

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF PERMIT

In the Matter of an
Application for Permit by:


Mr. William Mack, Sr., Managing Director
El Paso Merchant Energy Company
1001 Louisiana Street
Houston, Texas 77002

DEP File No. 0810199-001-AC (PSD-318)
Manatee Energy Center
Manatee County

Enclosed is the Final Permit Number 0810199-001-AC (PSD-FL-318) to construct a 600 MW Power Plant called the Manatee Energy Center in Manatee County. This permit is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit 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 Legal Office; 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 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.


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

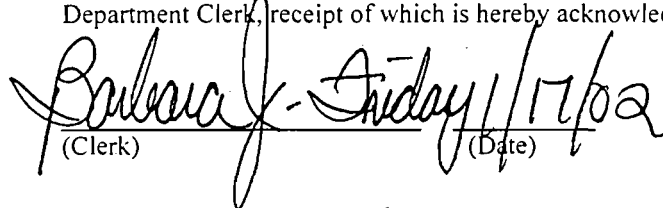
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT (including the FINAL permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 1/17/02 to the person(s) listed:

William Mack, El Paso*
Gregg Worley, EPA
John Bunyak, NPS
Bill Thomas, DEP SWD
Tom Davis, P.E., ECT
Chair, Manatee County BCC*
Karen Collins, PhD., Manatee County EMD
Jerry Campbell, Hillsborough County EPC
Peter Hessling, Pinellas County DEM

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date,
pursuant to §120.52, Florida Statutes, with the designated
Department Clerk, receipt of which is hereby acknowledged.


(Clerk) (Date)

FINAL DETERMINATION
File No. 0810199-001-AC (PSD-FL-318)
MANATEE ENERGY CENTER
600 MW POWER PLANT FACILITY

The Department distributed a Public Notice package on September 11, 2001 for the project to construct a natural gas electrical power plant to be known as the Manatee Energy Center in Manatee County. The project consists of three (3) nominal 170 MW General Electric 7FA combustion turbine-electrical generators, an unfired heat recovery steam generator, a separate steam-electrical generator; three 135-foot stack; a mechanical draft cooling tower; one 2600-hp diesel generator, one 250-hp diesel fire pump, one gas heater, aqueous ammonia storage tank and small diesel storage tanks and other ancillary equipment. The Public Notice of Intent to Issue was published on September 20, 2001, in the Sarasota Herald-Tribune, Manatee County.

Written comments were received during the 30-day public comment period from EPA Region IV, the Manatee County Environmental Management Department (Manatee County), and from El Paso Merchant Energy Company (El Paso).

The comments from El Paso, Manatee County, and EPA along with the Department's responses are listed below.

El Paso Comments and Department Responses:

In reference to Permit Specific Conditions III.A.2 and 17, related to minimizing startup times and control of startup emissions, El Paso submitted a letter prepared by General Electric dated September 21, 2001. The Department had suggested that this could be done by installation of a separate bypass stack and damper to facilitate startup of the steam cycle while operating the combustion turbine in low emission modes 5, 5Q, and 6Q. GE commented as follows:

"Operating the damper door as a modulating valve is not recommended. We are aware of a similar application at a project at KEPCO (Hungary?). Because of the turbulent flows, damage to the damper door and its seals allowed leakage to the atmosphere after the damper was closed resulting in a significant loss in performance".

In reference to Condition III.A.8, El Paso submitted the following comment: "The 2000 hour per year limit on steam 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 flow augmentation".

Following discussions with the Department, El Paso proposed to install "a HRSG stack damper (without a bypass stack) to reduce the frequency of cold and warm starts" and "an oxidation catalyst control system to minimize CO and VOC emissions occurring during startups and shutdowns and power augmentation operating conditions".

Department Response:

The Department reviewed General Electric's letter and wrote an e-mail to their representative re-framing the issue and asking how startup emissions can be minimized for a combined cycle configuration and whether modulating valves (instead of dampers) can be designed for this purpose. General Electric's further input will be useful when reviewing future projects, but will not come in time to implement it into the present project.

The Department has determined that El Paso oxidation catalyst proposal is a proper solution for this project. It reflects the first installation of oxidation catalyst in a GE Frame 7FA combined cycle unit in the State of Florida. The oxidation catalyst certainly will reduce high emissions of CO that can occur during the prolonged cold startup of a combined cycle unit when the basic combustion turbine is operated outside of DLN modes.

The oxidation catalyst will further minimize emissions of CO and VOC under all other modes of operation, especially power augmentation. The CO emission limits will be reduced and the permit will be revised as follows:

Section III.A. Emission Unit 001: Combined Cycle Turbine No. CC-1 (Controls): The efficient combustion of pipeline-quality natural gas at high temperature minimizes emissions of CO, PM/PM10, SAM, SO₂, and VOC. A selective catalytic reduction (SCR) system combined with Dry Low NO_x combustion technology reduces NO_x emissions. An Oxidation catalyst system combined with DLN combustion technology reduces CO and VOC.

Specific Condition III.A.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]

Specific Condition III.A.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.]

Specific Condition III.A.11 - Carbon Monoxide (CO):

- a. *Initial Test, Standard Operation:* When not operating in the power augmentation mode, CO emissions shall not exceed ~~9.7 34.0~~ pounds per hour nor ~~2.5 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 ~~2.5 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 ~~16.1 48.0~~ pounds per hour nor ~~4 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.
- d. *Continuous Compliance, Power Augmentation:* When injecting steam for power augmentation, CO emissions shall not exceed ~~4.0 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.]

Section III.A.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 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 2.4 3.0 pounds per hour and 1.1 4.3 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.]

Specific Condition III.A.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.

- 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. A damper shall be installed on the HRSG stack to minimize the frequency of cold and warm starts. An oxidation catalyst control system shall be installed to reduce excess emissions occurring during startups, shutdowns, and malfunctions. A Best Operating Practice procedure for minimizing emissions during startup and shutdown shall be submitted to the Department within 60 days following procurement of the HRSG.~~
- c. Low-Load Restriction: Except for startup and shutdown, operation ~~under DLN Modes 1, 2, 3, and 4 below 50 percent~~ is prohibited.

Specific Condition III.B.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 the 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.

- c. Low-Load Restriction: Except for startup and shutdown, operation ~~under DLN Modes 1, 2, 3, and 4 below 50 percent~~ is prohibited.

In reference to Condition III.A.20, El Paso submitted the following 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”.

Department Response:

The Department agrees with El Paso and clarifies the mentioned condition as follows:

Specific Condition III.A.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. Compliance with the continuous CO emissions standards shall be based on a 3-hour block average starting at midnight of each operating day. The 3-hour block average shall be calculated from 3 consecutive hourly average emission rate values. If a unit operates less than 3 hours during the block, the 3-hour block average shall be the average of available valid hourly average emission rate values for the 3-hour block. 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.]

Additional Department Clarifications of Permit Conditions

Based on comments received and petitions filed for several projects in Broward County, the Department reviewed the Emission Unit exemptions at Section 62-210.300, F.A.C. The Department's position is that the units mentioned in Section III.D.1-6 are not exempt from permitting and that they should be considered under the facility BACT determinations for each pollutant.

The affected units were already included in the permit. The conditions are revised as follows:

Section III D – Other Emission Units

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. A not to exceed limit of 4200 mg/l total dissolved solids shall be maintained within the cooling tower. {Permitting Note: Potential emissions in tons per year are expected to be less than 1.64 for PM and 0.99 for PM₁₀}. [Rule 62-212.400 (5) (c) F.A.C., BACT determination].
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)}. [Rule 62-212.400 (5) (c) F.A.C., BACT determination].
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. [Rule 62-212.400 (5) (c) F.A.C., BACT determination].
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)}. [Rule 62-212.400 (5) (c) F.A.C., BACT determination].
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. [Rule 62-4.070 (3) F.A.C.]
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.~~ This unit shall store 0.05% or less sulfur diesel fuel (by weight). [Rule 62-212.400 (5) (c) F.A.C., BACT determination].

Manatee County Environmental Management Department (MCEMD) Comments:

MCEMD Comment 1: *"The proposed facility has been determined to be a major source of air pollution, since emissions of at least one regulated air pollutant (particulate matter, sulfur dioxide, nitrogen oxides, carbon monoxide or volatile organic compounds) exceeds 100 tons per year (TPY). The Department's technical evaluation and preliminary determination is that "emissions from the facility will not cause or contribute to a violation of any state or federal ambient air quality standard".*

The new federal standard for ozone has been established at a level equivalent to 85 ppb averaged over any 8-hour period. An area will be considered non-attainment if the average of the annual fourth highest ozone readings at a monitoring site for any three year period equals or exceeds 85 ppb. Based on DEP's monitoring data, the three year running average for ozone within Manatee County has been steadily increasing. Considering that the County is marginally meeting the ozone standard and, that the neighboring counties of Sarasota and Hillsborough have already exceeded the standard for years 1999-2001, Manatee County does not concur with the Department's evaluation that the facility will not cause or contribute to violation of ambient air quality standards".

Please provide any additional information that will confirm the Department's position that these air quality standards will not be exceeded".

Department Response: The Department is confident that the proposed NO_x and VOC increases at the El Paso facility will not interfere with the Tampa Bay areawide strategy for reducing ozone concentrations. Ozone is an areawide pollution problem and the solution to reducing ozone levels is broad-based local and regional reductions in NO_x and VOC emissions (the precursors to ozone formation).

Based on recent monitoring data, the Tampa Bay area is marginally out of attainment of the 8-hour ozone standard. The area is still classified by EPA as in attainment. The Department will need to address this situation by requiring sufficient areawide reductions of NO_x and/or VOC to bring the area into compliance. Although the regulatory process is delayed because of court challenges to the 8-hour standard, the Department can identify a number of existing requirements that will significantly reduce ozone precursors in the Tampa Bay area. These requirements include the massive NO_x reductions from the TECO Order, low sulfur gasoline (low sulfur gasoline reduces NO_x emissions in cars and trucks), low sulfur diesel fuel, and more restrictive new car and truck emissions (Tier II standards).

In total, these reductions (mostly of NO_x) amount to tens of thousand tons per year or more over the next decade. The NO_x (365 tons per year) and VOC (29 tons per year) emissions increases from the proposed El Paso facility would not significantly reduce the total areawide reductions expected in the future. In fact, an argument can be made that the operation of the more efficient El Paso facility would result in further decreases in areawide emissions to the extent that even a small amount of power from higher polluting facilities is offset with power generated by the El Paso facility.

To more conclusively "prove" that the 365 tons of NO_x and 29 tons of VOC will not cause or contribute to a violation a very sophisticated and expensive model would need to be run for the entire region. The key inputs to the model would be traffic, power plants throughout the region, other industrial sources, and meteorology. Variations of the input from El Paso (from 0 to 365 TPY of NO_x, and 0 to 29 TPY of VOC) would not make any appreciable difference in the results. The uncertainty in any regional ozone model would be much greater than any contribution from this project.

Interestingly, emissions of NO_x from the El Paso project are primarily NO that tends to reduce ozone on a very localized basis. As the NO transforms to NO₂ miles downwind, it tends to increase ozone.

Variations in the emissions from the major conventional plants would make a difference. The reductions of 50,000 to 100,000 of NO_x caused by the Clean Air Act, the Department's Consent Decree, repowering of some conventional units, and competition from cleaner units will reduce the contribution of power plants to violations of the NAAQS in the Tampa Bay area. These reductions are about three orders of magnitude greater than the increase from the El Paso project. As previously discussed, the El Paso project will probably cause at least some further modest reduction in the region, based on displacement of some existing power with cleaner power.

MCEMD Comment 2 *"The design for the proposed facility includes a steam turbine generator and an unfired heat recovery steam generator capable of a maximum of 120MW. According to Chapter 403.503, F.S., steam or solar electrical generating facilities of less than 75 megawatts [emphasis added] is exempt from the criteria under the Florida Electrical Power Plant Siting Act. What control systems will be used to ensure that the 75 MW threshold is not exceeded?"*

Department Response: The Department required from El Paso a clear description of the manner by which electrical power from the steam turbine-electrical generator will be limited to less than 75 MW. Therefore, on the June 26, 2001, El Paso's letter in response to the Department's request for additional information stated the following:

"The steam turbine electrical generator (STG) planned for the Manatee Energy Center (BEC) combined cycle (CC) unit will have a maximum generating capacity of 120 megawatts (MW). The CC unit will have a modern distributed control system (DCS) that will serve as a means to control STG operation utilizing plant instrumentation and equipment. In conjunction with the steam turbine governor, a control management system will be implemented that will limit the STG output to less than 75 MW. The power output of the STG will be recorded on the plant DCS for records purposes and reporting needs as required. The CC unit will feature hardware provisions that will allow diversion of steam produced by the heat recovery steam generator (HRSG) from the STG thereby limiting its output. The main hardware features that will limit STG electrical output include CTG steam mass augmentation, STG controls, and a STG steam bypass system. Each of the systems is described in the following sections.

"The CC unit CTG will incorporate steam injection nozzles and design features that will allow a portion of the high-pressure steam generated by the HRSG to be diverted from the STG to the CTG. This introduction of steam to the CTG allows for a mass flow enhancement. The increased mass flow that results from steam injection will increase CTG output as well as fuel consumption. At ambient temperatures of about 50°F or less, steam mass flow augmentation will be limited by CTG equipment limitations. For instance, CTG backpressures could increase to levels beyond those recommended by the vendor. At these colder ambient temperature conditions, steam injection into the CTG will be curtailed and alternate means of steam diversion from the STG will be called on to a greater extent.

"The specifics of the limitations on CTG steam injection will be developed by the CTG vendor. Additionally, the specifics of steam introduction will be developed in conjunction with the CTG control systems for proper coordination with the Dry Low-NO_x (DLN) combustor control algorithms.

"Steam flow to the CTG steam injection nozzles, including CTG control integration, will be controlled from a signal generated within the DCS. This control signal will operate a control valve that regulates steam flow by modulation of the valve seat or opening area thereby allowing steam flow modulation.

"Steam flow to the CTG injection nozzles will be measured with classical steam flow measurement devices such as an orifice plate or an annubar. The steam flow measurement device will have a differential pressure transmitter attached to pressure sensing lines that will monitor the process and produce a proportional 4-20 milliamp (ma) signal that will tie in to the plant DCS. This signal will be converted to flow and signals will be transmitted to the CTG combustion control systems as well as to

the balance of the plant DCS. During base load operations, the steam flow to the CTG injection nozzles will likely be a fixed steam mass flow or fixed percent of CTG mass flow. Injection of steam will occur at 100 percent load only. During upsets/startups and conditions such as low ambient temperatures, the steam flow will be controlled to coordinate with CTG combustion control to allow stable operation and avoid surge and stall within the CTG. During these periods, alternate STG steam diversion paths will be used.

“The STG will be fitted with an electronic governor and control system that will control the steam flow into the STG and hence the STG electrical output. Additional instrumentation will be used to adjust this control loop. For instance, condenser back pressure, intermediate pressure and low pressure steam flows, steam temperatures and pressure will each have a significant impact on the determination of the proper steam flow to the STG.

“The primary measurement of STG electrical output will be the main input to the STG governor control loops. This power measurement will be feed to the STG governor to compare to the primary set point. As an example, the primary set point may have a value of 74.9 MW. Following control system tuning, the set point will be adjusted to allow for control swings and upsets such that the hourly STG electrical production average will never exceed 75 MW.

“Whenever steam to the CTG injection nozzles and to all other locations are not sufficient to reduce STG output to the set point, the primary means of final control will be a STG steam bypass system. The STG steam bypass system will allow steam flow from the HRSG to bypass the STG and "dump" directly into the condenser. The DCS will generate a final control signal that will modulate this steam dump. A CC plant typically includes this hardware to allow for steam dumping during upsets or malfunctions. Additional control signals and associated hardware will regulate this dump steam as the final means of disposal of excess HRSG steam. In addition, an economizer bypass system may be used to reduce the flow of water passing through the economizer stage of the HRSG, which will reduce the flow-of steam produced.

“The control systems described above will typically scan each instrument every second and recalculate and update the status and driving signals going to each field device. Following control system tuning, the control systems will regulate STG output to the required level”.

MCEMD Comment 2: *“The proposed facility will employ cooling towers for the purpose of cooling and condensing steam. Much of this cooling water is evaporated and must be replaced. According to the Southwest Florida Water Management District (SWFWMD), the proposed location of the facility is within the Most Impacted Area (MIA) which prohibits the permitting of new groundwater withdrawals. Please provide details as to the source and quality of water to be used at the facility”.*

Department Response:

The Manatee Energy Center plans to use reclaimed water provided by the City of Bradenton Water Reclamation Facility (El Paso’s e-mail dated December 3, 2001).

MCEMD Comment 3: *“How will this new supplier of electrical energy interact with the current regional suppliers? Will this facility displace energy being supplied these existing facilities? Does this facility have a local client base or will the energy be transmitted outside the region? Will a "needs determination" evaluation be conducted? Due to the fact that Manatee County is marginally meeting the current ozone standard, we would support an offset or pollutant trading so that the development of this facility would not cause a net increase in air emissions.*

Department Response

A “Need” determination pursuant to Sections 403.501-518, Florida Power Plant Siting Act is outside of the authority of the Department. The project was reviewed by the Department in accordance with the air permitting regulations applicable to projects are exempt from the Act.

The Department already concluded that emissions from the facility would not cause or contribute to a violation of the ozone standard. The Department also believes that the project will tend to reduce emissions in the Tampa Bay area if it displaces even 1 megawatt from conventional plants for every 10 megawatts that it generates. The plan proposed by MCEMD cannot be implemented unilaterally by the Department and certainly not by the time the Department is required to act on the El Paso.

Attachment I is a response from El Paso to the County’s comments. The Department does not necessarily agree or disagree with the explanation provided by El Paso, but appreciates the effort to answer the County’s questions.

MCEMD Comment 4: “The Tampa Bay Estuary Program (TBEP) is charged with ensuring that Bay conditions are protected and in some instances improved. The TBEP determined that excessive nitrogen loading to the Bay is of special concern. This nutrient causes algal blooms, decreased water clarity and generally degrades water quality, resulting in habitat and fisheries losses. Recent studies indicate that at least 29 percent of the Bay’s total nitrogen load is from atmospheric deposition. Due to the proximity to the Bay and Terra Ceia Aquatic Preserve, it is essential that the applicant provide detailed information on expected depositional impacts from nitrogen components (NO_x and ammonia) and other pollutants, along with their plans to offset these impacts in order to meet the TBEP’s goal of “holding the line” on pollutant inputs to the Bay. Why couldn’t Best Available Control Technology (BACT) be replaced with Maximum Available Control Technology (MACT) in this sensitive area? For example, SCONO_x is considered to be a better control device and does not contribute bio-available ammonia through “ammonia slip”. Can the Department require MACT for facilities located in sensitive areas?”

Department Response:

As previously mentioned, the Department concluded that emissions to the atmosphere will be relatively low and that impacts on ambient air are less than significant. The Department does not dispute the assertions regarding deposition into the Bay. However a systematic approach that implements Clean Air Act requirements, promotes repowering, enforces on polluters, and encourages clean projects will hold the line and actually improve Tampa Bay.

The Department determined that MACT is not applicable because the facility will emit less than 10 tons per year of any hazardous air pollutant (HAP). The EPA has advised that MACT for certain types of combustion turbines (such as the GE 7FA) will likely be the use of Dry Low NO_x (DLN) technology. For certain other types of turbines, MACT will be the use of oxidation catalyst.

The Department notes that MACT for hazardous air pollutants (HAPs) is typically less stringent than BACT for PSD pollutants. However, the Department notes that DLN technology will be installed on the simple cycle units and both DLN and oxidation catalyst will be installed on the combined cycle unit.

Please refer to the enclosed BACT determination. The Department considered SCONO_x, but found that it is not technically feasible on the simple cycle units. It is not cost-effective on the combined cycle unit.

El Paso reviewed the County’s comment and replied as follows: “Based on the use of reclaim water currently discharged to Tampa Bay, operation of the Manatee Energy Center will result in a net decrease in total nitrogen loading to Tampa Bay. Reclaim water used by the Manatee Energy Center will be managed such that surface discharges to Tampa Bay will not occur”.

El Paso also stated that “a report evaluating nitrogen loading on Tampa Bay due to operation of the Manatee Energy Center is being prepared and will be provided to the Department when available”. The Department does not necessarily agree or disagree with El Paso’s assessment of this issue, but is appreciative of the effort made in responding to the County’s comment. The Department will provide a copy of the future El Paso report.

MCEMD Comment 5: “*Although the proposal is for a predominantly gas-fired power plant, the permit would allow combustion of diesel fuel in a 2600 HP diesel-fired electric generator and a 250HP diesel water pump. The hourly emissions of criteria pollutants would be significantly greater. We question whether these increased emissions from the use of diesel fuel is acceptable in terms of cumulative effects of other regional and in-County sources?*”

Department Response:

It is anticipated that each of these units will consume less than 32,000 gallons per year which would normally make them exempt from permitting if they were constructed at existing facilities. The No. 2 distillate fuel oil used for this project will have a maximum 0.05 percent sulfur specification and will be used only for these small units. This compares with the maximum limit set by Manatee County for fuel sulfur of 1 percent (Manatee County Code of Ordinances – Section 1-32-5(d)).

As stated previously, the 2600 HP Emergency Generator 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). Emissions from the 250 HP Fire Water Pump Diesel Engine 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.

With the very low emissions and the likelihood of (passively) offsetting even some power from nearby conventional units, it is clear that the project as designed is acceptable “in terms of cumulative effects of other regional and in-county sources.”

MCEMD Comment 6: “*In several sections, the permit requires that reports and notifications be submitted to the Department of Environmental Protection. We would ask that the Manatee County Environmental Management Department also is listed as a recipient of such reports, documents, and notifications, according to the same time frames required for submittal the Department*”.

Department Response:

The Department will review and revise the permit to include the Manatee County Environmental Management Department as a recipient of the various documents, reports and notifications.

Environmental Protection Agency (EPA) Comments

Many of EPA’s comments are favorable critiques of the Department’s approach in preparing the draft permit and BACT determination. Following are certain EPA comments that the Department has determined require clarification or a response.

EPA Comment 4 - Oxidation Catalysis: “*The draft permit CO emission limit of 8 ppmvd for the simple cycle combustion turbines and for the combined cycle combustion turbine when not operating in power augmentation mode is among the lower BACT limits established in Region 4 for combustion turbines. We further understand Florida Department of Environmental Protection’s (FDEP) expectation that the turbines will in fact typically operate with even lower emissions based on inherent combustor design and good combustion practices alone. However, please note that the use of catalytic oxidation for further control of combustion turbine CO emissions, especially for combined cycle combustion turbines, has become much more common as part of BACT determinations for combustion turbine projects.*”

Catalytic oxidation has the added advantage of controlling volatile organic compound (VOC) emissions including volatile organic hazardous air pollutants

Further related to the CO draft permit emission limit of 8 ppmvd, we note that Appendix BD (the BACT determination) indicates an emission rate of 7.4 ppmvd at full load for either combined cycle or simple cycle combustion turbines. Based on our understanding that the draft permit has precedence over Appendix BD, we presume that 8 ppmvd will be the enforceable limit.

Emissions of CO from combustion turbines increase sharply below a certain load level (unless an add-on control device is in use). For GE 7FA combustion turbines, this sharp increase occurs with operation below about a 50-percent load level. It is not clear to us that the draft permit restricts normal operation (that is, operation other than during startup and shutdown) to load levels of 50 percent and higher. Condition A.17.c. prohibits operation of the combined cycle combustion turbine at "DLN Modes 1, 2, 3, and 4" (except during startup and shutdown), and Condition B.13.c. specifies a similar restriction for the simple cycle combustion turbines. Since the load levels equivalent to these modes are not specifically stated, however, we are not certain what load levels are prohibited. Furthermore, we would appreciate your identifying which monitoring requirements in the draft permit serve to track compliance with the low-load restrictions.

Department Response: In their application, El Paso, submitted cost-effectiveness calculations to control CO emissions by oxidation catalyst. Based on the most conservative case the calculations result in an oxidation catalyst cost estimate of \$2,475 per ton of CO removed (combined cycle operation) and \$8,981 (simple cycle operation). The Department does not consider oxidation catalyst to be cost-effective for simple cycle operation based on these calculations.

El Paso's cost effectiveness calculations are based on reduction of CO concentrations from the range of 11.7 to 1.2 ppmvd under combined cycle (steam power augmentation mode) and from 7.4 to 0.7 ppmvd under simple cycle operation. Based on data available to the Department, actual emissions without oxidation catalyst are on the order of 1 ppmvd while firing gas or fuel oil at least under normal modes of operation (not steam power augmentation). This is substantially less than even the objective by oxidation catalyst.

The Department has actual no data on CO emissions during steam power augmentation and initially limited operation under this mode to 2000 hours per year. However as discussed in the first comment by El Paso on Page 1, the company will install oxidation catalyst on the combined cycle unit and the Department will reduce CO emission limits while allowing continuous operation under steam power augmentation mode. This will also reduce VOC and HAP emissions. A CO monitor will be installed on the combined cycle unit.

The Department believes that with SCR and oxidation catalyst, there is less reason to limit operations to less than 50 percent of full load. However, El Paso has agreed to a condition that operation at loads less than 50 percent is not allowed except during startup and shutdown.

Startup under simple cycle operation will be short (less than 15 minutes), while emissions under full load operation will be very low even without oxidation catalyst. The Department will require El Paso to install a CO monitor at the El Paso Broward to collect information regarding CO emissions during simple cycle startup and shutdown. The data may be used to set startup limitations at future projects.

EPA Comment 5 - Startup and Shutdown Data Inclusion and Exclusion: "As we have often commented, startup and shutdown are part of normal combustion turbine operation and need to be addressed in PSD permits. FDEP has done so for this project by establishing a work practice standard and by limiting the number of hours of emissions that can be excluded from NO_x and CO compliance demonstrations for the combined cycle combustion turbine and from NO_x compliance demonstration for the simple cycle combustion turbines. Other permit options that could be considered include limitations on the number of startups and shutdowns in any 12-month period; mass emission limits for NO_x and CO emissions during any 24-hour period to include emissions during startup and shutdown; and future establishment of startup and shutdown BACT emission limits for NO_x and CO derived from test results during the first few months of commercial operation. In addition, compliance with any explicit or implicit annual emissions limits should be assessed with startup and shutdown emissions included. Regarding the option of mass emission limits, we acknowledge FDEP's comments that such limits may be difficult to quantify.

"The only definition of startup that we find is in Appendix BD of the package. As mentioned previously, we understand that the provisions of Appendix BD are not necessarily enforceable. Furthermore, the definition in Appendix BD denotes when startup commences but does not state the operating level or other characteristic marking the end of startup and the beginning of normal operation. We recommend that a more complete definition be developed so that the emission measurements eligible for exclusion under the excess emissions provisions can be confirmed easily.

"Conditions 17d of the combined cycle section and 13d of the simple cycle section contain provisions allowing certain data during periods of startup and shutdown to be excluded from compliance demonstrations". Condition 17d for the combined cycle combustion turbine exempts up to 2 hourly emission rate values in a calendar day, except for combined cycle cold startups, in which case up to 4 hourly emission rate values in a calendar day can be exempted. Additionally, Condition 17d indicates that no more than a total of 4 hourly emission rate values shall be exempted in a calendar day. It is unclear to us the purpose of the latter restriction on total hourly emission rate values. Also, it should be clarified in what case a total of 4 hours can be exempted when there is no combined cycle cold startup during the calendar day.

"Condition 13d for the simple cycle combustion turbines exempts "no more than 2 hourly emission rate values" from the NO_x compliance demonstration as well as restricting the exemption to "no more than a total of 3 hourly emission rate values" in a calendar day. The purpose of the latter restriction is unclear, since the NO_x compliance period is a 24-hour block average. Finally, to remain consistent with previous FDEP simple cycle combustion turbine permits, no more than 2 hours out of a 24-hour period (or calendar day) should be exempted from compliance demonstrations".

Department Response: The Department does not allow extended operation at low loads for the simple cycle units during which higher emissions typically occur. Startup for the simple cycle units is simply the time it takes to reach DLN Mode 5Q (roughly corresponds to 50 percent of full load). The Work Practice BACT requires that this mode be reached within 15 minutes. Both emissions and the DLN Modes are tracked by the Mark VI control system.

General Electric did not agree with the Department's Work Practice BACT to minimize startup time of the combined cycle unit (i.e. time to achieve Mode 5Q). El Paso proposed the alternative of installing oxidation catalyst for CO and VOC reduction. The facility must also employ good operating practices during periods of excess emissions. This includes, for example, operation of the SCR system on the combined cycle unit as soon and for as long as the temperature conditions within the heat recovery steam generator allow.

The Department believes that the measures described (in addition to exclusive firing of natural gas) will result in the lowest emissions (whether in startup or steady state modes) from any combined or simple cycle projects permitted in the Southeast.

The Department has been progressively implementing EPA's comments regarding startups, high emission modes, inclusion and exclusion of data, etc. The present permit represents a major effort in this regard. Further efforts will be made as emissions data are received from facilities required to demonstrate compliance with NO_x and CO limits by CEMS.

The following sentence of Specific Condition 13.d. for the simple cycle turbines was revised as suggested: "No more than a total of two ~~three~~ hourly average emission rate values shall be excluded from the continuous NO_x compliance demonstrations for such periods in any calendar day".

EPA Comment 6 - Initial and Annual Testing: "Draft permit Condition 14 pertaining to simple cycle combustion turbines requires testing initially and at permit renewal for PM/PM₁₀, CO, NO_x, and VOC. The draft permit conditions for the combined cycle combustion turbine do not require PM/PM₁₀ and VOC initial and renewal testing. We have agreed with FDEP in the past that PM/PM₁₀ and VOC testing is not required for combined cycle combustion turbines with continuous emission monitoring systems (CEMS) for CO. However, a permit for a project with both combined cycle and simple cycle combustion turbines that has different initial and renewal testing requirements for the two types of turbines may be perceived as inconsistent. On a related point, we recommend that FDEP give consideration to requiring CO CEMS for the simple cycle combustion turbines as well as for the combined cycle combustion turbine in view of the fact that the simple cycle combustion turbines will be allowed to operate up 5,000 hours per year at full load (and even more hours at a combination of full and partial loads)".

Department Response: The Department agrees with EPA and revises these conditions to include initial and renewal testing for PM/PM₁₀ and VOC emissions for all turbines. The Department will require El Paso to install a CO monitor at the El Paso Broward to collect information regarding CO emissions during the very short simple cycle startup and shutdown periods. The data may be used to set startup limitations at future projects. The Department notes that after the startup period, emissions will be approximately 1 - 2 ppmvd (although the limit is 7.4 ppmvd) based on actual test data. The continuous collection of CO data at all simple cycle units does not appear justified except at those that exhibit inherently higher emissions than the GE 7FA.

EPA Comment 7- Pipeline Natural Gas: "The term "pipeline-quality natural gas" appears several times in the draft permit. We have sought in the past for a government agency or industry trade group definition of "pipeline-quality" and have never succeeded in finding such a definition. We presume that the term "pipeline-quality natural gas" means natural gas obtained from an intrastate or interstate commercial natural gas pipeline."

Department Response: The Department confirms that such gas is obtained from a FERC-regulated natural gas pipeline.

EPA Comment 8 - Ammonia Emissions: "The draft permit contains an emission limit for ammonia of 5 ppmvd. Ammonia is not regulated under the PSD program, and we do not have a definitive policy on ammonia emissions. However, we can comment that the limit in the draft permit is consistent with (although not equal to the lowest) ammonia limits we are aware of from projects outside Region 4."

EPA Comment 9 - Air Quality Impact: "In the air quality impact evaluations prepared for this project, we see no acknowledgment that NO_x emissions are precursors to ground-level ozone formation. Such acknowledgment would help demonstrate why control of NO_x emissions from combustion turbines is important".

Department Response:

The Department certainly acknowledges that NO_x emissions and VOC emissions are the key precursors in the formation of ground-level ozone.

CONCLUSION

The final action of the Department is to issue the permit with the changes noted above.



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

PERMITTEE:

El Paso Merchant Energy Company
1001 Louisiana Street
Houston, TX 77002

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; 3057.6.0 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.

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

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 (NO_x), 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-Annual 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. An oxidation catalyst system combined with DLN combustion technology reduces CO and VOC.

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. [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 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 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.]

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

A. COMBINED CYCLE GAS TURBINE

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. [Rule 62-212.400 (BACT), F.A.C.]
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.]
11. Carbon Monoxide (CO)
 - a. Initial Test, Standard Operation: When not operating in the power augmentation mode, CO emissions shall not exceed 9.7 pounds per hour nor 2.5 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 2.5 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 16.1 pounds per hour nor 4 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.

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

A. COMBINED CYCLE GAS TURBINE

- d. *Continuous Compliance, Power Augmentation:* When injecting steam for power augmentation, CO emissions shall not exceed 4 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 pounds per hour nor 2.5 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 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.]

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 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 2.4 pounds per hour and 1.1 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.]

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:* A damper shall be installed on the HRSG stack to minimize the frequency of cold and warm starts. An oxidation catalyst control system shall be installed to reduce excess emissions occurring during startups, shutdowns, and malfunctions. A Best Operating Practice procedure for minimizing emissions during startup and shutdown shall be submitted to the Department within 60 days following procurement of the HRSG.
- c. *Low-Load Restriction:* Except for startup and shutdown, operation below 50 percent is prohibited.

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

A. COMBINED CYCLE GAS TURBINE

- d. *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.]

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, PM/PM₁₀, VOC 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.]

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. Compliance with the continuous CO emissions standards shall be based on a 3-hour block average starting at midnight of each operating day. The 3-hour block average shall be calculated from 3 consecutive hourly average emission rate values. If a unit operates less than 3 hours during the block, the 3-hour block average shall be the average of available valid hourly average emission rate values for the 3-hour block. 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

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

A. COMBINED CYCLE GAS TURBINE

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.]

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.]

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 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.]

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

B. SIMPLE CYCLE GAS TURBINES

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)
- 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.]
 - 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.
- 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.
 - 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.
 - Low-Load Restriction*: Except for startup and shutdown, operation below 50 percent is prohibited.
 - 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 two 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.]

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:
 - a. *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.
 - b. *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.
 - c. *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 reference 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. A not to exceed limit of 4200 mg/l total dissolved solids shall be maintained within the cooling tower. {Permitting Note: Potential emissions in tons per year are expected to be less than 1.64 for PM and 0.99 for PM₁₀}. [Rule 62-212.400 (5) (c) F.A.C., BACT determination].
2. 2600 HP Diesel Generator: 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)}. [Rule 62-212.400 (5) (c) F.A.C., BACT determination].
3. 12.8 MMBtu/hr Gas-fired Natural Gas Fuel Heater: 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. [Rule 62-212.400 (5) (c) F.A.C., BACT determination].
4. 250 HP Diesel Fire Pump: 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)}. [Rule 62-212.400 (5) (c) F.A.C., BACT determination].
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. [Rule 62-4.070 (3) F.A.C.]
6. Two Diesel Fuel Storage Tanks (each less than 1000 gallons): This unit shall store 0.05% or less sulfur diesel fuel (by weight). [Rule 62-212.400 (5) (c) F.A.C., BACT determination].

APPENDIX BD
BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

El Paso Manatee Energy Center
PSD-FL-318 and 0810199-001-AC
Manatee County, Florida

BACKGROUND

The applicant, El Paso Merchant Energy Company (El Paso), proposes to install three nominal 175-megawatt (MW) General Electric PG 7241FA (GE 7FA) combustion turbine-electrical generators at the planned Manatee Energy Center near Piney Point, Manatee County. The proposed project will constitute a New Major Facility per Rule 62-212.400(d)2.b., Florida Administrative Code (F.A.C.). It is therefore subject to review for the Prevention of Significant Deterioration (PSD) and a determination of Best Available Control Technology (BACT) per Rule 62-212.400, F.A.C. Emissions of particulate matter (PM and PM₁₀), carbon monoxide (CO), nitrogen oxides (NO_x), sulfur dioxide (SO₂), and sulfuric acid mist (SAM) will exceed the "Significant Emission Rates" with respect to Table 212.400-2, (F.A.C.). PSD and BACT reviews are required for each of these pollutants.

Two of the units will operate in simple cycle mode and intermittent duty while the third will operate in combined cycle mode and continuous duty. The units will exhaust through separate 135-foot stacks. The units will be fired exclusively with pipeline natural gas. El Paso proposes to operate the simple cycle units up to 5,000 hours per year per unit. Descriptions of the process, project, air quality effects, and rule applicability are given in the Technical Evaluation and Preliminary Determination, accompanying the Department's Intent to Issue dated September 11, 2001.

DATE OF RECEIPT OF A BACT APPLICATION:

The application was received on March 28, 2001 (complete June 27) and included a BACT proposal prepared by the applicant's consultant, ECT.

PREPARED BY:

A. A. Linero, P.E. and Teresa Heron, Permit Engineer

ORIGINAL BACT DETERMINATION REQUESTED BY THE APPLICANT:

POLLUTANT	CONTROL TECHNOLOGY	PROPOSED BACT LIMIT
Nitrogen Oxides	Dry Low NO _x Combustors Selective Catalytic Reduction	9 ppmvd @ 15% O ₂ (simple cycle units) 3.5 ppmvd @ 15% O ₂ (combined cycle)
Particulate Matter	Pipeline Natural Gas Combustion Controls	18.3 pounds per hour (Front + Back Half, Simple) 20 pounds per hour (Front + Back Half, Combined)
Carbon Monoxide	As Above	7.4 ppmvd (Full load, Simple or Combined) 12 ppmvd (Combined Cycle Steam Augmentation)
Sulfur Oxides	As Above	1.5 grains sulfur/100 std cubic feet

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BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

BACT DETERMINATION PROCEDURE:

In accordance with Rule 62-212.400, F.A.C., this BACT determination is based on the maximum degree of reduction of each pollutant emitted which the Department of Environmental Protection (Department), on a case by case basis, taking into account energy, environmental and economic impacts, and other costs, determines is achievable through application of production processes and available methods, systems, and techniques. In addition, the regulations state that, in making the BACT determination, the Department shall give consideration to:

- Any Environmental Protection Agency determination of BACT pursuant to Section 169, and any emission limitation contained in 40 CFR Part 60 - Standards of Performance for New Stationary Sources or 40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants.
- All scientific, engineering, and technical material and other information available to the Department.
- The emission limiting standards or BACT determination of any other state.
- The social and economic impact of the application of such technology.

The EPA currently stresses that BACT should be determined using the "Top-Down" approach, particularly when permits are issued by states acting on behalf of EPA. The Department considers Top-Down to be a useful tool, though not a unique or required approach to achieve a BACT under the State regulations. The first step in this approach is to determine, for the emission unit in question, the most stringent control available for a similar or identical emission unit or emission unit category. If it is shown that this level of control is technically or economically unfeasible for the emission unit in question, then the next most stringent level of control is determined and similarly evaluated. This process continues until the BACT level under consideration cannot be eliminated by any substantial or unique technical, environmental, or economic objections.

STANDARDS OF PERFORMANCE FOR NEW STATIONARY SOURCES:

The minimum basis for a BACT determination is 40 CFR 60, Subpart GG, Standards of Performance for Stationary Gas Turbines (NSPS). The Department adopted subpart GG by reference in Rule 62-204.800, F.A.C. The key emission limits required by Subpart GG are 75 ppmvd NO_x @ 15% O₂ (assuming 25 percent efficiency) and 150 ppmvd SO₂ @ 15% O₂ (or <0.8% sulfur in fuel). The BACT proposed by El Paso is well within the NSPS limit, which allows NO_x emissions in the range of 100 - 110 ppmvd for the high efficiency units to be purchased for the El Paso project.

A National Emission Standard for Hazardous Air Pollutants (NESHAP) under development exists for stationary gas turbines. However this facility will not be subject to the NESHAP or to a requirement for a case-by-case determination of maximum achievable control technology because HAP emissions will be less than 10 TPY.

DETERMINATIONS BY EPA AND STATES:

The following tables include some recently permitted simple and combined cycle turbines. The proposed El Paso project is included to facilitate comparison.

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BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

TABLE 1

RECENT NO_x EMISSION LIMIT PROPOSALS AND DETERMINATIONS FOR "F-CLASS"
SIMPLE CYCLE PROJECTS IN THE SOUTHEAST

Project Location	Power Output (MW)	NO _x Limit ppmvd @ 15% O ₂ and Fuel	Technology	Comments
El Paso Manatee, FL	350	9 NG	DLN	2x175 MW GE 7FA CTs (Gas only)
El Paso Deerfield, FL	525	9 - NG	DLN	3x175 MW GE 7FA CTs Draft 8/2001. Gas Only
Enron Deerfield, FL	510	9 - NG 36 - No. 2 FO	DLN WI	3x170 MW GE 7FA CTs Draft 06/01. 500 hrs on oil
Enron Pompano, FL	510	9 - NG 36 - No. 2 FO	DLN WI	3x170 MW GE 7FA CTs Revised Draft 06/01. 500 hrs on oil
Midway St. Lucie, FL	510	9 - NG 42 - No. 2 FO	DLN WI	3x170 MW GE 7FA CTs Issued 2/01. 1000 hrs on oil
DeSoto County, FL	510	9 - NG 42 - No. 2 FO	DLN WI	3x170 MW GE 7FA CTs Issued 7/00. 1000 hrs on oil
Shady Hills Pasco, FL	510	9 - NG 42 - No. 2 FO	DLN WI	3x170 MW GE 7FA CTs Issued 1/00. 1000 hrs on oil
Vandolah Hardee, FL	680	9 - NG 42 - No. 2 FO	DLN WI	4x170 MW GE 7FA CTs Issued 11/99. 1000 hrs on oil
Oleander Brevard, FL	850	9 - NG 42 - No. 2 FO	DLN WI	5x170 MW GE 7FA CTs Issued 11/99. 1000 hrs on oil
JEA Baldwin, FL	510	10.5 - NG 42 - No. 2 FO	DLN WI	3x170 MW GE 7FA CTs Issued 10/99. 750 hrs on oil
TEC Polk Power, FL	330	10.5 - NG 42 - No. 2 F.O.	DLN WI	2x165 MW GE 7FA CTs Issued 10/99. 750 hrs on oil
Dynegy, FL	510	15 - NG	DLN	3x170 MW WH 501F CTs Issued. Gas only
Dynegy Heard, GA	510	15 - NG	DLN	3x170 MW WH 501F CTs Issued. Gas only
Thomaston, GA	680	15 - NG 42 - No. 2 FO	DLN WI	4x170 MW GE 7FA CTs Issued. 1687 hrs on oil
Dynegy Reidsville, NC	900	15 - NG (by 2002) 42 - No. 2 FO	DLN WI	5x180 MW WH 501F CTs Initially 25 ppm NO _x limit on gas Issued. 1000 hrs on oil.
Lyondell Harris, TX	160	25 - NG	DLN	1x160 MW WH 501F CTs Issued 11/99. Gas only
Southern Energy, WI	525	15/12 - NG 42 - No. 2 FO	DLN WI	3x175 MW GE 7FA CTs 15/12 ppm are on 1/24 hr basis Issued 1/99. 800 hrs on oil
Carson Energy, CA	42	5 - NG (LAER)	Hot SCR	42 MW LM6000PA. Startup 1995. Ammonia limit is 20 ppmvd
McClelland AFB, CA	85	5 - NG (LAER)	Hot SCR	85 MW GE 7EA. Applied 1999 Ammonia proposal 10 ppmvd
Lakeland, FL	250 CON	9/9 - NG (by 2002) 42/15 - No. 2 FO	DLN/HSCR WI/HSCR	250 MW WH 501G CT Initially 25 ppm NO _x limit on gas Issued 7/98. 250 hrs on oil.
PREPA, PR	248 CON	10 - No. 2 FO	WI & HSCR	3x83 MW ABB GT11N CTs Issued 12/95.

CON = Continuous DLN = Dry Low NO_x Combustion FO = Fuel Oil GE = General Electric
SC = Simple Cycle SCR = Selective Catalytic Reduction NG = Natural Gas WH = Westinghouse
INT = Intermittent HSCR = Hot SCR WI = Water or Steam Injection ABB = Asea Brown Bovari

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BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

TABLE 2

RECENT CO, VOC, AND PM EMISSION LIMIT PROPOSALS AND DETERMINATIONS
FOR "F-CLASS" SIMPLE CYCLE PROJECTS

Project Location	CO - ppm (or as indicated)	VOC - ppm (or as indicated)	PM - lb/hr (or as indicated)	Technology and Comments
El Paso Manatee, FL	8 (7.4@15% O ₂) - N	1.4 (1.3@15% O ₂)	18 lb/hr (Front & Back)	Clean Fuels Good Combustion
El Paso Deerfield, FL	8 (7.4@15% O ₂) - NG	1.4 (1.3@15% O ₂)	18 lb/hr (Front & Back)	Clean Fuels Good Combustion
Enron Deerfield, FL	9 - NG 30 - FO	1.4 - NG 1.4 - FO	18 lb/hr - NG 34 lb/hr - FO	Clean Fuels Good Combustion
Pompano Beach, FL	9 - NG 30 - FO	1.4 - NG 1.4 - FO	10 lb/hr - NG 17 lb/hr - FO	Clean Fuels Good Combustion
Midway St. Lucie, FL	9 - NG 30 - FO	1.4 - NG 1.4 - FO	10 lb/hr - NG 17 lb/hr - FO	Clean Fuels Good Combustion
DeSoto County, FL	12 - NG 20 - FO	1.4 - NG 7 - FO	10 lb/hr - NG 17 lb/hr - FO	Clean Fuels Good Combustion
Shady Hills Pasco, FL	12 - NG 20 - FO	1.4 - NG 7 - FO	10 lb/hr - NG 17 lb/hr - FO	Clean Fuels Good Combustion
Vandolah Hardee, FL	12 - NG 20 - FO	1.4 - NG 7 - FO	10 lb/hr - NG 17 lb/hr - FO	Clean Fuels Good Combustion
Oleander Brevard, FL	12 - NG 20 - FO	3 - NG 6 - FO	10% Opacity	Clean Fuels Good Combustion
JEA Baldwin, FL	12 - NG 20 - FO	1.4 - NG/FO Not PSD	9/17 lb/hr - NG/FO 10% Opacity	Clean Fuels Good Combustion
TEC Polk Power, FL	15 - NG 33 - FO	7 - NG 7 - FO	10% Opacity	Clean Fuels Good Combustion
Dynegy, FL	25 - NG	? - NG	? - NG	Clean Fuels Good Combustion
Dynegy Heard Co., GA	25 - NG	? - NG	? - NG	Clean Fuels Good Combustion
Tenaska Heard Co., GA	15 - NG 20 - FO	? - NG ? - FO	? - NG ? lb/hr - FO	Clean Fuels Good Combustion
Dynegy Reidsville, NC	25 - NG 50 - FO	6 lb/hr - NG 8 lb/hr - FO	6 lb/hr - NG 23 lb/hr - FO	Clean Fuels Good Combustion
Lyondell Harris, TX	25 - NG			Clean Fuels Good Combustion
Southern Energy, WI	12@>50% load - NG 15@>75% 24@<75% - FO	2 - NG 5 - FO	18 lb/hr - NG 44 lb/hr - FO	Clean Fuels Good Combustion
RockGen Cristiana, WI	12@>50% load - NG 15@>75% 24@<75% - FO	2 - NG 5 - FO	18 lb/hr - NG 44 lb/hr - FO	Clean Fuels Good Combustion
Carson Energy, CA	6 - NG			Oxidation Catalyst
McClelland AFB, CA	23 - NG	3.9 - NG	7 lb/hr	Clean Fuels Good Combustion
Lakeland, FL	25 - NG or 10 by Ox Cat 75 - FO @ 15% O ₂	4 - NG 10 - FO	10% Opacity	Clean Fuels Good Combustion
PREPA, PR	9 - FO @ 15% O ₂	11 - FO @ 15% O ₂	0.0171 gr/dscf	Clean Fuels Good Combustion

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TABLE 3

RECENT NO_x EMISSION LIMIT PROPOSALS AND DETERMINATIONS FOR "F-CLASS"
 COMBINED CYCLE PROJECTS IN THE SOUTHEAST

Project Location	Capacity Megawatts	NO _x Limit ppmvd @ 15% O ₂ and Fuel	Technology	Comments
El Paso Manatee, FL	250	2.5 - NG	SCR	175 MW GE 7FA
El Paso Deerfield, FL	250	2.5 - NG	SCR	175 MW GE 7FA Draft 8/2001
CPV Pierce, FL	245	2.5 - NG 10 - FO	SCR	170 MW GE 7FA CT 7/2001
Metcalf Energy, CA	600	2.5 - NG	SCR	2x170 MW WH501F & Duct Burners
Enron/Ft. Pierce, FL	~250	3.5 - NG 10 - FO	SCR	170 MW MHI501F CT Repowering
CPV Atlantic, FL	245	3.5 - NG 10 - FO	SCR	170 MW GE 7FA CT
CPV Gulfcoast, FL	245	3.5 - NG 10 - FO	SCR	170 MW GE 7FA CT
TECO Bayside, FL	1750	3.5 - NG 12 - FO	SCR	7x170 MW GE 7FA CTs Repowering
FPC Hines II, FL	530	3.5 - NG 12 - FO	SCR	2x170 MW WH501F
Calpine Osprey, FL	527	3.5 - NG	SCR	2x170 MW WH501F Draft 5/00
Calpine Blue Heron, FL	1080	3.5 - NG	SCR	4x170 MW WH501F Draft 2/00
Santee Cooper, SC	~500	9 - NG	DLN	2x170 MW GE 7FA CTs ~ 4/00
Mobile Energy, AL	~250	~3.5 - NG ~11 - FO	SCR	178 MW GE 7FA CT 1/99
Alabama Power Barry	800	3.5 - NG	SCR	3x170 MW GE 7FA CTs 11/98
Alabama Power Theo	210	3.5 - NG	SCR	4x170 MW GE 7FA CTs 11/98
KUA Cane Island 3, FL	250	3.5 - NG (12 - simple cycle) 15 - FO	SCR	170 MW GE 7FA. 11/99 DLN on simple cycle
Lake Worth LLC, FL	250	9 or 3.5 - NG 9.4 or 3.5 - NG (CT&DB) 42 or 16.4 - FO	DLN or SCR DLN or SCR WI or SCR	170 MW GE 7FA. 11/99 Increase allowed for DB under DLN.
Miss Power Daniel	1000	3.5 - NG	SCR	4x170 MW GE 7FA CTs 11/98

DB = Duct Burner
 NG = Natural Gas
 FO = Fuel Oil

DLN = Dry Low NO_x Combustion
 SCR = Selective Catalytic Reduction
 WI = Water or Steam Injection

GE = General Electric
 WH = Westinghouse
 CT = Combustion Turbine

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TABLE 4
 RECENT CO, VOC, AND PM EMISSION LIMIT PROPOSALS AND DETERMINATIONS
 FOR "F-CLASS" COMBINED CYCLE PROJECTS

Project Location	CO - ppmvd (or lb/mmBtu)	VOC - ppmv (or lb/mmBtu)	PM - lb/mmBtu (or gr/dscf or lb/hr)	Technology and Comments
El Paso Manatee, FL	9 (7.4 @15% O ₂) 15 (12 @15% O ₂) (PA)	1.4 - NG	20 lb/hr – (Front & Back) 5 ppmvd Ammonia Slip	Clean Fuels Good Combustion
El Paso Deerfield, FL	9 (7.4 @15% O ₂) 15 (12 @15% O ₂) (PA)	1.4 - NG	20 lb/hr – (Front & Back) 5 ppmvd Ammonia Slip	Clean Fuels Good Combustion
CPV Pierce, FL	9 - NG (50 - 100% load) 15 - NG (PA) 20 - FO	1.4 - NG 3.5 FO	11 lb/hr – NG (front) 36 lb/hr – FO (front) 5 ppmvd Ammonia Slip	Clean Fuels Good Combustion
Metcalf Energy, CA	6 - NG (100% load)	.00126 lb/mmBtu-NG	12 lb/hr – NG (w DB) 5 ppmvd Ammonia Slip	Clean Fuels Good Combustion
Enron Ft. Pierce, FL	3.5 - NG 10 - Low Load 8 - FO	2.2 - NG 16 – Low Load 10 - FO	10% Opacity	Oxidation Catalyst Clean Fuels Good Combustion
CPV Atlantic, FL	9 - NG (50 - 100% load) 15 - NG (PA) 20 - FO	1.4 - NG 3.5 FO	11 lb/hr – NG (front) 36 lb/hr – FO (front) 5 ppmvd Ammonia Slip	Clean Fuels Good Combustion
CPV Gulfcoast, FL	9 - NG (50 - 100% load) 15 - NG (PA) 20 - FO	1.4 - NG 3.5 FO	11 lb/hr – NG (front) 36 lb/hr – FO (front) 5 ppmvd Ammonia Slip	Clean Fuels Good Combustion
TECO Bayside, FL	9 - NG (24-hr CEMS) 20 - FO (24-hr CEMS)	1.3 - NG 3 - FO	12 lb/hr – NG 30 lb/hr - FO	Clean Fuels Good Combustion
FPC Hines II, FL	16 - NG (24-hr CEMS) 30 - FO (24-hr CEMS)	2 - NG 10 - FO	10% Opacity – NG 5/9 ammonia – NG/FO	Clean Fuels Good Combustion
Calpine Osprey, FL	10 - NG 17 - NG (DB&PA)	2.3 - NG 4.6 - NG (DB&PA)	24 lb/hr – NG (DB&PA) 10 percent Opacity 9 ppmvd Ammonia Slip	Clean Fuels Good Combustion
Calpine Blue Heron, FL	10 - NG (24-hr CEMS) 17 - NG (DB&PA)	1.2 - NG 6.6 - NG (DB&PA)	31.9 lb/hr – NG (DB&PA) 10 percent Opacity 5 ppmvd Ammonia Slip	Clean Fuels Good Combustion
Mobile Energy, AL	~18 - NG ~26 - FO	~5 - NG ~6 - FO	10% Opacity	Clean Fuels Good Combustion
Alabama Power Barry	~15 - NG(CT) ~25 - NG(DB & CT)	~8 - NG(CT) ~12 - NG(CT & DB)	0.010 lb/mmBtu – (CT) 0.011 lb/mmBtu -(CT/DB) 10% Opacity	Clean Fuels Good Combustion
Alabama Power Theo	~36 - CT & DB	~12.5 CT & DB		Clean Fuels Good Combustion
KUA Cane Island	10 - NG (CT) 20 - NG (CT&DB) 30 - FO	1.4 - NG (CT) 4 - NG (CT&DB) 10 - FO	10% Opacity	Clean Fuels Good Combustion
Lake Worth LLC, FL	9 - NG (CT) 15 - NG (CT & DB) 20 - F.O. (3-hr)	1.4 - NG (CT) 1.8 - NG (CT & DB) 3.5 - F.O.	10% Opacity	Clean Fuels Good Combustion
Miss Power Daniel	~15 - NG(CT) ~25 - NG(DB & CT)	~8 - NG(CT) ~12 - NG(CT & DB)	0.010 lb/mmBtu – (CT) 0.011 lb/mmBtu -(CT/DB) 10% Opacity	Clean Fuels Good Combustion

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All of the projects listed above control SO₂ and sulfuric acid mist by limiting the sulfur content of the fuel. In every case, pipeline quality natural gas is used and has a sulfur content less than 2 grains per 100 cubic feet. In some cases, the limits are even lower or are expressed in different terms. However all ultimately rely on a fairly uniform gas distribution network and have very little flexibility in actually controlling sulfur content. Similarly, emissions of these two pollutants are controlled by using 0.05 percent sulfur distillate fuel oil.

Some of the projects listed above include front and back half catch for PM limits. Therefore comparison is not simple.

REVIEW OF NITROGEN OXIDES CONTROL TECHNOLOGIES:

Some of the discussion in this section is based on a 1993 EPA document on Alternative Control Techniques for NO_x Emissions from Stationary Gas Turbines. Project-specific information is included where applicable.

Nitrogen Oxides Formation

Nitrogen oxides form in the gas turbine combustion process as a result of the dissociation of molecular nitrogen and oxygen to their atomic forms and subsequent recombination into seven different oxides of nitrogen. Thermal NO_x forms in the high temperature area of the gas turbine combustor. Thermal NO_x increases exponentially with increases in flame temperature and linearly with increases in residence time. Flame temperature is dependent upon the ratio of fuel burned in a flame to the amount of fuel that consumes all of the available oxygen.

By maintaining a low fuel ratio (lean combustion), the flame temperature will be lower, thus reducing the potential for NO_x formation. Prompt NO_x is formed in the proximity of the flame front as intermediate combustion products. The contribution of Prompt to overall NO_x is relatively small in near-stoichiometric combustors and increases for leaner fuel mixtures. This provides a practical limit for NO_x control by lean combustion.

In all but the most recent gas turbine combustor designs, the high temperature combustion gases are cooled to an acceptable temperature with dilution air prior to entering the turbine (expansion) section. The sooner this cooling occurs, the lower the thermal NO_x formation. Cooling is also required to protect the first stage nozzle. When this is accomplished by air cooling, the air is injected into the component and is ejected into the combustion gas stream, causing a further drop in combustion gas temperature. This, in turn, lowers achievable thermal efficiency for the unit.

The relationship between flame temperature, firing temperature, unit efficiency, and NO_x formation can be appreciated from Figure 1 which is from a General Electric discussion on these principles.

Fuel NO_x is formed when fuels containing bound nitrogen are burned. This phenomenon is not important for natural gas-fired projects such as the El Paso Manatee Energy Center.

Uncontrolled emissions range from about 100 to over 600 parts per million by volume, dry, corrected to 15 percent oxygen (ppmvd @15% O₂). The Department estimates uncontrolled emissions at approximately 200 ppmvd @15% O₂ for each turbine of the El Paso project. The proposed NO_x controls will reduce these emissions significantly.

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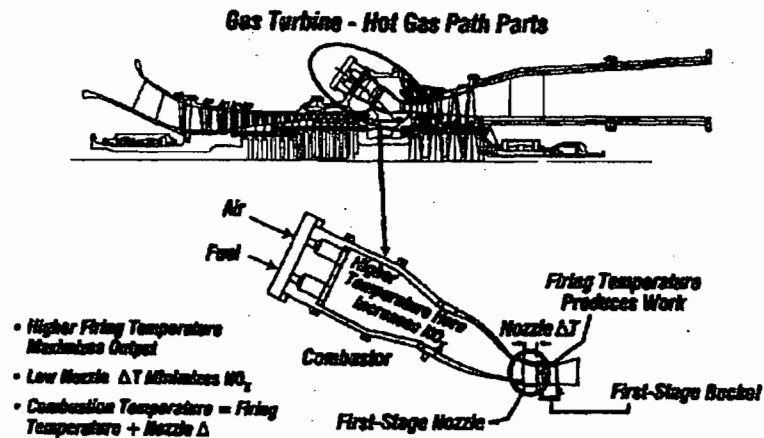


Figure 1 – Relation Between Flame Temperature and Firing Temperature

NO_x Control Techniques

Wet Injection

Injection of either water or steam directly into the combustor lowers the flame temperature and thereby reduces thermal NO_x formation. Typical emissions achieved by wet injection are in the range of 15–25 ppmvd when firing gas and 42 ppmvd when firing fuel oil in large combustion turbines. These values often form the basis, particularly in combined cycle turbines, for further reduction to BACT limits by other techniques. Carbon monoxide (CO) and hydrocarbon (HC) emissions are relatively low for most gas turbines. However steam and (more so) water injection may increase emissions of both of these pollutants.

Combustion Controls: Dry Low NO_x (DLN)

The excess air in lean combustion cools the flame and reduces the rate of thermal NO_x formation. Lean premixing of fuel and air prior to combustion can further reduce NO_x emissions. This is accomplished by minimizing localized fuel-rich pockets (and high temperatures) that can occur when trying to achieve lean mixing within the combustion zones.

The above principle is incorporated into the General Electric DLN-2.6 can-annular combustor shown in Figure 2.

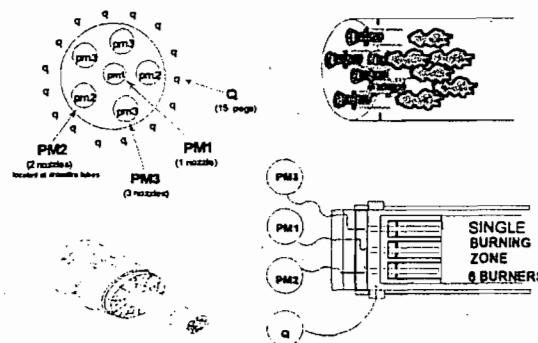


Figure 2 – DLN-2.6 Fuel Nozzle Arrangement

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Each combustor includes six nozzles within which fuel and air have been fully pre-mixed. There are 16 small fuel passages around the circumference of each combustor can known as quarternary fuel pegs. The six nozzles are sequentially ignited as load increases in a manner that maintains lean pre-mixed combustion and flame stability.

Design emission characteristics of the DLN-2.6 combustor while firing natural gas are given in Figure 3 for a unit tuned to meet a 15 ppmvd NO_x limit (by volume, dry corrected to at 15 percent oxygen) at JEA's Kennedy Station. The combustor can be tuned differently to achieve emissions as low as 9 ppm of NO_x.

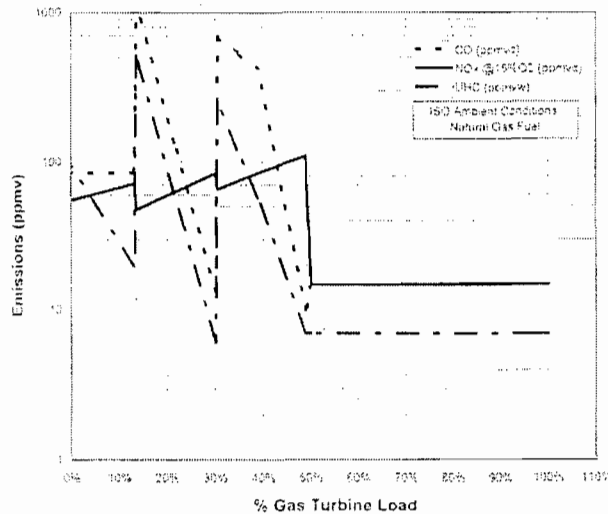


Figure 3 – Emissions Characteristics for DLN-2.6 (if tuned to 15 ppmvd NO_x)

The combustor emits NO_x at concentrations of 15 ppmvd at loads between 50 and 100 percent of capacity, but concentrations as high as 100 ppmvd may occur at less than 50 percent of capacity. Note that VOC comprises a very small amount of the “unburned hydrocarbons” which in turn is mostly non-VOC methane.

Following are the results of the new and clean tests conducted on a dual-fuel GE 7FA combustion turbine operating in combined cycle mode and burning natural gas at the City of Tallahassee Purdom Station Unit 8.¹ The DLN-2.6 combustors for this project were guaranteed to achieve 9 ppmvd of NO_x while burning natural gas although the permit limit is 12 ppmvd. The results are all superior to the emission characteristics given in Figure 3.

Percent of Full Load	NO _x (ppmv @15% O ₂)	CO (ppmv)
70	7.2	
80	6.1	
90	6.6	
100	8.7	0.85
Limit	12	25

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Following are the results of the new and clean tests conducted on a dual-fuel GE 7FA combustion turbine operating in simple cycle mode and burning natural gas at the Tampa Electric Polk Power Station.² The DLN 2-6 combustors for this project were guaranteed to achieve 9 ppmvd of NO_x while burning natural gas although the permit limit is 10.5 ppmvd. Again, the results are all superior to the emission characteristics given in Figure 3.

Percent of Full Load	NO _x (ppmvd @15% O ₂)	CO (ppmvd)	VOC (ppmvd)
50	5.3	1.6	0.5
70	6.3	0.5	0.4
85	6.2	0.4	0.2
100	7.6	0.3	0.1
Limit	10.5	15	7

Recent conversations with other operators indicate that the “Dry Low NO_x” characteristics extend to operations less than 50 percent of full load, though such operation is not (yet) guaranteed by GE.³

An important consideration is that power and efficiency are sacrificed in the effort to achieve low NO_x by combustion technology. This limitation is seen in Figure 4 from an EPRI report.⁴ Developments such as single crystal blading, aircraft compressor design, high technology blade cooling have helped to greatly increase efficiency and lower capital costs. Further improvements are more difficult in large part because of the competing demands for air to support lean premix combustion and to provide blade cooling. New concepts are under development by GE and the other turbine manufacturers to meet the challenges implicit in Figure 4.

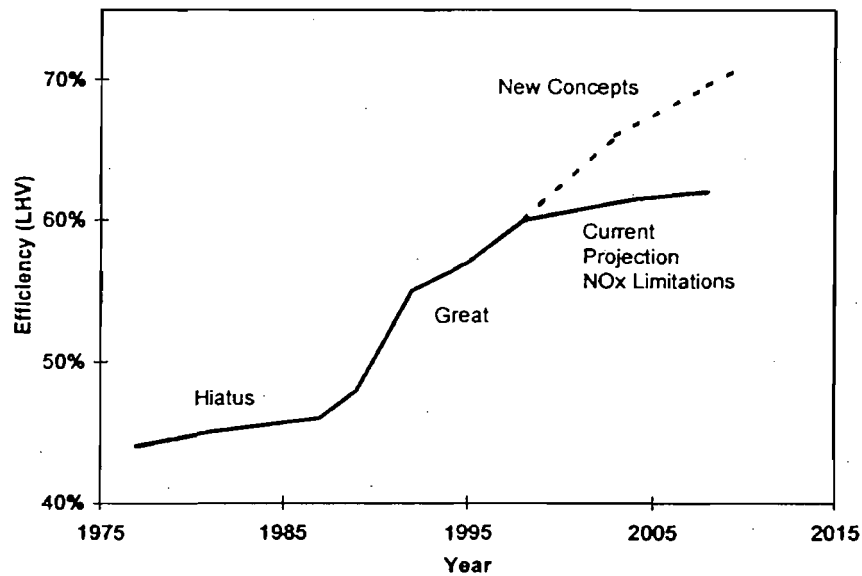


Figure 4 – Efficiency Increases in Combustion Turbines

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Further NO_x reductions related to flame temperature control are possible such as closed loop steam cooling. This feature is available only in larger units (G or H Class technology) than the units planned by El Paso. It is more feasible for a combined cycle unit with a heat recovery steam generator (HRSG). In simple cycle, a once-through steam generator would be required. Steam is circulated through the internal portion of the nozzle component, the transition piece between the combustor and the nozzle, or certain turbine blades. The difference between flame temperature and firing temperature into the first stage is minimized and higher efficiency is attained. Flame temperatures and NO_x emissions can therefore be maintained at comparatively low levels even at high firing temperatures (refer back to Figure 1). At the same time, thermal efficiency should be greater when employing steam cooling instead of air cooling.

Catalytic Combustion: XONON™

Catalytic combustion involves using a catalytic bed to oxidize a lean air and fuel mixture within a combustor instead of burning with a flame as described above. In a catalytic combustor the air and fuel mixture oxidizes at lower temperatures, producing less NO_x.⁵ In the past, the technology was not reliable because the catalyst would not last long enough to make the combustor economical.

There has been increased interest in catalytic combustion as a result of technological improvements and incentives to reduce NO_x emissions without the use of add-on control equipment and reagents. Westinghouse, for example, is working to replace the central pilot in its DLN technology with a catalytic pilot in a project with Precision Combustion Inc.

Catalytica has developed a system know as XONON™, which works by partially burning fuel in a low temperature pre-combustor and completing the combustion in a catalytic combustor. The overall result is low temperature partial combustion (and thus lower NO_x production) followed by flameless catalytic combustion to further attenuate NO_x formation.

In 1998, Catalytica announced the startup of a 1.5 MW Kawasaki gas turbine equipped with XONON™.⁶ The turbine is owned by Catalytica and is located at the Gianera Generating Station of Silicon Valley Power, a municipally owned utility serving the City of Santa Clara, California. Previously, this turbine and XONON™ system had successfully completed over 1,200 hours of extensive full-scale tests at a project development facility in Oklahoma that documented XONON's ability to limit emissions of NO_x to less than 3 ppmvd.

Recently, Catalytica and GE announced that the XONON™ combustion system has been specified as the *preferred* emissions control system with GE 7FA turbines that have been ordered for Enron's proposed 750 MW Pastoria Energy Facility.⁷ The project will enter commercial operation by the summer of 2001. However actual installation of XONON™ is doubtful.

In principle, XONON™ will work on a simple cycle project. However, the Department does not have information regarding the status of the technology for fuel oil firing and cycling operations.

Selective Catalytic Combustion: SCR

Selective catalytic reduction (SCR) is an add-on NO_x control technology that is employed in the exhaust stream following the gas turbine. SCR reduces NO_x emissions by injecting ammonia into the flue gas in the presence of a catalyst. Ammonia reacts with NO_x in the presence of a catalyst and excess oxygen yielding molecular nitrogen and water. The catalysts used in combined cycle, low temperature applications (conventional SCR), are usually vanadium or titanium oxide and

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account for almost all installations. For high temperature applications (Hot SCR up to 1100 °F), such as simple cycle turbines, zeolite catalysts are available but used in few applications to-date. SCR units are typically used in combination with wet injection or DLN combustion controls.

In the past, sulfur was found to poison the catalyst material. Sulfur-resistant catalyst materials are now becoming more available. Catalyst formulation improvements have proven effective in resisting sulfur-induced performance degradation with fuel oil in Europe and Japan, where conventional SCR catalyst life in excess of 4 to 6 years has been achieved, while 8 to 10 years catalyst life has been reported with natural gas.

Excessive ammonia use tends to increase emissions of CO, ammonia (slip) and particulate matter (when sulfur-bearing fuels are used).

Kissimmee Utilities Authority (KUA) installed an SCR system at the Cane Island Unit 3 project. The KUA project will meet a limit of 3.5 ppmvd with a combination of DLN and SCR. Permits were issued recently to Competitive Power Ventures (CPV), Calpine, Florida Power Corporation, and Tampa Electric to achieve 3.5 ppmvd. More recently a permit was issued to CPV for its Pierce, Polk County project with a limit of 2.5 ppmvd @15% O₂ by SCR.

Figure 5 below is a diagram of a HRSG including an SCR reactor with honeycomb catalyst and the ammonia injection grid. The SCR system lies between low and high-pressure steam systems where the temperature requirements for conventional SCR can be met. Figure 6 is a photograph of FPC Hines Energy Complex. The external lines to the ammonia injection grid are easily visible. The magnitude of the installation can be appreciated from the relative size compared with nearby individuals and vehicles.

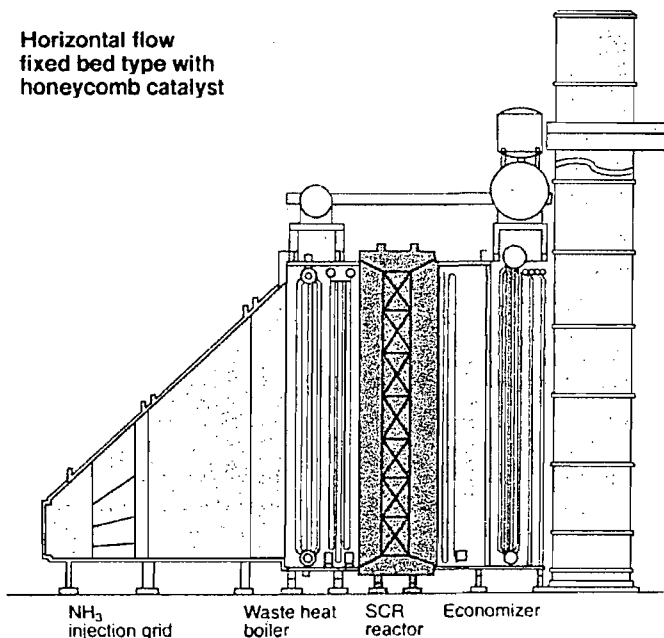


Figure 5 – SCR System within HRSG

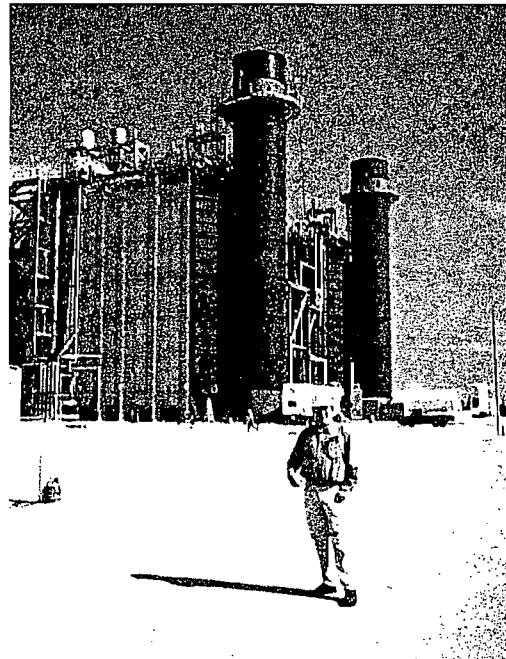


Figure 6 – FPC Hines Power Block I

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Selective Non-Catalytic Combustion

Selective non-catalytic reduction (SNCR) works on the same principle as SCR. The differences are that it is applicable to hotter streams than conventional or hot SCR, no catalyst is required, and urea can be used as a source of ammonia. No applications have been identified wherein SNCR was applied to a gas turbine because the exhaust temperature of 1100 °F is too low to support the NO_x removal mechanism.

The Department did, however, specify SNCR as one of the available options for the combined cycle Santa Rosa Energy Center. The project will incorporate a large 600 MMBtu/hr duct burner in the heat recovery steam generator (HRSG) and can provide the acceptable temperatures (between 1400 and 2000 °F) and residence times to support the reactions.

SCONO_xTM

SCONO_xTM is a catalytic add-on technology that achieves NO_x control by oxidizing and then absorbing the pollutant onto a honeycomb structure coated with potassium carbonate. The pollutant is then released as molecular nitrogen during a regeneration cycle that requires dilute hydrogen gas. The technology has been demonstrated on small units in California and has been purchased for a small source in Massachusetts.⁸

California regulators and industry sources stated that the first 250 MW block to install SCONO_xTM will be at PG&E's La Paloma Plant near Bakersfield.⁹ The overall project includes several more 250 MW blocks with SCR for control.¹⁰ USEPA has identified an "achieved in practice" BACT value of 2.0 ppmvd over a three-hour rolling average based upon the recent performance of a Vernon, California natural gas-fired 32 MW combined cycle turbine equipped with SCONO_xTM.

SCONO_xTM technology (at 2.0 ppmvd) is considered to represent LAER in non-attainment areas where cost is not a factor in setting an emission limit. It competes with less-expensive SCR in those areas, but has the advantages that it does not cause ammonia emissions in exchange for NO_x reduction. Advantages of the SCONO_xTM process include in addition to the reduction of NO_x, the elimination of ammonia and the control of VOC and CO emissions. SCONO_xTM has not been applied on any major sources in ozone attainment areas.

Recently EPA Region IX acknowledged that SCONO_xTM was demonstrated in practice to achieve 2.0 ppmv NO_x.¹¹ Permitting authorities planning to issue permits for future combined cycle gas turbine systems firing exclusively on natural gas, and subject to LAER must recognize this limit which, in most cases, would result in a LAER determination of 2.0 ppmvd. More recently, Goal Line announced that SCONO_xTM has in practice achieved emissions of 1.3 ppmvd.¹²

According to a recent press release, the Environmental Segment of ABB Alstom Power offers the technology (with performance guarantees) to "all owners and operators of natural gas-fired combined cycle combustion turbines, regardless of size."¹³

SCONO_x requires a much lower temperature regime that is not available in simple cycle units and is therefore not feasible for the simple cycle units proposed in this application.

REVIEW OF SULFUR DIOXIDE (SO₂) AND SULFURIC ACID MIST (SAM)

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SO₂ control processes can be classified into five categories: fuel/material sulfur content limitation, absorption by a solution, adsorption on a solid bed, direct conversion to sulfur, or direct conversion to sulfuric acid. A review of the BACT determinations for combustion turbines contained in the BACT Clearinghouse shows that the exclusive use of low sulfur fuels constitutes the top control option for SO₂ from natural gas and fuel oil-fired combustion turbines.

For this project, the applicant has proposed as BACT the use of pipeline natural gas. The applicant estimated total emissions for the project at 69 TPY of SO₂ and 10 TPY of SAM. The Department expects the emissions to be lower because the typical natural gas in Florida contains less than the 1.5 grains of sulfur per 100 standard cubic feet (gr S/100scf) specification proposed by El Paso. This value is well below the “default” maximum value of 20 gr S/100 scf characteristic of natural gas, but is still high enough to require a BACT determination.

REVIEW OF PARTICULATE MATTER (PM/PM₁₀) CONTROL TECHNOLOGIES:

Particulate matter is generated by various physical and chemical processes during combustion and will be affected by the design and operation of the NO_x controls. The particulate matter emitted from this unit will mainly be less than 10 microns in diameter (PM₁₀).

Natural gas will be the only fuel fired and is efficiently combusted in gas turbines. Clean fuels are necessary to avoid damaging turbine blades and other components already exposed to very high temperature and pressure. Natural gas is an inherently clean fuel and contains no ash.

A technology review indicated that the top control option for PM/PM₁₀ is a combination of good combustion practices, fuel quality, and filtration of inlet air. Total annual emissions of PM₁₀ for the project are expected to be approximately 181 tons per year (including filterable and condensable particulate fractions).

Drift eliminators will be installed on the freshwater mechanical draft cooling tower to reduce PM/PM₁₀. The drift eliminators proposed by El Paso will reduce drift to 0.0005 percent of the circulating water flow rate. This is equivalent to approximately 1 and 1.6 tons per year of PM₁₀ and PM respectively.

REVIEW OF CARBON MONOXIDE (CO) CONTROL TECHNOLOGIES

CO is emitted from combustion turbines due to incomplete fuel combustion. Combustion design and catalytic oxidation are the control alternatives that are viable for the project. The most stringent control technology for CO emissions is the use of an oxidation catalyst.

CO is emitted from combustion turbines due to incomplete fuel combustion. Most combustion turbines incorporate good combustion to minimize emissions of CO. There is a great deal of uncertainty regarding actual CO emissions from installed units. Despite the relatively high BACT limits typically proposed when using combustion controls, much lower emissions have actually been reported from several facilities without use of oxidation catalyst. For example, although Westinghouse does not offer a single digit CO guarantee on the 501F, the units installed at the FPC Hines Energy Complex achieved CO emissions in the range of 1-3 ppmvd on both gas and fuel oil at full load.¹⁴ As previously discussed, GE 7FA units achieved similar results when firing gas at the City of Tallahassee Purdom Unit 8 and the TECO Polk Power Station Unit 2 at loads between 50 and 100 percent.

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CO emissions *should* be low (at least at full load) because of the very high combustion temperatures characteristic of "F-Class" turbines. It appears that contract writing has not yet "caught up" with the field experience to consistently guarantee low CO emissions for F-Class units, at least at high loads.

One alternative is to complete the combustion by installation of an oxidation catalyst. Among the most recently permitted projects with oxidation catalyst requirements are the 500 MW Wyandotte Energy project in Michigan, the El Dorado project in Nevada, Ironwood in Pennsylvania, Millennium in Massachusetts, and Sutter Calpine in California. The permitted CO values of these units are between 3 and 5 ppmvd.

A recent permit was issued by the Bay Area AQMD in California for the Metcalf Energy Center. The limit for CO from a Siemens-Westinghouse 501F gas turbine is 6 ppmvd (at full load). No Catalyst is required. However it is doubtful that performance can be maintained at low load.

A recent draft permit was issued by the Department that limits CO to 3.5 ppmvd on a Mitsubishi 501F combustion turbine.¹⁵ Enron will install an oxidation catalyst at Ft. Pierce in order to avoid high CO emissions at low load (<70 percent of full load). This results in the ability to obtain a guarantee for the low permitted level at full load. This would not have been a concern if the units were GE7FAs for the reasons discussed above.

The limit originally proposed by El Paso for the Manatee Energy Center under normal operation is 7.4 ppmvd @15% O₂ at full load. This is consistent with the description of the DLN-2.6 technology. The expected results are 1-2 ppmvd and are actually better than what the Enron and Metcalf projects will likely achieve across the 50-100 percent operating range.

A higher limit of 12 ppmvd @15% O₂ was originally proposed during power augmentation for the combined cycle unit. Under this mode, steam from the HRSG is re-injected into the combustors to boost power production. One consequence is that CO emissions can increase.

Since the original review, El Paso proposed oxidation catalyst to allow continuous power augmentation and to minimize startup emissions. Total annual emissions of CO for the project are now expected to be little more than 100 tons per year based on the new proposed limits of 2.5 ppmvd under normal modes and 4 ppmvd during power augmentation. Actual emissions will probably be much lower.

REVIEW OF VOLATILE ORGANIC COMPOUND (VOC) CONTROL TECHNOLOGIES

Volatile organic compound (VOC) emissions, like CO emissions, are formed due to incomplete combustion of fuel. The high flame temperature is very efficient at destroying VOC. The applicant has proposed good combustion practices to control VOC. The limit proposed by El Paso for this project is 1.1 ppmvd @ 15% O₂ for all modes of operation. According to GE (and Department data), VOC emissions less than 1.4 ppm were achieved during recent tests of the DLN-2.6 technology when firing natural gas.¹⁶

Based on the chosen equipment, the Department believes that annual VOC emissions will be less than 40 TPY. Therefore a BACT determination is not required.

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BACKGROUND ON PROPOSED GAS TURBINE

El Paso plans to install three nominal 175-MW General Electric 7FA gas turbines, one of which will operate in combined cycle mode. Per the discussion above, such units are capable of achieving and have achieved (with DLN and SCR technology) all of the emission limits proposed by El Paso as BACT.

The GE Speedtronic™ Mark VI Gas Control System will be used. This control system is designed to fulfill all gas turbine control requirements. These include fuel control in accordance with the requirements of the speed, load control under part-load conditions, temperature control under maximum capability conditions, or during start-up conditions. The Mark VI also monitors the DLN process and controls fuel staging and combustion modes to maintain the programmed NO_x values.¹⁷

STARTUP AND SHUTDOWN EMISSIONS

The Department defines “Startup” as follows¹⁸:

“Startup” - The commencement of operation of any emissions unit which has shut down or ceased operation for a period of time sufficient to cause temperature, pressure, chemical or pollution control device imbalances, which result in excess emissions.

The Department permits excess emissions during startup and shut down as follows:¹⁹

Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) 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.

The Department defines “Excess Emissions” as follows:²⁰

“Excess Emissions” - Emissions of pollutants in excess of those allowed by any applicable air pollution rule of the Department, or by a permit issued pursuant to any such rule or Chapter 62-4, F.A.C. The term applies only to conditions which occur during startup, shutdown, sootblowing, load changing or malfunction.

The U.S. EPA Region IV office recently recommended that the Department consider “establishment of startup and shutdown BACT for CO and NO_x such as mass emission limits (e.g., pounds of emissions in any 24-hour period) that include startup and shutdown emissions, or future emission limits derived from monitoring results during the first few months of commercial operation.”²¹

The Department reviewed a number of emission estimates and permit conditions addressing startup and shutdowns for projects in California, Georgia, Washington, and Mississippi and has determined that much of the information is based on estimates that are very difficult to verify.

A review of published General Electric information indicates that features are incorporated into the design of the DLN-2.6 technology specifically aimed at minimizing emissions. One of the key elements was to incorporate lean pre-mixed burning while operating the unit in low load and startup.²² This is in contrast with the previous DLN-2.0 technology that relied on diffusion mode combustion at four of the burners in each combustor during startup and low load operation.

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During startup of a GE 7FA simple cycle unit, NO_x concentrations in the exhaust are greater than during full-load operation. The concentrations are estimated at 20 to 80 ppmvd @15% O₂ during the first 10 minutes or so after the unit is actually firing fuel. This occurs while only one to four of the six nozzles shown in Figure 2 are in operation on each combustor.

Within the following 5 minutes, the unit switches to Mode 5 (or 5 Q), during which NO_x concentrations are typically less than 10 ppmvd even though the unit is not yet at full load.²³ The Low-NO_x modes occurs when at least the five outer nozzles are in operation.

Given the short duration and the relatively low exhaust rate (and load) during the high pollutant concentration phases of simple cycle startup, the Department believes that the NO_x emissions during the first hour of startup and operation will be approximately equal to emissions during an hour of full load steady-state operation. Arguments covering shutdown are similar and the time is more compressed so that the Department believes the conclusion is the same for startup as for shutdown.

NO_x concentrations in the exhaust during startup and shutdown will be less than the New Source Performance Standard limit of approximately 110 ppmvd @15% O₂ applicable to F-Class turbines. A simple cycle unit will typically have one startup and shutdown every day that it is used.

The startup scenarios for a GE 7FA combined cycle unit are as follows:

- Hot Start: One hour following a shutdown less than or equal to 8 hours.
- Warm Start: Two hours following a shutdown between 8 and 48 hours.
- Cold Start: Four hours following a shutdown greater than or equal to 48 hours.

During a combined cycle cold unit startup, the gas turbine will operate at a very low load (less than 10 percent) while the heat recovery steam generator and the steam turbine-electrical generator are heated up. During a portion of the 4 hour startup, emissions will be roughly 60 to 80 ppmvd NO_x @15% O₂. Once the HRSG is heated sufficiently, the ammonia system is turned on to abate emissions.

While NO_x emissions during the initial phase of startup (low load and no ammonia injection) are greater than during full load steady state operation, such startups are infrequent. Also, it is noted that such a cold startup would be preceded by a shutdown of at least 48 hours. Therefore the startup emissions would not cause annual emissions greater than the potential-to-emit under continuous operation. Similar analyses can be performed for warm startups and hot startups.

The combined cycle startup scenario described above can (at least in theory) be modified by use of a bypass stack and damper.²⁴ Under this scenario, the steam cycle can be slowly brought up to load while the gas turbine reaches full load as fast as it would under simple cycle mode. The exhaust gas can be modulated in such a fashion that the HRSG and steam turbine are ramped up slowly in accordance with their respective specifications. At the same time, the gas turbine will quickly accelerate to the DLN modes (5Q or 6Q) thus minimizing emissions. In this manner the startup NO_x and CO concentrations are reduced to the values observed during simple cycle startup. Thereafter the unit will exhibit the same characteristics (for about three hours) as a simple cycle unit in steady-state operation until the ammonia system is actuated.

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Implementation of bypass modulation requires an additional stack and design features to minimize stratification and uneven heating of boiler tube bundles in the HRSG. The initial response from GE is that such a configuration at a project in Hungary resulted in equipment damage and leakage of exhaust gas to the atmosphere resulting in a significant loss in performance.²⁵

The Department is gathering information from recently commissioned 7FA units to more accurately estimate startup emissions for NO_x and address carbon monoxide too.

DEPARTMENT BACT DETERMINATION

Following are the BACT limits determined for the El Paso project assuming full load. Values for NO_x and CO are corrected to 15% O₂ on a dry volume basis. These emission limits or their equivalents in terms of pounds per hour and NSPS units, as well as the applicable averaging times, are specified in the permit.

POLLUTANT	CONTROL TECHNOLOGY	DEPARTMENT'S PROPOSED BACT LIMIT
Nitrogen Oxides	Dry Low NO _x Combustors Selective Catalytic Reduction	9 ppmvd @ 15% O ₂ (simple cycle units) 2.5 ppmvd @ 15% O ₂ (combined cycle) 5 ppm ammonia slip from combined cycle unit
Particulate Matter	Pipeline Natural Gas Combustion Controls	20 pounds per hour (filterable plus condensable) 0.0005 % drift of circulating rate – cooling tower
Visible Emissions	As Above	10 Percent (surrogate for PM ₁₀)
Carbon Monoxide	As Above	7.4 ppmvd @ 15% O ₂ (full load, simple or combined) 12 ppmvd @ 15% O ₂ (limited power augmentation)
Sulfur Oxides	As Above	1.5 grain sulfur/100 std cubic feet
All (Ancillaries)	Low Sulfur Fuels Drift Eliminators on Cooling Tower	1.5 grain sulfur/100 std cubic feet 0.05% sulfur (oil) 0.0005 percent drift

RATIONALE FOR DEPARTMENT'S DETERMINATION

- Certain control options are feasible on combined cycle units but not on simple cycle units. This rules out Low Temperature (conventional) SCR, and SCONOX on simple cycle units. XONON is claimed to be available for F Class gas-fired projects.
- The Top technology and Lowest Achievable Emission Rate (LAER) for simple cycle combustion turbines are high temperature (Hot) SCR and an emission limit of 5 ppmvd NO_x.
- It is conceivable that catalytic combustion technology such as XONON™ can be applied to this project. Theoretically XONON can achieve the 5-ppmvd NO_x value and would equate to the top technology.
- An example of the top technology is the Carson Plant in Sacramento, California where there is a Hot SCR system on a simple cycle LM6000PA combustion turbine with a limit of 5 ppmvd.

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- Hot SCR is proposed as LAER for the Sacramento Municipal Utilities District simple cycle GE 7EA project at McClelland Air Force Base to achieve 5 ppmvd.
- The levelized costs of NO_x removal by Hot SCR for the El Paso project were estimated by El Paso at \$22,052 per ton assuming 5,000 hours of operation. The estimates are based on reducing NO_x emissions from 9 to 3.5 ppmvd @15% O₂.
- The Department does not accept the precise Hot SCR cost calculations presented by El Paso and considers them on the high end. But even at half the cost estimated by El Paso, the Department would agree that Hot SCR is not cost-effective for this project.
- XONON is rejected because it has not yet been demonstrated in large combustion turbines and is likely to be even less cost-effective than Hot SCR.
- The Department accepts El Paso's BACT proposal of 9 ppmvd NO_x @15% O₂ for the simple cycle units and exclusive use of natural gas. The Department notes that data from the City of Tallahassee and TECO demonstrate that the GE 7FA units actually achieve 6 to 8 ppmvd @15% O₂.
- The proposed BACT limit of 9 ppmvd for the simple cycle units is less than one-tenth of the applicable NSPS limit per 40 CFR 60, Subpart GG for units as efficient as the 7FA.
- The Department's overall BACT determination for the simple cycle units is equivalent to approximately 0.35 lb of NO_x per megawatt-hour (lb/MWH) by Dry Low NO_x. For reference, the new NSPS promulgated on September 3, 1998 requires that new conventional power plants (based on boilers, etc.) meet a (fuel independent) limit of 1.6 lb/MW-hr.
- The Department will limit operation of the two units to an average of 5,000 hours per year per simple cycle unit. The Department will further limit the operation of each and every individual unit to the fuel-equivalent of 5,000 full load hours of operation. The purpose is to maintain the conclusion regarding cost-effectiveness under intermittent duty operation.
- Although startup and shutdown emissions are generally exempt, emissions during startup and shutdown are less than the NSPS limit of 110 ppmvd @15% O₂ (that applies during steady-state operation).
- The Department does not yet have sufficient information from field experience to set start-up and shutdown emissions limits. However, the modes that give rise to high NO_x concentration have been identified. The Department will therefore set a work practices standard as BACT.
- The Work Practice BACT for simple cycle startup is that 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. The shutdown case is trivial.
- The Lowest Achievable Emission Rate (LAER) for a combined cycle unit is approximately 2 ppmvd NO_x at 15 percent oxygen (@15% O₂) while firing natural gas. It has been achieved at the 32 MW Federal Merchant Plant in Los Angeles. The owner, Goal Line, has requested recognition of a 1.3 ppmvd NO_x value as *achieved in practice*.
- There are several projects for large turbines in Massachusetts, Connecticut, New York, and California requiring SCR with a NO_x emission limit of 2 ppmvd @15% O₂.

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- The “Top” technology in a top/down analysis for a combined cycle unit will achieve approximately 2 ppmvd @15% O₂ by either SCONO_x or SCR.
- El Paso estimated the cost effectiveness of SCONO_x at \$24,187 per ton of NO_x removed. The Department does not necessarily accept the precise SCONO_x cost calculations presented by El Paso. However, even at half the cost estimated by El Paso, the Department agrees that SCONO_x would not be cost-effective for this project.
- El Paso estimated the cost-effectiveness of conventional (cold temperature) SCR at \$3,535 per ton of NO_x while reducing emissions from 9 to 3.5 ppmvd @15% O₂. The Department accepts El Paso’s estimate and believes this cost-effectiveness can be maintained while achieving an NO_x emission rate of 2.5 ppmvd @15% O₂.
- The National Park Service advised in its review of the application that BACT determinations of 2.5 ppmvd NO_x @15% O₂ have recently been issued for combined cycle projects in Maine and Washington. The Park Service also agreed that 9 ppmvd represents BACT for simple cycle units.²⁶
- The Department concludes that 2.5 ppmvd NO_x @15% O₂ (with 5 ppmvd ammonia slip) while firing natural gas in a combined cycle unit constitutes BACT. This value for the conventional SCR option takes into consideration the measurement uncertainties at low emission rates and minimizes particulate emissions due to ammonia emissions.
- EPA advised that the proposed 2.5 ppmvd limit is equal to the lowest value established in Region IV, that the 24-hour averaging time is acceptable in light of the low limit, and that the ammonia limit is consistent with projects outside the Region (notwithstanding lack of rule authority or a policy within EPA).
- The effects of aqueous ammonia use and ammonia slip are not unacceptable. In fact, ammonia is used throughout the nearby fertilizer complexes in Hillsborough, Polk, and Manatee County.
- The Department’s overall BACT determination for the combined cycle unit is less than 0.07 lb of NO_x per megawatt-hour (lb/MWH) by Dry Low NO_x.
- The Work Practice BACT for combined cycle startup is that the combustion turbine will start up and operate as a simple cycle unit and modulate exhaust to the HRSG. This requires installation of a bypass stack and damper. The unit shall reach Mode 5Q (i.e. five burners plus quaternary pegs in operation) within 15 minutes following gas turbine ignition and crossfire. Ammonia injection will be practiced within three hours after gas turbine ignition and crossfire.
- The Department does not have a cost estimate for the additional stack and design requirements, but believes the additional power and flexibility offered by full load simple cycle operation during the cold startup of the steam cycle more than compensates for the additional costs.
- In lieu of the Department’s determination regarding Work Practice BACT, the company will install dampers (but no bypass stack) to retain as much heat as possible during periods of shutdown. This will tend to reduce the number of long cold startups in comparison with the shorter hot startups.
- The applicant estimates VOC emissions of 1.1 ppmvd @15% O₂ (or less) for all firing modes. These levels will not trigger PSD or a requirement for a BACT determination.

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- El Paso estimated levelized costs at \$9,000 per ton to reduce emissions at the simple cycle units from about 7.4 to 0.7 ppmvd CO @15% O₂. The Department does not adopt this estimate, but would agree that even much lower estimates would not be cost-effective for removal of CO.
- In view of the performance of GE 7FA units without add-on control (~ 0 - 4 ppmvd), it is obvious that oxidation catalyst is definitely not cost-effective for the simple cycle units based on *actual* emissions and appears to not be cost-effective based on permitted emissions.
- El Paso estimated levelized costs for CO catalyst control at \$2,475 to reduce emissions from 11.7 to 1.2 ppmvd @15% O₂ for the combined cycle unit operating in power augmentation mode.
- In view of the performance of GE 7FA units cited in the discussion above (Tallahassee and TECO Polk Power data) without add-on control (~ 1 ppmvd), it appears to the Department that oxidation catalyst costs are substantially biased to the low side based on *actual* emissions.
- The Department determines BACT for CO achievable by good combustion as 7.4 ppmvd @15% O₂ at full load and 8 ppmvd @15% O₂ over the full operational range for simple cycle and combined cycle operation. Additionally, the Department determines BACT for CO as 7.4 ppmvd @15% O₂ for the combined cycle unit during power augmentation if unlimited and 12 ppmvd @15% O₂ if limited to 2000 hours per year.
- The CO BACT determination of 8 ppmvd @15% O₂ under normal combined cycle operation and 12 ppmvd @15% O₂ under (limited) power augmentation are low and within the range of recent BACT determinations for combustion turbines in the Southeast.
- El Paso proposes to install CO catalyst to allow unlimited power augmentation. The catalyst will also reduce emissions of CO (and VOC and HAPs) during startup and under all modes of operation. El Paso proposes to reduce CO emission limits to 2.5 and 4.0 ppmvd @15% O₂ for normal and (unlimited) power augmentation conditions respectively.
- The Department acknowledges El Paso's request and will lower the emissions accordingly. This does not imply that the Department has determined that BACT for is 2.5 ppmvd for normal operation or that BACT is 4.0 ppmvd for (limited) power augmentation or that oxidation catalyst is necessarily required to meet the Department's BACT determination.
- BACT for sulfur oxides for this project (including the ancillary equipment emission units) is the exclusive use of pipeline natural gas with a specification of 1.5 grains per 100 standard cubic feet. Pipeline quality natural gas in Florida contains less than this value.
- The Department agrees that inlet air filtration, good combustion, and use of inherently clean fuels constitute BACT for PM/PM₁₀ for this project (including ancillary equipment emission units).
- The emission limit for PM₁₀ from the combustion turbines will be set at 11 pounds per hour. This value is based on filterable fraction only per the Department's definition of PM/PM₁₀. Expected particulate emissions based on filterable plus condensable particulate matter are 20 pounds per hour.
- The Department will set a visible emissions BACT limit at 10 percent. The Department will rely on VE observation as a surrogate for PM/PM₁₀ BACT compliance (after the initial PM/PM₁₀ test).

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- BACT for the Cooling Tower was determined to be use of fresh water and drift eliminators designed and maintained to reduce drift to 0.0005 percent of the circulating water flow rate. A lower drift rate would be reasonable for project where reused wastewater is the cooling medium.


POLLUTANT	COMPLIANCE PROCEDURE
Visible Emissions (initial, annual)	Method 9
PM/PM ₁₀ (initial)	Method 5 (Front-half catch)
VOC	Method 25A corrected by methane from Method 18
CTM-027(initial, quarterly, annual)	Procedure for Collection and Analysis of Ammonia in Stationary Sources
SO ₂ /SAM	Record keeping for the sulfur content of fuels delivered to the site
CO (initial, annual, CEMS)	Method 10; CO-CEMS (continuous 3-hr block average)
NO _x (continuous 24-hr)	NO _x CEMS, O ₂ or CO ₂ diluent monitor, and flow device as needed
NO _x (initial and annual)	Annual Method 20 (can use RATA if at capacity); Method 7E

DETAILS OF THE ANALYSIS MAY BE OBTAINED BY CONTACTING:

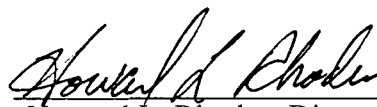
Teresa Heron, Permit Engineer
A. A. Linero, P.E. Administrator
New Source Review Section
Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Recommended By:

Approved By:



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



Howard L. Rhodes, Director
Division of Air Resources Management

1/16/02
Date

1/16/02
Date

APPENDIX BD
BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

References

- ¹ Report. Cubix Corporation. "Exhaust Emissions from a GE PG7241FA Simple Cycle Power Turbine at TECO Polk Power Station." September 2000.
- ² Report. Cubix Corporation. "Exhaust Emissions from a GE PG7241FA Simple Cycle Power Turbine at TECO Polk Power Station." September 2000.
- ³ Telecom. Heron, T., FDEP and Gianazza, N. B., JEA. Additional Hours of Operation at JEA Kennedy Station. January 22, 2001.
- ⁴ Paper. Cohn, A. and Scheibel, J., EPRI. Current Gas Turbine Developments and Future Projects. October 1997.
- ⁵ Compliance Manual. California EPA, CARB Compliance Division. Gas Turbines. June 1996.
- ⁶ News Release. Catalytica. First Gas Turbine with Catalytica's XONON installed to Produce Electricity at a Utility. October 8, 1998.
- ⁷ News Release. Catalytica. XONON™ Specified With GE 7FA Gas Turbines for Enron Power Project. December 15, 1999.
- ⁸ News Release. Goaline. Genetics Institute Buys SCONOX_x Clean Air System. August 20, 1999.
- ⁹ "Control Maker Strives to Sway Utility Skeptics." Air Daily. Volume 5, No. 199. October 14, 1998.
- ¹⁰ Telecom. Linero, A.A., FDEP, and Beckham, D., U.S. Generating. Circa November 1998.
- ¹¹ Letter. Haber, M., EPA Region IX to Danziger, R., GLET. SCONOX_x at Federal Cogeneration. March 23, 1998.
- ¹² Report. Danziger, R., et. al., "21,000 Hour Performance Report on SCONOX_x". September 2000.
- ¹³ News Release. ABB Alstom Power, Environmental Segment. ABB Alstom Power to Supply Groundbreaking SCONOX™ Technology. December 1, 1999.
- ¹⁴ Reports. Cubix Corporation. "Initial Compliance Reports – Power Block I." February and May 1999.
- ¹⁵ Draft Permit. Florida DEP. Enron Ft. Pierce Repowering Project. June 2001.
- ¹⁶ Telecom. Vandervort, C., GE, and Linero, A.A., DEP. "VOC Emissions from FA Gas Turbines with DLN-2.6 Combustors."
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- ¹⁸ Air Regulation. Stationary Sources – General Requirements, Definitions (startup). Rule 62-210.200(275), F.A.C.
- ¹⁹ Air Regulation. Stationary Sources – General Requirements, Excess Emissions. Rule 62-210.700(1), F.A.C.
- ²⁰ Air Regulation. Stationary Sources – General Requirements, Definitions (excess emissions). Rule 62-210.200(119), F.A.C.
- ²¹ Letter. Neeley, R.D., EPA Region IV to Linero, A.A., FDEP. Preliminary Determination for Pompano Beach Energy Center. April 12, 2001.
- ²² Davis, L.B., and Black, S.H., "Dry Low NO_x Combustion Systems for GE Heavy-Duty Gas Turbines." August 9, 2001.
- ²³ Fax Communication. Ling, J., KUA to Linero, A.A., FDEP. Process Alarms and Events Exception Report and NO_x Readings During Startup of KUA Unit 3 on August 9, 2001.
- ²⁴ Telecom. Linero, A.A., FDEP, and Ling, J., KUA. Startup of Unit 3 at Cane Island Station. August 9, 2001.
- ²⁵ Letter. Horstman, D. R., General Electric to Skelton, N., El Paso. Engineering Review – Damper Door as Modulating Valve.
- ²⁶ Memo. Morse, D., National Park Service to Linero, A. A., Florida DEP. El Paso Merchant Energy – Broward County. April 24, 2001.

SECTION IV. APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- G.2 This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- a) Have access to and copy and records that must be kept under the conditions of the permit;
 - b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.
- Reasonable time may depend on the nature of the concern being investigated.
- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- a) A description of and cause of non-compliance; and
 - b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

SECTION IV. APPENDIX GG
NSPS Subpart GG Requirements for Gas Turbines

NSPS SUBPART GG REQUIREMENTS

[Note: Inapplicable provisions have been deleted in the following conditions, but the numbering of the original rules has been preserved for ease of reference to the original rules. The term "Administrator" when used in 40 CFR 60 shall mean the Department's Secretary or the Secretary's designee. Department notes and requirements related to the Subpart GG requirements are shown in **bold** immediately following the section to which they refer. The rule basis for the Department requirements specified below is Rule 62-4.070(3), F.A.C.]

11. Pursuant to 40 CFR 60.332 Standard for Nitrogen Oxides:

- (a) On and after the date of the performance test required by § 60.8 is completed, every owner or operator subject to the provisions of this subpart as specified in paragraph (b) section shall comply with:
 - (1) No owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any stationary gas turbine, any gases which contain nitrogen oxides in excess of:

$$STD = 0.0075 \frac{(14.4)}{Y} + F$$

where:

STD = allowable NO_x emissions (percent by volume at 15 percent oxygen and on a dry basis).

Y = manufacturer's rated heat rate at manufacturer's rated load (kilojoules per watt hour) or, actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt-hour.

F = NO_x emission allowance for fuel-bound nitrogen as defined in paragraph (a)(3) of this section.

- (3) F shall be defined according to the nitrogen content of the fuel as follows:

Fuel-bound nitrogen (percent by weight)	F (NO _x percent by volume)
N ≤ 0.015	0
0.015 < N ≤ 0.1	0.04(N)
0.1 < N ≤ 0.25	0.004 + 0.0067(N - 0.1)
N > 0.25	0.005

Where, N = the nitrogen content of the fuel (percent by weight).

Department requirement: While firing gas, the "F" value shall be assumed to be 0.

[Note: This is required by EPA's March 12, 1993 determination regarding the use of NO_x CEMS. The "Y" value for this unit is approximately 10 for natural gas. The equivalent emission standard is 108 ppmvd at 15% oxygen. The emissions standards of this permit is more stringent than this requirement.]

- (b) Electric utility stationary gas turbines with a heat input at peak load greater than 107.2 gigajoules per hour (100 million Btu/hour) based on the lower heating value of the fuel fired shall comply with the provisions of paragraph (a)(1) of this section.

12. Pursuant to 40 CFR 60.333 Standard for Sulfur Dioxide:

On and after the date on which the performance test required to be conducted by 40 CFR 60.8 is completed, every owner or operator subject to the provision of this subpart shall comply with:

SECTION IV. APPENDIX GG
NSPS Subpart GG Requirements for Gas Turbines

14. Pursuant to 40 CFR 60.335 Test Methods and Procedures:

- (a) To compute the nitrogen oxides emissions, the owner or operator shall use analytical methods and procedures that are accurate to within 5 percent and are approved by the Administrator to determine the nitrogen content of the fuel being fired.
- (b) In conducting the performance tests required in 40 CFR 60.8, the owner or operator shall use as reference methods and procedures the test methods in appendix A of this part or other methods and procedures as specified in this section, except as provided for in 40 CFR 60.8(b). Acceptable alternative methods and procedures are given in paragraph (f) of this section.
- (c) The owner or operator shall determine compliance with the nitrogen oxides and sulfur dioxide standards in 40 CFR 60.332 and 60.333(a) as follows:
- (1) The nitrogen oxides emission rate (NO_x) shall be computed for each run using the following equation:

$$\text{NO}_x = (\text{NO}_{x0}) (\text{Pr}/\text{Po})^{0.5} e^{19(\text{Ho}-0.00633)} (288^\circ\text{K}/\text{Ta})^{1.53}$$

where:

NO_x = emission rate of NO_x at 15 percent O₂ and ISO standard ambient conditions, volume percent.

NO_{x0} = observed NO_x concentration, ppm by volume.

Pr = reference combustor inlet absolute pressure at 101.3 kilopascals ambient pressure, mm Hg.

Po = observed combustor inlet absolute pressure at test, mm Hg.

Ho = observed humidity of ambient air, g H₂O/g air.

e = transcendental constant, 2.718.

Ta = ambient temperature, °K.

Department requirement: The owner or operator is not required to have the NO_x monitor required by this permit continuously calculate NO_x emissions concentrations corrected to ISO conditions. However, the owner or operator shall keep records of the data needed to make the correction, and shall make the correction when required by the Department or Administrator.

[Note: This is consistent with guidance from EPA Region 4.]

- (2) The monitoring device of 40 CFR 60.334(a) shall be used to determine the fuel consumption and the water-to-fuel ratio necessary to comply with 40 CFR 60.332 at 30, 50, 75, and 100 percent of peak load or at four points in the normal operating range of the gas turbine, including the minimum point in the range and peak load. All loads shall be corrected to ISO conditions using the appropriate equations supplied by the manufacturer.

Department requirement: The owner or operator is allowed to conduct initial performance tests at a single load because a NO_x monitor shall be used to demonstrate compliance with the BACT NO_x limits of this permit.

[Note: This is consistent with guidance from EPA Region 4.]

- (3) Method 20 shall be used to determine the nitrogen oxides, sulfur dioxide, and oxygen concentrations. The span values shall be 300 ppm of nitrogen oxide and 21 percent oxygen. The NO_x emissions shall be determined at each of the load conditions specified in paragraph (c)(2) of this section.

SECTION IV. APPENDIX SC STANDARD CONDITIONS

{Permitting Note: The following conditions apply to all emissions units and activities at this facility.}

EMISSIONS AND CONTROLS

1. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
2. Circumvention: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
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. [Rule 62-210.700(4), F.A.C.]
4. Unconfined Particulate Emissions: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

TESTING REQUIREMENTS

5. Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the 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. [Rule 62-297.310(2), F.A.C.]
6. Calculation of Emission Rate: For each emissions performance test, the indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]
7. Test Procedures: Tests shall be conducted in accordance with all applicable requirements of Chapter 62-297, F.A.C.
 - a. Required Sampling Time. 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. The minimum observation period for a visible emissions compliance test shall be thirty (30) minutes. The observation period shall include the period during which the highest opacity can reasonably be expected to occur.
 - b. Minimum Sample Volume. Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet.
 - c. Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, F.A.C.
[Rule 62-297.310(4), F.A.C.]
8. 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

SECTION IV. APPENDIX XS

CONTINUOUS MONITOR SYSTEMS SEMI-ANNUAL REPORT

{Note: This form is referenced in 40 CFR 60.7, Subpart A, General Provisions.}

Pollutant (*Circle One*): Nitrogen Oxides (NOx) Carbon Monoxide (CO)

Reporting period dates: From _____ to _____

Company: _____

Emission Limitation: _____

Address: _____

Monitor Manufacturer and Model No.: _____

Date of Latest CMS Certification or Audit: _____

Process Unit(s) Description: _____

Total source operating time in reporting period ^a: _____

Emission data summary ^a		CMS performance summary ^a	
1. Duration of Excess Emissions In Reporting Period Due To:		1. CMS downtime in reporting period due to:	
a. Startup/Shutdown		a. Monitor Equipment Malfunctions	
b. Control Equipment Problems		b. Non-Monitor Equipment Malfunctions	
c. Process Problems		c. Quality Assurance Calibration	
d. Other Known Causes		d. Other Known Causes	
e. Unknown Causes		e. Unknown Causes	
2. Total Duration of Excess Emissions		2. Total CMS Downtime	
3. $\frac{[\text{Total Duration of Excess Emissions}] \times (100\%)}{[\text{Total Source Operating Time}]^b}$		3. $\frac{[\text{Total CMS Downtime}] \times (100\%)}{[\text{Total source operating time}]}$	

^a For opacity, record all times in minutes. For gases, record all times in hours.

^b For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in 40 CFR 60.7(c) shall be submitted.

Note: On a separate page, describe any changes to CMS, process or controls during last 6 months.

I certify that the information contained in this report is true, accurate, and complete.

Name

Title

Signature

Date

Memorandum

Florida Department of Environmental Protection

TO: Howard L. Rhodes
THRU: Al Linero *adj for CHF*
FROM: Teresa Heron *TH*
DATE: January 16, 2001
SUBJECT: El Paso Manatee Energy Center
600 Megawatt Gas-fueled Power Plant
DEP File No. 0810199-001-AC (PSD-FL-318)

Attached is the final package for construction of a 600 MW gas-fueled power plant near Piney Point in Manatee County. The plant will consist of a 250 MW combined cycle and two intermittent duty, simple cycle, 175 MW GE 7FA combustion turbines along with ancillary equipment. There is no fuel oil issue on this project.

The NO_x BACT limit for the combined cycle unit was determined to be 2.5 ppmvd @15% O₂ on a 24-hr average time and 5 ppmvd ammonia slip. We determined that BACT for CO is 7.4 ppmvd @15% O₂ and 12 ppmvd for limited power augmentation on the combined cycle unit.

Because El Paso wanted unlimited power augmentation (steam injection), they decided to install oxidation catalyst and requested modification of the limits to 2.5 and 4 ppmvd for normal operation and (unlimited) power augmentation, respectively. This is the first oxidation catalyst to be installed on a GE 7FA in this state. They plan to do the same at their Broward project as part of an effort to resolve the case there.

We would still consider our draft BACT determination to be applicable for a combined cycle project with limited power augmentation. We clarified the special conditions that brought about the more stringent standard and oxidation catalyst installation. Under normal operations (i.e. not power augmentation) such units actually achieve about 1 ppmvd without oxidation catalyst. Therefore except for combined cycle cold startups, and substantial power augmentation, there is little tangible benefit in oxidation catalyst on such units.

The simple cycle units will meet NO_x and CO limits of 9 and 7.4 ppmvd @15% O₂, respectively. There is no power augmentation issue on simple cycle and no CO catalyst is proposed. The units reach full load and low CO emissions modes very rapidly.

We recommend your approval of the attached permit and BACT determination.

AAL/th

Attachments



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

OCT 12 2001

RECEIVED

OCT 22 2001

4APT-APB

BUREAU OF AIR REGULATION

Mr. A. A. Linero, P.E.
Florida Department of Environmental Protection
Mail Station 5500
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Linero:

Thank you for sending the preliminary determination and draft prevention of significant deterioration (PSD) permit for El Paso Merchant Energy's Belle Glade Energy Center (PSD-FL-317) dated September 7, 2001. The preliminary determination is for the proposed construction of two simple cycle combustion turbines (CTs) and one combined cycle combustion turbine with a total nominal generating capacity of 600 MW to be located in Palm Beach County, Florida. The combustion turbines proposed for the facility are General Electric, frame 7 FA units. As proposed, each simple cycle CT will be allowed to fire natural gas an average of 5,000 hours per year and the combined cycle CT will be allowed to fire natural gas up to 8,760 hours per year. Total net emissions increases from the proposed project are above the thresholds requiring PSD review for nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), particulate matter (PM/PM₁₀), and sulfuric acid mist.

Based on our review of the PSD permit application, preliminary determination and draft PSD permit, we have the following comments:

1. The permit application package includes a draft permit with appendices including Appendix BD, the best available control technology (BACT) determination. We understand that the draft permit takes precedence over Appendix BD and that any items in Appendix BD that appear to be a requirement must be incorporated in the permit to be enforceable. This understanding lies at the base of some of the comments below.
2. We understood the reason for El Paso proposing to configure only one of the combustion turbines as part of a combined cycle system (that is, to avoid the requirements of Florida's Power Plant Siting Act). But at the same time, we were concerned that El Paso might sequentially convert the simple cycle combustion turbines to combined cycle operation without going through the same level of control technology assessment that would have been required had combined cycle operation been proposed from the start. Therefore, we were pleased to see the permit condition requiring a revised CO and NO_x BACT analysis should El Paso propose to convert a simple cycle combustion turbine to combined cycle

service and further requiring that this analysis be performed as though the turbine had never been built (thus precluding any “equity in the ground” advantage).

3. The 2.5 ppmvd NO_x emission limit determined to represent BACT for the combined cycle combustion turbine is equal to the lowest BACT emission rate that has been established in Region 4 to date and is similar to many of the lowest BACT emission rates that have been established in other regions as well. On the other hand, the 24-hour compliance averaging period associated with the 2.5 ppmvd limit (as well as the 9 ppmvd NO_x emission limit for the simple cycle combustion turbines) is longer than many of the combustion turbine NO_x compliance averaging periods for similar projects. (Compliance averaging periods of 1 to 3 hours appear in many permits.) However, we consider 24 hours to be an acceptable averaging period in light of the low emission limits.
4. Regarding the CO BACT determination and associated emissions limits, we have the following comments:
 - a. The draft permit CO emission limit of 8 ppmvd for the simple cycle combustion turbines and for the combined cycle combustion turbine when not operating in power augmentation mode is among the lower BACT limits established in Region 4 for combustion turbines. We further understand Florida Department of Environmental Protection’s (FDEP) expectation that the turbines will in fact typically operate with even lower emissions based on inherent combustor design and good combustion practices alone. However, please note that the use of catalytic oxidation for further control of combustion turbine CO emissions, especially for combined cycle combustion turbines, has become much more common as part of BACT determinations for combustion turbine projects. Catalytic oxidation has the added advantage of controlling volatile organic compound (VOC) emissions including volatile organic hazardous air pollutants.
 - b. Further related to the CO draft permit emission limit of 8 ppmvd, we note that Appendix BD (the BACT determination) indicates an emission rate of 7.4 ppmvd at full load for either combined cycle or simple cycle combustion turbines. Based on our understanding that the draft permit has precedence over Appendix BD, we presume that 8 ppmvd will be the enforceable limit.
 - c. Emissions of CO from combustion turbines increase sharply below a certain load level (unless an add-on control device is in use). For GE 7FA combustion turbines, this sharp increase occurs with operation below about a 50-percent load level. It is not clear to us that the draft permit restricts normal operation (that is, operation other than during startup and shutdown) to load levels of 50 percent and higher. Condition A.17.c. prohibits operation of the combined cycle combustion turbine at “DLN Modes 1, 2, 3, and 4” (except during startup and shutdown), and Condition B.13.c. specifies a similar restriction for the simple cycle combustion

turbines. Since the load levels equivalent to these modes are not specifically stated, however, we are not certain what load levels are prohibited. Furthermore, we would appreciate your identifying which monitoring requirements in the draft permit serve to track compliance with the low-load restrictions.

5. We have the following comments concerning the startup and shutdown provisions of the permit package:
 - a. As we have often commented, startup and shutdown are part of normal combustion turbine operation and need to be addressed in PSD permits. FDEP has done so for this project by establishing a work practice standard and by limiting the number of hours of emissions that can be excluded from NO_x and CO compliance demonstrations for the combined cycle combustion turbine and from NO_x compliance demonstration for the simple cycle combustion turbines. Other permit options that could be considered include limitations on the number of startups and shutdowns in any 12-month period; mass emission limits for NO_x and CO emissions during any 24-hour period to include emissions during startup and shutdown; and future establishment of startup and shutdown BACT emission limits for NO_x and CO derived from test results during the first few months of commercial operation. In addition, compliance with any explicit or implicit annual emissions limits should be assessed with startup and shutdown emissions included. Regarding the option of mass emission limits, we acknowledge FDEP's comments that such limits may be difficult to quantify.
 - b. The only definition of startup that we find is in Appendix BD of the package. As mentioned previously, we understand that the provisions of Appendix BD are not necessarily enforceable. Furthermore, the definition in Appendix BD denotes when startup commences but does not state the operating level or other characteristic marking the end of startup and the beginning of normal operation. We recommend that a more complete definition be developed so that the emission measurements eligible for exclusion under the excess emissions provisions can be confirmed easily.
 - c. Conditions 17d of the combined cycle section and 13d of the simple cycle section contain provisions allowing certain data during periods of startup and shutdown to be excluded from compliance demonstrations.
 - i. Condition 17d for the combined cycle combustion turbine exempts up to 2 hourly emission rate values in a calendar day, except for combined cycle cold startups, in which case up to 4 hourly emission rate values in a calendar day can be exempted. Additionally, Condition 17d indicates that no more than a total of 4 hourly emission rate values shall be exempted in a calendar day. It is unclear to us the purpose of the latter restriction on total hourly emission rate values. Also, it should be clarified in what case a total of 4 hours can be exempted when there is

no combined cycle cold startup during the calendar day.

- ii. Condition 13d for the simple cycle combustion turbines exempts “no more than 2 hourly emission rate values” from the NO_x compliance demonstration as well as restricting the exemption to “no more than a total of 3 hourly emission rate values” in a calendar day. The purpose of the latter restriction is unclear, since the NO_x compliance period is a 24-hour block average. Finally, to remain consistent with previous FDEP simple cycle combustion turbine permits, no more than 2 hours out of a 24-hour period (or calendar day) should be exempted from compliance demonstrations.
6. Draft permit Condition 14 pertaining to simple cycle combustion turbines requires testing initially and at permit renewal for PM/PM₁₀, CO, NO_x, and VOC. The draft permit conditions for the combined cycle combustion turbine do not require PM/PM₁₀ and VOC initial and renewal testing. We have agreed with FDEP in the past that PM/PM₁₀ and VOC testing is not required for combined cycle combustion turbines with continuous emission monitoring systems (CEMS) for CO. However, a permit for a project with both combined cycle and simple cycle combustion turbines that has different initial and renewal testing requirements for the two types of turbines may be perceived as inconsistent. On a related point, we recommend that FDEP give consideration to requiring CO CEMS for the simple cycle combustion turbines as well as for the combined cycle combustion turbine in view of the fact that the simple cycle combustion turbines will be allowed to operate up 5,000 hours per year at full load (and even more hours at a combination of full and partial loads).
7. The term “pipeline-quality natural gas” appears several times in the draft permit. We have sought in the past for a government agency or industry trade group definition of “pipeline-quality” and have never succeeded in finding such a definition. We presume that the term “pipeline-quality natural gas” means natural gas obtained from an intrastate or interstate commercial natural gas pipeline.
8. The draft permit contains an emission limit for ammonia of 5 ppmvd. Ammonia is not regulated under the PSD program, and we do not have a definitive policy on ammonia emissions. However, we can comment that the limit in the draft permit is consistent with (although not equal to the lowest) ammonia limits we are aware of from projects outside Region 4.
9. In the air quality impact evaluations prepared for this project, we see no acknowledgment that NO_x emissions are precursors to ground-level ozone formation. Such acknowledgment would help demonstrate why control of NO_x emissions from combustion turbines is important.

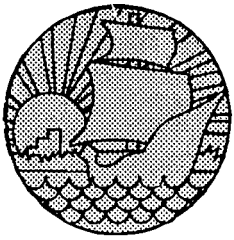
Thank you for the opportunity to comment on the Belle Glade Energy Center preliminary determination and draft PSD permit. If you have any questions regarding these comments, please direct them to either Katy Forney at 404-562-9130 or Jim Little at 404-562-9118.

Sincerely,

Kay T Prince

Kay T. Prince
Chief
Air Planning Branch

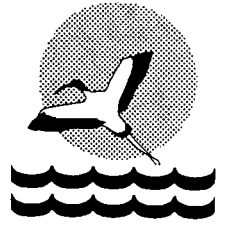
cc: J. Neum ✓
C. Holladay ✓
D. Grajani, PBCo. ✓
J. Davis, ECT ✓
G. Bunch, NPS ✓
L. Goldman, SED ✓



MANATEE COUNTY GOVERNMENT

"To Serve With Excellence"

ENVIRONMENTAL MANAGEMENT DEPARTMENT



October 18, 2001

RECEIVED

OCT 19 2001

Mr. A. A. Linero, P. E.
Administrator
New Source Review Section
Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

BUREAU OF AIR REGULATION

Re: DEP File No. 0810199-001-AC (PSD-FL-318)
El Paso Manatee Energy Center
600 Megawatt Power Project

Dear Mr. Linero:

After reviewing the Manatee Energy Center, Intent to Issue Air Construction Permit and related documentation, Manatee County Environmental Management Department (EMD) is providing the following comments:

1. The proposed facility has been determined to be a major source of air pollution, since emissions of at least one regulated air pollutant (particulate matter, sulfur dioxide, nitrogen oxides, carbon monoxide or volatile organic compounds) exceeds 100 tons per year (TPY). The Department's technical evaluation and preliminary determination is that "emissions from the facility will not cause or contribute to a violation of any state or federal ambient air quality standard".

The new federal standard for ozone has been established at a level equivalent to 85 ppb averaged over any 8-hour period. An area will be considered non-attainment if the average of the annual fourth highest ozone readings at a monitoring site for any three year period equals or exceeds 85 ppb. Based on DEP's monitoring data, the three year running average for ozone within Manatee County has been steadily increasing. Considering that the County is marginally meeting the ozone standard and, that the neighboring counties of Sarasota and Hillsborough have already exceeded the standard for years 1999-2001, Manatee County does not concur with the Department's evaluation that the facility will not cause or contribute to violation of ambient air quality standards.

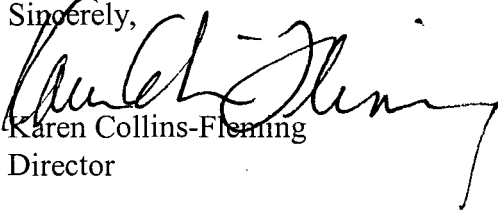
Please provide any additional information that will confirm the Department's position that these air quality standards will not be exceeded.

2. The design for the proposed facility includes a steam turbine generator and an unfired heat recovery steam generator capable of a maximum of 120MW. According to Chapter 403.503, F.S., steam or solar electrical generating facilities of **less than 75 megawatts** [emphasis added] is exempt from the criteria under the Florida Electrical Power Plant Siting Act. What control systems will be used to ensure that the 75 MW threshold is not exceeded?
3. The proposed facility will employ cooling towers for the purpose of cooling and condensing steam. Much of this cooling water is evaporated and must be replaced. According to the Southwest Florida Water Management District (SWFWMD), the proposed location of the facility is within the Most Impacted Area (MIA) which prohibits the permitting of new groundwater withdrawals. Please provide details as to the source and quality of water to be used at the facility.
4. How will this new supplier of electrical energy interact with the current regional suppliers? Will this facility displace energy being supplied these existing facilities? Does this facility have a local client base or will the energy be transmitted outside the region? Will a "needs determination" evaluation be conducted? Due to the fact that Manatee County is marginally meeting the current ozone standard, we would support an offset or pollutant trading so that the development of this facility would not cause a net increase in air emissions.
5. The Tampa Bay Estuary Program (TBEP) is charged with ensuring that Bay conditions are protected and in some instances improved. The TBEP determined that excessive nitrogen loading to the Bay is of special concern. This nutrient causes algal blooms, decreased water clarity and generally degrades water quality, resulting in habitat and fisheries losses. Recent studies indicate that at least 29 percent of the Bay's total nitrogen load is from atmospheric deposition. Due to the proximity to the Bay and Terra Ceia Aquatic Preserve, it is essential that the applicant provide detailed information on expected depositional impacts from nitrogen components (NOX and ammonia) and other pollutants, along with their plans to offset these impacts in order to meet the TBEP's goal of "holding the line" on pollutant inputs to the Bay. Why couldn't Best Available Control Technology (BACT) be replaced with Maximum Available Control Technology (MACT) in this sensitive area. For example, SCONOX is considered to be a better control device and does not contribute bio-available ammonia through "ammonia slip". Can the Department require MACT for facilities located in sensitive areas?
6. Although the proposal is for a predominantly gas-fired power plant, the permit would allow combustion of diesel fuel in a 2600 HP diesel-fired electric generator and a 250HP diesel water pump. The hourly emissions of criteria pollutants would be significantly greater. We question whether these increased emissions from the use of diesel fuel is acceptable in terms of cumulative effects of other regional and in-County sources?

7. In several sections, the permit requires that reports and notifications be submitted to the Department of Environmental Protection. We would ask that the Manatee County Environmental Management Department also be listed as a recipient of such reports, documents, and notifications, according to the same time frames required for submittal to the Department.

We appreciate the opportunity to comment on this important project.

Sincerely,

A handwritten signature in black ink, appearing to read "Karen Collins-Fleming". The signature is fluid and cursive, written over the printed name and title.

Karen Collins-Fleming
Director

KCF:RCB

cc: County Commission members
Ernie Padgett, County Administrator
Jeff Stiensnyder, County Attorneys' Office
Rob Brown, Water Quality Administrator

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
 The Honorable Joe McClash
 Manatee County Board of
 County Commissioners
 P.O. Box 1000
 Bradenton, FL 34205

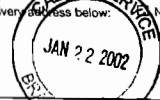
2. Article Number (Copy from service label)
 7001 0320 0001 3692 8581

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

C. Signature *Larry D. Farnham* Agent Addressee

D. Is delivery address different from item 1? Yes No
 If YES, enter delivery address below:



3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

SENDER: COMPLETE THIS SECTION

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
 Mr. William Mack, Sr.
 Managing Director
 El Paso Merchant Energy Co.
 1001 Louisiana St.
 Houston, TX 77002

2. Article Number (Copy from service label)
 7001 0320 0001 3692 8604

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

C. Signature *W. Mack* Agent Addressee

D. Is delivery address different from item 1? Yes No
 If YES, enter delivery address below:

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

SENDER: COMPLETE THIS SECTION

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Jonathan R. Bruce, Chair
 Manatee County Board
 of County Commissioners
 Post Office Box 1000
 Bradenton, FL 34206-1000

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery
Terry L. Farnham 4/24/03

C. Signature Agent
 X *Terry L. FARNHAM* Addressee

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type

Certified Mail Express Mail

Registered Return Receipt for Merchandise

Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

7001 0320 0001 3692 6297

U.S. Postal Service
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 (Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

7001 0320 0001 3692 6297

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Sent To
 Jonathan R. Bruce

Street, Apt. No.,
 or PO BOX 1000

City, State, ZIP+4
 Bradenton, FL 34206-1000

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

7001 0320 0001 3692 6402

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

Sent To
William Mack
Street, Apt. No.
of Coastal Tower, 9 Greenway Plaza 1682A
City, State, ZIP+4
Houston, TX 77046-0995

PS Form 3800, January 2001

See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Ms. Jennifer Mollhagen
 Senior Environmental Scientist
 El Paso Corporation
 P. O. Box 2511
 Houston, TX 77252-2511

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent
 Addressee

B. Received by (Printed Name) Agent
 C. Date of Delivery Addressee
 MAR - 3 2003

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

7001 0320 0001 3692 6914

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

7001 0320 0001 3692 6914

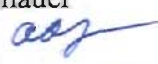
Postage	\$	
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Postmark
Here

Sent To
 Jennifer Mollhagen
 Street, Apt. No.,
 or P.O. Box 2511
 City, State, ZIP+4
 Houston, TX 77252-2511

Memorandum

Florida Department of Environmental Protection

TO: Howard L. Rhodes
THRU: Trina L. Vielhauer
Al Linero 
FROM: Teresa Heron
DATE: April 21, 2003
SUBJECT: El Paso Manatee Energy Center 600 Megawatt Gas-fueled Power Plant
DEP File No. 0810199-002-AC (PSD-FL-318)
El Paso Belle Glade Energy Center 600 Megawatt Gas-fueled Power Plant
DEP File No. 0990594-002-AC (PSD-FL-317)
El Paso Broward Energy Center 775 Megawatt Gas-fueled Power Plant
DEP File No. 0112545-002-AC (PSD-FL-316)

Attached are letters modifying the permit for each of the above reference power plant facilities. These permit modifications are to extend the permit expiration date along with the dates to commence and to complete construction. A request was filed on February 12, 2003.

The PSD permits were issued on January 16, 2002 (Manatee), January 28, 2002 (Belle Glade) and May 15, 2002 (Broward), all with an expiration date of December 1, 2004. The facilities have not started construction.

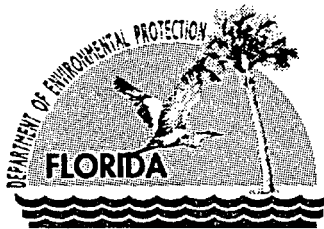
The permitted facilities will consist of a 250 MW combined cycle and two (Manatee and Belle Glade) and three (Broward) intermittent duty, simple cycle, 175 MW GE 7FA combustion turbines along with ancillary equipment.

The NOx BACT limit for the combined cycle unit was determined to be 2.5 ppmvd @15% O₂ on a 24-hr average time and 5 ppmvd ammonia slip. BACT for CO, controlled by oxidation catalyst was 2.5 and 4 ppmvd for normal operation and power augmentation, respectively. These are the first oxidation catalysts to be installed on a GE 7FA in this state. The simple cycle units will meet NOx and CO limits of 9 and 7.4 ppmvd @15% O₂ respectively without power augmentation.

We recommend your approval.

AAL/th

Attachments



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

April 21, 2003

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. William Mack
Senior Managing Director
El Paso Merchant Energy Company
Coastal Tower, Nine Greenway Plaza, Suite
1682A
Houston, Texas 77046-0995

Re: DEP File No. 0810199-AC (PSD-FL-318)
Manatee Energy Center-600 MW Cogeneration Plant

Dear Mr. Mack:

The Department reviewed your letter dated February 11, 2003 for extension of the referenced air construction permit. The request is to extend the dates for commencement of construction, completion of physical construction, and permit expiration.

The Department hereby determines that the request to extend the permit expiration date along with the dates to commence and to complete construction is acceptable. The following permit specific conditions are hereby modified as follows:

FIRST PAGE OF PERMIT

Expires: ~~December 1, 2004~~ **December 1, 2005**

SECTION II - CONDITION 3

PSD Approval to Construct Expiration: Approval to construct shall become invalid if construction is not commenced ~~within 18 months after receipt of such approval by September 1, 2004,~~ or if construction is discontinued for a period of 18 months or more, or if physical construction is not completed ~~within a reasonable time by September 1, 2005. The Department may extend the 18-month period upon a satisfactory showing that an extension is justified. [40 CFR 52.21(r)(2)].~~

SECTION II - CONDITION 4

Completion of Construction: The permit expiration date is ~~December 1, 2004~~ **December 1, 2005**. Physical construction shall be complete by ~~September 1, 2004~~ **September 1, 2005**. The additional time provides for testing, submittal of results, and submittal of the Title V permit to the Department.

SECTION II - CONDITION 6

BACT Determination: In conjunction with ~~extension of the 18-month periods to commence or continue construction,~~ phasing of the project, or an extension of the ~~December 1, 2004~~ **December 1, 2005** permit expiration date, the permittee may be required to demonstrate the adequacy of any previous

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determination of Best Available Control Technology (BACT) for the source. [40 CFR 52.21(j)(4); 40CFR 51.166(j) and Rule 62-4.070 F.A.C.]

The Department determined that the present BACT is adequate.

A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permitting decision is issued pursuant to Chapter 403, Florida Statutes.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under 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 filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall 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 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

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 notice. 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. Mediation is not available in this proceeding.

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 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, 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.

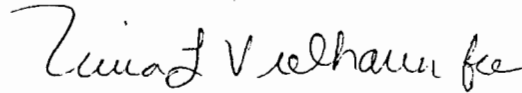
The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2) F.S., and that the purpose of the underlying statute will 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 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 permitting decision is final and effective on the date filed with the clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this order will not be effective until further order of the Department.

Any party to this permitting decision (order) has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, 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 must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida



Howard L. Rhodes, Director
Division of Air Resources
Management

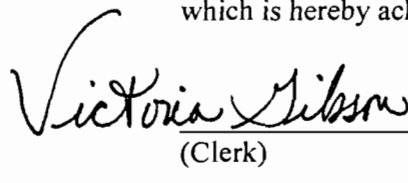
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this PERMIT MODIFICATION was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 4/22/03 to the person(s) listed:

William Mack, El Paso*
Jennifer Mollhagen, El Paso
Karen Collins, PhD., Manatee County EMD
Jerry Campbell, Hillsborough County EPC
Jerry Kissel, DEP SWD
Tom Davis, P.E., ECT
Peter Hessling, Pinellas County DEM
Chair, Manatee County BCC*

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to §120.52, Florida Statutes,
with the designated Department Clerk, receipt of
which is hereby acknowledged.

 April 22, 2003
(Clerk) (Date)



RECEIVED

APR 03 2003

BUREAU OF AIR REGULATION

April 2, 2003

Ms. Patty Adams
Bureau of Air Regulation
Florida Dept. of Environmental Protection
2600 Blair Stone Road (MS #5505)
Tallahassee, Florida 32399-2400

Re: Request for Permit Extension
Belle Glade Energy Center, PSD-FL-317
Broward Energy Center, PSD-FL-316
Manatee Energy Center, PSD-FL-318

Dear Ms. Adams:

El Paso Merchant Energy Company (El Paso) is submitting a check made out to the Florida Department of Environmental Protection in the amount of \$150.00, to cover the \$50.00 processing fee for each of the three (3) above-referenced requests for permit extensions. If you have any questions or need more information, please contact me at 713-420-4771 or Krish Ravishankar at (713) 420-5563. Thank you for your help.

Sincerely,

Jennifer Mollhagen
Sr. Environmental Scientist

CC: Krish Ravishankar, El Paso

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Jonathan R. Bruce, Chair
 Manatee County Board
 of County Commissioners
 Post Office Box 1000
 Bradenton, FL 34206-1000

COMPLETE THIS SECTION ON DELIVERY

- A. Received by (Please Print Clearly) B. Date of Delivery
Terry L. Farnham 4/24/03
- C. Signature
 X *Terry L. Farnham*
 Agent
 Addressee
- D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type

- Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee)
-
- Yes

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PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

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Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

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Jonathan R. Bruce

Street, Apt. No.,
or PO Box
1000

City, State, ZIP+4
Bradenton, FL 34206-1000

PS Form 3800, January 2001

See Reverse for Instructions

U.S. Postal Service
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(Domestic Mail Only; No Insurance Coverage Provided)

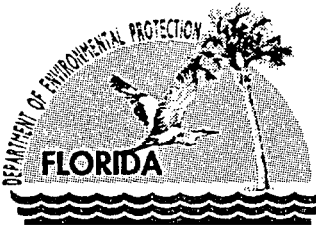
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Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

Sent To
William Mack
 Street, Apt. No.,
 or P.O. Box
Coastal Tower, 9 Greenway Plaza 1682A
 City, State, ZIP+4
Houston, TX 77046-0995



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

February 21, 2003

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Ms. Jennifer Mollhagen
Sr. Environmental Scientist
El Paso Corporation
P. O. Box 2511
Houston, Texas 77252-2511

RE: Request for Extension of Expiration Date
PSD-FL-316, Broward Energy Center
PSD-FL-317, Belle Glade Energy Center
PSD-FL-318, Manatee Energy Center

Dear Ms. Mollhagen:

The Bureau of Air Regulation received the above referenced permit extension requests on February 12, 2003. Since these facilities do not hold current Title V operating permits, a fee of \$50 for each extension is required to process this request. If you have any questions, please feel free to call me at (850)921-9505.

Sincerely,

Patty Adams
Bureau of Air Regulation

/pa

cc: Teresa Heron

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February 11, 2003

Al Linero
Bureau of Air Regulation
Florida Dept. of Environmental Protection
2600 Blair Stone Road (MS #5505)
Tallahassee, Florida 32399-2400

RECEIVED

FEB 12 2003

BUREAU OF AIR REGULATION

Re: Request for Permit Extension
Manatee Energy Center
Manatee County, Florida
Air Permit No. PSD-FL-318
Facility ID No. 0810199

Dear Mr. Linero:

El Paso Merchant Energy Company (El Paso) currently has a permit (Air Permit No. PSD-FL-318) to construct, own, and operate a new electric power-generating plant in Manatee County, Florida. The new power plant, designated as the Manatee Energy Center (Manatee), will have a total generating capacity of nominal 600 MW, and will be fired exclusively with natural gas. The plant will consist of one combined cycle gas turbine, two simple cycle gas turbines, and associated equipment, and will be located in Manatee County.

El Paso would like to request an extension of the above-referenced permit. The permit is currently scheduled to expire on December 1, 2004, and we would like your permission to extend the permit until December 1, 2005. The facility has not yet begun construction. If you have any questions or need more information, please contact me at 713-420-4771 or Krish Ravishankar at (713) 420-5563. Thank you for your help.

Sincerely,

Jennifer Mollhagen
Sr. Environmental Scientist

CC: Krish Ravishankar, El Paso

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input checked="" type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) _____</p> <p>C. Date of Delivery MAR - 3 2003</p>
<p>1. Article Addressed to:</p> <p>Ms. Jennifer Mollhagen Senior Environmental Scientist El Paso Corporation P. O. Box 2511 Houston, TX 77252-2511</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
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<p>PS Form 3811, August 2001 Domestic Return Receipt 102595-02-M-1540</p>	

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Environmental Consulting & Technology, Inc.

October 18, 2001

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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

3701 Northwest
98th Street
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(352)
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PERMITTEE:

El Paso Merchant Energy Company
1001 Louisiana Street
Houston, TX 77002

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 (NO_x), 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:
 - a. **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.
 - b. **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.
 - c. **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 (<u>each</u> 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
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- (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

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STATE OF FLORIDA
COUNTY OF MANATEE

BUREAU OF AIR REGULATION

BEFORE THE UNDERSIGNED AUTHORITY PERSONALLY APPEARED MOYA NEVILLE, WHO ON OATH SAYS SHE IS ADVERTISING DIRECTOR OF THE SARASOTA HERALD-TRIBUNE, A DAILY NEWSPAPER PUBLISHED AT SARASOTA, IN SARASOTA COUNTY FLORIDA, AND CIRCULATED IN MANATEE COUNTY DAILY; THAT THE ATTACHED COPY OF ADVERTISEMENT, BEING A NOTICE IN THE MATTER OF:

NOTICE OF INTENT TO ISSUE PERMIT

IN THE COURT WAS PUBLISHED IN MANATEE EDITION OF SAID NEWSPAPER IN THE ISSUES OF:

SEPTEMBER 20, 2001

AFFIANT FURTHER SAYS THAT THE SAID SARASOTA HERALD-TRIBUNE IS A NEWSPAPER PUBLISHED AT SARASOTA, IN SAID SARASOTA COUNTY, FLORIDA, AND THAT THE SAID NEWSPAPER HAS THERETOFRE BEEN CONTINUOUSLY PUBLISHED IN SAID SARASOTA COUNTY, FLORIDA, EACH DAY, AND HAS BEEN ENTERED AS SECOND CLASS MAIL MATTER AT THE POST OFFICE IN BRADENTON, IN SAID MANATEE COUNTY, FLORIDA, FOR A PERIOD OF ONE YEAR NEXT PRECEDING THE FIRST PUBLICATION OF THE ATTACHED COPY OF ADVERTISEMENT; AND AFFIANT FURTHER SAYS THAT SHE HAS NEITHER PAID NOR PROMISED ANY PERSON, FIRM OR CORPORATION ANY DISCOUNT, REBATE, COMMISSION OR REFUND FOR THE PURPOSE OF SECURING THIS ADVERTISEMENT FOR PUBLICATION IN THE SAID NEWSPAPER.

SIGNED Moya Neville

SWORN TO AND SUBSCRIBED BEFORE ME THIS 20TH DAY OF SEPTEMBER A.D., 2001 BY MOYA NEVILLE WHO IS PERSONALLY KNOWN TO ME.

(SEAL) [Signature]

OFFICIAL NOTARY SEAL
BOBBIE J. CLARK
NOTARY PUBLIC STATE OF FLORIDA
COMMISSION NO. CC968394
MY COMMISSION EXP. OCT. 11, 2004

NOTARY PUBLIC

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No. 0810199-001-AC (PSD-FL-318)

El Paso Manatee Energy Center

Manatee County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit under the requirements for the Prevention of Significant Deterioration (PSD) of Air Quality to El Paso Merchant Energy Company. The permit is for the construction of a nominal 600 megawatt (MW) natural gas fueled power plant approximately 1 mile northeast of Buckley Road and U.S. 41 near Piney Point, Manatee County. A Best Available Control Technology (BACT) determination was required for sulfur dioxide, particulate matter (PM₁₀), nitrogen oxides (NO_x), sulfuric acid mist (SAM), and carbon monoxide (CO) pursuant to Rule 62.020, F.A.C. The applicant's name and address are El Paso Merchant Energy Company, 1001 Louisiana Street, Houston, Texas 77002.

El Paso proposes to construct three nominal 176-MW General Electric PG741FA natural gas-fired combustion turbine-electric generators. Two of the units will operate in simple cycle mode and intermittent duty. The other unit will operate in combined cycle mode and include an unfired heat recovery steam generator and a separate steam-electric generator.

Additional equipment includes three 136-foot stacks, a five-cell mechanical draft fresh water cooling tower, a 2,600-horsepower emergency diesel-fired electrical generator, a 250-hp emergency diesel-fired fire water pump, a natural gas fired heater, an aqueous ammonia storage tank, and raw and demineralized water storage tanks.

NO_x emissions will be controlled by Dry Low NO_x (DLN-2.6) combustors. The two simple cycle units must meet an emission limit of parts per million by volume, dry, at 16 percent oxygen (ppmv @ 15% O₂). NO_x emissions from the combined cycle unit will be further controlled by selective catalytic reduction (SCR) to achieve 2.6 ppmvd at 15% O₂. Emissions of CO will be controlled to 8 ppmvd @ 15% O₂, except during periods of power augmentation when the limit for the combined cycle unit will be 12 ppmvd @ 15% O₂.

Emissions of PM₁₀, SO₂, sulfuric acid mist, volatile organic compounds, and hazardous air pollutants (HAP) will be controlled by low levels by good combustion and use of inherently clean pipeline quality natural gas. Ammonia emissions (NH₃) generated by NO_x control on the combined cycle unit will be limited to 5 ppmvd.

The combined maximum emissions from the three units in tons per year are summarized below. These include the minor emissions from the emergency diesel engines and the cooling towers.

Pollutant	Maximum Potential Emissions	PSD Significant Emission Rate
PM ₁₀ (filterable plus condensable)	181	29/16
CO	349	100
NO _x	360	40
VOC	29	40
SO ₂	68	40
Sulfuric Acid Mist	10	7

According to the applicant, maximum predicted air quality impacts due to emissions from the El Paso project are less than the PSD Class II and Class I significant impact levels.

A CALPUFF modeling analysis for the El Paso project was submitted by the applicant to the National Park Service (NPS). As to the application, regional haze impacts at the Chassahowitzka NWR will be below the NPS significant impact levels (that would otherwise require multi-source modeling).

Based on the required analyses, the Department has reasonable assurance that the proposed project will not cause or significantly contribute to a violation of any ambient air quality standard or PSD increment.

The project is not subject to Sections 403.601-618, F.S., Florida Electrical Power Plant Siting Act, based on information regarding electrical power generated from the steam cycle submitted by the applicant and reviewed by the Department.

The Department will issue the FINAL Permit, in accordance with the conditions of the 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 Department will accept written comments and requests for a public meeting concerning the proposed permit issuance action within a period of 30 (thirty) days from the date of publication of this Public Notice to Issue Air Construction Permit. Written comments shall be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5506, Tallahassee, FL 32309-2400. Any comments filed shall be made available for public inspection. If comments received result in a significant change in the proposed action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.568 and 120.57, F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.568 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #56, Tallahassee, Florida 32309-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.00(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.90(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition 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 section 120.568 and 120.57, F.S., or to intervene in the proceeding and participate as a party to it. Any subsequent intervention will be only the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.206 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petitioner must so indicate; (e) A concise statement of the ultimate relief sought, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the petitioner's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by 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 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:

Department of Environmental Protection Bureau of Air Regulation 111 S. Magnolia Drive, Suite 4 Tallahassee, Florida 32301 Telephone: 850/488-0114 Fax: 850/922-0970	Department of Environmental Protection Southwest District Office 3804 Coconut Palm Drive Tampa, Florida 33619-8218 Telephone: 813/744-6100 Fax: 813/744-6084
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The complete project file includes the application, technical evaluations, Draft Permit, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrative Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information. The draft permit, technical evaluation and preliminary BACT determination can be accessed at: <http://www8.myflorida.com/licenses/permits/consent/consent/air/airpermit.html>

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. William Mack, Sr.
 Managing Director
 El Paso Merchant Energy Co.
 1001 Louisiana Street
 Houston, TX 77002

2. Article Number (Copy from service label)

7000 0600 0026 4129 8061

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

9-19-1

C. Signature

[Signature] 9/19

- Agent
- Addressee

D. Is delivery address different from item 1? Yes

If YES, enter delivery address below: No

3. Service Type

- Certified Mail Express Mail
- Registered Return Receipt for Merchandise
- Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)		
Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	
Recipient's Name (Please Print Clearly) (to be completed by mailer) William Mack, Sr. Street, Apt. No., or PO Box No. 1001 Louisiana Street City, State, ZIP+4 Houston, TX 77002		
PS Form 3800, February 2000		See Reverse for Instructions

7000 0600 0026 4129 8061



Environmental Consulting & Technology, Inc.

September 24, 2001

SENT VIA OVERNIGHT MAIL ON SEPTEMBER 24, 2001

RECEIVED

SEP 25 2001

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
111 S. Magnolia Drive, Suite 23
Tallahassee, FL 32301

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

Dear Mr. Linero:

The Public Notice of the draft Department Prevention of Significant Deterioration (PSD) permit for the Manatee Energy Center was published in Sarasota Herald-Tribune on September 20, 2001. A copy of the newspaper's affidavit of publication is attached.

Please contact the undersigned at (352) 332-6230, Ext. 351 if there are any questions regarding this notice.

ENVIRONMENTAL CONSULTING & TECHNOLOGY, INC.

Thomas W. Davis, P.E.
Principal Engineer

Attachment

cc: Mr. Krish Ravishankar, El Paso

- J. Neron ✓
- C. Halladay ✓
- B. Thomas, SWP ✓
- K. Collins, Manatee Co. EMD ✓
- G. Campbell, Hillsborough Co. EPE ✓
- P. Hessling, Pinellas Co. DEM ✓
- G. Bennett, NPS ✓
- G. Worley, EPA ✓
- Chair, Manatee Co. BCC ✓

3701 Northwest
98th Street
Gainesville, FL
32606

(352)
332-0444

FAX (352)
332-6722

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY			
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	A. Received by (Please Print Clearly) <i>Artker</i>	B. Date of Delivery <i>9-13-01</i>		
1. Article Addressed to: Marion Forthoffer, Air Quality Manager Manatee County Environmental Management Dept. 202 Sixth Avenue East Bradenton, FL 34208	C. Signature <i>[Signature]</i>			
2. Article Number (Copy from service label) 7000 0600 0026 4129 8030	D. Is delivery address different from item 1? If YES, enter delivery address below: <table border="0"> <tr> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> No</td> </tr> </table>		<input type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/> Yes	<input type="checkbox"/> No			
PS Form 3811, July 1999	3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes		

Domestic Return Receipt 102595-99-M-1789

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

7000 0600 0026 4129 8030

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee <small>(Endorsement Required)</small>		
Restricted Delivery Fee <small>(Endorsement Required)</small>		
Total Postage & Fees	\$	

Recipient's Name (Please Print Clearly) (to be completed by mailer)
 Marion Forthoffer
Street, Apt. No., or PO Box No.
 202 6th Avenue East
City, State, ZIP+4
 Bradenton, FL 34208

PS Form 3800, February 2000

See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
 The Honorable Joe McClash
 Manatee County Board of
 Commissioners
 PO Box 1000
 Bradenton, FL 34205

2. Article Number (Copy from service label)
 7000 0600 0026 4129 8047

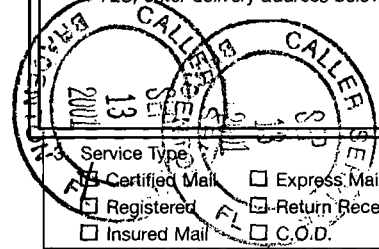
PS Form 3811, July 1999

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery
 Terry L. Farnham

C. Signature
 X Terry L. FARNHAM Agent

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No



3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

Domestic Return Receipt

102595-99-M-178

**U.S. Postal Service
 CERTIFIED MAIL RECEIPT**
 (Domestic Mail Only; No Insurance Coverage Provided)

7000 0600 0026 4129 8047

Postage	\$	
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Postmark Here

Recipient's Name (Please Print Clearly) (to be completed by mailer)
 The Honorable Joe McClash
 Street, Apt. No., or PO Box No.
 P. O. Box 1000
 City, State, ZIP+4
 Bradenton, FL 34205

PS Form 3800, February 2000

See Reverse for Instructions



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

September 11, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. William Mack Sr., Managing Director
El Paso Merchant Energy Company
1001 Louisiana Street
Houston, Texas 77002

Re: DEP File No. 0810199-001-AC (PSD-FL-318)
Manatee Energy Center
600-Megawatt Power Plant


Dear Mr. Mack:

Enclosed is one copy of the Draft Permit, Technical Evaluation and Preliminary Determination, and Draft BACT Determination, for the Manatee Energy Center to be located in Piney Point, Manatee County. The Department's Intent to Issue Air Construction Permit and the "Public Notice of Intent to Issue Air Construction Permit" are also included.

The Public Notice must be published one time only as soon as possible in a newspaper of general circulation in the area affected, pursuant to Chapter 50, Florida Statutes. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

Please submit any other written comments you wish to have considered concerning the Department's proposed action to A. A. Linero, P.E. Administrator, New Source Review Section at the above letterhead address. If you have any questions please call Ms. Teresa Heron at 850/921-9529 or Mr. Linero at 850/921-9523.

Sincerely,


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

CHF/al

Enclosures

"More Protection, Less Process"

Printed on recycled paper.

In the Matter of an
Application for Permit by:

Mr. William Mack, Sr., Managing Director
El Paso Merchant Energy Company
1001 Louisiana Street
Houston, Texas 77002

DEP File No. 0810199-001-AC (PSD-318)
El Paso Manatee Energy Center
Manatee County

INTENT TO ISSUE AIR CONSTRUCTION PERMIT

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit (copy of DRAFT Permit attached) for the proposed project, detailed in the application specified above and the attached Technical Evaluation and Preliminary Determination, for the reasons stated below.

The applicant, El Paso Merchant Energy Company, applied on March 28, 2001 (complete June 27, 2001) to the Department for an air construction permit to construct a 600-megawatt natural gas-fueled combustion turbine power plant for the Manatee Energy Center to be located in Piney Point, Manatee County.

The Department 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, and 62-212. The above actions are not exempt from permitting procedures. The Department has determined that an air construction permit under the provisions for the Prevention of Significant Deterioration (PSD) of Air Quality is required for the proposed work.

The Department intends to issue this air construction permit based on the belief that reasonable assurances have been provided to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1., F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Construction Permit. The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C., requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114; Fax 850/ 922-6979). You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in section 50.051, F.S. to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rules 62-110.106(9) & (11), F.A.C.

The Department will issue the final permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments and requests for public meetings concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of the enclosed Public Notice. The Department will also accept written and oral comments at a public hearing (meeting) to be held as described in the enclosed Public Notice. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department 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., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under 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 filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall 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 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

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 notice. 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. Mediation is not available in this proceeding.

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 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, 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 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.

Executed in Tallahassee, Florida.


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

CERTIFICATE OF SERVICE

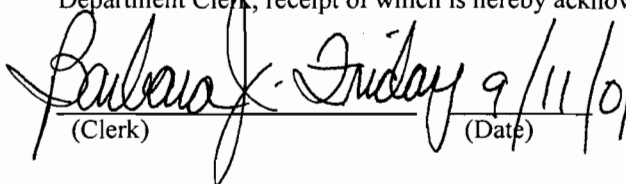
The undersigned duly designated deputy agency clerk hereby certifies that this Intent to Issue Air Construction Permit (including the Public Notice, Technical Evaluation and Preliminary Determination, Draft BACT Determination, and the DRAFT permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 9/11/01 to the person(s) listed:

William Mack, El Paso*
Gregg Worley, EPA
John Bunyak, NPS
Bill Thomas, DEP SWD
Tom Davis, P.E., ECT

Chair, Manatee County BCC*
Karen Collins, PhD., Manatee County EMD
Jerry Campbell, Hillsborough County EPC
Peter Hessling, Pinellas County DEM

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


(Clerk) 9/11/01 (Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No. 0810199-001-AC (PSD-FL-318)

El Paso Manatee Energy Center
Manatee County

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Additional equipment includes three 135-foot stacks, a five-cell mechanical draft fresh water cooling tower, a 2,600-horsepower (hp) emergency diesel-fired electrical generator, a 250-hp emergency diesel-fired fire water pump, a natural gas fired heater, an aqueous ammonia storage tank, and raw and demineralized water storage tanks.

NO_x emissions will be controlled by Dry Low NO_x (DLN-2.6) combustors. The two simple cycle units must meet an emission limit of 9 parts per million by volume, dry, at 15 percent oxygen (ppmvd @15% O₂). NO_x emissions from the combined cycle unit will be further controlled by selective catalytic reduction (SCR) to achieve 2.5 ppmvd at 15% O₂. Emissions of CO will be controlled to 8 ppmvd @15% O₂ except during periods of power augmentation when the limit for the combined cycle unit will be 12 ppmvd @15% O₂.

Emissions of PM/PM₁₀, SO₂, sulfuric acid mist, volatile organic compounds, and hazardous air pollutants (HAP) will be controlled to very low levels by good combustion and use of inherently clean pipeline quality natural gas. Ammonia emissions (NH₃) generated due to NO_x control on the combined cycle unit will be limited to 5 ppmvd.

The combined maximum emissions from the three units in tons per year are summarized below. These include the minor emissions from the emergency diesel engines and the cooling towers.

<u>Pollutant</u>	<u>Maximum Potential Emissions</u>	<u>PSD Significant Emission Rate</u>
PM/PM ₁₀ (filterable plus condensable)	181	25/15
CO	349	100
NO _x	365	40
VOC	29	40
SO ₂	69	40
Sulfuric Acid Mist	10	7

According to the applicant, maximum predicted air quality impacts due to emissions from the El Paso project are less than the applicable PSD Class II and Class I significant impact levels.

A CALPUFF modeling analysis for the El Paso project was submitted by the applicant to the National Park Service (NPS). According to the applicant, "regional haze impacts at the Chassahowitzka NWR will be below the NPS significant Impact levels (that would otherwise require multi-source modeling)."

Based on the required analyses, the Department has reasonable assurance that the proposed project will not cause or significantly contribute to a violation of any ambient air quality standard or PSD increment.

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

The Department will issue the FINAL Permit, in accordance with the conditions of the DRAFT Permit, unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

Notice for Newspaper

The Department will accept written comments and requests for a public meeting concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department 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., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under 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 filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall 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 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301

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 notice. 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 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:

Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/922-6979

Department of Environmental Protection
Southwest District Office
3804 Coconut Palm Drive
Tampa, Florida 33619-8218
Telephone: 813/744-6100
Fax: 813/744-6084

The complete project file includes the application, technical evaluations, Draft Permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information. The draft permit, technical evaluation and preliminary BACT determination can be accessed at <http://www8.myflorida.com/licensingpermitting/learn/environment/air/airpermit.html>

Notice for Newspaper

TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION

El Paso Manatee Energy Center

600-Megawatt Electrical Power Plant

Manatee County

DEP File No. 0810199-001-AC (PSD-FL-318)

Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation

September 11, 2001

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

1. APPLICATION INFORMATION

1.1 Applicant Name and Address

El Paso Merchant Energy Company
 1001 Louisiana Street
 Houston, Texas 77002

Authorized Representative: *William Mack, Sr., Managing Director*

1.2 Reviewing and Process Schedule

03-28-01: Date of Receipt of Application
 06-27-01: Application Complete
 09-11-01: Distributed Intent to Issue

2. FACILITY INFORMATION

2.1 Facility Location

Refer to Figures 1 and 2 below. The El Paso Manatee Energy Center will be located in Manatee County. The location is approximately 110 km to the south of the Chassahowitzka National Wilderness Area (CNWA). The proposed site is 1 mile northeast of Buckeye Road and U.S. Highway 41 near Piney Point. The UTM coordinates for this facility are Zone 17; 349.1 km East; 3,057.6 km North.



Figure 1 – Regional Location

Figure 2 – Proposed Project Site

2.2 Standard Industrial Classification Codes (SIC)

Industry Group No.	49	Electric, Gas, and Sanitary Services
Industry No.	4911	Electric Services

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

2.3 Facility Category

This proposed project will generate 600 megawatts (nominal MW) of electrical power. The facility is classified as a Major or Title V Source of air pollution because emissions of at least one regulated air pollutant, such as particulate matter (PM/PM₁₀), sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), or volatile organic compounds (VOC) exceeds 100 TPY.

This facility is within an industry included in the list of the 28 Major Facility Categories per Table 62-212.400-1, F.A.C. Because emissions are greater than 100 TPY for at least one criteria pollutant, the facility is also a major facility with respect to Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD), and a Best Available Control Technology (BACT) determination is required. Given that emissions of at least one single criteria pollutant will exceed 100 TPY, PSD Review and a BACT determination are required for each pollutant emitted in excess of the Significant Emission Rates listed in Table 62-212.400-2, F.A.C. These values are: 40 TPY for NO_x, SO₂, and VOC; 25/15 TPY of PM/PM₁₀; 7 TPY of Sulfuric Acid Mist (SAM); and 100 TPY of CO.

3. PROJECT DESCRIPTION

This permit addresses the following emissions units:

ID	Emission Unit Description
001	Combined Cycle Unit No. CC-1 consists of a natural gas-fueled General Electric Model PG7241FA (GE 7FA) combustion turbine-electrical generator with a nominal capacity of 175 MW, an unfired heat recovery steam generator (HRSG), a separate steam turbine-electrical generator and a 135-foot stack.
002	Simple Cycle Unit No. SC-1 consists of a natural gas-fueled GE 7FA combustion turbine-electrical generator with a nominal capacity of 175 MW and a 135-foot stack.
003	Simple Cycle Unit No. SC-2 consists of a natural gas-fueled GE 7FA combustion turbine-electrical generator with a nominal capacity of 175 MW and a 135-foot stack.
004	Cooling Tower – one 5-cell freshwater mechanical draft cooling tower.
005	Other Emissions Units including one 2600-hp diesel generator, one 250-hp diesel fire pump, one gas heater, aqueous ammonia storage tank and small diesel storage tanks.

Significant emission rate increases per Table 212.400-2, F.A.C. will occur for CO, SO₂, SAM, PM/PM₁₀ and NO_x. A BACT determination is required for each of these pollutants. An air quality impact review is also required for CO, PM/PM₁₀, NO_x, and SO₂.

Each turbine will be equipped with Dry Low NO_x (DLN-2.6) combustors and evaporative inlet cooling systems. Each will have a maximum heat input rating of approximately 1,700 mmBtu per hour while operating at 100% load. El Paso proposes to operate the simple cycle units up to 5,000 hours per year per unit and to operate the combined cycle unit continuously. The key components of the GE MS 7001FA (a predecessor of the PG 7241FA) are identified in Figure 3. An exterior view is also shown. The project includes highly automated controls, described as the GE Mark VI Gas Turbine Control System to fulfill all of the gas turbine control requirements.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

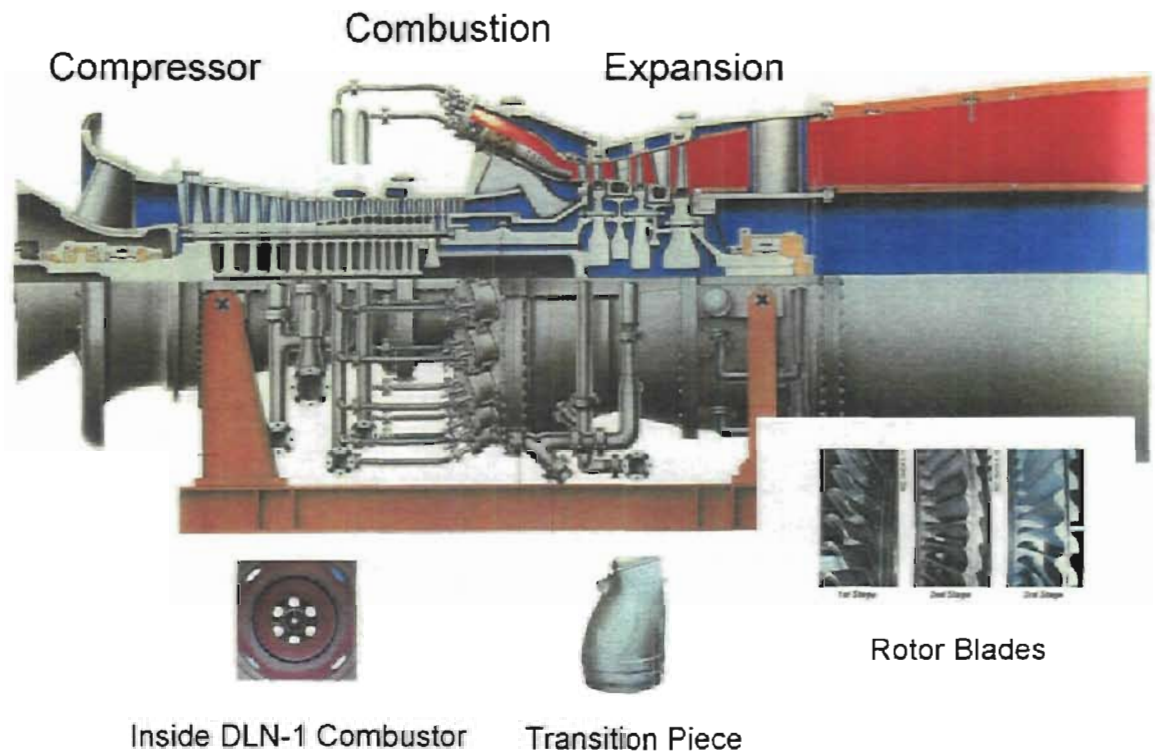


Figure 3 - Internal and External Views of Early GE 7FA

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

4. PROCESS DESCRIPTION

A gas turbine is an internal combustion engine that operates with rotary rather than reciprocating motion. Ambient air is drawn into the 18-stage compressor of the GE 7FA where it is compressed by a pressure ratio of about 15 times atmospheric pressure. The compressed air is then directed to the combustor section, where fuel is introduced, ignited, and burned. The combustion section consists of 14 separate can-annular combustors.

Flame temperatures in a typical combustor section can reach 3600 degrees Fahrenheit (°F). Units such as the 7FA operate at lower flame temperatures, which minimize NO_x formation. The hot combustion gases are then diluted with additional cool air and directed to the turbine section at temperatures of approximately 2400 °F. Energy is recovered in the turbine section in the form of shaft horsepower, of which typically more than 50 percent is required to drive the internal compressor section. The balance of recovered shaft energy is available to drive the external load unit such as an electrical generator.

Figure 4 is a simplified process flow diagram of the proposed El Paso project. Three of the units will operate in the simple cycle mode. Cycle efficiency, defined as a percentage of useful shaft energy output to fuel energy input, is approximately 35 percent for F-Class combustion turbines in the simple cycle mode. In addition to shaft energy output, 1 to 2 percent of fuel input energy can be attributed to mechanical losses. The balance is exhausted from the turbine in the form of heat.

One of the units will operate in combined cycle mode in which the combustion turbine drives an electric generator while the exhausted gases are used to raise additional steam in a heat recovery steam generator. The steam, in-turn, drives a separate steam turbine-electrical generator producing additional electrical power. In combined cycle mode, the thermal efficiency of the 7FA can exceed 56 percent.

At high ambient temperature, the units cannot generate as much power because of lower compressor inlet air density. To compensate for the loss of output (which can be on the order of 20 MW compared to referenced temperatures), an inlet air cooler (fogger or chiller) can be installed ahead of the combustion turbine inlet. At an ambient temperature of 95 °F, roughly 15 MW of power can be regained per simple cycle unit by using a chiller to cool the inlet air to 50 °F.

Other possibilities include placing a gas-fired duct burner between the combustion turbine and the HRSG, power augmentation and peaking. Power augmentation is accomplished by injecting some steam from the HRSG into the rotor (power) section of the combustion turbine. Peaking is simply running the unit at greater than design fuel input. The additional process information related to the combustor design, and control measures to minimize pollutant emissions are given in the attached draft BACT determination.

5. RULE APPLICABILITY

The proposed project is subject to preconstruction review requirements under the provisions of Chapter 403, Florida Statutes, and Chapters 62-4, 62-204, 62-210, 62-212, 62-214, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.).

This project will be located in Manatee County; an area designated as attainment for all criteria pollutants in accordance with Rule 62-204.360, F.A.C. The proposed project is subject to PSD review under Rule 62-212.400, F.A.C. for the reasons given in Section 2.3, Facility Category, above.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

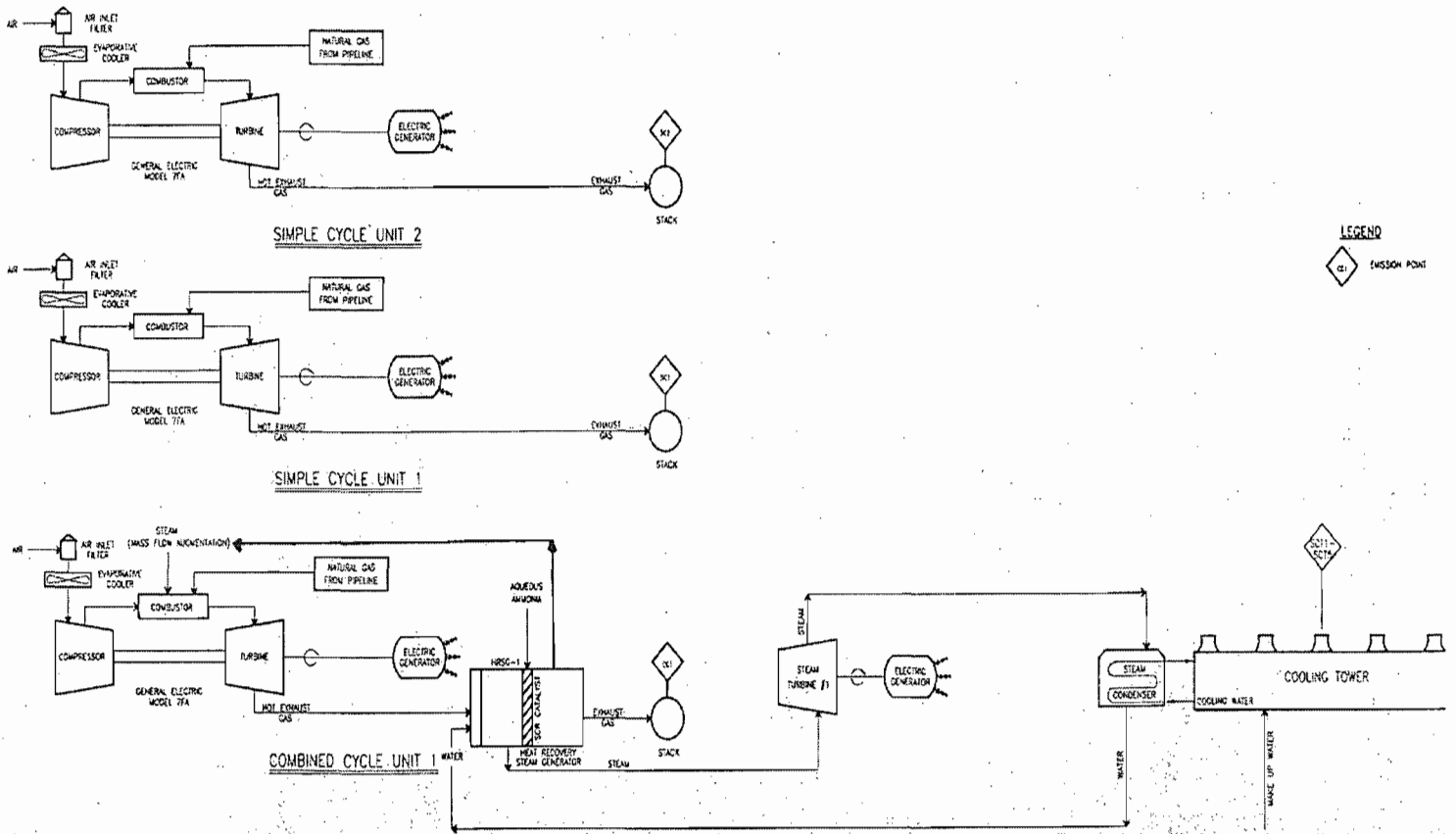


Figure 4 – Process Flow Diagram

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

This PSD review consists of an evaluation of resulting ambient air pollutant concentrations, and increases with respect to the National Ambient Air Quality Standards and Increments as well as a determination of Best Available Control Technology (BACT) for PM/PM₁₀, CO, SO₂, SAM and NO_x. An analysis of the air quality impact from proposed project upon soils, vegetation and visibility is required along with air quality impacts resulting from associated commercial, residential, and industrial growth

The emission units affected by this air construction permit shall comply with all applicable provisions of the Florida Administrative Code (including applicable portions of the Code of Federal Regulations incorporated therein) and, specifically, the following Chapters and Rules related to air:

5.1 State Regulations

Chapter 62-4	Permits.
Rule 62-204.220	Ambient Air Quality Protection
Rule 62-204.240	Ambient Air Quality Standards
Rule 62-204.260	Prevention of Significant Deterioration Increments
Rule 62-204.800	Federal Regulations Adopted by Reference
Rule 62-210.300	Permits Required
Rule 62-210.350	Public Notice and Comments
Rule 62-210.370	Reports
Rule 62-210.550	Stack Height Policy
Rule 62-210.650	Circumvention
Rule 62-210.700	Excess Emissions
Rule 62-210.900	Forms and Instructions
Rule 62-212.300	General Preconstruction Review Requirements
Rule 62-212.400	Prevention of Significant Deterioration
Rule 62-213	Operation Permits for Major Sources of Air Pollution
Rule 62-214	Requirements For Sources Subject To The Federal Acid Rain Program
Rule 62-296.320	General Pollutant Emission Limiting Standards
Rule 62-297.310	General Test Requirements
Rule 62-297.401	Compliance Test Methods
Rule 62-297.520	EPA Continuous Monitor Performance Specifications

5.2 Federal Rules

40 CFR 60	Applicable sections of Subpart A, General Requirements, Subparts Dc, and GG
40 CFR 72	Acid Rain Permits (applicable sections)
40 CFR 73	Allowances (applicable sections)
40 CFR 75	Monitoring (applicable sections including applicable appendices)
40 CFR 77	Acid Rain Program-Excess Emissions (future applicable requirements)

5.2 Manatee County Code of Ordinances

Chapter 1-32	Air Pollution Control
Section 1-32-3	Adoption of State Rules
Section 1-32.5(d)	Prohibitions (fuel sulfur limit)
Section 1-32.6	Permits Required
Section 1-32.7	Prevention of Significant Deterioration

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

6. SOURCE IMPACT ANALYSIS

6.1 Emission Limitations

The proposed project will emit the following PSD pollutants (Table 212.400-2, F.A.C.): PM/PM₁₀, SO₂, NO_x, CO, SAM, and negligible quantities of fluorides (F), mercury (Hg) and lead (Pb). The applicant's proposed annual emissions are summarized in the Table below and form the basis of the source impact review. The Department's proposed permitted allowable emissions are summarized in the Draft BACT document and Specific Condition Nos. 10-16 Section III (Combined Cycle) and Specific Condition Nos. 8-12 Section III (Simple Cycle) of Draft Permit PSD-FL-318.

6.2 Emission Summary

The annual emissions increases for all PSD pollutants as a result of the project are presented below:

PROJECT EMISSIONS (TPY) AND PSD APPLICABILITY

Pollutant	Emissions ¹	PSD Significance	PSD Review?
PM/PM ₁₀ (filterable plus condensable)	181	25	Yes
SO ₂	69	40	Yes
NO _x	391 ²	40	Yes
CO	349	100	Yes
Ozone (VOC)	29	40	No
Sulfuric Acid Mist	10	7	Yes
Total Fluorides	~0	3	No
Mercury	~0	0.1	No
Lead	0.3	0.6	No
HAPs	6	NA	NA

1. Based on 5,000 hours of natural gas firing per year per simple cycle unit, 8,760 hours per year for the combined cycle unit. Includes emergency diesel engines and cooling tower.

2. NO_x emissions will be 365 TPY based on Department's proposed BACT determination.

6.3 Control Technology

The PSD regulations require new major stationary sources to undergo a control technology review for each pollutant that may be potentially emitted above significant amounts. The control technology review requirements of the PSD regulations are applicable to emissions of NO_x, SO₂, CO, SAM, and PM/PM₁₀. Emissions control will be accomplished primarily by good combustion of clean natural gas. The combustors will operate in lean pre-mixed mode to minimize the flame temperature and nitrogen oxides formation potential. A selective catalytic reduction (SCR) system will be installed within the heat recovery steam generator of the single combined cycle unit to effect additional NO_x control. A full discussion is given in the separate Draft Best Available Control Technology (BACT) Determination that is incorporated into this document by reference.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

6.4 Existing Air Quality in the Vicinity of the project

6.4.1 Description of Vicinity

Refer to Figures 1 and 2 above. The project will be located 1 mile northeast of Buckeye Road and U.S. Highway 41 near Piney Point, Manatee County. The site is about 1 mile south of the Manatee and Hillsborough County line.

Port Manatee lies to the west on the coast. An inactive fertilizer complex called Piney Point Phosphates lies immediately to the south of the proposed site. The Department recently approved a nominal 250-megawatt power plant (CPV Manatee) immediately south of the Piney Point Phosphates facility.

Refer to Figure 5. The immediate area is sparsely populated. The County seat is Bradenton, located about 10 miles south of Piney Point. St. Petersburg in Pinellas County is about 10 miles northwest of Piney Point across Tampa Bay. The Tampa Electric Big Bend coal-fired power plant lies about 15 miles northeast of the site near Highway 41. The FPL Manatee residual oil-fired power plant is located less than 10 miles southeast of the site in Parrish.



Figure 5 – Location of Project, Nearby Cities and Power Plants

The immediate surrounding area is a combination of agricultural, industrial, and sparsely populated zones. Figure 6 is a photograph taken from a vantage point on the large gypsum stacks located at Piney Point Phosphates. The photograph shows the planned site of the recently permitted CPV Gulfcoast Power Plant at the intersection of Buckeye and Bud Rhoden Roads. Figure 7 shows the approximate location of the planned El Paso Manatee facility north of the Piney Point Phosphates.

Figure 8 was also taken from the gypsum stack in the direction of the Piney Point Phosphates facility. Figure 9 is a photograph of the 1600-megawatt FPL Manatee Power Plant by State Road 62 in Parrish.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION



Figure 6 – CPV Gulfcoast Site



Figure 7 – Approximate View of El Paso Site



Figure 8 – Fertilizer Complex



Figure 9 – FPL Manatee Power Plant

6.4.2 Climate

The average annual temperature for Manatee County is 72 degrees. Winds are predominately out of the East. Refer to Figure 10 below.

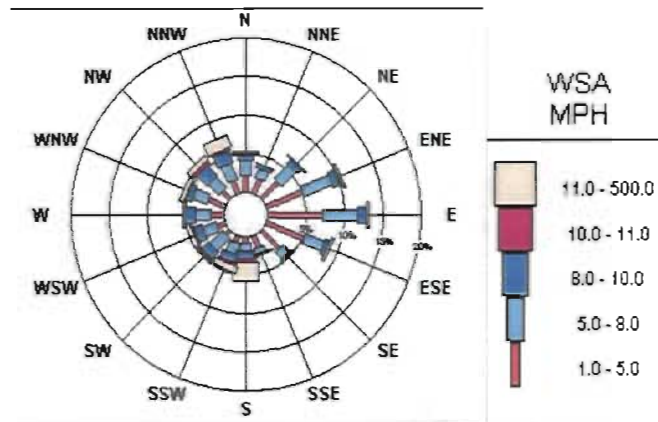


Figure 10 – Manatee County Wind Rose – January 1998 to December 1998

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

6.4.2 Major Stationary Sources in Manatee County

The current largest sources of air pollutants (stack emissions) in Manatee County are listed below:

MAJOR SOURCES OF SO₂ IN MANATEE COUNTY (1999)

Owner/Company	Site Name	Tons per year
Florida Power and Light	Manatee Power Plant	25,340
Piney Point Phosphates (inactive)	Piney Point Phosphates	1320*
Tropicana Products, Inc	Tropicana Products, Inc	330
CPV Gulfcoast, Ltd (permitted)	CPV Gulfcoast, Ltd	76*
El Paso (Proposed)	Manatee Energy Center	69*
Kleensoil International	Mobile Remediation Unit # 1	68

* Potential emissions

MAJOR SOURCES OF NO_x IN MANATEE COUNTY (1999)

Owner/Company	Site Name	Tons per year
Florida Power and Light	Manatee Power Plant	7,823
Tropicana Products, Inc	Tropicana Products	707
El Paso (Proposed)	Manatee Energy Center	365*
Piney Point Phosphates (inactive)	Piney Point Phosphates	169*
CPV Gulfcoast, Ltd (permitted)	CPV Gulfcoast, Ltd	126*
Flowers Baking Company	Flowers Baking Company	5

* Potential emissions

MAJOR SOURCES OF VOC IN MANATEE COUNTY (1999)

Owner/Company	Site Name	Tons per year
Tropicana Products, Inc	Tropicana Products, Inc	1354
Florida Power and Light	Manatee Power Plant	127
American Marine Holdings, Inc	Donzi Marine	71
Flowers Baking Company	Flowers Baking Company	64
Chris Craft Boats	Chris Craft Boats	58
El Paso (proposed)	Manatee Energy Center	29*
Manatee County Utility Dept	Lena Road Landfill	23
CPV Gulfcoast, Ltd (permitted)	CPV Gulfcoast, Ltd	15*

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

MAJOR SOURCES OF PM IN MANATEE COUNTY (1999)

Owner/Company	Site Name	Tons per year
Florida Power and Light	Manatee Power Plant	3,162
El Paso (Future)	Manatee Energy Center	181
Tropicana Products, Inc	Tropicana Products, Inc	170
CPV Gulfcoast, Ltd (under construction)	CPV Gulfcoast, Ltd	57
Flowers Baking Company	Flowers Baking Company	3

6.4.3 Air Quality Monitoring in Manatee County

Manatee County has 7 monitors at 4 sites measuring PM, ozone, SO₂ and NO₂. The 2001 Manatee County monitoring network is shown in Figure 11.

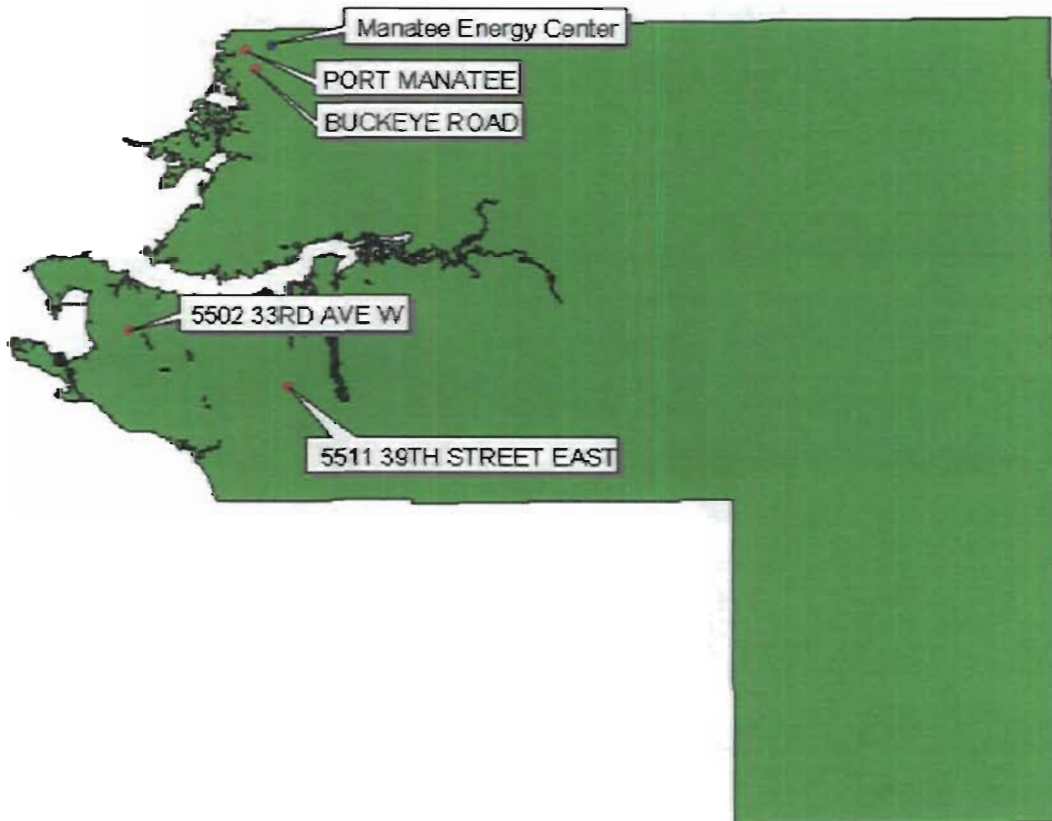


Figure 11 – Manatee County Monitoring Network

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

6.4.4 Ambient Air Quality in Manatee County

Measured ambient air quality is given in the following table. The highest measured values are all less than the respective National Ambient Air Quality Standards. The average measurements are all less than the respective standards.

1999 AMBIENT AIR QUALITY NEAR PROJECT SITE

Pollutant	Site Location			Averaging Period	Ambient Concentration				
	City	Site no.	UTM		1st High	2nd High	Mean	Standard	Units
PM ₁₀	Buckeye Road	081-0008	17-3056.200N-	24-hour	48	42		150 ^c	ug/m ³
			348.100E	Annual			24	50 ^b	ug/m ³
SO ₂	Port Manatee	081-3002	17-3057.318N-	3-hour	60	56		500 ^a	ppb
			347.461E	24-hour	21	17		100 ^a	ppb
				Annual			4	20 ^b	ppb
NO ₂	GT Bray	081-4012	17-3040.318N-	Annual			7	53 ^b	ppb
CO	Tampa	057-1070	17-3096.500N-	1-hour	6	6		35 ^a	ppm
			357.000E	8-hour	4	3		9 ^a	ppm
Ozone	Port Manatee	081-3002	17-3057.318N-	1-hour	0.112	0.111	0.051	0.12 ^c	ppm
			347.461E						

a - Not to be exceeded more than once per year.

b - Arithmetic mean.

c - Not to be exceeded on more than an average of one day per year over a three-year period.

d - Mean ozone value reflects the average daily 1-hour maximum reading Jan.-Sept.99.

6.5 Air Quality Impact Analysis

6.5.1 Introduction

The proposed project will increase emissions of five pollutants at levels in excess of PSD significant amounts: PM/PM₁₀, CO, NO_x, SO₂, and SAM. PM₁₀, SO₂ and NO_x are criteria pollutants and have national and state ambient air quality standards (AAQS), PSD increments, and significant impact levels defined for them. CO is a criteria pollutant and has only AAQS and significant impact levels defined for it. There are no applicable PSD increments, AAQS or de minimis monitoring levels for SAM; the BACT determination will set the emission limits for SAM.

The applicant's initial PM/PM₁₀, CO, NO_x, and SO₂ air quality impact analyses for this project predicted no significant impacts in the vicinity of the project. Therefore, no further applicable AAQS and PSD increment impact analyses for CO, NO_x, PM₁₀ and SO₂ were required in the Class II area. The nearest PSD Class I area is the Chassahowitzka National Wilderness Area (CNWA) located about 110 km to the north. The applicant's PSD Class I air quality analysis showed no significant impacts. Therefore, a cumulative PSD Class I increment analysis was not required. Also, the maximum predicted impacts for all pollutants were below their respective *de minimis* ambient impact levels. Therefore, pre-construction monitoring at the proposed site was not required for this project. Based on the preceding discussion, the air quality analyses required by the PSD regulations for this project were the following:

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

- A significant impact analysis for PM₁₀, CO, SO₂, and NO₂ in the surrounding Class II Area;
- A significant impact analysis for PM₁₀, SO₂, and NO₂ in the CNWA;
- An analysis of impacts on soils, vegetation, visibility, and of growth-related air quality modeling impacts.

Based on these required analyses, the Department has reasonable assurance that the proposed project, as described in this report and subject to the conditions of approval proposed herein, will not cause or significantly contribute to a violation of any AAQS or PSD increment. However, the following EPA-directed stack height language is included: "In approving this permit, the Department has determined that the application complies with the applicable provisions of the stack height regulations as revised by EPA on July 8, 1985 (50 FR 27892). Portions of the regulations have been remanded by a panel of the U.S. Court of Appeals for the D.C. Circuit in NRDC v. Thomas, 838 F. 2d 1224 (D.C. Cir. 1988). Consequently, this permit may be subject to modification if and when EPA revises the regulation in response to the court decision. This may result in revised emission limitations or may affect other actions taken by the source owners or operators." A more detailed discussion of the required analyses follows.

6.5.2 Ambient Monitoring Requirements

Preconstruction ambient air quality monitoring is required for all pollutants subject to PSD review unless otherwise exempted or satisfied. The monitoring requirement may be satisfied by using existing representative monitoring data, if available. Substantial monitoring data exist for the area as discussed in the previous sections.

An exemption to the monitoring requirement may be obtained if the maximum air quality impact resulting from the projected emissions increase, as determined by air quality modeling, is less than a pollutant-specific de minimus concentration. The table below shows that predicted impacts from the combustion turbines are substantially less than the respective de minimus levels; therefore, preconstruction ambient air quality monitoring is not required for any pollutant. Additionally, the approximate high values measured at existing ambient monitoring sites in Manatee County are included for comparison purposes.

Installation of additional monitors near the proposed site will probably not show any increases from the plant because of the very low impact levels. Basically, the highest contribution from the plant would be on the order of 4 percent or less of the highest measured concentrations. This is less than the inherent measurement error in the sampling and analytical techniques.

MAXIMUM PROJECT AIR QUALITY IMPACTS FOR COMPARISON TO THE DE MINIMIS AMBIENT IMPACT LEVELS

Pollutant	Averaging Time	Max Predicted Impact (ug/m ³)	De Minimis Level (ug/m ³)	Baseline Concentrations (ug/m ³)	Impact Greater Than De Minimis?
PM ₁₀	24-hour	2	10	~ 50	NO
NO ₂	Annual	0.04	14	~ 15	NO
SO ₂	24-hour	0.2	13	~ 55	NO
CO	8-hour	3	575	~ 5000	NO

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

6.5.3 Models and Meteorological Data Used in the Air Quality Analysis

PSD Class II Area

The EPA-approved Industrial Source Complex Short-Term (ISCST3) dispersion model was used to evaluate the pollutant emissions from the proposed project in the surrounding Class II Area. This model determines ground-level concentrations of inert gases or small particles emitted into the atmosphere by point, area, and volume sources. It incorporates elements for plume rise, transport by the mean wind, Gaussian dispersion, and pollutant removal mechanisms such as deposition. The ISCST3 model allows for the separation of sources, building wake downwash, and various other input and output features. A series of specific model features, recommended by the EPA, are referred to as the regulatory options. The applicant used the EPA recommended regulatory options. Direction-specific downwash parameters were used for all sources for which downwash was considered. The stacks associated with this project all satisfied the good engineering practice (GEP) stack height criteria.

Meteorological data used in the ISCST3 model consisted of a concurrent 5-year period of hourly surface weather observations and twice-daily upper air soundings from the Tampa International Airport station at Tampa, Florida (surface and upper air data). The 5-year period of meteorological data was from 1987 through 1991. This airport station was selected for use in the study because it is the closest primary weather station to the study area and is most representative of the project site. The surface observations included wind direction, wind speed, temperature, cloud cover, and cloud ceiling.

PSD Class I Area

The California Puff (CALPUFF) dispersion model was used to evaluate the pollutant emissions from the proposed project in the Class I CNWA. Meteorological data used in this model was 1990 ISCST3 data, which was enhanced for CALPUFF. Meteorological surface data used were from Gainesville, Tampa, Daytona Beach, Vero Beach, Fort Myers and Orlando. Meteorological upper air data used were from Ruskin, Apalachicola and West Palm Beach. Hourly precipitation data were obtained from 19 stations around the central part of the state.

CALPUFF is a non-steady state, Lagrangian, long-range transport model that incorporates Gaussian puff dispersion algorithms. This model determines ground-level concentrations of inert gases or small particles emitted into the atmosphere by point, line, area, and volume sources. The CALPUFF model has the capability to treat time-varying sources. It is also suitable for modeling domains from tens of meters to hundreds of kilometers, and has mechanisms to handle rough or complex terrain situations. Finally, the CALPUFF model is applicable for inert pollutants as well as pollutants that are subject to linear removal and chemical conversion mechanism.

6.5.4 Significant Impact Analysis

In order to conduct a significant impact analysis, the applicant uses the proposed project's emissions at worst load conditions as inputs to the models. The highest predicted short-term concentrations and highest predicted annual averages predicted by this modeling are compared to the appropriate significant impact levels for the Class I and Class II Areas. If this modeling at worst load conditions shows significant impacts, additional modeling which includes the emissions from surrounding facilities is required to determine the project's impacts on the existing air quality and any applicable AAQS or PSD increments. If no significant impacts are shown, the applicant is exempted from doing any further modeling.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

For the Class II analysis a combination of fence line, near-field and far-field receptors were chosen for predicting maximum concentrations in the vicinity of the project. The fence line receptors consisted of discrete Cartesian receptors spaced at 50-meter intervals around the facility fence line. The remaining receptor grid consisted of densely spaced Cartesian receptors at 100 meters apart starting at and extending to 1 kilometer at 100 meter spacing from the fence line. Beyond 1 kilometer, polar receptor rings (with 36 receptors per ring at 10 degree intervals) with a spacing of 100 meters were used out to 2 kilometers from the facility. From 2 to 4 kilometers, polar receptor rings with a spacing of 250 meters were used. Between 4 and 10 kilometers, polar receptor rings with a spacing of 500 meters were used.

For the Class I significant impact analysis, thirteen receptors were positioned to define the boundary of the CNWA. The tables below show the applicant's results of the significant impact modeling for the Class II and Class I areas:

MAXIMUM PROJECT AIR QUALITY IMPACTS FROM THE EL PASO PROJECT FOR COMPARISON TO THE PSD CLASS II SIGNIFICANT IMPACT LEVELS

Pollutant	Averaging Time	Max Predicted Impact (ug/m ³)	Significant Impact Level (ug/m ³)	Significant Impact?
SO ₂	Annual	0.01	1	NO
	24-Hour	0.2	5	NO
	3-Hour	1	25	NO
PM ₁₀	Annual	0.1	1	NO
	24-Hour	2	5	NO
CO	8-Hour	3	500	NO
	1-Hour	17	2000	NO
NO ₂	Annual	0.04	1	NO

The results of the applicant's significant impact modeling show that there are no predicted significant impacts due to the PM₁₀, CO, SO₂, and NO₂ emissions from this project in the vicinity of the facility; therefore, no further modeling was required in the Class II area.

MAXIMUM PROJECT AIR QUALITY IMPACTS FROM THE EL PASO PROJECT COMPARED WITH PSD CLASS I SIGNIFICANT IMPACT LEVELS (CHASSAHOWITZKA)

Pollutant	Averaging Time	Max. Predicted Impact at Class I Area (ug/m ³)	Class I Significant Impact Level (ug/m ³)	Significant Impact?
PM ₁₀	Annual	0.002	0.2	NO
	24-hour	0.03	0.3	NO
NO ₂	Annual	0.001	0.1	NO
SO ₂	Annual	0.001	0.1	NO
	24-hour	0.01	0.2	NO
	3-hour	0.03	1	NO

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

The results of the applicant's significant impact modeling for the CNWA show that there are no significant impacts predicted due to SO₂, NO₂, and PM₁₀ emissions from this project; therefore, no further modeling was required in the Class I area for these pollutants.

6.5.5 Additional Impacts Analysis

Impact on Soils, Vegetation, And Wildlife

Very low emissions are expected from these natural gas-fueled combustion turbines in comparison with conventional power plants generating equal power. Emissions of acid rain and ozone precursors will be very low. The maximum ground-level concentrations predicted to occur for PM₁₀, CO, NO_x, and SO₂ as a result of the proposed project, including background concentrations and all other nearby sources, will be considerably less than the respective AAQS. The project impacts are less than the significant impact levels for all pollutants. These values in-turn are less than the respective applicable allowable increments.

The total maximum concentrations predicted to occur for NO_x from the Manatee Energy Center would be about ½ % of the existing NO_x concentrations in Manatee County, which is well below the AAQS. Similarly, maximum predicted SO₂ concentrations would be roughly 1.5% of the existing SO₂ concentrations currently measured in the county, which is also, well below the AAQS.

The concentrations of key pollutants are substantially less than values known to cause damage to vegetation. For example, sensitive vascular plants, such as white ash, sumacs, yellow poplar, goldenrods, legumes, blackberry, southern pine, red oak and ragweeds, are known to be sensitive to short term SO₂ exposure. Injury has been documented at exposures of 790 ug/m³ according to the application. The average long-term and maximum short-term SO₂ concentrations caused by the proposed project are several orders of magnitude less (0.01 – 1 ug/m³). It is also noted that, at the site of the only SO₂ station in the county, the 3-hour average and 24-hour concentrations of SO₂ are 156 and 55 ug/m³ respectively. Therefore, the contribution from the proposed project would be minimal.

Similar analyses apply to the other pollutants and their impacts on soil, vegetation and wildlife. The Department's conclusion is that the effects of the project on soils, vegetation, and wildlife will be minimal or insignificant.

Impact On Visibility and Regional Haze

Natural gas is a clean fuel and produces little ash. This will minimize smoke formation. The low NO_x and SO₂ emissions will also minimize plume visibility (typically zero percent opacity). The contribution to smog in the area will be minimal. The applicant submitted a regional haze analysis for the CNWA. According to the applicant, the regional haze impacts will be below the federal land manager's significant impact levels.

Growth-Related Air Quality Impacts

There will be short-term increases in the labor force to construct the project. These temporary increases will not result in significant commercial and residential growth in the vicinity of the project. When operational, the project will generate approximately 25 jobs at the site. Air quality impacts due to industrial/commercial growth will be minimal according to the application.

Hazardous Air Pollutants

The project is not a major source of hazardous air pollutants (HAPs) and is not subject to any specific industry or HAP control requirements pursuant to Section 112 of the Clean Air Act.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

7. CONCLUSION

Based on the foregoing technical evaluation of the application and additional information submitted by the applicant, the Department has made a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations. In making this preliminary determination, the Department also drafted a determination of Best Available Control Technology that may be modified based on comments from the applicant, agencies, and the public.

Teresa Heron, Permit Engineer
Debbie Galbraith, Meteorologist
A. A. Linero, P.E. Administrator

PERMITTEE:

El Paso Merchant Energy Company
1001 Louisiana Street
Houston, TX 77002

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; 3057.6.0 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 (DRAFT)

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 (NO_x), 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 (DRAFT)

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 (DRAFT)

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 (DRAFT)

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]
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 ammonia injection grid, catalyst, aqueous ammonia storage, monitoring and control system, 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.]

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. COMBINED CYCLE GAS TURBINE

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.]
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.]
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.

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. COMBINED CYCLE GAS TURBINE

- 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 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.
- 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 pounds per hour nor 2.5 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 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.]

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 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 pounds per hour and 1.3 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.]

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.

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. COMBINED CYCLE GAS TURBINE

- c. *Low-Load Restriction*: Except for startup and shutdown, operation under DLN Modes 1, 2, 3, and 4 is prohibited.
- d. *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.]

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.]
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.]

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. COMBINED CYCLE GAS TURBINE

- 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.]

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.

DRAFT

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

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 (DRAFT)

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.]

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 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.]

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

B. SIMPLE CYCLE GAS TURBINES

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)
- 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.]
 - 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.
- 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.
 - 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.
 - Low-Load Restriction*: Except for startup and shutdown, operation under DLN Modes 1, 2, 3, and 4 is prohibited.
 - 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.]

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

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 (DRAFT)

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	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 (DRAFT)

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 (DRAFT)

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 (DRAFT)

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. 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 (DRAFT)

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 (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 (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.

APPENDIX BD
BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

El Paso Manatee Energy Center
PSD-FL-318 and 0810199-001-AC
Manatee County, Florida

BACKGROUND

The applicant, El Paso Merchant Energy Company (El Paso), proposes to install three nominal 175-megawatt (MW) General Electric PG 7241FA (GE 7FA) combustion turbine-electrical generators at the planned Manatee Energy Center near Piney Point, Manatee County. The proposed project will constitute a New Major Facility per Rule 62-212.400(d)2.b., Florida Administrative Code (F.A.C.). It is therefore subject to review for the Prevention of Significant Deterioration (PSD) and a determination of Best Available Control Technology (BACT) per Rule 62-212.400, F.A.C. Emissions of particulate matter (PM and PM₁₀), carbon monoxide (CO), nitrogen oxides (NO_x), sulfur dioxide (SO₂), and sulfuric acid mist (SAM) will exceed the "Significant Emission Rates" with respect to Table 212.400-2, (F.A.C.). PSD and BACT reviews are required for each of these pollutants.

Two of the units will operate in simple cycle mode and intermittent duty while the third will operate in combined cycle mode and continuous duty. The units will exhaust through separate 135-foot stacks. The units will be fired exclusively with pipeline natural gas. El Paso proposes to operate the simple cycle units up to 5,000 hours per year per unit. Descriptions of the process, project, air quality effects, and rule applicability are given in the Technical Evaluation and Preliminary Determination, accompanying the Department's Intent to Issue dated September 7, 2001.

DATE OF RECEIPT OF A BACT APPLICATION:

The application was received on March 28, 2001 (complete June 27) and included a BACT proposal prepared by the applicant's consultant, ECT.

PREPARED BY:

A. A. Linero, P.E.

BACT DETERMINATION REQUESTED BY THE APPLICANT:

POLLUTANT	CONTROL TECHNOLOGY	PROPOSED BACT LIMIT
Nitrogen Oxides	Dry Low NO _x Combustors Selective Catalytic Reduction	9 ppmvd @ 15% O ₂ (simple cycle units) 3.5 ppmvd @ 15% O ₂ (combined cycle)
Particulate Matter	Pipeline Natural Gas Combustion Controls	18.3 pounds per hour (Front + Back Half, Simple) 20 pounds per hour (Front + Back Half, Combined)
Carbon Monoxide	As Above	7.4 ppmvd (Full load, Simple or Combined) 12 ppmvd (Combined Cycle Steam Augmentation)
Sulfur Oxides	As Above	1.5 grains sulfur/100 std cubic feet

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BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

BACT DETERMINATION PROCEDURE:

In accordance with Rule 62-212.400, F.A.C., this BACT determination is based on the maximum degree of reduction of each pollutant emitted which the Department of Environmental Protection (Department), on a case by case basis, taking into account energy, environmental and economic impacts, and other costs, determines is achievable through application of production processes and available methods, systems, and techniques. In addition, the regulations state that, in making the BACT determination, the Department shall give consideration to:

- Any Environmental Protection Agency determination of BACT pursuant to Section 169, and any emission limitation contained in 40 CFR Part 60 - Standards of Performance for New Stationary Sources or 40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants.
- All scientific, engineering, and technical material and other information available to the Department.
- The emission limiting standards or BACT determination of any other state.
- The social and economic impact of the application of such technology.

The EPA currently stresses that BACT should be determined using the "Top-Down" approach, particularly when permits are issued by states acting on behalf of EPA. The Department considers Top-Down to be a useful tool, though not a unique or required approach to achieve a BACT under the State regulations. The first step in this approach is to determine, for the emission unit in question, the most stringent control available for a similar or identical emission unit or emission unit category. If it is shown that this level of control is technically or economically unfeasible for the emission unit in question, then the next most stringent level of control is determined and similarly evaluated. This process continues until the BACT level under consideration cannot be eliminated by any substantial or unique technical, environmental, or economic objections.

STANDARDS OF PERFORMANCE FOR NEW STATIONARY SOURCES:

The minimum basis for a BACT determination is 40 CFR 60, Subpart GG, Standards of Performance for Stationary Gas Turbines (NSPS). The Department adopted subpart GG by reference in Rule 62-204.800, F.A.C. The key emission limits required by Subpart GG are 75 ppmvd NO_x @ 15% O₂ (assuming 25 percent efficiency) and 150 ppmvd SO₂ @ 15% O₂ (or <0.8% sulfur in fuel). The BACT proposed by El Paso is well within the NSPS limit, which allows NO_x emissions in the range of 100 - 110 ppmvd for the high efficiency units to be purchased for the El Paso project.

A National Emission Standard for Hazardous Air Pollutants (NESHAP) under development exists for stationary gas turbines. However this facility will not be subject to the NESHAP or to a requirement for a case-by-case determination of maximum achievable control technology because HAP emissions will be less than 10 TPY.

DETERMINATIONS BY EPA AND STATES:

The following tables include some recently permitted simple and combined cycle turbines. The proposed El Paso project is included to facilitate comparison.

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BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

TABLE 1

RECENT NO_x EMISSION LIMIT PROPOSALS AND DETERMINATIONS FOR "F-CLASS"
SIMPLE CYCLE PROJECTS IN THE SOUTHEAST

Project Location	Power Output (MW)	NO _x Limit ppmvd @ 15% O ₂ and Fuel	Technology	Comments
El Paso Manatee, FL	350	9 NG	DLN	2x175 MW GE 7FA CTs (Gas only)
El Paso Deerfield, FL	525	9 - NG	DLN	3x175 MW GE 7FA CTs Draft 8/2001. Gas Only
Enron Deerfield, FL	510	9 - NG 42 - No. 2 FO	DLN WI	3x170 MW GE 7FA CTs Draft 06/01. 1000 hrs on oil
Pompano Beach, FL	510	9 - NG 42 - No. 2 FO	DLN WI	3x170 MW GE 7FA CTs Draft 03/01. 1000 hrs on oil
Midway St. Lucie, FL	510	9 - NG 42 - No. 2 FO	DLN WI	3x170 MW GE 7FA CTs Issued 2/01. 1000 hrs on oil
DeSoto County, FL	510	9 - NG 42 - No. 2 FO	DLN WI	3x170 MW GE 7FA CTs Issued 7/00. 1000 hrs on oil
Shady Hills Pasco, FL	510	9 - NG 42 - No. 2 FO	DLN WI	3x170 MW GE 7FA CTs Issued 1/00. 1000 hrs on oil
Vandolah Hardee, FL	680	9 - NG 42 - No. 2 FO	DLN WI	4x170 MW GE 7FA CTs Issued 11/99. 1000 hrs on oil
Oleander Brevard, FL	850	9 - NG 42 - No. 2 FO	DLN WI	5x170 MW GE 7FA CTs Issued 11/99. 1000 hrs on oil
JEA Baldwin, FL	510	10.5 - NG 42 - No. 2 FO	DLN WI	3x170 MW GE 7FA CTs Issued 10/99. 750 hrs on oil
TEC Polk Power, FL	330	10.5 - NG 42 - No. 2 F.O.	DLN WI	2x165 MW GE 7FA CTs Issued 10/99. 750 hrs on oil
Dynegy, FL	510	15 - NG	DLN	3x170 MW WH 501F CTs Issued. Gas only
Dynegy Heard, GA	510	15 - NG	DLN	3x170 MW WH 501F CTs Issued. Gas only
Thomaston, GA	680	15 - NG 42 - No. 2 FO	DLN WI	4x170 MW GE 7FA CTs Issued. 1687 hrs on oil
Dynegy Reidsville, NC	900	15 - NG (by 2002) 42 - No. 2 FO	DLN WI	5x180 MW WH 501F CTs Initially 25 ppm NO _x limit on gas Issued. 1000 hrs on oil.
Lyondell Harris, TX	160	25 - NG	DLN	1x160 MW WH 501F CTs Issued 11/99. Gas only
Southern Energy, WI	525	15/12 - NG 42 - No. 2 FO	DLN WI	3x175 MW GE 7FA CTs 15/12 ppm are on 1/24 hr basis Issued 1/99. 800 hrs on oil
Carson Energy, CA	42	5 - NG (LAER)	Hot SCR	42 MW LM6000PA. Startup 1995. Ammonia limit is 20 ppmvd
McClelland AFB, CA	85	5 - NG (LAER)	Hot SCR	85 MW GE 7EA. Applied 1999 Ammonia proposal 10 ppmvd
Lakeland, FL	250 CON	9/9 - NG (by 2002) 42/15 - No. 2 FO	DLN/HSCR WI/HSCR	250 MW WH 501G CT Initially 25 ppm NO _x limit on gas Issued 7/98. 250 hrs on oil.
PREPA, PR	248 CON	10 - No. 2 FO	WI & HSCR	3x83 MW ABB GT11N CTs Issued 12/95.

CON = Continuous DLN = Dry Low NO_x Combustion FO = Fuel Oil GE = General Electric
SC = Simple Cycle SCR = Selective Catalytic Reduction NG = Natural Gas WH = Westinghouse
INT = Intermittent HSCR = Hot SCR WI = Water or Steam Injection ABB = Asea Brown Bovari

El Paso Manatee Energy Center
600-Megawatt Gas Turbine Power Plant

DEP File No. 0810199-001-AC (PSD-FL-318)
Manatee County

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BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

TABLE 2

RECENT CO, VOC, AND PM NO_x EMISSION LIMIT PROPOSALS AND
DETERMINATIONS FOR “F-CLASS” SIMPLE CYCLE PROJECTS

Project Location	CO - ppm (or as indicated)	VOC - ppm (or as indicated)	PM - lb/hr (or as indicated)	Technology and Comments
El Paso Manatee, FL	8 (7.4@15% O ₂) - N	1.4 (1.3@15% O ₂)	18 lb/hr (Front & Back)	Clean Fuels Good Combustion
El Paso Deerfield, FL	8 (7.4@15% O ₂) - NG	1.4 (1.3@15% O ₂)	18 lb/hr (Front & Back)	Clean Fuels Good Combustion
Enron Deerfield, FL	9 - NG 30 - FO	1.4 - NG 1.4 - FO	18 lb/hr - NG 34 lb/hr - FO	Clean Fuels Good Combustion
Pompano Beach, FL	9 - NG 30 - FO	1.4 - NG 1.4 - FO	10 lb/hr - NG 17 lb/hr - FO	Clean Fuels Good Combustion
Midway St. Lucie, FL	9 - NG 30 - FO	1.4 - NG 1.4 - FO	10 lb/hr - NG 17 lb/hr - FO	Clean Fuels Good Combustion
DeSoto County, FL	12 - NG 20 - FO	1.4 - NG 7 - FO	10 lb/hr - NG 17 lb/hr - FO	Clean Fuels Good Combustion
Shady Hills Pasco, FL	12 - NG 20 - FO	1.4 - NG 7 - FO	10 lb/hr - NG 17 lb/hr - FO	Clean Fuels Good Combustion
Vandolah Hardee, FL	12 - NG 20 - FO	1.4 - NG 7 - FO	10 lb/hr - NG 17 lb/hr - FO	Clean Fuels Good Combustion
Oleander Brevard, FL	12 - NG 20 - FO	3 - NG 6 - FO	10% Opacity	Clean Fuels Good Combustion
JEA Baldwin, FL	12 - NG 20 - FO	1.4 - NG/FO Not PSD	9/17 lb/hr - NG/FO 10% Opacity	Clean Fuels Good Combustion
TEC Polk Power, FL	15 - NG 33 - FO	7 - NG 7 - FO	10% Opacity	Clean Fuels Good Combustion
Dynergy, FL	25 - NG	? - NG	? - NG	Clean Fuels Good Combustion
Dynergy Heard Co., GA	25 - NG	? - NG	? - NG	Clean Fuels Good Combustion
Tenaska Heard Co., GA	15 - NG 20 - FO	? - NG ? - FO	? - NG ? lb/hr - FO	Clean Fuels Good Combustion
Dynergy Reidsville, NC	25 - NG 50 - FO	6 lb/hr - NG 8 lb/hr - FO	6 lb/hr - NG 23 lb/hr - FO	Clean Fuels Good Combustion
Lyondell Harris, TX	25 - NG			Clean Fuels Good Combustion
Southern Energy, WI	12@>50% load - NG 15@>75% 24@<75% - FO	2 - NG 5 - FO	18 lb/hr - NG 44 lb/hr - FO	Clean Fuels Good Combustion
RockGen Cristiana, WI	12@>50% load - NG 15@>75% 24@<75% - FO	2 - NG 5 - FO	18 lb/hr - NG 44 lb/hr - FO	Clean Fuels Good Combustion
Carson Energy, CA	6 - NG			Oxidation Catalyst
McClelland AFB, CA	23 - NG	3.9 - NG	7 lb/hr	Clean Fuels Good Combustion
Lakeland, FL	25 - NG or 10 by Ox Cat 75 - FO @ 15% O ₂	4 - NG 10 - FO	10% Opacity	Clean Fuels Good Combustion
PREPA, PR	9 - FO @15% O ₂	11 - FO @15% O ₂	0.0171 gr/dscf	Clean Fuels Good Combustion

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TABLE 3

RECENT NO_x EMISSION LIMIT PROPOSALS AND DETERMINATIONS FOR “F-CLASS”
 COMBINED CYCLE PROJECTS IN THE SOUTHEAST

Project Location	Capacity Megawatts	NO _x Limit ppmvd @ 15% O ₂ and Fuel	Technology	Comments
El Paso Manatee, FL	250	2.5 – NG	SCR	175 MW GE 7FA
El Paso Deerfield, FL	250	2.5 – NG	SCR	175 MW GE 7FA Draft 8/2001
CPV Pierce, FL	245	2.5 – NG 10 – FO	SCR	170 MW GE 7FA CT 7/2001
Metcalf Energy, CA	600	2.5 – NG	SCR	2x170 MW WH501F & Duct Burners
Enron/Ft. Pierce, FL	~250	3.5 – NG 10 – FO	SCR	170 MW MHI501F CT Repowering
CPV Atlantic, FL	245	3.5 – NG 10 – FO	SCR	170 MW GE 7FA CT
CPV Gulfcoast, FL	245	3.5 – NG 10 – FO	SCR	170 MW GE 7FA CT
TECO Bayside, FL	1750	3.5 – NG 12 – FO	SCR	7x170 MW GE 7FA CTs Repowering
FPC Hines II, FL	530	3.5 – NG 12 – FO	SCR	2x170 MW WH501F
Calpine Osprey, FL	527	3.5 – NG	SCR	2x170 MW WH501F Draft 5/00
Calpine Blue Heron, FL	1080	3.5 – NG	SCR	4x170 MW WH501F Draft 2/00
Santee Cooper, SC	~500	9 – NG	DLN	2x170 MW GE 7FA CTs ~ 4/00
Mobile Energy, AL	~250	~3.5 – NG ~11 – FO	SCR	178 MW GE 7FA CT 1/99
Alabama Power Barry	800	3.5 – NG	SCR	3x170 MW GE 7FA CTs 11/98
Alabama Power Theo	210	3.5 – NG	SCR	4x170 MW GE 7FA CTs 11/98
KUA Cane Island 3, FL	250	3.5 – NG (12 – simple cycle) 15 – FO	SCR	170 MW GE 7FA. 11/99 DLN on simple cycle
Lake Worth LLC, FL	250	9 or 3.5 – NG 9.4 or 3.5 – NG (CT&DB) 42 or 16.4 – FO	DLN or SCR DLN or SCR WI or SCR	170 MW GE 7FA. 11/99 Increase allowed for DB under DLN.
Miss Power Daniel	1000	3.5 – NG	SCR	4x170 MW GE 7FA CTs 11/98

DB = Duct Burner
 NG = Natural Gas
 FO = Fuel Oil

DLN = Dry Low NO_x Combustion
 SCR = Selective Catalytic Reduction
 WI = Water or Steam Injection

GE = General Electric
 WH = Westinghouse
 CT = Combustion Turbine

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TABLE 4

RECENT CO, VOC, AND PM NO_x EMISSION LIMIT PROPOSALS AND
DETERMINATIONS FOR "F-CLASS" COMBINED CYCLE PROJECTS

Project Location	CO - ppmvd (or lb/mmBtu)	VOC - ppmv (or lb/mmBtu)	PM - lb/mmBtu (or gr/dscf or lb/hr)	Technology and Comments
El Paso Manatee, FL	9 (7.4 @15% O ₂) 15 (12 @15% O ₂) (PA)	1.4 - NG	20 lb/hr – (Front & Back) 5 ppmvd Ammonia Slip	Clean Fuels Good Combustion
El Paso Deerfield, FL	9 (7.4 @15% O ₂) 15 (12 @15% O ₂) (PA)	1.4 - NG	20 lb/hr – (Front & Back) 5 ppmvd Ammonia Slip	Clean Fuels Good Combustion
CPV Pierce, FL	9 - NG (50 - 100% load) 15 - NG (PA) 20 - FO	1.4 - NG 3.5 FO	11 lb/hr – NG (front) 36 lb/hr – FO (front) 5 ppmvd Ammonia Slip	Clean Fuels Good Combustion
Metcalf Energy, CA	6 - NG (100% load)	.00126 lb/mmBtu-NG	12 lb/hr – NG (w DB) 5 ppmvd Ammonia Slip	Clean Fuels Good Combustion
Enron Ft. Pierce, FL	3.5 - NG 10 - Low Load 8 - FO	2.2 - NG 16 – Low Load 10 - FO	10% Opacity	Oxidation Catalyst Clean Fuels Good Combustion
CPV Atlantic, FL	9 - NG (50 - 100% load) 15 - NG (PA) 20 - FO	1.4 - NG 3.5 FO	11 lb/hr – NG (front) 36 lb/hr – FO (front) 5 ppmvd Ammonia Slip	Clean Fuels Good Combustion
CPV Gulfcoast, FL	9 - NG (50 - 100% load) 15 - NG (PA) 20 - FO	1.4 - NG 3.5 FO	11 lb/hr – NG (front) 36 lb/hr – FO (front) 5 ppmvd Ammonia Slip	Clean Fuels Good Combustion
TECO Bayside, FL	9 – NG (24-hr CEMS) 20 – FO (24-hr CEMS)	1.3 – NG 3 – FO	12 lb/hr – NG 30 lb/hr - FO	Clean Fuels Good Combustion
FPC Hines II, FL	16 - NG (24-hr CEMS) 30 – FO (24-hr CEMS)	2 – NG 10 – FO	10% Opacity – NG 5/9 ammonia – NG/FO	Clean Fuels Good Combustion
Calpine Osprey, FL	10 – NG 17 – NG (DB&PA)	2.3 – NG 4.6 – NG (DB&PA)	24 lb/hr – NG (DB&PA) 10 percent Opacity 9 ppmvd Ammonia Slip	Clean Fuels Good Combustion
Calpine Blue Heron, FL	10 – NG (24-hr CEMS) 17 – NG (DB&PA)	1.2 – NG 6.6 – NG (DB&PA)	31.9 lb/hr – NG (DB&PA) 10 percent Opacity 5 ppmvd Ammonia Slip	Clean Fuels Good Combustion
Mobile Energy, AL	~18 – NG ~26 – FO	~5 – NG ~6 - FO	10% Opacity	Clean Fuels Good Combustion
Alabama Power Barry	~15 – NG(CT) ~25 – NG(DB & CT)	~8 - NG(CT) ~12 – NG(CT & DB)	0.010 lb/mmBtu – (CT) 0.011 lb/mmBtu -(CT/DB) 10% Opacity	Clean Fuels Good Combustion
Alabama Power Theo	~36 – CT & DB	~12.5 CT & DB		Clean Fuels Good Combustion
KUA Cane Island	10 - NG (CT) 20 - NG (CT&DB) 30 - FO	1.4 - NG (CT) 4 - NG (CT&DB) 10 - FO	10% Opacity	Clean Fuels Good Combustion
Lake Worth LLC, FL	9 - NG (CT) 15 – NG (CT & DB) 20 - F.O. (3-hr)	1.4 - NG (CT) 1.8 - NG (CT & DB) 3.5 – F.O.	10% Opacity	Clean Fuels Good Combustion
Miss Power Daniel	~15 - NG(CT) ~25 – NG(DB & CT)	~8 - NG(CT) ~12 – NG(CT & DB)	0.010 lb/mmBtu – (CT) 0.011 lb/mmBtu -(CT/DB) 10% Opacity	Clean Fuels Good Combustion

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All of the projects listed above control SO₂ and sulfuric acid mist by limiting the sulfur content of the fuel. In every case, pipeline quality natural gas is used and has a sulfur content less than 2 grains per 100 cubic feet. In some cases, the limits are even lower or are expressed in different terms. However all ultimately rely on a fairly uniform gas distribution network and have very little flexibility in actually controlling sulfur content. Similarly, emissions of these two pollutants are controlled by using 0.05 percent sulfur distillate fuel oil.

Some of the projects listed above include front and back half catch for PM limits. Therefore comparison is not simple.

REVIEW OF NITROGEN OXIDES CONTROL TECHNOLOGIES:

Some of the discussion in this section is based on a 1993 EPA document on Alternative Control Techniques for NO_x Emissions from Stationary Gas Turbines. Project-specific information is included where applicable.

Nitrogen Oxides Formation

Nitrogen oxides form in the gas turbine combustion process as a result of the dissociation of molecular nitrogen and oxygen to their atomic forms and subsequent recombination into seven different oxides of nitrogen. Thermal NO_x forms in the high temperature area of the gas turbine combustor. Thermal NO_x increases exponentially with increases in flame temperature and linearly with increases in residence time. Flame temperature is dependent upon the ratio of fuel burned in a flame to the amount of fuel that consumes all of the available oxygen.

By maintaining a low fuel ratio (lean combustion), the flame temperature will be lower, thus reducing the potential for NO_x formation. Prompt NO_x is formed in the proximity of the flame front as intermediate combustion products. The contribution of Prompt to overall NO_x is relatively small in near-stoichiometric combustors and increases for leaner fuel mixtures. This provides a practical limit for NO_x control by lean combustion.

In all but the most recent gas turbine combustor designs, the high temperature combustion gases are cooled to an acceptable temperature with dilution air prior to entering the turbine (expansion) section. The sooner this cooling occurs, the lower the thermal NO_x formation. Cooling is also required to protect the first stage nozzle. When this is accomplished by air cooling, the air is injected into the component and is ejected into the combustion gas stream, causing a further drop in combustion gas temperature. This, in turn, lowers achievable thermal efficiency for the unit.

The relationship between flame temperature, firing temperature, unit efficiency, and NO_x formation can be appreciated from Figure 1 which is from a General Electric discussion on these principles.

Fuel NO_x is formed when fuels containing bound nitrogen are burned. This phenomenon is not important for natural gas-fired projects such as the El Paso Manatee Energy Center.

Uncontrolled emissions range from about 100 to over 600 parts per million by volume, dry, corrected to 15 percent oxygen (ppmvd @15% O₂). The Department estimates uncontrolled emissions at approximately 200 ppmvd @15% O₂ for each turbine of the El Paso project. The proposed NO_x controls will reduce these emissions significantly.

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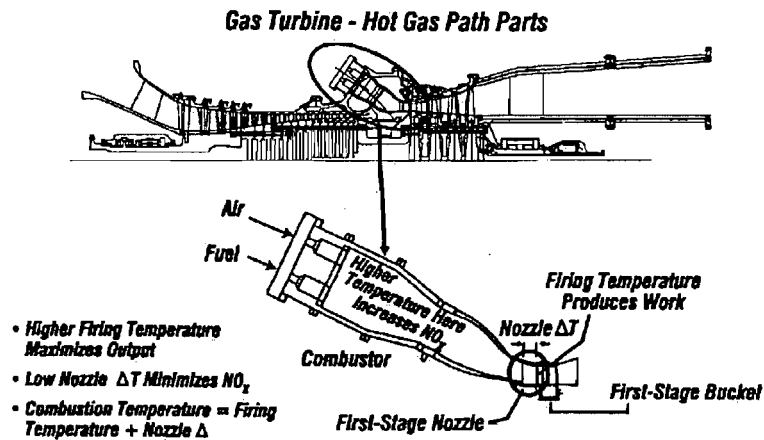


Figure 1 – Relation Between Flame Temperature and Firing Temperature

NO_x Control Techniques

Wet Injection

Injection of either water or steam directly into the combustor lowers the flame temperature and thereby reduces thermal NO_x formation. Typical emissions achieved by wet injection are in the range of 15–25 ppmvd when firing gas and 42 ppmvd when firing fuel oil in large combustion turbines. These values often form the basis, particularly in combined cycle turbines, for further reduction to BACT limits by other techniques. Carbon monoxide (CO) and hydrocarbon (HC) emissions are relatively low for most gas turbines. However steam and (more so) water injection may increase emissions of both of these pollutants.

Combustion Controls: Dry Low NO_x (DLN)

The excess air in lean combustion cools the flame and reduces the rate of thermal NO_x formation. Lean premixing of fuel and air prior to combustion can further reduce NO_x emissions. This is accomplished by minimizing localized fuel-rich pockets (and high temperatures) that can occur when trying to achieve lean mixing within the combustion zones.

The above principle is incorporated into the General Electric DLN-2.6 can-annular combustor shown in Figure 2.

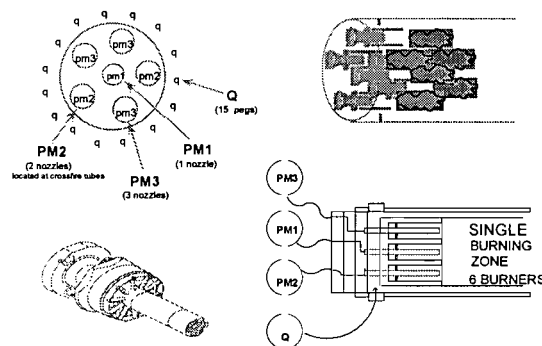


Figure 2 – DLN-2.6 Fuel Nozzle Arrangement

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Each combustor includes six nozzles within which fuel and air have been fully pre-mixed. There are 16 small fuel passages around the circumference of each combustor can known as quarternary fuel pegs. The six nozzles are sequentially ignited as load increases in a manner that maintains lean pre-mixed combustion and flame stability.

Design emission characteristics of the DLN-2.6 combustor while firing natural gas are given in Figure 3 for a unit tuned to meet a 15 ppmvd NO_x limit (by volume, dry corrected to at 15 percent oxygen) at JEA’s Kennedy Station. The combustor can be tuned differently to achieve emissions as low as 9 ppm of NO_x.

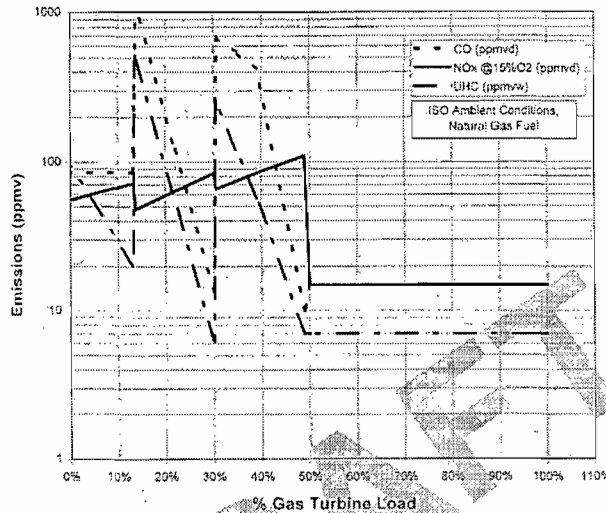


Figure 3 – Emissions Characteristics for DLN-2.6 (if tuned to 15 ppmvd NO_x)

The combustor emits NO_x at concentrations of 15 ppmvd at loads between 50 and 100 percent of capacity, but concentrations as high as 100 ppmvd may occur at less than 50 percent of capacity. Note that VOC comprises a very small amount of the “unburned hydrocarbons” which in turn is mostly non-VOC methane.

Following are the results of the new and clean tests conducted on a dual-fuel GE 7FA combustion turbine operating in combined cycle mode and burning natural gas at the City of Tallahassee Purdom Station Unit 8.¹ The DLN-2.6 combustors for this project were guaranteed to achieve 9 ppmvd of NO_x while burning natural gas although the permit limit is 12 ppmvd. The results are all superior to the emission characteristics given in Figure 3.

Percent of Full Load	NO _x (ppmvd @15% O ₂)	CO (ppmvd)
70	7.2	
80	6.1	
90	6.6	
100	8.7	0.85
Limit	12	25

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Following are the results of the new and clean tests conducted on a dual-fuel GE 7FA combustion turbine operating in simple cycle mode and burning natural gas at the Tampa Electric Polk Power Station.² The DLN 2-6 combustors for this project were guaranteed to achieve 9 ppmvd of NO_x while burning natural gas although the permit limit is 10.5 ppmvd. Again, the results are all superior to the emission characteristics given in Figure 3.

Percent of Full Load	NO _x (ppmvd @15% O ₂)	CO (ppmvd)	VOC (ppmvd)
50	5.3	1.6	0.5
70	6.3	0.5	0.4
85	6.2	0.4	0.2
100	7.6	0.3	0.1
Limit	10.5	15	7

Recent conversations with other operators indicate that the “Dry Low NO_x” characteristics extend to operations less than 50 percent of full load, though such operation is not (yet) guaranteed by GE.³

An important consideration is that power and efficiency are sacrificed in the effort to achieve low NO_x by combustion technology. This limitation is seen in Figure 4 from an EPRI report.⁴ Developments such as single crystal blading, aircraft compressor design, high technology blade cooling have helped to greatly increase efficiency and lower capital costs. Further improvements are more difficult in large part because of the competing demands for air to support lean premix combustion and to provide blade cooling. New concepts are under development by GE and the other turbine manufacturers to meet the challenges implicit in Figure 4.

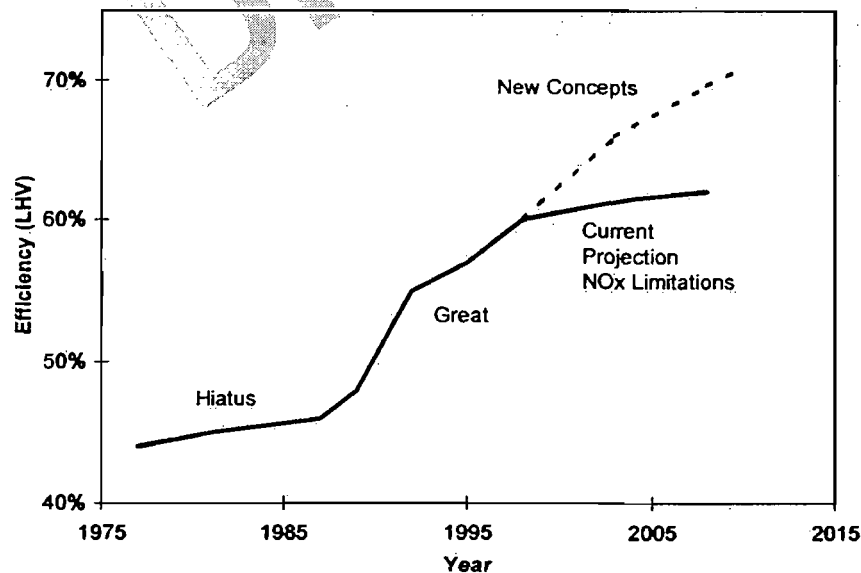


Figure 4 – Efficiency Increases in Combustion Turbines

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Further NO_x reductions related to flame temperature control are possible such as closed loop steam cooling. This feature is available only in larger units (G or H Class technology) than the units planned by El Paso. It is more feasible for a combined cycle unit with a heat recovery steam generator (HRSG). In simple cycle, a once-through steam generator would be required. Steam is circulated through the internal portion of the nozzle component, the transition piece between the combustor and the nozzle, or certain turbine blades. The difference between flame temperature and firing temperature into the first stage is minimized and higher efficiency is attained. Flame temperatures and NO_x emissions can therefore be maintained at comparatively low levels even at high firing temperatures (refer back to Figure 1). At the same time, thermal efficiency should be greater when employing steam cooling instead of air cooling.

Catalytic Combustion: XONON™

Catalytic combustion involves using a catalytic bed to oxidize a lean air and fuel mixture within a combustor instead of burning with a flame as described above. In a catalytic combustor the air and fuel mixture oxidizes at lower temperatures, producing less NO_x.⁵ In the past, the technology was not reliable because the catalyst would not last long enough to make the combustor economical.

There has been increased interest in catalytic combustion as a result of technological improvements and incentives to reduce NO_x emissions without the use of add-on control equipment and reagents. Westinghouse, for example, is working to replace the central pilot in its DLN technology with a catalytic pilot in a project with Precision Combustion Inc.

Catalytica has developed a system know as XONON™, which works by partially burning fuel in a low temperature pre-combustor and completing the combustion in a catalytic combustor. The overall result is low temperature partial combustion (and thus lower NO_x production) followed by flameless catalytic combustion to further attenuate NO_x formation.

In 1998, Catalytica announced the startup of a 1.5 MW Kawasaki gas turbine equipped with XONON™.⁶ The turbine is owned by Catalytica and is located at the Gianera Generating Station of Silicon Valley Power, a municipally owned utility serving the City of Santa Clara, California. Previously, this turbine and XONON™ system had successfully completed over 1,200 hours of extensive full-scale tests at a project development facility in Oklahoma that documented XONON's ability to limit emissions of NO_x to less than 3 ppmvd.

Recently, Catalytica and GE announced that the XONON™ combustion system has been specified as the *preferred* emissions control system with GE 7FA turbines that have been ordered for Enron's proposed 750 MW Pastoria Energy Facility.⁷ The project will enter commercial operation by the summer of 2001. However actual installation of XONON™ is doubtful.

In principle, XONON™ will work on a simple cycle project. However, the Department does not have information regarding the status of the technology for fuel oil firing and cycling operations.

Selective Catalytic Combustion: SCR

Selective catalytic reduction (SCR) is an add-on NO_x control technology that is employed in the exhaust stream following the gas turbine. SCR reduces NO_x emissions by injecting ammonia into the flue gas in the presence of a catalyst. Ammonia reacts with NO_x in the presence of a catalyst and excess oxygen yielding molecular nitrogen and water. The catalysts used in combined cycle, low temperature applications (conventional SCR), are usually vanadium or titanium oxide and

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account for almost all installations. For high temperature applications (Hot SCR up to 1100 °F), such as simple cycle turbines, zeolite catalysts are available but used in few applications to-date. SCR units are typically used in combination with wet injection or DLN combustion controls.

In the past, sulfur was found to poison the catalyst material. Sulfur-resistant catalyst materials are now becoming more available. Catalyst formulation improvements have proven effective in resisting sulfur-induced performance degradation with fuel oil in Europe and Japan, where conventional SCR catalyst life in excess of 4 to 6 years has been achieved, while 8 to 10 years catalyst life has been reported with natural gas.

Excessive ammonia use tends to increase emissions of CO, ammonia (slip) and particulate matter (when sulfur-bearing fuels are used).

Kissimmee Utilities Authority (KUA) installed an SCR system at the Cane Island Unit 3 project. The KUA project will meet a limit of 3.5 ppmvd with a combination of DLN and SCR. Permits were issued recently to Competitive Power Ventures (CPV), Calpine, Florida Power Corporation, and Tampa Electric to achieve 3.5 ppmvd. More recently a permit was issued to CPV for its Pierce, Polk County project with a limit of 2.5 ppmvd @15% O₂ by SCR.

Figure 5 below is a diagram of a HRSG including an SCR reactor with honeycomb catalyst and the ammonia injection grid. The SCR system lies between low and high-pressure steam systems where the temperature requirements for conventional SCR can be met. Figure 6 is a photograph of FPC Hines Energy Complex. The external lines to the ammonia injection grid are easily visible. The magnitude of the installation can be appreciated from the relative size compared with nearby individuals and vehicles.

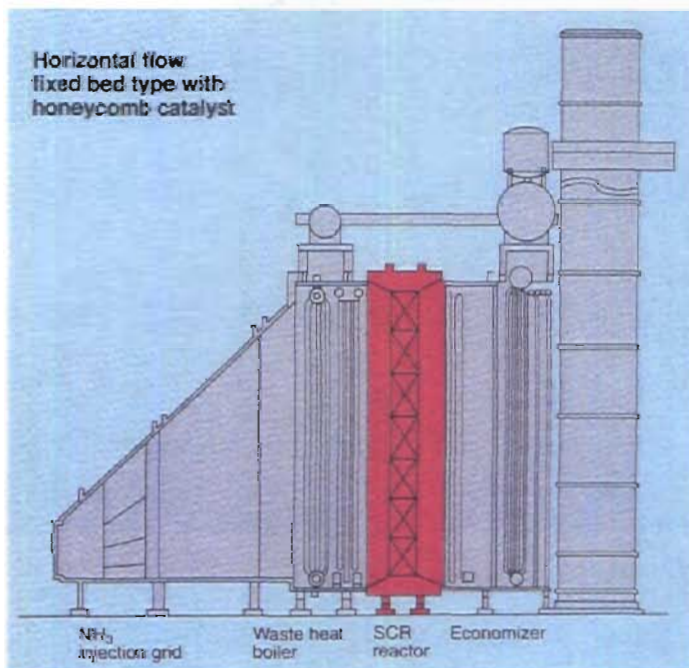


Figure 5 -- SCR System within HRSG



Figure 6 – FPC Hines Power Block I

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Selective Non-Catalytic Combustion

Selective non-catalytic reduction (SNCR) works on the same principle as SCR. The differences are that it is applicable to hotter streams than conventional or hot SCR, no catalyst is required, and urea can be used as a source of ammonia. No applications have been identified wherein SNCR was applied to a gas turbine because the exhaust temperature of 1100 °F is too low to support the NO_x removal mechanism.

The Department did, however, specify SNCR as one of the available options for the combined cycle Santa Rosa Energy Center. The project will incorporate a large 600 MMBtu/hr duct burner in the heat recovery steam generator (HRSG) and can provide the acceptable temperatures (between 1400 and 2000 °F) and residence times to support the reactions.

SCONO_xTM

SCONO_xTM is a catalytic add-on technology that achieves NO_x control by oxidizing and then absorbing the pollutant onto a honeycomb structure coated with potassium carbonate. The pollutant is then released as molecular nitrogen during a regeneration cycle that requires dilute hydrogen gas. The technology has been demonstrated on small units in California and has been purchased for a small source in Massachusetts.⁸

California regulators and industry sources stated that the first 250 MW block to install SCONO_xTM will be at PG&E's La Paloma Plant near Bakersfield.⁹ The overall project includes several more 250 MW blocks with SCR for control.¹⁰ USEPA has identified an "achieved in practice" BACT value of 2.0 ppmvd over a three-hour rolling average based upon the recent performance of a Vernon, California natural gas-fired 32 MW combined cycle turbine equipped with SCONO_xTM.

SCONO_xTM technology (at 2.0 ppmvd) is considered to represent LAER in non-attainment areas where cost is not a factor in setting an emission limit. It competes with less-expensive SCR in those areas, but has the advantages that it does not cause ammonia emissions in exchange for NO_x reduction. Advantages of the SCONO_xTM process include in addition to the reduction of NO_x, the elimination of ammonia and the control of VOC and CO emissions. SCONO_xTM has not been applied on any major sources in ozone attainment areas.

Recently EPA Region IX acknowledged that SCONO_xTM was demonstrated in practice to achieve 2.0 ppmv NO_x.¹¹ Permitting authorities planning to issue permits for future combined cycle gas turbine systems firing exclusively on natural gas, and subject to LAER must recognize this limit which, in most cases, would result in a LAER determination of 2.0 ppmvd. More recently, Goal Line announced that SCONO_xTM has in practice achieved emissions of 1.3 ppmvd.¹²

According to a recent press release, the Environmental Segment of ABB Alstom Power offers the technology (with performance guarantees) to "all owners and operators of natural gas-fired combined cycle combustion turbines, regardless of size."¹³

SCONO_x requires a much lower temperature regime that is not available in simple cycle units and is therefore not feasible for the simple cycle units proposed in this application.

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REVIEW OF SULFUR DIOXIDE (SO₂) AND SULFURIC ACID MIST (SAM)

SO₂ control processes can be classified into five categories: fuel/material sulfur content limitation, absorption by a solution, adsorption on a solid bed, direct conversion to sulfur, or direct conversion to sulfuric acid. A review of the BACT determinations for combustion turbines contained in the BACT Clearinghouse shows that the exclusive use of low sulfur fuels constitutes the top control option for SO₂ from natural gas and fuel oil-fired combustion turbines.

For this project, the applicant has proposed as BACT the use of pipeline natural gas. The applicant estimated total emissions for the project at 69 TPY of SO₂ and 10 TPY of SAM. The Department expects the emissions to be lower because the typical natural gas in Florida contains less than the 1.5 grains of sulfur per 100 standard cubic feet (gr S/100scf) specification proposed by El Paso. This value is well below the "default" maximum value of 20 gr S/100 scf characteristic of natural gas, but is still high enough to require a BACT determination.

REVIEW OF PARTICULATE MATTER (PM/PM₁₀) CONTROL TECHNOLOGIES:

Particulate matter is generated by various physical and chemical processes during combustion and will be affected by the design and operation of the NO_x controls. The particulate matter emitted from this unit will mainly be less than 10 microns in diameter (PM₁₀).

Natural gas will be the only fuel fired and is efficiently combusted in gas turbines. Clean fuels are necessary to avoid damaging turbine blades and other components already exposed to very high temperature and pressure. Natural gas is an inherently clean fuel and contains no ash.

A technology review indicated that the top control option for PM/PM₁₀ is a combination of good combustion practices, fuel quality, and filtration of inlet air. Total annual emissions of PM₁₀ for the project are expected to be approximately 181 tons per year (including filterable and condensable particulate fractions).

Drift eliminators will be installed on the freshwater mechanical draft cooling tower to reduce PM/PM₁₀. The drift eliminators proposed by El Paso will reduce drift to 0.0005 percent of the circulating water flow rate. This is equivalent to approximately 1 and 1.6 tons per year of PM₁₀ and PM respectively.

REVIEW OF CARBON MONOXIDE (CO) CONTROL TECHNOLOGIES

CO is emitted from combustion turbines due to incomplete fuel combustion. Combustion design and catalytic oxidation are the control alternatives that are viable for the project. The most stringent control technology for CO emissions is the use of an oxidation catalyst.

CO is emitted from combustion turbines due to incomplete fuel combustion. Most combustion turbines incorporate good combustion to minimize emissions of CO. There is a great deal of uncertainty regarding actual CO emissions from installed units. Despite the relatively high BACT limits typically proposed when using combustion controls, much lower emissions have actually been reported from several facilities without use of oxidation catalyst. For example, although Westinghouse does not offer a single digit CO guarantee on the 501F, the units installed at the FPC Hines Energy Complex achieved CO emissions in the range of 1-3 ppmvd on both gas and fuel oil at full load.¹² As previously discussed, GE 7FA units achieved similar results when firing gas at the City of Tallahassee Purdom Unit 8 and the TECO Polk Power Station Unit 2 at loads between 50 and 100 percent.

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CO emissions *should* be low (at least at full load) because of the very high combustion temperatures characteristic of “F-Class” turbines. It appears that contract writing has not yet “caught up” with the field experience to consistently guarantee low CO emissions for F-Class units, at least at high loads.

One alternative is to complete the combustion by installation of an oxidation catalyst. Among the most recently permitted projects with oxidation catalyst requirements are the 500 MW Wyandotte Energy project in Michigan, the El Dorado project in Nevada, Ironwood in Pennsylvania, Millennium in Massachusetts, and Sutter Calpine in California. The permitted CO values of these units are between 3 and 5 ppmvd.

A recent permit was issued by the Bay Area AQMD in California for the Metcalf Energy Center. The limit for CO from a Siemens-Westinghouse 501F gas turbine is 6 ppmvd (at full load). No Catalyst is required. However it is doubtful that performance can be maintained at low load.

A recent draft permit was issued by the Department that limits CO to 3.5 ppmvd on a Mitsubishi 501F combustion turbine.¹⁵ Enron will install an oxidation catalyst at Ft. Pierce in order to avoid high CO emissions at low load (<70 percent of full load). This results in the ability to obtain a guarantee for the low permitted level at full load. This would not have been a concern if the units were GE7FAs for the reasons discussed above.

The limit proposed by El Paso for the Manatee Energy Center under normal operation is 7.4 ppmvd @15% O₂ at full load. This is consistent with the description of the DLN-2.6 technology. The expected results are 1-2 ppmvd and are actually better than what the Enron and Metcalf projects will likely achieve across the 50-100 percent operating range.

A higher limit of 12 ppmvd @15% O₂ is proposed during power augmentation for the combined cycle unit. Under this mode, steam from the HRSG is re-injected into the combustors to boost power production. One consequence is that CO emissions can increase.

Total annual emissions of CO for the project are expected to be approximately 349 tons per year.

REVIEW OF VOLATILE ORGANIC COMPOUND (VOC) CONTROL TECHNOLOGIES

Volatile organic compound (VOC) emissions, like CO emissions, are formed due to incomplete combustion of fuel. The high flame temperature is very efficient at destroying VOC. The applicant has proposed good combustion practices to control VOC. The limit proposed by El Paso for this project is 1.4 ppmvd @ 15% O₂ for all modes of operation. According to GE (and Department data), VOC emissions less than 1.4 ppm were achieved during recent tests of the DLN-2.6 technology when firing natural gas.¹⁶

Based on the chosen equipment, the Department believes that annual VOC emissions will be less than 40 TPY. Therefore a BACT determination is not required.

BACKGROUND ON PROPOSED GAS TURBINE

El Paso plans to install three nominal 175-MW General Electric 7FA gas turbines, one of which will operate in combined cycle mode. Per the discussion above, such units are capable of achieving and have achieved (with DLN and SCR technology) all of the emission limits proposed by El Paso as BACT.

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The GE Speedtronic™ Mark VI Gas Control System will be used. This control system is designed to fulfill all gas turbine control requirements. These include fuel control in accordance with the requirements of the speed, load control under part-load conditions, temperature control under maximum capability conditions, or during start-up conditions. The Mark VI also monitors the DLN process and controls fuel staging and combustion modes to maintain the programmed NO_x values.¹⁷

STARTUP AND SHUTDOWN EMISSIONS

The Department defines “Startup” as follows¹⁸:

“Startup” - The commencement of operation of any emissions unit which has shut down or ceased operation for a period of time sufficient to cause temperature, pressure, chemical or pollution control device imbalances, which result in excess emissions.

The Department permits excess emissions during startup and shut down as follows:¹⁹

Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) 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.

The Department defines “Excess Emissions” as follows:²⁰

“Excess Emissions” - Emissions of pollutants in excess of those allowed by any applicable air pollution rule of the Department, or by a permit issued pursuant to any such rule or Chapter 62-4, F.A.C. The term applies only to conditions which occur during startup, shutdown, sootblowing, load changing or malfunction.

The U.S. EPA Region IV office recently recommended that the Department consider “establishment of establishment of startup and shutdown BACT for CO and NO_x such as mass emission limits (e.g., pounds of emissions in any 24-hour period) that include startup and shutdown emissions, or future emission limits derived from monitoring results during the first few months of commercial operation.”²¹

The Department reviewed a number of emission estimates and permit conditions addressing startup and shutdowns for projects in California, Georgia, Washington, and Mississippi and has determined that much of the information is based on estimates that are very difficult to verify.

A review of published General Electric information indicates that features are incorporated into the design of the DLN-2.6 technology specifically aimed at minimizing emissions. One of the key elements was to incorporate lean pre-mixed burning while operating the unit in low load and startup.²² This is in contrast with the previous DLN-2.0 technology that relied on diffusion mode combustion at four of the burners in each combustor during startup and low load operation.

During startup, NO_x concentrations in the exhaust of a simple cycle unit are greater than during full-load operation. The concentrations are estimated at 20 to 80 ppmvd @15% O₂ during the first 10 minutes or so after the unit is actually firing fuel. This occurs while only one to four of the six nozzles shown in Figure 2 are in operation on each combustor.

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Within the following 5 minutes, the unit switches to Mode 5 (or 5 Q), during which NO_x concentrations are typically less than 10 ppmvd even though the unit is not yet at full load.²³ The Low-NO_x modes occurs when at least the five outer nozzles are in operation.

Given the short duration and the relatively low exhaust rate (and load) during the high pollutant concentration phases of simple cycle startup, the Department believes that the NO_x emissions during the first hour of startup and operation will be approximately equal to emissions during an hour of full load steady-state operation. Arguments covering shutdown are similar and the time is more compressed so that the Department believes the conclusion is the same for startup as for shutdown.

NO_x concentrations in the exhaust during startup and shutdown will be less than the New Source Performance Standard limit of approximately 110 ppmvd @15% O₂ applicable to F-Class turbines. A simple cycle unit will typically have one startup and shutdown every day that it is used.

For a combined cycle cold unit startup, the gas turbine will operate at a very low load (less than 10 percent) while the heat recovery steam generator and the steam turbine-electrical generator are heated up. During a period of approximately 3 hours emissions will be roughly 60 to 80 ppmvd NO_x @15% O₂. Once the HRSG is heated sufficiently, the ammonia system is turned on to abate emissions.

While emissions during the first two or three hours may be greater than during full load steady state operation, such startups are infrequent. Also, it is noted that such a cold startup would be preceded by a shutdown of at least 72 hours. Therefore the startup emissions would not cause annual emissions greater than the potential-to-emit under continuous operation.

The combined cycle startup scenario described above can be modified by use of a bypass stack and damper.²⁴ Under this scenario, the steam cycle can be slowly brought up to load while the gas turbine reaches full load as fast as it would under simple cycle mode. The exhaust gas can be modulated in such a fashion that the HRSG and steam turbine are ramped up slowly in accordance with their respective specifications. At the same time, the gas turbine will quickly accelerate to the DLN modes (5Q or 6Q) thus minimizing emissions. In this manner the startup NO_x and CO concentrations are reduced to the values observed during simple cycle startup. Thereafter the unit will exhibit the same characteristics (for about three hours) as a simple cycle unit in steady-state operation until the ammonia system is actuated.

Implementation of bypass modulation requires an additional stack and design features to minimize stratification and uneven heating of boiler tube bundles in the HRSG.

The Department is gathering information from recently commissioned 7FA units to more accurately estimate startup emissions for NO_x and address carbon monoxide too.

DEPARTMENT BACT DETERMINATION

Following are the BACT limits determined for the El Paso project assuming full load. Values for NO_x and CO are corrected to 15% O₂ on a dry volume basis. These emission limits or their equivalents in terms of pounds per hour and NSPS units, as well as the applicable averaging times, are specified in the permit.

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POLLUTANT	CONTROL TECHNOLOGY	DEPARTMENT'S PROPOSED BACT LIMIT
Nitrogen Oxides	Dry Low NO _x Combustors Selective Catalytic Reduction	9 ppmvd @ 15% O ₂ (simple cycle units) 2.5 ppmvd @ 15% O ₂ (combined cycle) 5 ppm ammonia slip from combined cycle unit
Particulate Matter	Pipeline Natural Gas Combustion Controls	20 pounds per hour (filterable plus condensable) 0.0005 % drift of circulating rate – cooling tower
Visible Emissions	As Above	10 Percent (surrogate for PM ₁₀)
Carbon Monoxide	As Above	7.4 ppmvd @15% O ₂ (full load, simple or combined) 12 ppmvd @15% O ₂ (combined-steam augmentation)
Sulfur Oxides	As Above	1.5 grain sulfur/100 std cubic feet

RATIONALE FOR DEPARTMENT'S DETERMINATION

- Certain control options are feasible only for combined cycle units are not applicable to simple cycle operation. This rules out Low Temperature (conventional) SCR, and SCONOX. XONON is claimed to be available for F Class gas-fired projects.
- The Top technology and Lowest Achievable Emission Rate (LAER) for simple cycle combustion turbines are high temperature (Hot) SCR and an emission limit of 5 ppmvd NO_x.
- It is conceivable that catalytic combustion technology such as XONON™ can be applied to this project. Theoretically XONON can achieve the 5-ppmvd NO_x value and would equate to the top technology.
- An example of the top technology is the Carson Plant in Sacramento, California where there is a Hot SCR system on a simple cycle LM6000PA combustion turbine with a limit of 5 ppmvd.
- Hot SCR is proposed as LAER for the Sacramento Municipal Utilities District simple cycle GE 7EA project at McClelland Air Force Base to achieve 5 ppmvd.
- The levelized costs of NO_x removal by Hot SCR for the El Paso project were estimated by El Paso at \$22,052 per ton assuming 5,000 hours of operation. The estimates are based on reducing NO_x emissions from 9 to 3.5 ppmvd @15% O₂.
- The Department does not accept the precise Hot SCR cost calculations presented by El Paso and considers them on the high end. But even at half the cost estimated by El Paso, the Department would agree that Hot SCR is not be cost-effective for this project.
- XONON is rejected because it has not yet been demonstrated in large combustion turbines and is likely to be even less cost-effective than Hot SCR.
- The Department accepts El Paso's BACT proposal of 9 ppmvd NO_x @15% O₂ for the simple cycle units and exclusive use of natural gas. The Department notes that data from the City of Tallahassee and TECO demonstrate that the GE 7FA units actually achieve 6 to 8 ppmvd @15% O₂.

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- The proposed BACT limit of 9 ppmvd for the simple cycle units is less than one-tenth of the applicable NSPS limit per 40 CFR 60, Subpart GG for units as efficient as the 7FA.
- The Department's overall BACT determination for the simple cycle units is equivalent to approximately 0.35 lb of NO_x per megawatt-hour (lb/MWH) by Dry Low NO_x. For reference, the new NSPS promulgated on September 3, 1998 requires that new conventional power plants (based on boilers, etc.) meet a (fuel independent) limit of 1.6 lb/MW-hr.
- The Department will limit operation of the two units to an average of 5,000 hours per year per simple cycle unit. The Department will further limit the operation of each and every individual unit to the fuel-equivalent of 5,000 full load hours of operation. The purpose is to maintain the conclusion regarding cost-effectiveness under intermittent duty operation.
- Although startup and shutdown emissions are generally exempt, emissions during startup and shutdown are less than the NSPS limit of 110 ppmvd @15% O₂ (that applies during steady-state operation).
- The Department does not yet have sufficient information from field experience to set start-up and shutdown emissions limits. However, the modes that give rise to high NO_x concentration have been identified. The Department will therefore set a work practices standard as BACT.
- The Work Practice BACT for simple cycle startup is that 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. The shutdown case is trivial.
- The Lowest Achievable Emission Rate (LAER) for a combined cycle unit is approximately 2 ppmvd NO_x at 15 percent oxygen (@15% O₂) while firing natural gas. It has been achieved at the 32 MW Federal Merchant Plant in Los Angeles. The owner, Goal Line, has requested recognition of a 1.3 ppmvd NO_x value as *achieved in practice*.
- There are several projects for large turbines in Massachusetts, Connecticut, New York, and California requiring SCR with a NO_x emission limit of 2 ppmvd @15% O₂.
- The "Top" technology in a top/down analysis for a combined cycle unit will achieve approximately 2 ppmvd @15% O₂ by either SCONO_x or SCR.
- El Paso estimated the cost effectiveness of SCONO_x at \$24,187 per ton of NO_x removed. The Department does not necessarily accept the precise SCONO_x cost calculations presented by El Paso. However, even at half the cost estimated by El Paso, the Department agrees that SCONO_x would not be cost-effective for this project.
- El Paso estimated the cost-effectiveness of conventional (cold temperature) SCR at \$3,535 per ton of NO_x while reducing emissions from 9 to 3.5 ppmvd @15% O₂. The Department accepts El Paso's estimate and believes this cost-effectiveness can be maintained while achieving an NO_x emission rate of 2.5 ppmvd @15% O₂.
- The National Park Service advised in its review of the application that BACT determinations of 2.5 ppmvd NO_x @15% O₂ have recently been issued for combined cycle projects in Maine and Washington. The Park Service also agreed that 9 ppmvd represents BACT for simple cycle units.²⁵

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- The Department concludes that 2.5 ppmvd NO_x @15% O₂ (with 5 ppmvd ammonia slip) while firing natural gas in a combined cycle unit constitutes BACT. This value for the conventional SCR option takes into consideration the measurement uncertainties at low emission rates and minimizes particulate emissions due to ammonia emissions.
- The effects of aqueous ammonia use and ammonia slip are not unacceptable. The North Broward Resource Recovery Facility across the street from the proposed site also uses aqueous ammonia for NO_x control.
- The Department's overall BACT determination for the combined cycle unit is less than 0.07 lb of NO_x per megawatt-hour (lb/MWH) by Dry Low NO_x.
- The Work Practice BACT for combined cycle startup is that the combustion turbine will start up and operate as a simple cycle unit and modulate exhaust to the HRSG. This requires installation of a bypass stack and damper. The unit shall reach Mode 5Q (i.e. five burners plus quaternary pegs in operation) within 15 minutes following gas turbine ignition and crossfire. Ammonia injection will be practiced within three hours after gas turbine ignition and crossfire.
- The Department does not have a cost estimate for the additional stack and design requirements, but believes the additional power and flexibility offered by full load simple cycle operation during the cold startup of the steam cycle more than compensates for the additional costs.
- The applicant estimates VOC emissions of 1.4 ppmvd @15% O₂ (or less) for all firing modes. These levels will not trigger PSD or a requirement for a BACT determination.
- El Paso estimated levelized costs at \$9,000 per ton to reduce emissions at the simple cycle units from about 7.4 to 0.7 ppmvd CO @15% O₂. The Department does not adopt this estimate, but would agree that even much lower estimates would not be cost-effective for removal of CO.
- In view of the performance of GE 7FA units without add-on control (~ 0 - 4 ppmvd), it is obvious that oxidation catalyst is definitely not cost-effective for the simple cycle units based on *actual* emissions and appears to not be cost-effective based on permitted emissions.
- El Paso estimated levelized costs for CO catalyst control at \$2,475 to reduce emissions from 11.7 to 1.2 ppmvd @15% O₂ for the combined cycle unit operating in power augmentation mode. In view of the performance of GE 7FA units cited in the discussion above (Tallahassee and TECO Polk Power data) without add-on control (~ 1 ppmvd), it appears to the Department that oxidation catalyst costs are substantially biased to the low side based on *actual* emissions.
- The Department will set CO limits achievable by good combustion as 7.4 ppmvd @15% O₂ at full load and 8 ppmvd @15% O₂ over the full operational range for simple cycle and combined cycle operation. Additionally, the Department will set a limit of 12 ppmvd @15% O₂ for the combined cycle unit during power augmentation.
- The CO limits of 8 ppmvd @15% O₂ under normal combined cycle operation and 12 ppmvd @15% O₂ under power augmentation are low and within the range of recent BACT determinations for combustion turbines in the Southeast.

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- The Department will set CO limits reflecting the "new and clean test" guarantees rather than actual performance because GE will not (yet) guarantee the lower values. The Department will gather more information and may substantially reduce CO limits in future projects if such performance is maintained at the new installations throughout the state. The Department will also limit the extent to which El Paso can operate in power augmentation mode to 2000 hours unless El Paso installs oxidation catalyst or proves that actual performance is much better than guaranteed (thus rendering control not cost effective).
- The CO impact on ambient air quality is lower compared to other pollutants because the allowable concentrations of CO are much greater than for NO_x, SO₂, or PM₁₀.
- There is no benefit is penalizing the applicant with a lower limit at this time just because the performance at another site was far better than guaranteed or expected. The applicant will be required to install a continuous CO monitor on the combined cycle unit. It is expected that data from continuous measurement will conclusively show that oxidation catalyst is not needed and is not cost effective for this project.
- BACT for sulfur oxides is the exclusive use of natural gas with a specification of 1.5 grains per 100 standard cubic feet. Pipeline quality natural gas in Florida contains less than this value.
- BACT for PM₁₀ was determined to be good combustion practices consisting of: inlet air filtering, exclusive use of pipeline natural gas, and operation of the unit in accordance with the manufacturer-provided manuals. The emission limit for PM₁₀ will be set at 11 pounds per hour. This value is based on filterable fraction only per the Department's definition of PM/PM₁₀. Expected particulate emissions based on filterable plus condensable particulate matter are 20 pounds per hour.
- PM₁₀ emissions will be very low and difficult to measure. Therefore, the Department will set a Visible Emission standard of 10 percent opacity as BACT.
- BACT for the Cooling Tower was determined to be use of fresh water and drift eliminators designed and maintained to reduce drift to 0.0005 percent of the circulating water flow rate. A lower drift rate would be reasonable for project where reused wastewater is the cooling medium.

POLLUTANT	COMPLIANCE PROCEDURE
Visible Emissions (initial, annual)	Method 9
PM/PM ₁₀ (initial)	Method 5 (Front-half catch)
VOC	Method 25A corrected by methane from Method 18
CTM-027(initial, quarterly, annual)	Procedure for Collection and Analysis of Ammonia in Stationary Sources
SO ₂ /SAM	Record keeping for the sulfur content of fuels delivered to the site
CO (initial, annual, CEMS)	Method 10; CO-CEMS (continuous 3-hr block average)
NO _x (continuous 24-hr)	NO _x CEMS, O ₂ or CO ₂ diluent monitor, and flow device as needed
NO _x (initial and annual)	Annual Method 20 (can use RATA if at capacity); Method 7E

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DETAILS OF THE ANALYSIS MAY BE OBTAINED BY CONTACTING:

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New Source Review Section
Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Recommended By:

Approved By:

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

Howard L. Rhodes, Director
Division of Air Resources Management

Date

Date

DRAFT

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- ¹⁰ Telecom. Linero, A.A., FDEP, and Beckham, D., U.S. Generating. Circa November 1998.
- ¹¹ Letter. Haber, M., EPA Region IX to Danziger, R., GLET. SCONOX_x at Federal Cogeneration. March 23, 1998.
- ¹² Report. Danziger, R., et. al., "21,000 Hour Performance Report on SCONOX_x". September 2000.
- ¹³ News Release. ABB Alstom Power, Environmental Segment. ABB Alstom Power to Supply Groundbreaking SCONOX™ Technology. December 1, 1999.
- ¹⁴ Reports. Cubix Corporation. "Initial Compliance Reports – Power Block I." February and May 1999.
- ¹⁵ Draft Permit. Florida DEP. Enron Ft. Pierce Repowering Project. June 2001.
- ¹⁶ Telecom. Vandervort, C., GE, and Linero, A.A., DEP. "VOC Emissions from FA Gas Turbines with DLN-2.6 Combustors."
- ¹⁷ Rowen, W.I. "General Electric Speedtronic™ Mark V Gas Turbine Control System. 1994."
- ¹⁸ Air Regulation. Stationary Sources – General Requirements, Definitions (startup). Rule 62-210.200(275), F.A.C.
- ¹⁹ Air Regulation. Stationary Sources – General Requirements, Excess Emissions. Rule 62-210.700(1), F.A.C.
- ²⁰ Air Regulation. Stationary Sources – General Requirements, Definitions (excess emissions). Rule 62-210.200(119), F.A.C.
- ²¹ Letter. Neeley, R.D., EPA Region IV to Linero, A.A., FDEP. Preliminary Determination for Pompano Beach Energy Center. April 12, 2001.
- ²² Davis, L.B., and Black, S.H., "Dry Low NO_x Combustion Systems for GE Heavy-Duty Gas Turbines." August 9, 2001.
- ²³ Fax Communication. Ling, J., KUA to Linero, A.A., FDEP. Process Alarms and Events Exception Report and NO_x Readings During Startup of KUA Unit 3 on August 9, 2001.
- ²⁴ Telecom. Linero, A.A., FDEP, and Ling, J., KUA. Startup of Unit 3 at Cane Island Station. August 9, 2001.
- ²⁵ Memo. Morse, D., National Park Service to Linero, A. A., Florida DEP. El Paso Merchant Energy – Broward County. April 24, 2001.

SECTION IV. APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- G.2 This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- a) Have access to and copy and records that must be kept under the conditions of the permit;
 - b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- a) A description of and cause of non-compliance; and
 - b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

SECTION IV. APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

- G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- a) Determination of Best Available Control Technology (X)
 - b) Determination of Prevention of Significant Deterioration (X); and
 - c) Compliance with New Source Performance Standards (X).
- G.14 The permittee shall comply with the following:
- a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c) Records of monitoring information shall include:
 - 1. The date, exact place, and time of sampling or measurements;
 - 2. The person responsible for performing the sampling or measurements;
 - 3. The dates analyses were performed;
 - 4. The person responsible for performing the analyses;
 - 5. The analytical techniques or methods used; and
 - 6. The results of such analyses.
- G.15 When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SECTION IV. APPENDIX GG
NSPS Subpart GG Requirements for Gas Turbines

NSPS SUBPART GG REQUIREMENTS

[Note: Inapplicable provisions have been deleted in the following conditions, but the numbering of the original rules has been preserved for ease of reference to the original rules. The term “Administrator” when used in 40 CFR 60 shall mean the Department’s Secretary or the Secretary’s designee. Department notes and requirements related to the Subpart GG requirements are shown in **bold** immediately following the section to which they refer. The rule basis for the Department requirements specified below is Rule 62-4.070(3), F.A.C.]

11. Pursuant to 40 CFR 60.332 Standard for Nitrogen Oxides:

(a) On and after the date of the performance test required by § 60.8 is completed, every owner or operator subject to the provisions of this subpart as specified in paragraph (b) section shall comply with:

(1) No owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any stationary gas turbine, any gases which contain nitrogen oxides in excess of:

$$\text{STD} = 0.0075 \frac{(14.4)}{Y} + F$$

where:

STD = allowable NOx emissions (percent by volume at 15 percent oxygen and on a dry basis).

Y = manufacturer’s rated heat rate at manufacturer’s rated load (kilojoules per watt hour) or, actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt-hour.

F = NOx emission allowance for fuel-bound nitrogen as defined in paragraph (a)(3) of this section.

(3) F shall be defined according to the nitrogen content of the fuel as follows:

Fuel-bound nitrogen (percent by weight)	F (NOx percent by volume)
$N \leq 0.015$	0
$0.015 < N \leq 0.1$	$0.04(N)$
$0.1 < N \leq 0.25$	$0.004 + 0.0067(N - 0.1)$
$N > 0.25$	0.005

Where, N = the nitrogen content of the fuel (percent by weight).

Department requirement: While firing gas, the “F” value shall be assumed to be 0.

[Note: This is required by EPA’s March 12, 1993 determination regarding the use of NOx CEMS. The “Y” value for this unit is approximately 10 for natural gas. The equivalent emission standard is 108 ppmvd at 15% oxygen. The emissions standards of this permit is more stringent than this requirement.]

(b) Electric utility stationary gas turbines with a heat input at peak load greater than 107.2 gigajoules per hour (100 million Btu/hour) based on the lower heating value of the fuel fired shall comply with the provisions of paragraph (a)(1) of this section.

12. Pursuant to 40 CFR 60.333 Standard for Sulfur Dioxide:

On and after the date on which the performance test required to be conducted by 40 CFR 60.8 is completed, every owner or operator subject to the provision of this subpart shall comply with:

SECTION IV. APPENDIX GG
NSPS Subpart GG Requirements for Gas Turbines

- (b) No owner or operator subject to the provisions of this subpart shall burn in any stationary gas turbine any fuel which contains sulfur in excess of 0.8 percent by weight.

13. Pursuant to 40 CFR 60.334 Monitoring of Operations:

- (b) The owner or operator of any stationary gas turbine subject to the provisions of this subpart shall monitor sulfur content and nitrogen content of the fuel being fired in the turbine. The frequency of determination of these values shall be as follows:
- (2) If the turbine is supplied its fuel without intermediate bulk storage the values shall be determined and recorded daily. Owners, operators or fuel vendors may develop custom schedules for determination of the values based on the design and operation of the affected facility and the characteristics of the fuel supply. These custom schedules shall be substantiated with data and must be approved by the Administrator before they can be used to comply with paragraph (b) of this section.

Department requirement: The requirement to monitor the nitrogen content of pipeline quality natural gas fired is waived. For purposes of complying with the sulfur content monitoring requirements of this rule, the owner or operator shall obtain a monthly report from the vendor indicating the sulfur content of the natural gas being supplied from the pipeline for each month of operation.

[Note: This is consistent with EPA's custom fuel monitoring policy and guidance from EPA Region 4.]

- (c) For the purpose of reports required under 40 CFR 60.7(c), periods of excess emissions that shall be reported are defined as follows:
- (1) *Nitrogen oxides.* Any one-hour period during which the average water-to-fuel ratio, as measured by the continuous monitoring system, falls below the water-to-fuel ratio determined to demonstrate compliance with 40 CFR 60.332 by the performance test required in § 60.8 or any period during which the fuel-bound nitrogen of the fuel is greater than the maximum nitrogen content allowed by the fuel-bound nitrogen allowance used during the performance test required in § 60.8. Each report shall include the average water-to-fuel ratio, average fuel consumption, ambient conditions, gas turbine load, and nitrogen content of the fuel during the period of excess emissions, and the graphs or figures developed under 40 CFR 60.335(a).

Department requirement: NO_x emissions monitoring by CEM system shall substitute for the requirements of paragraph (c)(1) because a NO_x monitor is required to demonstrate compliance with the standards of this permit. Data from the NO_x monitor shall be used to determine "excess emissions" for purposes of 40 CFR 60.7 subject to the conditions of the permit.

[Note: As required by EPA's March 12, 1993 determination, the NO_x monitor shall meet the applicable requirements of 40 CFR 60.13, Appendix B and Appendix F for certifying, maintaining, operating and assuring the quality of the system; shall be capable of calculating NO_x emissions concentrations corrected to 15% oxygen; shall have no less than 95% monitor availability in any given calendar quarter; and shall provide a minimum of four data points for each hour and calculate an hourly average. The requirements for the CEMS specified by the specific conditions of this permit satisfy these requirements.]

- (2) *Sulfur dioxide.* Any daily period during which the sulfur content of the fuel being fired in the gas turbine exceeds 0.8 percent.

SECTION IV. APPENDIX GG
NSPS Subpart GG Requirements for Gas Turbines

14. Pursuant to 40 CFR 60.335 Test Methods and Procedures:

- (a) To compute the nitrogen oxides emissions, the owner or operator shall use analytical methods and procedures that are accurate to within 5 percent and are approved by the Administrator to determine the nitrogen content of the fuel being fired.
- (b) In conducting the performance tests required in 40 CFR 60.8, the owner or operator shall use as reference methods and procedures the test methods in appendix A of this part or other methods and procedures as specified in this section, except as provided for in 40 CFR 60.8(b). Acceptable alternative methods and procedures are given in paragraph (f) of this section.
- (c) The owner or operator shall determine compliance with the nitrogen oxides and sulfur dioxide standards in 40 CFR 60.332 and 60.333(a) as follows:

- (1) The nitrogen oxides emission rate (NO_x) shall be computed for each run using the following equation:

$$\text{NO}_x = (\text{NO}_{x0}) (\text{Pr}/\text{Po})^{0.5} e^{19(\text{Ho}-0.00633)} (288^\circ\text{K}/\text{Ta})^{1.53}$$

where:

NO_x = emission rate of NO_x at 15 percent O₂ and ISO standard ambient conditions, volume percent.

NO_{x0} = observed NO_x concentration, ppm by volume.

Pr = reference combustor inlet absolute pressure at 101.3 kilopascals ambient pressure, mm Hg.

Po = observed combustor inlet absolute pressure at test, mm Hg.

Ho = observed humidity of ambient air, g H₂O/g air.

e = transcendental constant, 2.718.

Ta = ambient temperature, °K.

Department requirement: The owner or operator is not required to have the NO_x monitor required by this permit continuously calculate NO_x emissions concentrations corrected to ISO conditions. However, the owner or operator shall keep records of the data needed to make the correction, and shall make the correction when required by the Department or Administrator.

[Note: This is consistent with guidance from EPA Region 4.]

- (2) The monitoring device of 40 CFR 60.334(a) shall be used to determine the fuel consumption and the water-to-fuel ratio necessary to comply with 40 CFR 60.332 at 30, 50, 75, and 100 percent of peak load or at four points in the normal operating range of the gas turbine, including the minimum point in the range and peak load. All loads shall be corrected to ISO conditions using the appropriate equations supplied by the manufacturer.

Department requirement: The owner or operator is allowed to conduct initial performance tests at a single load because a NO_x monitor shall be used to demonstrate compliance with the BACT NO_x limits of this permit.

[Note: This is consistent with guidance from EPA Region 4.]

- (3) Method 20 shall be used to determine the nitrogen oxides, sulfur dioxide, and oxygen concentrations. The span values shall be 300 ppm of nitrogen oxide and 21 percent oxygen. The NO_x emissions shall be determined at each of the load conditions specified in paragraph (c)(2) of this section.

SECTION IV. APPENDIX GG
NSPS Subpart GG Requirements for Gas Turbines

Department requirement: The owner or operator is allowed to make the initial compliance demonstration for NO_x emissions using certified CEM system data, provided that compliance be based on a minimum of three test runs representing a total of at least three hours of data, and that the CEMS be calibrated in accordance with the procedure in section 6.2.3 of Method 20 following each run. Alternatively, initial compliance may be demonstrated using data collected during the initial relative accuracy test audit (RATA) performed on the NO_x monitor. The span value specified in the permit shall be used instead of that specified in paragraph (c)(3) above.

[Note: These initial compliance demonstration requirements are consistent with guidance from EPA Region 4. The span value is changed pursuant to Department authority and is consistent with guidance from EPA Region 4.]

- (d) The owner or operator shall determine compliance with the sulfur content standard in 40 CFR 60.333(b) as follows: ASTM D 2880-71 shall be used to determine the sulfur content of liquid fuels and ASTM D 1072-80, D 3031-81, D 4084-82, or D 3246-81 shall be used for the sulfur content of gaseous fuels (incorporated by reference – see 40 CFR 60.17). The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to the approval of the Administrator.

Department requirement: The permit specifies sulfur testing methods.

[Note: This requirement establishes different methods than provided by paragraph (d) above, but the requirements are equally stringent and will ensure compliance with this rule.]

- (e) To meet the requirements of 40 CFR 60.334(b), the owner or operator shall use the methods specified in paragraphs (a) and (d) of this section to determine the nitrogen and sulfur contents of the fuel being burned. The analysis may be performed by the owner or operator, a service contractor retained by the owner or operator, the fuel vendor, or any other qualified agency.

[Note: The fuel analysis requirements of the permit meet or exceed the requirements of this rule and will ensure compliance with this rule.]

SECTION IV. APPENDIX XS
CONTINUOUS MONITOR SYSTEMS SEMI-ANNUAL REPORT

{Note: This form is referenced in 40 CFR 60.7, Subpart A, General Provisions.}

Pollutant (*Circle One*): Nitrogen Oxides (NOx) Carbon Monoxide (CO)

Reporting period dates: From _____ to _____

Company: _____

Emission Limitation: _____

Address: _____

Monitor Manufacturer and Model No.: _____

Date of Latest CMS Certification or Audit: _____

Process Unit(s) Description: _____

Total source operating time in reporting period ^a: _____

Emission data summary ^a		CMS performance summary ^a	
1. Duration of Excess Emissions In Reporting Period Due To:		1. CMS downtime in reporting period due to:	
a. Startup/Shutdown		a. Monitor Equipment Malfunctions	
b. Control Equipment Problems		b. Non-Monitor Equipment Malfunctions	
c. Process Problems		c. Quality Assurance Calibration	
d. Other Known Causes		d. Other Known Causes	
e. Unknown Causes		e. Unknown Causes	
2. Total Duration of Excess Emissions		2. Total CMS Downtime	
3. $\frac{[\text{Total Duration of Excess Emissions}] \times (100\%)}{[\text{Total Source Operating Time}]}$ ^b		3. $\frac{[\text{Total CMS Downtime}] \times (100\%)}{[\text{Total source operating time}]}$	

^a For opacity, record all times in minutes. For gases, record all times in hours.

^b For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in 40 CFR 60.7(c) shall be submitted.

Note: On a separate page, describe any changes to CMS, process or controls during last 6 months.

I certify that the information contained in this report is true, accurate, and complete.

Name

Title

Signature

Date

SECTION IV. APPENDIX SC

STANDARD CONDITIONS

{Permitting Note: The following conditions apply to all emissions units and activities at this facility.}

EMISSIONS AND CONTROLS

1. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
2. Circumvention: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
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. [Rule 62-210.700(4), F.A.C.]
4. Unconfined Particulate Emissions: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

TESTING REQUIREMENTS

5. Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the 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. [Rule 62-297.310(2), F.A.C.]
6. Calculation of Emission Rate: For each emissions performance test, the indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]
7. Test Procedures: Tests shall be conducted in accordance with all applicable requirements of Chapter 62-297, F.A.C.
 - a. *Required Sampling Time*. 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. The minimum observation period for a visible emissions compliance test shall be thirty (30) minutes. The observation period shall include the period during which the highest opacity can reasonably be expected to occur.
 - b. *Minimum Sample Volume*. Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet.
 - c. *Calibration of Sampling Equipment*. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, F.A.C.

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

SECTION IV. APPENDIX SC

STANDARD CONDITIONS

8. 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.]

9. Sampling Facilities: The permittee shall provide stack testing facilities and sampling locations in accordance with Rule 62-297.310(6), F.A.C.
10. Test Notification: The permittee shall notify the Compliance Authority in writing at least 30 days prior to any initial NSPS performance tests and at least 15 days prior to any other required tests. [Rule 62-297.310(7)(a)9., F.A.C. and 40 CFR 60.7, 60.8]
11. 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 shall 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. [Rule 62-297.310(7)(b), F.A.C.]

RECORDS AND REPORTS

12. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least five (5) years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rules 62-4.160(14) and 62-213.440(1)(b)2., F.A.C.]
13. Annual Operating Report: The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by March 1st of each year. [Rule 62-210.370(2), F.A.C.]
14. Emissions Performance Test Reports: A report indicating the results of any required emissions performance test shall be submitted to each Compliance Authority no later than 45 days after completion of the last test run. The test report shall provide sufficient detail on the tested emission unit and the procedures used to allow the Department to determine if the test was properly conducted and if the test results were properly computed. At a minimum, the test report shall provide the applicable information listed in Rule 62-297.310(8)(c), F.A.C. [Rule 62-297.310(8), F.A.C.]

Memorandum

Florida Department of Environmental Protection

TO: ~~Clair Fancy~~ *by AAL for OHT*
THRU: Al Linero *AAL 9/6*
FROM: Teresa Heron
DATE: September 6, 2001
SUBJECT: El Paso Manatee Energy Center
: 600 Megawatt Gas-fueled Power Plant
DEP File No. 0810199-001-AC (PSD-FL-318)

Attached is the public notice package for construction of a 600 MW gas-fueled power plant near Piney Point in Manatee County. The plant will consist of a 250 MW combined cycle and two intermittent duty, simple cycle, 175 MW GE 7FA combustion turbines. Ancillary facilities include inlet air chillers, one 5-cell freshwater mechanical draft cooling tower, a gas-fired heater, one 2600-hp diesel generator, one 250-hp diesel fire pump, aqueous ammonia storage tank, two 500 gallons diesel storage tanks, and three (possibly 4) 135-foot stacks.

Nitrogen Oxides (NO_x) emissions from the gas turbine will be controlled by Dry Low NO_x (DLN-2.6) combustion. The applicant proposed an NO_x emission limit of 3.5 (combined cycle) and 9 ppmvd (simple cycle) @15% O₂. The NO_x BACT standard has been determined to be 2.5 ppmvd @15% O₂ in a 24-hr average time. The simple cycle units are limited to 5,000 hour per year per unit. The turbines will burn natural gas only. Emissions of carbon monoxide, volatile organic compounds, sulfur dioxide, sulfuric acid mist, and particulate matter (PM/PM₁₀) will be very low because of the inherently clean pipeline quality natural gas and the design of the GE unit.

Maximum predicted air quality impacts due to emissions from the El Paso project are less than the applicable PSD Class II significant impact levels, with the exception of 24-hour average PM₁₀. Therefore, multi-source modeling was required for PM₁₀. The modeling showed that the available increment has not been consumed. We are still awaiting input from the National Park Service following their review of the refined modeling performed by the applicant. We will consider their input during the comment period.

We included startup and shutdown considerations. We gave El Paso the opportunity to review and comment on the Work Practice proposal. They did not see a problem, but obviously reserve the right to comment during the 30-day comment period.

September 9 (Sunday) will be Day 74. I recommend your approval of the attached Intent to Issue.

AAL/th

Attachments



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

P.E. Certification Statement

Permittee:

DEP File No. 0810199-001-AC (PSD-FL-318)

El Paso Merchant Energy Company
Manatee Energy Center
Manatee County

Project type:

Project is construction of a 600 MW gas-fueled power plant consisting of three nominal 175-megawatt (MW) General Electric PG 7241FA combustion turbine-electrical generators .

Two of the units will operate in simple cycle mode and intermittent duty while the third will operate in combined cycle and continuous duty. The units will exhaust through separate 135-foot stacks. The units will be fired exclusively with pipeline natural gas. El Paso proposes to operate the simple cycle units up to 5,000 hours per year per unit.

The simple cycle units must meet a BACT nitrogen oxides limit of 9 parts per million by volume, dry, at 15% oxygen (ppmvd). The combined cycle unit must meet a limit of 2.5 ppmvd @15% O2 on a 24-hour basis by installing a selective catalytic reduction system. Other pollutants, including particulate matter (PM/PM₁₀), carbon monoxide, volatile organic compounds, sulfur dioxide, and sulfuric acid mist will be controlled by good combustion and use of pipeline quality natural gas.

Projected impacts from the proposed project emissions are all less than the applicable significant impact limits (SILs) corresponding to the surrounding Class II areas or the nearest Class I area (Chassahowitzka Wildlife Area). The project will not cause or contribute to a violation of any National Ambient Air Quality Standard or Increment.

I HEREBY CERTIFY that the engineering features described in the above referenced application 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).

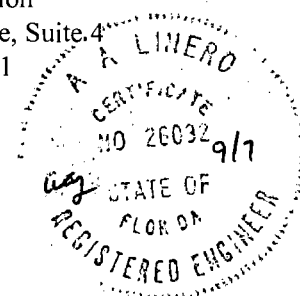
9/7/2001

A. A. Linero, P.E.

Date

Registration Number: 26032

Department of Environmental Protection
Bureau of Air Regulation
New Source Review Section
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Phone (850) 921-9523
Fax (850) 922-6979



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FLORIDA ELECTRICAL POWER PLANT SITING ACT APPLICABILITY
DETERMINATION

El Paso Manatee Energy Center

The meaning of electrical power plant, for the purpose of certification under the act “does not include any steam or solar electrical generating facility of less than 75 megawatts in capacity unless the applicant for such a facility elects to apply for certification under this act.” [403.503(13), F.S.]

“The provisions of the act shall apply to any electrical power plant as defined herein, except that the provisions of this act shall not apply to any electrical power plant or steam generating plant of less than 75 megawatts in capacity” [403.506(1), F.S.]

A combined cycle plant consists of two cycles. The first is the gas turbine cycle, also known as the *Brayton Cycle*. The second is the steam turbine or *Rankine Cycle*. [Steam, its Generation and Use, Babcock & Wilcox, 1992]

For combined cycles, the Department considers the Act to apply only when electricity generated from the electrical generator operated on the Rankine cycle equals or exceeds 75 MW, not including the separate electrical generator operated on the Brayton cycle.

In past permitting actions, the Department has accepted operational limitations on the gross electrical output from the steam turbine-electrical generator as the measure of capacity. [Okeelanta Cogeneration, Destec Tiger Bay, CPV Pierce]

The Department requires a clear description of the manner by which electrical power from the steam turbine-electrical generator will be limited to less than 75 MW.

The Department received an application from El Paso Merchant Energy Company for the Manatee Energy Center on March 28, 2001. The application included a copy of a letter from the Department dated August 25, 2000 acknowledging that the configurations proposed by Coastal (now El Paso) have the ability to equal or exceed 75 MW and requiring that any permit application to the Department “include description of engineering devices to limit delivery to the steam turbine” and “monitoring of the electric generation rate on a rolling hourly average to demonstrate that 75 MW is not equaled or exceeded.”

El Paso submitted a letter dated June 26, 2001 in response to the Department’s request for additional information following receipt of the application. El Paso stated the following:

“The steam turbine electrical generator (STG) planned for the Manatee Energy Center (BEC) combined cycle (CC) unit will have a maximum generating capacity of 120 megawatts (MW). The CC unit will have a modern distributed control system (DCS) that will serve as a means to control STG operation utilizing plant instrumentation and equipment. In conjunction with the steam turbine governor, a control management system will be implemented that will limit the STG output to less than 75 MW. The power output of the STG will be recorded on the plant DCS for records purposes and reporting needs as required. The CC unit will feature hardware provisions that will allow diversion of steam produced by the heat recovery steam generator (HRSG) from the STG thereby

limiting its output. The main hardware features that will limit STG electrical output include CTG steam mass augmentation, STG controls, and a STG steam bypass system. Each of the systems is described in the following sections.

A. CTG Steam Mass Flow Augmentation

- *The CC unit CTG will incorporate steam injection nozzles and design features that will allow a portion of the high-pressure steam generated by the HRSG to be diverted from the STG to the CTG. This introduction of steam to the CTG allows for a mass flow enhancement. The increased mass flow that results from steam injection will increase CTG output as well as fuel consumption. At ambient temperatures of about 50°F or less, steam mass flow augmentation will be limited by CTG equipment limitations. For instance, CTG backpressures could increase to levels beyond those recommended by the vendor. At these colder ambient temperature conditions, steam injection into the CTG will be curtailed and alternate means of steam diversion from the STG will be called on to a greater extent.*
- *The specifics of the limitations on CTG steam injection will be developed by the CTG vendor. Additionally, the specifics of steam introduction will be developed in conjunction with the CTG control systems for proper coordination with the dry low-NO_x (DLN) combustor control algorithms.*
- *Steam flow to the CTG steam injection nozzles, including CTG control integration, will be controlled from a signal generated within the DCS. This control signal will operate a control valve that regulates steam flow by modulation of the valve seat or opening area thereby allowing steam flow modulation.*
- *Steam flow to the CTG injection nozzles will be measured with classical steam flow measurement devices such as an orifice plate or an annubar. The steam flow measurement device will have a differential pressure transmitter attached to pressure sensing lines that will monitor the process and produce a proportional 4-20 milliamp (ma) signal that will tie in to the plant DCS. This signal will be converted to flow and signals will be transmitted to the CTG combustion control systems as well as to the balance of the plant DCS. During base load operations, the steam flow to the CTG injection nozzles will likely be a fixed steam mass flow or fixed percent of CTG mass flow. Injection of steam will occur at 100 percent load only. During upsets/startups and conditions such as low ambient temperatures, the steam flow will be controlled to coordinate with CTG combustion control to allow stable operation and avoid surge and stall within the CTG. During these periods, alternate STG steam diversion paths will be used.*

B. Steam Turbine Generator (STG) Controls

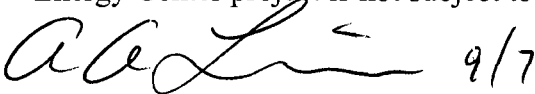
- *The STG will be fitted with an electronic governor and control system that will control the steam flow into the STG and hence the STG electrical output. Additional instrumentation will be used to adjust this control loop. For instance, condenser back pressure, intermediate pressure and low pressure steam flows, steam temperatures and pressure will each have a significant impact on the determination of the proper steam flow to the STG.*
- *The primary measurement of STG electrical output will be the main input to the STG governor control loops. This power measurement will be feed to the STG governor to compare to the primary set point. As an example, the primary set point may have a value of 74.9 MW. Following control system tuning, the set point will be adjusted to allow for control swings and upsets such that the hourly STG electrical production average will never exceed 75 MW.*

C. STG Steam Bypass System

- *Whenever steam to the CTG injection nozzles and to all other locations are not sufficient to reduce STG output to the set point, the primary means of final control will be a STG steam bypass system. The STG steam bypass system will allow steam flow from the HRSG to bypass the STG and "dump" directly into the condenser. The DCS will generate a final control signal that will modulate this steam dump. A CC plant typically includes this hardware to allow for steam dumping during upsets or malfunctions. Additional control signals and associated hardware will regulate this dump steam as the final means of disposal of excess HRSG steam. In addition, an economizer bypass system may be used to reduce the flow of water passing through the economizer stage of the HRSG, which will reduce the flow-of steam produced.*

The control systems described above will typically scan each instrument every second and recalculate and update the status and driving signals going to each field device. Following control system tuning, the control systems will regulate STG output to the required level.

The Department accepts El Paso's operational description and concludes that the Manatee Energy Center project is not subject to the Florida Electrical Power Plant Siting Act.

 9/7

A. A. Linero, P.E. Administrator
New Source Review Section

Hamilton Oven, P.E. Administrator
Power Plant Siting Office



Environmental Consulting & Technology, Inc.

July 31, 2001

SENT VIA OVERNIGHT MAIL ON JULY 31, 2001

RECEIVED

AUG 01 2001

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-AC (PSD-FL-318)
Manatee Energy Center – New 600 MW Gas Turbine Power Plant**

Dear Mr. Linero:

On behalf of El Paso Merchant Energy Company (EPMEC), the following information is provided regarding the EPMEC Manatee Energy Center (MEC) Air Construction Permit Application submitted to the Department in March 2001:

Item 1. Emergency Generator Diesel Engine

The MEC will include a 2,600-horsepower (HP) emergency diesel-fired electrical generator. EPMEC requests that the Department's draft PSD permit include a condition limiting annual diesel fuel usage for the 2,600-HP emergency diesel-fired electrical generator to no more than 32,000 gallon per year such that the diesel engine qualifies for the categorical permit exemption of Rule 62-210.300(3)(a)20., F.A.C. A revised Air Construction Permit Application, Appendix C, potential emission inventory worksheet for the 2,600-HP emergency diesel-fired electrical generator is attached.

Item 2. Emergency Fire Water Pump Diesel Engine

The MEC will include a 250-HP emergency diesel-fired fire water pump. This diesel engine qualifies for the categorical permit exemption of Rule 62-210.300(3)(a)21., F.A.C.

Item 3. Emergency Diesel Engine Fuel Storage Tanks

As noted above, the MEC will include a 2,600-HP emergency diesel-fired electrical generator and a 250-HP emergency diesel-fired fire water pump. Each of these emergency diesel engines will include a small (i.e., less than 1,000 gallon) diesel fuel storage tank. Emissions of volatile organic compounds (VOCs) from each small diesel fuel oil storage tank will well below the potential emission thresholds of Rule 62-210.300(3)(b), F.A.C. The emergency diesel engine diesel fuel

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Mr. A.A. Linero
July 31, 2001
Page -2-

storage tanks therefore qualify for an exemption from permitting pursuant to Rule 62-210.300(3)(b), F.A.C.

Your continued expeditious processing of the EPMEC Manatee Energy Center permit application is appreciated. Please contact Mr. Krish Ravishankar at (713) 420-5563 if there are any further questions regarding this permit application.

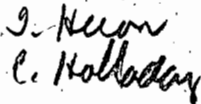
ENVIRONMENTAL CONSULTING & TECHNOLOGY, INC.



Thomas W. Davis, P.E.
Principal Engineer

Attachment

cc: Mr. Krish Ravishankar, EPMEC
Mr. Bill Thomas, FDEP Southwest District
Ms. Karen Collins-Fleming, Manatee CHD
Mr. Gregg Worley, EPA Region 4
Mr. John Bunyak, National Park Service



POTENTIAL EMISSION INVENTORY WORKSHEET

EPMEC Manatee Energy Center

EG-ENG

EMISSION SOURCE TYPE

DIESEL ENGINES - CRITERIA POLLUTANTS

FACILITY AND SOURCE DESCRIPTION

Emission Source Description: Stationary Diesel Engine
 Emission Control Method(s)/ID No.(s): None
 Emission Point Description: 2,600 HP Emergency Generator Diesel Engine

EMISSION ESTIMATION EQUATIONS

Emission (lb/hr) = Emission Factor (lb/hr)
 Emission (ton/yr) = Emission Factor (lb/hr) x Operating Period (hrs/yr) x (1 ton/ 2,000 lb)

Source: ECT, 2000.

INPUT DATA AND EMISSIONS CALCULATIONS

Operating Hours:	175	hrs/yr
Fuel Flow:	28,324	gal/yr
Fuel Flow:	161.9	gal/hr
Diesel Fuel Oil Sulfur Content:	0.05	weight %
Diesel Fuel Oil Heat Content:	141,000	Btu/gal (HHV)
Heat Input:	22.82	MMBtu/hr (HHV)

Criteria Pollutant	Emission Factor (lb/hr)	Potential Emission Rates	
		(lb/hr)	(tpy)
NO _x	37.24	37.24	3.26
CO	8.34	8.34	0.73
TOC	2.05	2.05	0.18
SO ₂	0.820	0.82	0.07
PM	1.380	1.38	0.12
PM ₁₀	1.380	1.38	0.12

SOURCES OF INPUT DATA

Parameter	Data Source
Operating Hours (annual)	EPMEC, 2001.
Fuel Flow Rate (gal/yr)	ECT, 2001.
Emission Factors (all except TOC)	ECT, 2001.
Emission Factor (TOC)	AP-42, Table 3.4-1, EPA, October 1996.

NOTES AND OBSERVATIONS

DATA CONTROL

Data Collected by:	K. Ravishankar	Date:	Jul-01
Data Entered by:	T.Davis	Date:	Jul-01
Reviewed by:	K. Ravishankar	Date:	Jul-01



Environmental Consulting & Technology, Inc.

RECEIVED

JUN 27 2001

BUREAU OF AIR REGULATION

June 26, 2001

SENT VIA OVERNIGHT MAIL ON JUNE 26, 2001

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: Response to Request for Additional Information Dated April 27, 2001
DEP File No. 0810199-AC (PSD-FL-318)
Manatee Energy Center – New 600 MW Gas Turbine Power Plant**

Dear Mr. Linero:

On behalf of El Paso Merchant Energy Company (EPMEC), responses to the issues raised in your April 27, 2001 correspondence concerning the Manatee Energy Center permit application are provided as follows:

Item 1. FPPSA Requirements, Steam-Electrical Capacity, and Power Augmentation

The steam turbine generator (STG) planned for the Manatee Energy Center (MEC) combined cycle (CC) unit will have a maximum generating capacity of 120 megawatts (MW). The CC unit will have a modern distributed control system (DCS) that will serve as a means to control STG operation utilizing plant instrumentation and equipment. In conjunction with the steam turbine governor, a control management system will be implemented that will limit the STG output to less than 75 MW. The power output of the STG will be recorded on the plant DCS for records purposes and reporting needs as required. The CC unit will feature hardware provisions that will allow diversion of steam produced by the heat recovery steam generator (HRSG) from the STG thereby limiting its output. The main hardware features that will limit STG electrical output include CTG steam mass flow augmentation, STG controls, and a STG steam bypass system. Each of these systems is described in the following sections.

A. CTG Steam Mass Flow Augmentation

- The CC unit CTG will incorporate steam injection nozzles and design features that will allow a portion of the high-pressure steam generated by the HRSG to be diverted from the STG to the CTG. This introduction of steam to the CTG allows for a mass flow enhancement. The increased mass flow that results from steam injection will increase CTG output as well as fuel consumption. At ambient temperatures of about 50°F or less, steam mass flow augmentation will be limited by CTG equipment limitations. For instance, CTG backpressure could increase to levels beyond those recommended by the vendor. At these colder ambient temperature conditions, steam injection into the CTG will be curtailed and alternate means of steam diversion from the STG will be called on to a greater extent.

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- The specifics of the limitations on CTG steam injection will be developed by the CTG vendor. Additionally, the specifics of steam introduction will be developed in conjunction with the CTG control systems for proper coordination with the dry low-NO_x (DLN) combustor control algorithms.
- Steam flow to the CTG steam injection nozzles, including CTG control integration, will be controlled from a signal generated within the DCS. This control signal will operate a control valve that regulates steam flow by modulation of the valve seat or opening area thereby allowing steam flow modulation.
- Steam flow to the CTG injection nozzles will be measured with classical steam flow measurement devices such as an orifice plate or an annubar. The steam flow measurement device will have a differential pressure transmitter attached to pressure sensing lines that will monitor the process and produce a proportional 4-20 milliamp (ma) signal that will tie in to the plant DCS. This signal will be converted to flow and signals will be transmitted to the CTG combustion control systems as well as to the balance of the plant DCS. During base load operations, the steam flow to the CTG injection nozzles will likely be a fixed steam mass flow or fixed percent of CTG mass flow. Injection of steam will occur at 100 percent load only. During upsets/startups and conditions such as low ambient temperatures, the steam flow will be controlled to coordinate with CTG combustion control to allow stable operation and avoid surge and stall within the CTG. During these periods, alternate STG steam diversion paths will be used.

B. Steam Turbine Generator (STG) Controls

- The STG will be fitted with an electronic governor and control system that will control the steam flow into the STG and hence the STG electrical output. Additional instrumentation will be used to adjust this control loop. For instance, condenser back pressure, intermediate pressure and low pressure steam flows, steam temperatures and pressure will each have a significant impact on the determination of the proper steam flow to the STG.
- The primary measurement of STG electrical output will be the main input to the STG governor control loops. This power measurement will be feed to the STG governor to compare to the primary set point. As an example, the primary set point may have a value of 74.9 MW. Following control system tuning, the set point will be adjusted to allow for control swings and upsets such that the hourly STG electrical production average will never exceed 75 MW.

C. STG Steam Bypass System

- Whenever steam to the CTG injection nozzles and to all other locations are not sufficient to reduce STG output to the set point, the primary means of final control will be a STG steam bypass system. The STG steam bypass system will allow steam flow from the HRSG to bypass the STG and "dump" directly into the condenser. The DCS will generate a final control signal that will modulate this steam dump. A CC plant typically

includes this hardware to allow for steam dumping during upsets or malfunctions. Additional control signals and associated hardware will regulate this dump steam as the final means of disposal of excess HRSG steam. In addition, an economizer bypass system may be used to reduce the flow of water passing through the economizer stage of the HRSG, which will reduce the flow of steam produced.

The control systems described above will typically scan each instrument every second and recalculate and update the status and driving signals going to each field device. Following control system tuning, the control systems will regulate STG output to the required level.

As noted above, steam mass flow augmentation will only be used at 100 percent load and when ambient air temperatures are above approximately 50°F. EPMEC plans to operate the MEC CC unit to provide base load electrical power. The maximum annual hours of steam mass flow augmentation will therefore primarily depend on ambient temperatures as well as electrical power demand. At a 68°F CTG inlet air temperature and 100 percent load, steam mass flow augmentation will increase CTG electrical output by approximately 12.8 MW.

Item 2. Emissions During Steam Mass Flow Augmentation

The emissions data provided with the submitted permit application represent the CTG vendor's (General Electric) estimate performance with respect to emission rates; reference Appendix B of the permit application dated March 2001. This vendor data indicates that CO exhaust concentrations during steam mass flow augmentation will not exceed 12 ppmvd, corrected to 15% O₂. Because CTG vendors typically include some margin on their estimated emission rates, the vendor data is considered to provide reasonable assurance that CO exhaust concentrations during steam mass flow augmentation will not exceed 12 ppmvd, corrected to 15% O₂.

The CO exhaust concentration expected during steam mass flow augmentation for the MEC CC CTG is lower than the limits contained in recent Department permits for combustion turbine projects utilizing steam mass flow augmentation. For example, the July 2000 CO BACT permit limit for Gulf Power Company's Lansing Smith Plant Unit 3 (also a GE 7FA CC unit) is 23 ppmvd at 15 percent oxygen with steam mass flow augmentation. The draft Department permit for Calpine's Blue Heron Project, issued in February 2001, proposes a CO BACT limit of 17 ppmvd at 15 percent oxygen during steam mass flow augmentation. The Department's April 2001 draft permit for the CPV Atlantic combustion turbine power project specifies a CO BACT limit of 15.0 ppmvd at 15 percent oxygen with steam mass flow augmentation.

Item 3. Capacity and Emissions

Maximum heat input, volumetric flow rate, exhaust gas exit temperature, and CTG power output at 100 percent load, 59°F CTG compressor inlet temperature, and without steam mass flow augmentation are provided in the following table for simple and combined cycle modes of operation.

Operating Mode	Heat Input, LHV (MMBtu/hr)	Flow Rate (acfm)	Exit Temperature (°F)	Power Output (MW)
Simple Cycle	1,668	2,427,702	1,120	170.9
Combined Cycle	1,668	998,405	190	169.0

Your April 27, 2001 correspondence also requested maximum heat input, volumetric flow rate, exhaust gas exit temperature, and CTG power output at partial loads (i.e., less than 100 percent load), 59°F CTG compressor inlet temperature, and with steam mass flow augmentation. As discussed above in Item 1., steam mass flow augmentation will only be used at 100 percent load.

CO, NO_x, PM/PM₁₀, and VOC emission rates at 100 percent load, 59°F CTG compressor inlet temperature, and without steam mass flow augmentation are provided in the following table for simple and combined cycle modes of operation.

Air Pollutant	Simple Cycle		Combined Cycle	
	(ppmvd) ^a	(lb/hr)	(ppmvd)	(lb/hr)
CO	7.4	29.0	7.4	29.0
NO _x	9.0	58.0	3.5	22.6
PM/PM ₁₀	N/A	18.3 ^b	N/A	19.0 ^b
VOC	1.3	2.8 ^c	1.3	2.8 ^c

^a Corrected to 15 percent oxygen.

^b As measured by EPA Reference Methods 201A and 202.

^c Non-methane, non-ethane VOCs expressed as methane equivalents.

Your April 27, 2001 correspondence also requested CO, NO_x, PM/PM₁₀, and VOC emission rates at partial loads (i.e., less than 100 percent load), 59°F CTG compressor inlet temperature, and with steam mass flow augmentation. As discussed above in Item 1., steam mass flow augmentation will only be used at 100 percent load.

Item 4. Fuel Heaters

The MEC will include one, 12.8 MMBtu/hr (HHV) gas-fired natural gas fuel heater that uses water as the heat transfer medium. This heater is exempt from permitting pursuant to Rule 62-210.300(3)(a)2., F.A.C., categorical exemption for individual hot water heaters rated at less than 100 MMBtu/hr burning annually no more than 150 MM ft³/yr of natural gas. At a natural gas heat content of 1,020 MMBtu/ft³ (HHV) and 8,760 hrs/yr operation, the MEC gas-fired natural gas fuel heater will burn 109.9 MM ft³/yr of natural gas. Note that NSPS Subpart Dc, applicable to new steam generating units (including units which heat water or any other heat transfer medium) greater than 10 MMBtu/hr heat input, does not contain any emission limitations for natural gas-fired units.

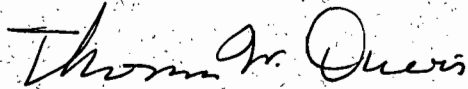
Mr. A.A. Linero
June 26, 2001
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Item 5. Relaxation of Restrictions on Pollutant Emitting Capacity

Any future modification to the MEC, as well as future modifications to any other facility in Florida, will be subject to the permitting requirements that are applicable at the time of the modification. The extent of permitting required will depend on the nature of the modification and the permitting requirements in effect at the time of the modification. Accordingly, conclusions with respect to the permitting requirements for future modification projects cannot be drawn without knowledge of the specifics of the future modification project and the permitting procedures that will be in effect at the time of the modification.

A professional engineer certification pursuant to Rule 62-4.050(3), F.A.C. is attached. Your continued expeditious processing of the MEC permit application is appreciated. Please contact Mr. Krish Ravishankar at (713) 420-5563 if there are any further questions regarding the MEC permit application.

ENVIRONMENTAL CONSULTING & TECHNOLOGY, INC.



Thomas W. Davis, P.E.
Principal Engineer

Attachment

cc: Mr. Krish Ravishankar, EPMEC
Mr. Bill Thomas, FDEP Southwest District
Ms. Karen Collins-Fleming, Manatee CHD
Mr. Gregg Worley, EPA Region 4
Mr. John Bunyak, National Park Service

**El Paso Merchant Energy Company
Manatee Energy Center**

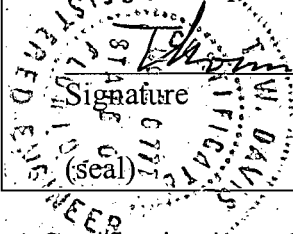
Professional Engineer Certification

Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the information provided to the Department regarding the El Paso Merchant Energy Company's proposed Manatee Energy Center is in accordance with all applicable Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of air pollutants not regulated for an emissions unit, based solely upon the materials, information and calculations provided with this certification.



T. W. Davis
Signature

6/26/01
Date

* Certification is applicable to the information provided in response to the Department's April 27, 2001 request for additional information regarding the proposed El Paso Merchant Energy Company's Manatee Energy Center.

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- Complete items 3, 4a, and 4b
- Print your name and address on the reverse of this form so that we can return this card to you.
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2. Restricted Delivery

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3. Article Addressed to:

Mr. William Mack
 Senior Managing Director
 El Paso Merchant Energy Co.
 Coastal Tower, None Greenway Pl
 Suite 1682A
 Houston, TX 77046-0995

4a. Article Number
 7099 3400 0000 1450 2491

4b. Service Type

Registered Certified
 Express Mail Insured
 Return Receipt for Merchandise COD

7. Date of Delivery

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

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X. Mack



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 El Paso Merchant Energy Co.
 Street, Apt. No., or PO Box No.
 Coastal Tower, 9 Greenway Pl, Ste 1682A
 City, State, ZIP+4
 Houston, TX 77046-0995

7099 3400 0000 1450 2491



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

April 27, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. William Mack
Senior Managing Director
El Paso Merchant Energy Company
Coastal Tower, Nine Greenway Plaza, Suite 1682A
Houston, Texas 77046-0995

Re: DEP File No. 0810199-AC (PSD-FL-318)
Manatee Energy Center-600 MW Cogeneration Plant

Dear Mr. Mack:

The Department has conducted a completeness review of the Manatee Energy Center's application received on March 28, 2001 for installation of a 600 megawatt new facility to be located one mile N.E. of Buckeye Road and U.S. Highway 41 in Piney Point. Please provide responses to our comments and questions as follows:

Your application states the steam electric turbine associated with the HSRG will be less than 75 MW, however an exact number was not provided. We need reasonable assurance that this new project is not an electrical power plant as defined in the Florida Electrical Power Plant Siting Act.

POWER AUGMENTATION

1. Power augmentation will allow the firing of additional natural gas while injecting water/steam into the turbine, to produce more megawatts. Explain the overall operation in the power augmentation mode. How much more power output is due to operation in the power augmentation mode (only). Will the steam turbine be sized for less than 75 MW capacity? Provide reasonable assurance that the steam turbine is not capable of exceeding 75 MW through its design by the steam turbine manufacturer. Provide a schematic of the power augmentation operation mode. What is the maximum manufacturer's recommended period (hr/year, hr/month) for operation in the power augmentation mode. Please advise how many hours the unit will actually operate in that mode based on conditions in Florida and other technical considerations.
2. Determine what actual emissions typically occur during power augmentation (especially for CO). We have found that emissions during gas and oil firing are typically around 1 ppm for new units and much less than manufacturer guarantees. However we do not have any information obtained while such units operate in power augmentation mode (PAM). There should be information available through GE, although we recognize that their guarantees may not be negotiable at this point. Provide reasonable assurance that the proposed limit under the power augmentation mode will not exceed 12 ppmvd @ 15 % O₂.
3. **Capacity and Emissions.** Please provide the following information:
 - Maximum heat input (mmBTU per hour), volumetric flow rate (acfm), exhaust gas exit temperature (in °F), and power output (MW) without power augmentation at 100% load and a compressor inlet temperature of 59° F.
 - Maximum heat input (mmBTU per hour), volumetric flow rate (acfm), exhaust gas exit temperature (in °F), and power output (MW) at >100% load with power augmentation and a compressor inlet temperature of 59° F.

"More Protection, Less Process"

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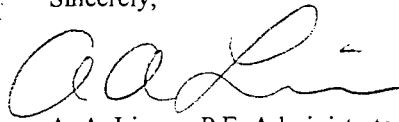
Mr. William Mack
Page 2 of 3
April 27, 2001

- CO, NOx, PM/PM10, and VOC emission rates without power augmentation at 100% load and a compressor inlet temperature of 59° and based on General Electric's emissions performance estimates.
 - CO, NOx, PM/PM10, and VOC emission rates with power augmentation at >100% load and a compressor inlet temperature of 59° and based on General Electric's emissions performance estimates.
4. **Fuel Heaters.** Does this project include any gas-fired natural gas fuel heaters? If so, please provide the maximum heat input and emission rates (lb/hour and tons per year).
5. **Relaxations of Restrictions on Pollutant Emitting Capacity.** You have requested up to 5000 hours of operation for each simple cycle gas turbine. At this level, it appears that a high-temperature SCR system (NOx control) and an oxidation catalyst system (CO control) may not be cost effective. However, any permit issued pursuant to this request will include a requirement to operate in simple cycle mode only. In addition, future conversion of any unit to combined cycle operation will invoke the source obligation requirements of Rule 62-212.400(2)(g), F.A.C. and the modification will be reviewed as if the simple cycle units had never been constructed with a new determination of the Best Available Control Technology for each significant pollutant.

The Department will resume processing your application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the authorized representative or responsible official. You are reminded that Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days or provide a written request for an additional period of time to submit the information. *Failure of an applicant to provide the timely requested information by the applicable date shall result in denial of the application*

We will forward any comments from the Department of Interior and EPA Region IV as soon as they are received. If you have any questions regarding this matter, please contact Teresa Heron (review engineer) at 850/921-9529 or Cleve Holladay (meteorologist) at 850/921-8986.

Sincerely,



A. A. Linero, P.E. Administrator
New Source Review Section

AAL/th

cc: Gregg Worley, EPA
John Bunyak, NPS
Bill Thomas, SWD
Karen Collins-Fleming, Director, Manatee County
Thomas W. Davis, PE.



Jeb Bush
Governor

BEST AVAILABLE COPY
**Department of
Environmental Protection**

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

David B. Struhs
Secretary

April 3, 2001

Mr. John Bunyak, Chief
Policy, Planning & Permit Review Branch
NPS – Air Quality Division
Post Office Box 25287
Denver, Colorado 80225

RE: Facility ID No. 0810199-001-AC, PSD-FL-318
Manatee Energy Center

Dear Mr. Bunyak:

Enclosed for your review and comment is an application for El Paso Merchant Energy Company to construct and operate a new electric power generating plant in Manatee County, Florida.

Your comments may be forwarded to my attention at the letterhead address or faxed to the Bureau of Air Regulation at 850/922-6979. If you have any questions, please contact Teresa Heron, review engineer, at 850/921-9529.

Sincerely,

Patricia Adams
Al Linero, P.E.

Administrator
New Source Review Section

AAL/pa

Enclosure

cc: Teresa Heron

"More Protection, Less Process"

Printed on recycled paper.



March 26, 2001

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

RECEIVED
MAR 28 2001
BUREAU OF AIR REGULATION

**Re: El Paso Merchant Energy Company
Manatee Energy Center
Air Construction Permit Application
US10199-001-AC PSD-FL-318**

Dear Mr. Linero:

El Paso Merchant Energy Company (EPMEC) is planning to construct, own, and operate a new electric power generating plant in Manatee County, Florida. The new power plant, designated as the Manatee Energy Center (MEC), will be a combustion turbine generator (CTG) facility comprised of one combined cycle (CC) CTG with a nominal generating capacity of 250 megawatts (MW) and two simple cycle (SC) CTGs, each with a nominal generating capacity of 175 MW. The CC unit will consist of one nominal 175 MW CTG, one unfired heat recovery steam generator, and one steam turbine generator constrained to generate less than 75 MW. Total MEC generating capacity will be a nominal 600 MW. The MEC CTGs will be fired exclusively with natural gas. MEC will be located in Manatee County approximately 0.6 miles northeast of Buckeye Road and U.S. Highway 41.

Seven copies of an Application for Air Permit – Title V Source, together with a check in the amount of \$7,500 as payment of the required permit processing fee, are enclosed for your review. Three of the applications include a CD-ROM containing the dispersion modeling files. Your expeditious processing of the EPMEC air permit application will be appreciated. Please contact me at 713/877-7023 if there are any questions.

Sincerely,

EL PASO MERCHANT ENERGY COMPANY

K. Ravishankar

Krish Ravishankar
Environmental Manager

cc: Ms. Karen Collins, Manatee County DEM

J. Neuron
Enclosures
C. Halladay
B. Thomas, SWD
EPA
NPS

C POWER COMPANY
9 GREENWAY PLAZA
HOUSTON, TX 77046

CHECK DATE 03/16/2001
CHECK NUMBER 70000405

FLORIDA DEPARTMENT OF

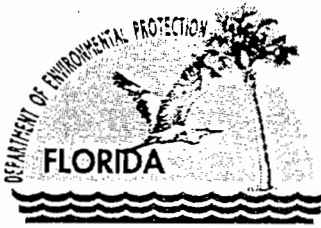
ENVIRONMENTAL PROTECTION
TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FL 32399-2400

REMITTANCE ADVICE

RETAIN FOR YOUR RECORDS

VENDOR 000006153
FLORIDA DEPARTMENT OF

Voucher ID	Invoice Number	Invoice Date	Description	Discount	Paid Amount
00100256	CKREQ010306A	03/06/2001	AIR PERMIT <i>0810199-001-AC</i>	0.00	7,500.00
TOTAL				\$0.00	\$7,500.00



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

April 3, 2001

Mr. Gregg Worley, Chief
Air, Radiation Technology Branch
Preconstruction/HAP Section
U.S. EPA, Region 4
61 Forsyth Street
Atlanta, Georgia 30303

RE: Facility ID No. 0810199-001-AC, PSD-FL-318
Manatee Energy Center

Dear Mr. Worley:

Enclosed for your review and comment is an application for El Paso Merchant Energy Company to construct and operate a new electric power generating plant in Manatee County, Florida.

Your comments may be forwarded to my attention at the letterhead address or faxed to the Bureau of Air Regulation at 850/922-6979. If you have any questions, please contact Teresa Heron, review engineer, at 850/921-9529.

Sincerely,

Al Al Linero, P.E.
Administrator
New Source Review Section

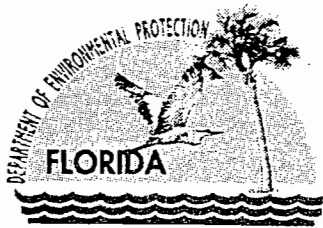
AAL/pa

Enclosure

cc: Teresa Heron

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Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

April 3, 2001

Mr. John Bunyak, Chief
Policy, Planning & Permit Review Branch
NPS – Air Quality Division
Post Office Box 25287
Denver, Colorado 80225

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Sincerely,

Al Linero, P.E.

Administrator

New Source Review Section

AAL/pa

Enclosure

cc: Teresa Heron

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Department of Environmental Protection

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61 Forsyth Street
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Sincerely,

ja Al Linero, P.E.
Administrator
New Source Review Section

AAL/pa

Enclosure

cc: Teresa Heron



March 26, 2001

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

RECEIVED
MAR 28 2001
BUREAU OF AIR REGULATION

Re: El Paso Merchant Energy Company
Manatee Energy Center
Air Construction Permit Application
U810199-001-AC PSD-PL-318

Dear Mr. Linero:

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Sincerely,

EL PASO MERCHANT ENERGY COMPANY

K. Ravishankar

Krish Ravishankar
Environmental Manager

cc: Ms. Karen Collins, Manatee County DEM

J. Nelson
Enclosures
C. Halladay
B. Thomas, SWD
EPA
NPS



March 26, 2001

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

RECEIVED
MAR 28 2001
BUREAU OF AIR REGULATION

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Manatee Energy Center
Air Construction Permit Application
U810199-001-AC PSD-FL-318**

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Sincerely,

EL PASO MERCHANT ENERGY COMPANY

K. Ravishankar

Krish Ravishankar
Environmental Manager

cc: Ms. Karen Collins, Manatee County DEM

J. Neuron
Enclosures
C. Halladay
B. Thomas, SWD
EPA
NPS



March 26, 2001

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

RECEIVED
MAR 28 2001
BUREAU OF AIR REGULATION

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Manatee Energy Center
Air Construction Permit Application
US10199-001-AC PSD-FL-318**

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Sincerely,

EL PASO MERCHANT ENERGY COMPANY

K. Ravishankar

Krish Ravishankar
Environmental Manager

cc: Ms. Karen Collins, Manatee County DEM

J. Neuron
Enclosures
C. Halladay
B. Thomas, SWD
EPA
NPS.



Environmental Consulting & Technology, Inc.

October 18, 2001

SENT VIA OVERNIGHT MAIL ON OCTOBER 18, 2001

RECEIVED

OCT 19 2001

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

3701 Northwest
98th Street
Gainesville, FL
32606

(352)
332-0444

FAX (352)
332-6722

PERMITTEE:

El Paso Merchant Energy Company
1001 Louisiana Street
Houston, TX 77002

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 (NO_x), 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 ~~47.0~~ 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 4.3 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.

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

The Honorable Joe McClash
Manatee County Board of
County Commissioners
P.O. Box 1000
Bradenton, FL 34205

2. Article Number (Copy from service label)
7001 0320 0001 3692 8581

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

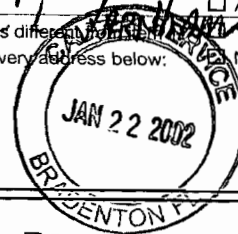
C. Signature

X

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type

- Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. William Mack, St.
Managing Director
El Paso Merchant Energy Co.
1001 Louisiana St.
Houston, TX 77002

2. Article Number (Copy from service label)
7001 0320 0001 3692 8604

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

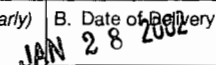
C. Signature

X

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type

- Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

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(1)

SARASOTA HERALD-TRIBUNE

PUBLISHED DAILY

SARASOTA, SARASOTA COUNTY, FLORIDA

RECEIVED

SEP 25 2001

BUREAU OF AIR REGULATION

ECT
KEITH GLYNN
3701 NW 98TH STREET
GAINESVILLE, FL 32606

STATE OF FLORIDA
COUNTY OF MANATEE

BEFORE THE UNDERSIGNED AUTHORITY PERSONALLY APPEARED MOYA NEVILLE, WHO ON OATH SAYS SHE IS ADVERTISING DIRECTOR OF THE SARASOTA HERALD-TRIBUNE, A DAILY NEWSPAPER PUBLISHED AT SARASOTA, IN SARASOTA COUNTY FLORIDA; AND CIRCULATED IN MANATEE COUNTY DAILY; THAT THE ATTACHED COPY OF ADVERTISEMENT, BEING A NOTICE IN THE MATTER OF:

NOTICE OF INTENT TO ISSUE PERMIT

IN THE COURT WAS PUBLISHED IN MANATEE EDITION OF SAID NEWSPAPER IN THE ISSUES OF:

SEPTEMBER 20, 2001

AFFIANT FURTHER SAYS THAT THE SAID SARASOTA HERALD-TRIBUNE IS A NEWSPAPER PUBLISHED AT SARASOTA, IN SAID SARASOTA COUNTY, FLORIDA, AND THAT THE SAID NEWSPAPER HAS THERETOFORE BEEN CONTINUOUSLY PUBLISHED IN SAID SARASOTA COUNTY, FLORIDA, EACH DAY, AND HAS BEEN ENTERED AS SECOND CLASS MAIL MATTER AT THE POST OFFICE IN BRADENTON, IN SAID MANATEE COUNTY, FLORIDA, FOR A PERIOD OF ONE YEAR NEXT PRECEDING THE FIRST PUBLICATION OF THE ATTACHED COPY OF ADVERTISEMENT; AND AFFIANT FURTHER SAYS THAT SHE HAS NEITHER PAID NOR PROMISED ANY PERSON, FIRM OR CORPORATION ANY DISCOUNT, REBATE, COMMISSION OR REFUND FOR THE PURPOSE OF SECURING THIS ADVERTISEMENT FOR PUBLICATION IN THE SAID NEWSPAPER.

SIGNED Moya Neville

SWORN TO AND SUBSCRIBED BEFORE ME THIS 20TH DAY OF SEPTEMBER A.D., 2001 BY MOYA NEVILLE WHO IS PERSONALLY KNOWN TO ME.

(SEAL) Bobbie J. Clark

OFFICIAL NOTARY SEAL
BOBBIE J CLARK
NOTARY PUBLIC STATE OF FLORIDA
COMMISSION NO. CC968394
MY COMMISSION EXP. OCT. 11, 2004

NOTARY PUBLIC

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No. 0810199-001-AC (PSD-FL-318)

El Paso Manatee Energy Center
Manatee County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit under the requirements for the Prevention of Significant Deterioration (PSD) of Air Quality to El Paso Merchant Energy Company. The permit is to construct a nominal 600-megawatt (MW) natural gas-fueled power plant approximately 1 mile northeast of Buckeye Road and U.S. 41 Highway near Piney Point, Manatee County. A Best Available Control Technology (BACT) determination was required for sulfur dioxide (SO₂), particulate matter (PM/P_{M10}), nitrogen oxides (NO_x), sulfuric acid mist (SAM), and carbon monoxide (CO) pursuant to Rule 62-212.400 F.A.C. The applicant's name and address are El Paso Merchant Energy Company, 1001 Louisiana Street, Houston, Texas 77002.

El Paso proposes to construct three nominal 175-MW General Electric PG721FA natural gas-fired combustion turbine-electrical generators. Two of the units will operate in simple cycle mode and intermittent duty. The other unit will operate in combined cycle mode and will include an unfired heat recovery steam generator and a separate steam-electrical generator.

Additional equipment includes three 135-foot stacks, a five-cell mechanical draft fresh water cooling tower, a 2,600-horsepower (hp) emergency diesel-fired electrical generator, a 250-hp emergency diesel-fired fire water pump, a natural gas fired heater, an aqueous ammonia storage tank, and raw and demineralized water storage tanks.

NO_x emissions will be controlled by Dry Low NO_x (DLN-2.6) combustors. The two simple cycle units must meet an emission limit of 9 parts per million by volume, dry, at 15 percent oxygen (ppmv @ 15% O₂). NO_x emissions from the combined cycle unit will be further controlled by selective catalytic reduction (SCR) to achieve 2.5 ppmvd at 15% O₂. Emissions of CO will be controlled to 8 ppmvd @ 15% O₂, except during periods of power augmentation when the limit for the combined cycle unit will be 12 ppmvd @ 15% O₂.

Emissions of PM/P_{M10}, SO₂, sulfuric acid mist, volatile organic compounds, and hazardous air pollutants (HAP) will be controlled to very low levels by good combustion and use of inherently clean pipeline quality natural gas. Ammonia emissions (NH₃) generated due to NO_x control on the combined cycle unit will be limited to 5 ppmvd.

The combined maximum emissions from the three units in tons per year are summarized below. These include the minor emissions from the emergency diesel engines and the cooling towers.

Pollutant	Maximum Potential Emissions	PSD Significant Emission Rate
PM/P _{M10} (filterable plus condensable)	181	25/15
CO	349	100
NO _x	365	40
VOC	29	40
SO ₂	69	40
Sulfuric Acid Mist	10	7

According to the applicant, maximum predicted air quality impacts due to emissions from the El Paso project are less than the applicable PSD Class II and Class I significant impact levels.

A CALPUFF modeling analysis for the El Paso project was submitted by the applicant to the National Park Service (NPS). According to the application, "regional haze impacts at the Chassahowitzka NWR will be below the NPS significant impact levels (that would otherwise require multi-source modeling)."

Based on the required analyses, the Department has reasonable assurance that the proposed project will not cause or significantly contribute to a violation of any ambient air quality standard or PSD increment.

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

The Department will issue the FINAL Permit, in accordance with the conditions of the 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 Department will accept written comments and requests for a public meeting concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of this Public Notice to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department 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., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under 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 filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition 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 section 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 the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petitioner must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

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 notice. 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 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:

Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/922-6979

Department of Environmental Protection
Southwest District Office
3804 Coconut Palm Drive
Tampa, Florida 33619-8218
Telephone: 813/744-6100
Fax: 813/744-6084

The complete project file includes the application, technical evaluations, Draft Permit, and the information submitted by the responsible officer, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information. The draft permit, technical evaluation and preliminary BACT determination can be accessed at <http://www8.myflorida.com/licensingpermitting/learn/environment/air/airpermit.html>.

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. William Mack, Sr.
 Managing Director
 El Paso Merchant Energy Co.
 1001 Louisiana Street
 Houston, TX 77002

2. Article Number (Copy from service label)
 7000 0600 0026 4129 8061

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) _____ B. Date of Delivery 9/19/19

C. Signature [Signature] 9/19 Agent Addressee

D. Is delivery address different from item 1? Yes No
 If YES, enter delivery address below: _____

3. Service Type

Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only, No Insurance Coverage Provided)

7000 0600 0026 4129 8061

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Recipient's Name (Please Print Clearly) (to be completed by mailer)
William Mack, Sr.
 Street, Apt. No., or PO Box No.
1001 Louisiana Street
 City, State, ZIP+4
Houston, TX 77002

PS Form 3800, February 2000 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

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1. Article Addressed to:

Marion Forthoffer, Air Quality Manager
 Manatee County Environmental
 Management Dept.
 202 Sixth Avenue East
 Bradenton, FL 34208

2. Article Number (Copy from service label)
 7000 0600 0026 4129 8030

COMPLETE THIS SECTION ON DELIVERY

A. Received by: (Please Print Clearly) Artker	B. Date of Delivery 9-13-01
C. Signature X <i>[Signature]</i>	<input type="checkbox"/> Agent <input type="checkbox"/> Addressee
D. Is delivery address different from item 1? If YES, enter delivery address below:	<input type="checkbox"/> Yes <input type="checkbox"/> No

3. Service Type

<input checked="" type="checkbox"/> Certified Mail	<input type="checkbox"/> Express Mail
<input type="checkbox"/> Registered	<input type="checkbox"/> Return Receipt for Merchandise
<input type="checkbox"/> Insured Mail	<input type="checkbox"/> C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

PS Form 3811, July 1999 Domestic Return Receipt 102595-99-M-1789

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

7000 0600 0026 4129 8030

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Recipient's Name (Please Print Clearly) (to be completed by mailer)
 Marion Forthoffer
Street, Apt. No., or PO Box No.
 202 6th Avenue East
City, State, ZIP+4
 Bradenton, FL 34208

PS Form 3800, February 2000

See Reverse for Instructions

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

7000 0600 0026 4129 8047

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Recipient's Name (Please Print Clearly) (to be completed by mailer)
 The Honorable Joe McClash
 Street, Apt. No., or PO Box No.
 P. O. Box 1000
 City, State, ZIP+4
 Bradenton, FL 34205

PS Form 3800, February 2000 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
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- Attach this card to the back of the mailpiece, or on the front if space permits.

1 Article Addressed to:
 The Honorable Joe McClash
 Manatee County Board of
 Commissioners
 PO Box 1000
 Bradenton, FL 34205

COMPLETE THIS SECTION ON DELIVERY

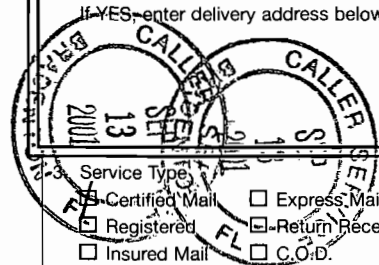
A. Received by (Please Print Clearly) *Terry L. Farnham* B. Date of Delivery

C. Signature *Terry L. FARNHAM*
 Agent
 Addressee

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

2-3 Service Type:
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes



2 Article Number (Copy from service label)
 7000 0600 0026 4129 8047

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SEP 17 2001

BUREAU OF AIR REGULATION

Dept. of Environmental Protection
Division of Air Resources Mgt.
Bureau of Air Regulation, NSR
2600 Blair Stone Rd., MS 5505
Tallahassee, FL 32399-2400

32399+2400



Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- 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):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. William Mack
Senior Managing Director
El Paso Merchant Energy Co.
Coastal Tower, None Greenway Pl
Suite 1682A
Houston, TX 77046-0995

4a. Article Number
7099 3400 0000 1450 2491

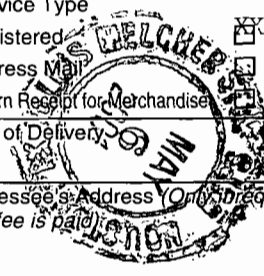
4b. Service Type
 Registered Certified
 Express Mail Insured
 Return Receipt for Merchandise COD

7. Date of Delivery

5. Received By: (Print Name)

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

6. Signature: (Addressee or Agent)
X. Mack



Thank you for using Return Receipt Service.

PS Form 3811, December 1994

102595-98-B-0229 Domestic Return Receipt

7099 3400 0000 1450 2491

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

Article Sent To:
Mr. William Mack

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Name (Please Print Clearly) (to be completed by mailer)
 El Paso Merchant Energy Co.
 Street, Apt. No., or PO Box No.
 Coastal Tower, 9 Greenway Pl, Ste 1682A
 City, State, ZIP+4
 Houston, TX 77046-0995

PS Form 3800, July, 1999

See Reverse for Instructions