with the gas turbine vendor and provide the Department with additional comments as necessary.

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

B. SIMPLE CYCLE GAS TURBINES

EMISSIONS PERFORMANCE TESTING

{Permitting Note: Performance test methods are specified in Gas Turbine Common Conditions, Section III.C.}

14. **Initial Tests Required:** Each simple cycle gas turbine shall be tested initially and upon permit renewal to demonstrate compliance with the emission standards for PM/PM₁₀, CO, NO_x, VOC and visible emissions. The initial tests shall be conducted within 60 days after achieving at least 90% of the maximum permitted capacity, but not later than 180 days after initial operation of each unit. With appropriate flow measurements, certified CEM system data may be used to demonstrate compliance with the NO_x standards. Tests for CO and VOC emissions shall be conducted concurrently. [Rule 62-297.310(7)(a)1., F.A.C.]
15. **Annual Performance Tests:** During each federal fiscal year (October 1st to September 30th), each simple cycle gas turbine shall be tested to demonstrate compliance with the emission standards for NO_x, CO and visible emissions. Annual compliance with the applicable NO_x and CO emissions standards can also be demonstrated with valid data collected by the required annual RATA at permitted capacity. NO_x emissions recorded by the CEM system shall be reported for each CO test run. {Permitting Note: Continuous compliance with the NO_x standard shall be demonstrated with certified CEMS system data.} [Rule 62-297.310(7)(a)4., F.A.C.]

CONTINUOUS MONITORING REQUIREMENTS

16. **CEM Systems:** The permittee shall install, calibrate, maintain, and operate continuous emission monitoring (CEM) systems to measure and record NO_x emissions from each simple cycle gas turbine in a manner sufficient to demonstrate continuous compliance with the emission standards of this section. Each CEM system shall comply with the general monitoring requirements specified under "Gas Turbine Common Conditions" in Section III.C. Each NO_x monitor shall have a span of no more than 25 ppmvd corrected to 15% oxygen. Compliance with the continuous NO_x emissions standards shall be based on a 24-hour block average starting at midnight of each operating day. The 24-hour block average shall be calculated from 24 consecutive hourly average emission rate values. If a unit operates less than 24 hours during the block, the 24-hour block average shall be the average of available valid hourly average emission rate values for the 24-hour block. For purposes of determining compliance with the CEM emission standards of this permit, missing (or excluded) data shall not be substituted. Instead the block average shall be determined using the remaining hourly data in the 24-hour block. Each monitoring system shall be installed, calibrated, and properly functioning prior to the initial performance tests and shall be used to demonstrate continuous compliance with the corresponding NO_x emissions standards specified in this section. [Rule 62-212.400(BACT), F.A.C.]

OTHER REQUIREMENTS

Each simple cycle gas turbine is also subject to the "Gas Turbine Common Conditions" specified in Section III.C as well as the "Standard Conditions" included as Appendix SC in Section IV.

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

C. GAS TURBINE COMMON CONDITIONS

This section of the permit addresses the following new emissions units.

ID	Emission Unit Description
001	Combined Cycle Unit No. CC-1 consists of a natural gas fired General Electric Model PG7241FA 175 MW gas turbine-electrical generator set, an unfired heat recovery steam generator, and a separate turbine-electrical generator.
002	Simple Cycle Unit No. SC-1 consists of a natural gas fired General Electric Model PG7241FA gas turbine-electrical generator set with a nominal capacity of 175 MW.
003	Simple Cycle Unit No. SC-2 consists of a natural gas fired General Electric Model PG7241FA gas turbine-electrical generator set with a nominal capacity of 175 MW.

NEW SOURCE PERFORMANCE STANDARDS, SUBPART GG

1. NSPS Requirements: The Department determines that compliance with the emissions performance and monitoring requirements of Sections III.A and B also demonstrates compliance with the New Source Performance Standards for gas turbines in 40 CFR 60, Subpart GG. For completeness, the applicable Subpart GG requirements are included in Appendix GG of this permit. [Rule 62-4.070(3), F.A.C.]

PERFORMANCE REQUIREMENTS

2. Operating Procedures: The Best Available Control Technology (BACT) determinations established by this permit rely on "good operating practices" to reduce emissions. Therefore, all operators and supervisors shall be properly trained to operate and maintain the combined cycle gas turbine and pollution control systems in accordance with the guidelines and procedures established by each manufacturer. The training shall include good operating practices as well as methods of minimizing excess emissions. [Rules 62-4.070(3) and 62-212.400(BACT), F.A.C.]

EXCESS EMISSIONS

3. Excess Emissions Prohibited: Excess emissions caused entirely or in part by poor maintenance, poor operation or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. All such emissions shall be included in any compliance demonstration based on continuous monitoring data. [Rule 62-210.700(4), F.A.C.]

EMISSIONS PERFORMANCE TESTING

4. Test Methods: Required tests shall be performed in accordance with the following reference methods.

Method	Description of Method and Comments
CTM-027	Procedure for Collection and Analysis of Ammonia in Stationary Source {Notes: This is an EPA conditional test method. The minimum detection limit shall be 1 ppm.}
5, 5B, or 17	Determination of Particulate Matter Emissions from Stationary Sources {Note: For gas firing, the minimum sampling time shall be two hours per run and the minimum sampling volume shall be 60 dscf per run.}
7E	Determination of Nitrogen Oxide Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

C. GAS TURBINE COMMON CONDITIONS

Test Methods, Continued

Method	Description of Method and Comments
10	Determination of Carbon Monoxide Emissions from Stationary Sources {Notes: The method shall be based on a continuous sampling train. The ascarite trap may be omitted or the interference trap of section 10.1 may be used in lieu of the silica gel and ascarite traps.}
18	Measurement of Gaseous Organic Compound Emissions by Gas Chromatography {Note: EPA Method 18 may be used (optional) concurrently with EPA Method 25A to deduct emissions of methane and ethane from the measured VOC emissions.}
20	Determination of Nitrogen Oxides, Sulfur Dioxide and Diluent Emissions from Stationary Gas Turbines
25A	Determination of Volatile Organic Concentrations

Except for Method CTM-027, the above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. Method CTM-027 is published on EPA's Technology Transfer Network Web Site at "<http://www.epa.gov/ttn/emc/ctm.html>". No other methods may be used for compliance testing unless prior written approval is received from the Department.

[Rules 62-204.800 and 62-297.100, F.A.C.; 40 CFR 60, Appendix A]

CONTINUOUS MONITORING REQUIREMENTS

5. **CEM Systems:** Each continuous emissions monitoring (CEM) system shall comply with the following requirements:
- CO Monitors.** The CO monitor shall be certified pursuant to 40 CFR 60, Appendix B, Performance Specification 4. Quality assurance procedures shall conform to the requirements of 40 CFR 60, Appendix F, and the Data Assessment Report of Section 7 shall be made each calendar quarter, and reported semi-annually to each Compliance Authority. The RATA tests required for the CO monitor shall be performed using EPA Method 10, of Appendix A of 40 CFR 60. The Method 10 analysis shall be based on a continuous sampling train, and the ascarite trap may be omitted or the interference trap of Section 10.1 may be used in lieu of the silica gel and ascarite traps.
 - NO_x Monitors.** Each NO_x monitor shall be certified pursuant to 40 CFR Part 75 and shall be operated and maintained in accordance with the applicable requirements of 40 CFR Part 75, Subparts B and C. Record keeping and reporting shall be conducted pursuant to 40 CFR Part 75, Subparts F and G. The RATA tests required for the NO_x monitor shall be performed using EPA Method 20 or 7E, of Appendix A of 40 CFR 60.
 - O₂ or CO₂ Monitors.** The oxygen (O₂) content or carbon dioxide (CO₂) content of the flue gas shall also be monitored at the location where CO and/or NO_x are monitored to correct the measured emissions rates to 15% oxygen. If a CO₂ monitor is installed, the oxygen content of the flue gas shall be calculated by the CEM system using F-factors that are appropriate for the fuel fired. Each O₂ and CO₂ monitor shall be certified pursuant to 40 CFR 60, Appendix B, Performance Specification 3. Quality assurance procedures shall conform to the requirements of 40 CFR 60, Appendix F, and the Data Assessment Report of Section 7 shall be made each calendar quarter, and reported quarterly to each Compliance Authority. The RATA tests required for the O₂ or CO₂ monitors shall be performed using EPA Method 3B, of Appendix A of 40 CFR 60.

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

C. GAS TURBINE COMMON CONDITIONS

- d. *Data Collection.* Each hourly average value shall be computed using at least one data point in each fifteen-minute quadrant of an hour, where the unit combusted fuel during that quadrant of an hour. Notwithstanding this requirement, an hourly value shall be computed from at least two data points separated by a minimum of 15 minutes (where the unit operates for more than one quadrant of an hour). The permittee shall use all valid measurements or data points collected during an hour to calculate the hourly averages. The CEM system shall be designed and operated to sample, analyze, and record data evenly spaced over an hour. If the CEM system measures concentration on a wet basis, the CEM system shall include provisions to determine the moisture content of the exhaust gas and an algorithm to enable correction of the monitoring results to a dry basis (0% moisture). Alternatively, the owner or operator may develop through manual stack test measurements a curve of moisture contents in the exhaust gas versus load for each allowable fuel, and use these typical values in an algorithm to enable correction of the monitoring results to a dry basis (0% moisture). Final results of the CEM system shall be expressed as ppmvd, corrected to 15% oxygen. The CEM system shall be used to demonstrate compliance with the CEM emission standards for CO and NO_x as specified in this permit. Upon request by the Department, the CEM systems emission rates shall be corrected to ISO conditions to demonstrate compliance with the applicable standards of 40 CFR 60.332.
- e. *Data Exclusion.* All required emissions data shall be recorded by the CEM systems during episodes of startup, shutdown and malfunction. CO and NO_x emissions data recorded during such episodes may be excluded from the corresponding compliance-averaging period subject to the conditions specified in Sections III.A and B of this permit. All periods of data excluded for any startup, shutdown or malfunction episode shall be consecutive for each episode. The permittee shall minimize the duration of data excluded for startup, shutdown and malfunctions, to the extent practicable. Data recorded during startup, shutdown or malfunction events shall not be excluded if the startup, shutdown or malfunction episode was caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure, which may reasonably be prevented. Best operational practices shall be used to minimize hourly emissions that occur during episodes of startup, shutdown and malfunction. Emissions of any quantity or duration that occur entirely or in part from poor maintenance, poor operation, or any other equipment or process failure, which may reasonably be prevented, shall be prohibited.
- f. *Data Exclusion Reports.* A summary report of the duration of data excluded from each compliance average calculation, and all instances of missing data from monitor downtime, shall be reported quarterly to each Compliance Authority. This report shall be consolidated with the report required pursuant to 40 CFR 60.7. For purposes of reporting "excess emissions" pursuant to the requirements of 40 CFR 60.7, excess emissions shall be defined to include the hourly emissions which are recorded by the CEM system during periods of data excluded for episodes of startup, shutdown and malfunction, as allowed above. The duration of excess emissions shall include the duration of the periods of data excluded for such episodes. Reports required by this paragraph and by 40 CFR 60.7 shall be submitted no less than quarterly, including periods in which no data is excluded or no instances of missing data occur.
- g. *Notification:* If a CEM system reports CO or NO_x emissions in excess of an emissions standard, the permittee shall notify each Compliance Authority within one working day with a preliminary report of: the nature, extent, and duration of the excess emissions; the cause of the excess emissions; and the actions taken to correct the problem. In addition, the Department may request a written summary report of the incident.

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

C. GAS TURBINE COMMON CONDITIONS

- h. *Availability.* Monitor availability for CO and NO_x CEM systems shall be 95% or greater in any calendar quarter. The report required in Appendix XS of this permit shall be used to demonstrate monitor availability. In the event 95% availability is not achieved, the permittee shall provide the Department with a report identifying the problems in achieving 95% availability and a plan of corrective actions that will be taken to achieve 95% availability. The permittee shall implement the reported corrective actions within the next calendar quarter. Failure to take corrective actions or continued failure to achieve the minimum monitor availability shall be violations of this permit.

{Permitting Note: Compliance with these requirements will ensure compliance with the other applicable CEM system requirements such as: NSPS Subpart GG; Rule 62-297.520, F.A.C.; 40 CFR 60.7(a)(5) and 40 CFR 60.13; 40 CFR Part 51, Appendix P; 40 CFR 60, Appendix B - Performance Specifications; and 40 CFR 60, Appendix F - Quality Assurance Procedures.}

[Rules 62-4.070(3) and 62-212.400(BACT), F.A.C.]

RECORDS

6. Fuel Sulfur Records: The permittee shall demonstrate compliance with the fuel sulfur specification of this permit by maintaining records of the sulfur content of the natural gas being supplied based on the vendor's analysis for each month of operation. Methods for determining the sulfur content of the natural gas shall be ASTM methods D4084-82, D3246-81 (or more recent versions) in conjunction with the provisions of 40 CFR 75 Appendix D. [Rules 62-4.070(3) and 62-4.160(15), F.A.C.]
7. Monitoring of Operations: To demonstrate compliance with the fuel consumption limits, the permittee shall monitor and record the rates of fuel consumption for each gas turbine in accordance with the provisions of 40 CFR 75 Appendix D. To demonstrate compliance with the turbine capacity requirements, the permittee shall monitor and record the operating rate of each combined cycle gas turbine on a daily average basis, considering the number of hours of operation during each day (including the times of startup, shutdown and malfunction). Such monitoring shall be made using a monitoring component of the CEM system required above, or by monitoring daily rates of consumption and heat content of each allowable fuel in accordance with the provisions of 40 CFR 75 Appendix D. [Rules 62-4.070(3) and 62-212.400(BACT), F.A.C.]
8. Monthly Operations Summary: By the fifth calendar day of each month, the permittee shall record the monthly fuel consumption (million cubic feet of natural gas per month), heat input rates (million BTU per month), and hours of operation for each gas turbine for the previous month. The information shall be recorded in a written (or electronic log) and shall summarize the previous month of operation and the previous 12 months of operation. Information recorded and stored as an electronic file shall be available for inspection and printing within at least three days of a request by the Department. [Rule 62-4.070(3), F.A.C.]

REPORTS

9. Semi-Annually Excess Emissions Reports: Following the NSPS format provided in Appendix XS of this permit, emissions shall be reported as "excess emissions" when emission levels exceed the standards specified in this permit (including periods of startup, shutdown and malfunction). Within 30 days following the end of the six month period, the permittee shall submit a report to the Compliance Authority summarizing periods of excess emissions, periods of data exclusion, and CEMS systems monitor availability for the previous six month period.
[Rules 62-4.130, 62-204.800, 62-210.700(6), F.A.C.; and 40 CFR 60.7]

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

D. OTHER EMISSIONS UNITS

This permit authorizes installation of the following emissions units.

ID	Emission Unit Description
004	Cooling Tower : One 5-cell mechanical draft fresh water cooling tower.
005	Other Emissions Units: One 2600 hp diesel generator, one 250 hp diesel fire pump, aqueous ammonia storage tank, a 12.8 MMBtu/hr (HHV) gas-fired fuel heater and two diesel fuel storage tanks (each less than 1000 gallons).

1. Cooling Tower: BACT for the Cooling Tower was determined to be the use of fresh water and drift eliminators designed and maintained to reduce drift to 0.0005 percent of the circulating water flow rate. {Permitting Note: Potential emissions in tons per year are expected to be less than 1.64 for PM and 0.99 for PM₁₀}.
2. 2600 HP Diesel Generator: This unit is specifically exempted from permitting and BACT requirements according to Rules 62-210.300 (3) and 62-210.300 (3)(a)20. F.A.C., provided that fuel oil use does not exceed 32,000 gallons per year. The unit will be fired with No. 2 diesel fuel with a maximum sulfur content of 0.05%. {Permitting Note: Potential emissions in tons per year are expected to be less than 0.12 for PM, 3.26 for NO_x, 0.73 for CO, 0.07 for SO₂ and 0.18 for TOC (total organic carbons)}.
3. 12.8 MMBtu/hr Gas-fired Natural Gas Fuel Heater: This unit is specifically exempted from permitting and BACT requirements according to Rules 62-210.300 (3) and 62-210.300 (3)(a)2 F.A.C., Categorical Exemptions. This unit is subject to applicable provisions of 40 CFR 60, Subpart Dc. New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units.
4. 250 HP Diesel Fire Pump: This unit is specifically exempted from permitting and BACT requirements according to Rules 62-210.300 (3) and 62-210.300 (3)(a)21 F.A.C., Categorical Permit Exemptions. The unit will be fired with No. 2 diesel fuel with a maximum sulfur content of 0.05%. {Permitting Note: Potential emissions in tons per year are expected to be less than 0.013 for PM, 0.74 for NO_x, 0.18 for CO, 0.0014 for SO₂ and 0.08 for TOC (total organic carbons)}
5. Aqueous Ammonia Storage Tank: This unit will contain less than a 20 percent concentration of aqueous ammonia by volume and therefore is not subject to applicable provisions of 40 CFR 68, Chemical Accident Provisions.
6. Two Diesel Fuel Storage Tanks (each less than 1000 gallons): This unit is specifically exempted from permitting and BACT requirements according to Rules 62-210.300 (3) and 62-210.300 (3)(b)(iv) F.A.C., Generic and Temporary Exemptions.

September 26, 2001

SENT BY FAX ON 9/26/01

Clerk's Office
Department of Environmental Protection
Office of General Counsel
3900 Commonwealth Boulevard
Room 633B
Tallahassee, FL 32399

Attn: Ms. Kathy Carter
Agency Clerk for the Office of General Counsel

**Re: El Paso Merchant Energy Company
Manatee Energy Center
DEP File No. 0810199-001-AC (PSD-FL-318)**

Dear Ms. Carter:

El Paso Merchant Energy Company ("El Paso") respectfully requests that the Department of Environmental Protection ("Department") grant El Paso a sixty (60) day extension of time to file a petition for a formal administrative hearing regarding the Department's draft air construction permit (Department Draft Air Permit No. PSD-FL318, Project No. 0810199-001-AC) for El Paso's Manatee Energy Center electrical power plant.

The following items are submitted in support of this request:

- (1) El Paso filed an application for an Air Construction Permit for El Paso's Manatee Energy Center electrical power plant with the Department on March 28, 2001. The Manatee Energy Center is a nominal 600 megawatt (MW) electric power generating plant to be located 1 mile northeast of Buckeye Road and U.S. Highway 41 near Piney Point, Manatee County.
- (2) On September 11, 2001, the Department distributed its Draft Permit, Technical Evaluation and Preliminary Determination, Draft Best Available Control Technology (BACT) Determination, Intent to Issue Air Construction Permit, and "Public Notice of Intent to Issue Air Construction Permit" for the Manatee Energy Center project. As the applicant for the Manatee Energy Center, El Paso is affected by the Department's proposed action.

Clerk's Office
Department of Environmental Protection
Office of General Counsel
September 26, 2001
Page -2-

- (3) The "Public Notice of Intent to Issue Air Construction Permit" was published in the Sarasota Herald-Tribune on September 20, 2001. The affidavit of publication of this notice was provided to the Department in correspondence from Environmental Consulting & Technology, Inc. (ECT) dated September 24, 2001.
- (4) The Draft Permit is complex and contains numerous requirements and conditions. A preliminary evaluation of the Draft Permit indicates that several permit conditions may be inconsistent with El Paso's permit application. Given the complexity of the Draft Permit, additional time is needed for El Paso and its consultants to properly review and analyze the draft permit requirements. El Paso also wishes to meet with the Department to discuss its concerns regarding the Draft Permit requirements.
- (5) El Paso does not anticipate filing a petition for a formal administrative hearing regarding the Draft Permit for the Manatee Energy Center. However, before waiving its rights for such a hearing, El Paso requests a 60-day extension of time to review the Draft Permit requirements and to meet with the Department.
- (6) El Paso has discussed this request with the Department's permitting engineer, Mr. Al Linero, Administrator, New Source Review Section. Mr. Linero indicated that he had no objection to El Paso requesting an extension of time to file a petition for a formal administrative hearing for the Manatee Energy Center project.

On behalf of El Paso, a 60-day extension of time to file a petition for a formal administrative hearing regarding the Manatee Energy Center Draft Air Construction Permit (Department Draft Air Permit No. PSD-FL-318, Project No. 0810199-001-AC) is requested.

Please contact Mr. Krish Ravishankar of El Paso at (713) 420-5563 or the undersigned at (352) 332-6230, Ext.351 if there are any questions regarding this matter.

Sincerely,

ENVIRONMENTAL CONSULTING & TECHNOLOGY, INC.

Thomas W. Davis, P.E.
Principal Engineer

cc: Mr. Krish Ravishankar, El Paso
Mr. Al Linero, FDEP