

2-23-95

Agenda for Martin Title 5 Application Review Meeting

1. Structure of Application

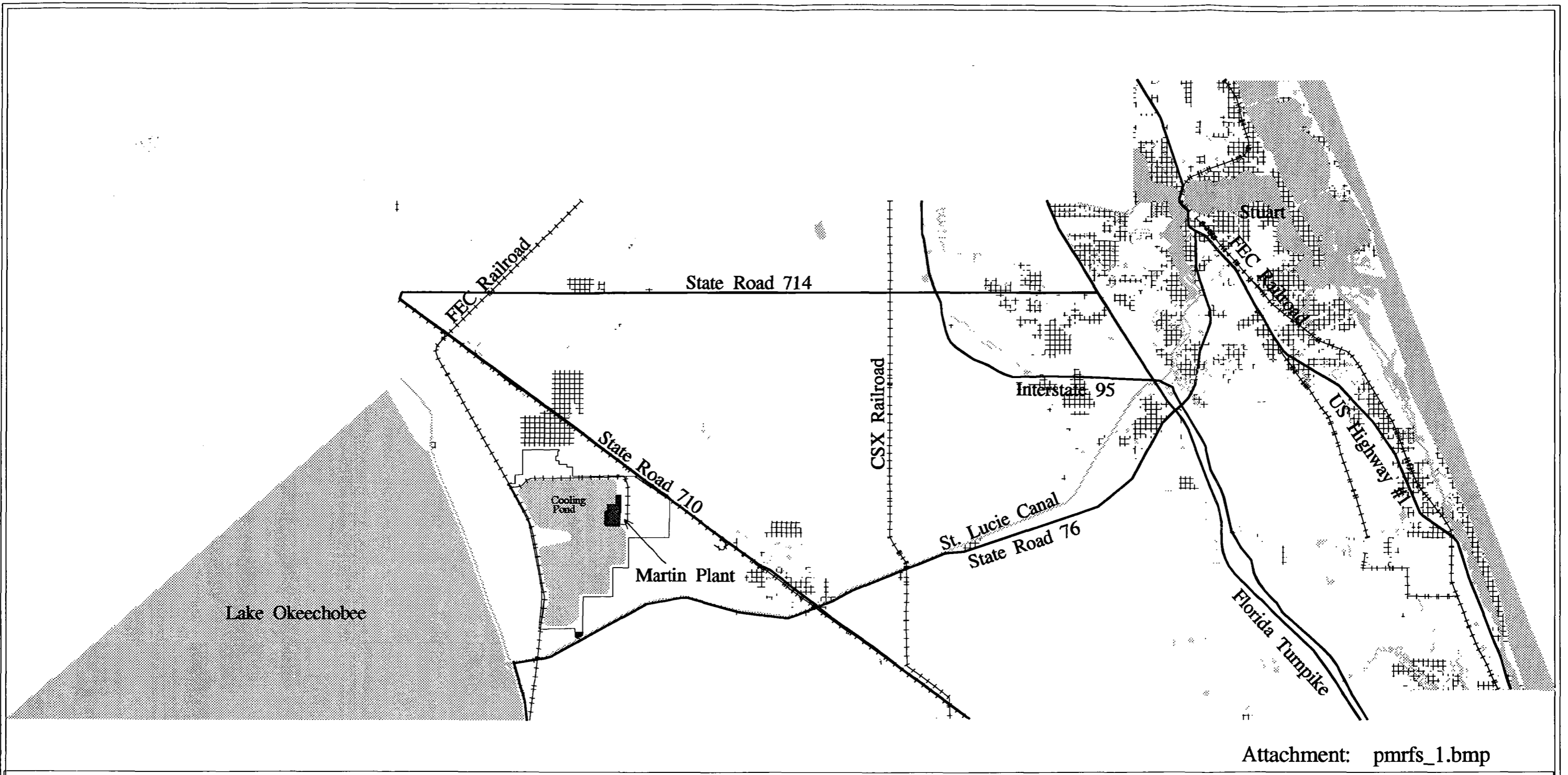
- 11 Emission Units (2 boilers, 4 CT's, 2 diesel generators, 1 aux boiler, 1 paint spray booth, facility-wide fugitives)
- copies of current operating permits included
- Acid Rain permit application included
- Lotus Notes Software "relics"

2. Review Application

- Application Information
- Facility Information
 - Insignificant Sources
- Boiler emission unit section
 - pollutant information approach
 - continuous monitor information (Pt. 60 & Pt. 75)
- CT emission unit section
- Aux boiler emission unit section
 - included superheater
- Emergency diesels
 - 2 separate emission unit sections (One is currently permitted and one is not)
- Paint Spray booth
 - conservative approach for VOC estimate
- Facility-wide fugitives
 - pollutants reported

3. Questions & Answers

- level of detail provided
- "completeness"



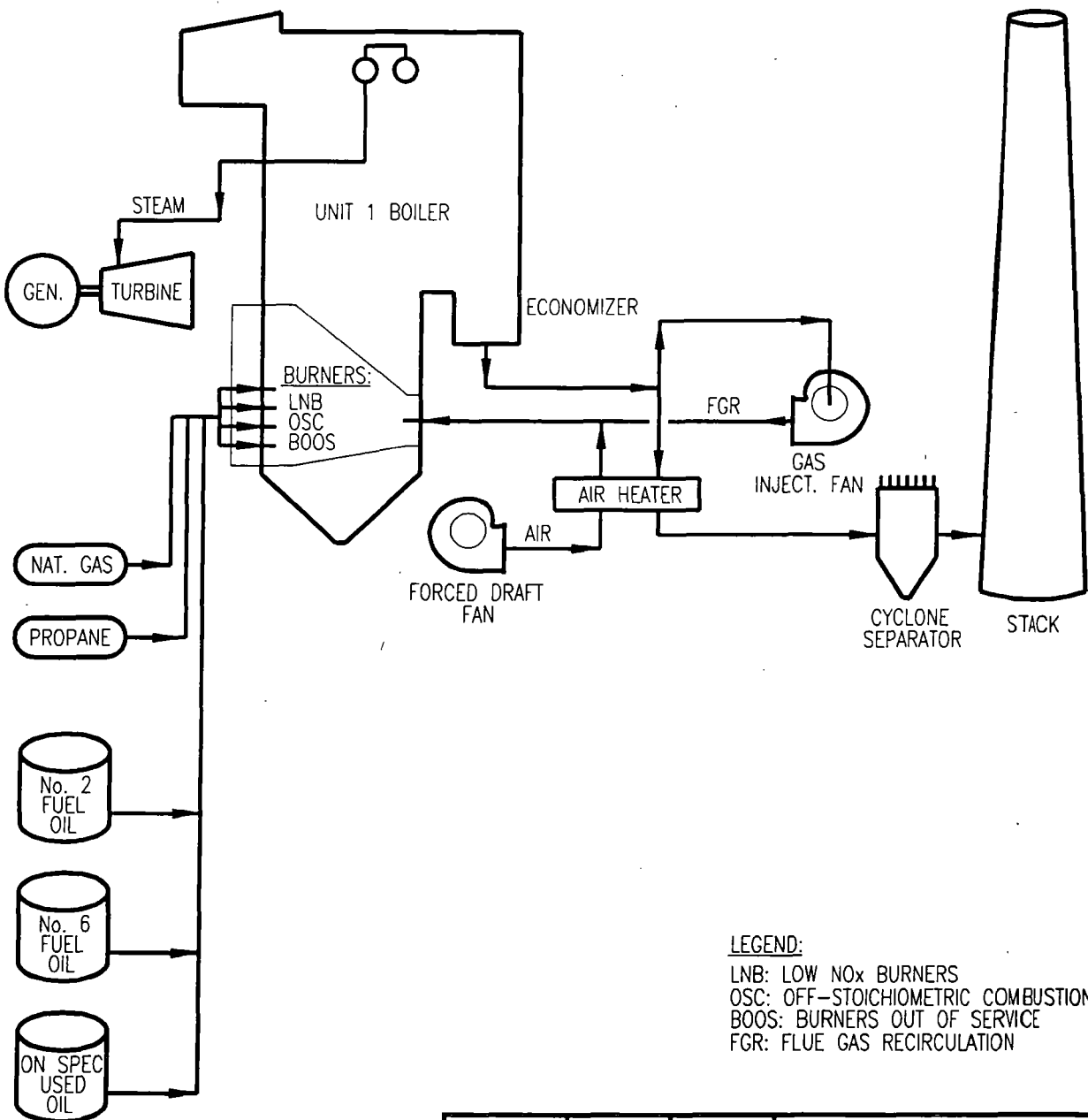
Martin Plant Area Map

Martin County



- Water
- Electrical Power Facility
- Residential Area
- Major Roads
- Railroads

WALKDOWN INFORMATION		TECHNICAL ACCEPTANCE	
ORG	BY	DATE	ORG
AS-BUILT INFORMATION	ENGINEERING ORGANIZATION	BY	DATE



LEGEND:
 LNB: LOW NO_x BURNERS
 OSC: OFF-STOICHIOMETRIC COMBUSTION
 BOOS: BURNERS OUT OF SERVICE
 FGR: FLUE GAS RECIRCULATION

BAR CODE

REV	DATE	REVISION DESCRIPTION	BY	CH	COR	APR	ORG
0	1/24/95	ISSUED FOR PERMIT	PWB	PWB			

	SYSTEM	DISCIPLINE	PLANT/UNIT
	SCALE	CAD FILE NAME	TITLE
	DRAWING SIZE	FPL ARCHIVE NAME	
		M	MARTIN PLANT
	N/A	MFD-5A	EMISSION UNIT PROCESS FLOW DIAGRAM STEAM GENERATOR/BOILER ATTACHMENT NO. EU1-1
	A (8.5X11)		
DRAWING NUMBER			SHEET
			REV
			0

Insignificant Source List

Following are several pages of insignificant sources for the facility. These are presented in tabular format with the following headings:

Equipment/System - In this column the location of the source is given (e.g. fuel oil system, water treatment system, etc.).

Size/Source - this column presents the size and quantity of the vent or emission release point(s).

Type of Emissions - This column presents the variety of pollutant or other substance emitted from the emission equipment/system.

Rationale - This column presents the reason that the emission source is proposed to be exempted as insignificant (e.g., Item 10 in the "Title V Insignificant Source Summary for the Electric Utility Industry" , no regulated pollutants, etc.).

The table is presented in 2 sections. The first section, pages 1 - 21, relates emissions at the facility to items in the "Title V Insignificant Source Summary for the Electric Utility Industry" listing, which has already been reviewed and tentatively approved by the Department. The second section, pages 22 - 28, presents other emissions which are proposed to be considered insignificant, and thus are not considered further in this application.

**INSIGNIFICANT ACTIVITIES SUMMARY
MARTIN PLANT
EXEMPT/PRESUMPTIVELY EXEMPT SOURCES**

UNITS 1 & 2 BOILER/STEAM GENERATOR POWER BLOCK			
Equipment/System	Size/Source	Type of Emissions	Rationale
Main Steam Hot and Cold Reheat	Pressure Relief Valves	Steam	Steam Exempted by D.E.P. Assessment Chart Item 26
	1" Vents to Atmosphere	Steam	
Extraction Steam	2" Vents to Atmosphere	Steam	Steam Exempted by D.E.P. Assessment Chart Item 26
Auxiliary Steam, Chemical Feed, Chlorine and Gas Purging	Waterbox Vacuum Pump Silencer/Separator Vent	Steam, chlorine vapors	No regulated pollutants emitted
	12" Steam Air Ejector Exhaust		
	Air Leakage Rotameter Vent		
	4" Condenser Equalization Line Vent		
	3" After Condenser Vent	Water vapor, steam	No regulated pollutants emitted
	2½" Generator Vent	air, water vapor, hydrogen	
	Hydrogen Detector Cabinet ¾" Vent	Hydrogen, air	No regulated pollutants emitted
	Hydrogen Supply Vent to Atmosphere		
	¾" Nitrogen Relief Valve	Nitrogen	No regulated pollutants emitted
	½" Vent Phosphate Pumps to Boiler	Phosphate vapors (mostly water vapor)	Na ₃ PO ₄ Vapors much less than 1 tpy
	Phosphate Solution Tank Vent	Phosphate vapors (mostly water vapor)	
Hydrazine Solution Tank Vent	Hydrazine vapors	N ₂ H ₄ Vapors much less than 1 tpy	
Cyclohexylamine Solution Tank Vent	Cyclohexylamine vapors	Vapors much less than 1 tpy	

UNITS 1 & 2 BOILER/STEAM GENERATOR POWER BLOCK			
Equipment/System	Size/Source	Type of Emissions	Rationale
Auxiliary Steam, Chemical Feed, Chlorine and Gas Purging (Continued)	Nitrogen Purge System	Nitrogen	N ₂ Non-Regulated Pollutant
	¾" CO ₂ Relief Valve (Generator Fire Protection)	Carbon dioxide	CO ₂ Non-Regulated Pollutant
	1" Chlorine Pressure Relief Valve	None	System Abandoned in Place
	½" Chlorine Dispenser Vents		
	Auxiliary Steam Relief Valves	Steam	Steam only Exempted by D.E.P. Assessment Chart Item 26
Boiler Feedwater	¾" Vents to Atmosphere	Water vapor	No regulated pollutants emitted
	3" B.F.P. Seal Drain Tanks Vent	Water vapor	
Condensate	¾" Vents to Atmosphere	Water vapor	No regulated pollutants emitted
	1" Relief Valves	Water vapor	
	Condensate Storage Tanks Vent (400,000 gal.)	Water vapor	
Caustic Wash, Lime Slurry, Ash Disposal & Reinjection	Steam Relief Valves	Water vapor	Steam Exempted by D.E.P. Assessment Chart Item 26
	Condensate Relief Valves	Water vapor	No regulated pollutants emitted
	Ash Pit	Mostly water vapor	H ₂ O Evaporation Exempted by D.E.P. Assessment Chart 28
	Caustic Wash Service Tank Vent (5,000 gal.)	Sodium hydroxide vapors	50% NaOH Vapors much less than 1 tpy

UNITS 1 & 2 BOILER/STEAM GENERATOR POWER BLOCK			
Equipment/System	Size/Source	Type of Emissions	Rationale
Potable Water	Bleach Tank 2" Vent (2,000 Gal.)	Sodium hypochlorite vapors	No regulated pollutants emitted
	Potable Water Storage Tank 4" Vent	Water vapor	No regulated pollutants emitted
Boiler Vents and Drains	¾" Vents to Atmosphere	Water vapor	No regulated pollutants emitted
	Condensate Recovery Flash Tank Relief VA.	Water vapor	
	Condensate Recovery Tank Vents 4"	Water vapor	
	22" Blowdown Tank Vent	Water vapor	Steam only Exempted by D.E.P. Assessment Chart item 26
Instrument Air	Inst. Air Water Separator Relief Valve	Water vapor	No regulated pollutants emitted
	Instrument Air Receiver Relief Valve		
	Instrument Air Dryer Relief Valve		
Service Air	Service Air Aftercooler Relief Valve	Water vapor	No regulated pollutants emitted
	Service Air Receiver Relief Valves		
B.F.P. Lube Oil	B.F.P. Lube Oil Reservoir Vent Fan 4"	Lube oil vapors (VOC)	Lube Oil VOC emissions Exempted by D.E.P. Assessment Chart Item 36
	B.F.P. Lube Oil Batch Tank 3" Vent and Filter		
	B.F.P. Lube Oil Conditioner Vent Fan 4"		
Light Oil System	Light Oil Tank 6" Vent (2,000 BBL)	Continuous	Exempted by E.P.A. Tanks 2 Program Results
	Water Draw-Off Sump		
	Diesel Day Tank ¾" Vent - (550 Gal.)		

UNITS 1 & 2 BOILER/STEAM GENERATOR POWER BLOCK			
Equipment/System	Size/Source	Type of Emissions	Rationale
Fuel Oil	Fuel Oil Storage Tanks Water Draw-off Sump	Water vapors, fuel oil vapors (VOC)	No regulated pollutants emitted
	Blowback Tank Relief Valve	Water vapors, fuel oil vapors (VOC)	No regulated pollutants emitted
	Steam Supply Relief Valve		
	Fuel Oil ¾" & 1" Vents to Atmosphere	Fuel Oil Vapors (VOC)	
	Fuel Oil ¾" Relief Valve	Fuel Oil Vapors (VOC)	
Combustion Air and Flue Gas	C.E.M. Gases	Nitrogen, carbon dioxide	Exempted by D.E.P. Assessment chart Item #15
Closed Cooling Water	¾" Vents to Atmosphere	Mostly water vapor	No regulated pollutants emitted
	Cooling Water Heat Exchangers Relief Valve	water vapor	
	Chemical Feed Tank Vent	Mostly water vapor, some molybdates	Molybdate vapors much less than 1 tpy
Turbine Gland Seal Steam and Drain	Gland Steam Condenser Exhauster 6" Vent to Atmosphere	Water vapor	No regulated pollutants emitted
Fuel Oil at Burners	1" Vents to Atmosphere	Fuel oil vapors (VOC)	Emissions much less than 1 tpy
Natural Gas	2" Vent to Atmosphere	Natural gas	Methane Vapors much less than 1 tpy
	6" Vent to Atmosphere		
Ignition (LP) Gas	1" Control Vent to Atmosphere	LP Gas	Methane Vapors much less than 1 tpy
	L.P. Gas Tanks Relief Valve	LP GAS	
Fuel Oil at Heaters	1" Vents to Atmosphere	Fuel oil vapors (VOC)	V.O.C. Emissions much less than 1 tpy

UNITS 1 & 2 BOILER/STEAM GENERATOR POWER BLOCK			
Equipment/System	Size/Source	Type of Emissions	Rationale
Control Building H.V.A.C.	Battery Rooms Exhaust Fan	Air, toilet vapors	Exempted by D.E.P. Assessment Chart Item 17 & FDEP rule 62-210.300(3) F.A.C.
	Men's Toilet Exhaust Fan		
	Women's Toilet Exhaust Fan		
	Elevator Shaft Exhaust Fan		
	M.C.C. Areas Exhaust Fans		
	Lab Exhaust Hood		
Turbine Generator Lube Oil	Generator Loop Seal Tank Exhauster 4" Vent to Atmosphere	Lube oil vapors (VOC)	Lube Oil VOC emissions presumptively Exempted by D.E.P. Assessment Chart Item 31
	Turbine Lube Oil Reservoir Vapor Extractor 6" Vent		
	Turbine Generator Lube Oil Batch Tank 4" Vent w/Filter		
	Turbine Generator Lube Oil conditioner Vapor Extractor 4" Vent		
	1" Polishing Filter Vent	Lube oil vapors (VOC)	
	1" Air Educator Vent	Lube oil vapors (VOC)	
Turbine Generator Enclosure	Miscellaneous Vents To Atmosphere	Air	Exempted by D.E.P. Chart Item 18

UNITS 1 & 2 BOILER/STEAM GENERATOR POWER BLOCK			
Equipment/System	Size/Source	Type of Emissions	Rationale
Miscellaneous Activities	Plant Grounds Maintenance		Exempted by D.E.P. Chart Item 8
	Routine Maintenance/Repair Activities	Air, Various Vapors	Exempted by D.E.P Chart Item 10
	Non-Halogenated Solvent Cleaning Operations	Vapors	Exempted by D.E.P Chart Item 13
	Internal Combustion Engines Which Drive compressors, Generators, Water Pumps or other Auxiliary Equipment	Propane, Gasoline or Diesel Fuel Combustion Products	Exempted by D.E.P Chart Item 16
	Transformers, Switches and Switchgear, Processing & Venting		Exempted by D.E.P Chart Item 19
	Electrically Heated Equipment Used for Heat Treating, Tracing, Drying, Soaking, Case Hardening or Surface Conditioning		Exempted by D.E.P Chart Item 24
	Air compressors and Centrifuges Used for Compressing Air		Exempted by D.E.P Chart Item 34
	Storage of Product in Sealed Containers		Exempted by D.E.P Chart Item 41
Miscellaneous Mobile Vehicle Operation	Cars, Light Trucks, Heavy Duty Trucks, Back Hoes, Tractors, Forklifts, Cranes, Etc.	Combustion Emissions	Exempted by D.E.P Rule FDEP 62-210.300(3)
Miscellaneous Mobile Equipment Operation	Compressors, Chain Saws, Small Generators, (< 100kw) Welding Machines, Electric Saws & Drills, Etc.		Exempted by D.E.P Chart Item 16

UNITS 3 & 4 COMBINED CYCLE POWER BLOCK			
Equipment/System	Size/Source	Type of Emission	Rationale
Main Steam and Reheat Steam	¾" Vents to Atmosphere	Steam	Steam only Exempted by D.E.P. Assessment Chart Item 26
	10" Rupture Disks Discharge to Atmosphere	Steam	
	HP/LP Drain Vent Tanks 8" Vents to Atmosphere	Steam	
	6" Rupture Disks Discharge to Atmosphere	Steam	
	10" Control Vents to Atmosphere	Steam	
HP & IP Steam Bypass	¾" Vents to Atmosphere	Steam	Steam only Exempted by D.E.P. Assessment Chart Item 26
Steam Drains	2" Main Steam Drain Tanks Control Discharge to Atmosphere	Steam / Water	Steam only Exempted by D.E.P. Assessment Chart Item 26
	1½" Main Steam Drain Tanks Control Discharge to Atmosphere	Steam / Water	
	20" Main Steam Atmospheric Receiver Tanks Vent to Atmosphere	Steam	
Condensate	¾" Vents to Atmosphere	Water vapor	No regulated pollutants emitted
	Gland Steam Exhauster 4" Vent to Atmosphere	Water vapor	
Feedwater	¾" Vents to Atmosphere	Water vapor	No regulated pollutants emitted

UNITS 3 & 4 COMBINED CYCLE POWER BLOCK			
Equipment/System	Size/Source	Type of Emissions	Rationale
Chemical Feed Skid	Ammonia Feed Tanks Vent	Ammonia vapors	N ₂ H ₂ Vapors much less than 1 tpy
	Hydrazine Feed Tanks Vent	Hydrazine vapors	N ₂ H ₂ Vapors much less than 1 tpy
	H.P. Phosphate Feed Tanks Vent	phosphate vapors	Na ₃ PO ₄ Vapors much less than 1 tpy
	I. P. Phosphate Feed Tanks Vent	phosphate vapors	Na ₃ PO ₄ Vapors much less than 1 tpy
C.T. Water Wash, Liquid Fuel Oil and Fuel Gas	4", 2", 1½" Fuel Gas Skids Vent to Atmosphere	VOC	Methane Vapors much less than 1 tpy
	Vents for Secondary Flue Gas to C.T.	Combustion gases	
	1" Vents to Atmosphere	Natural gas	Methane Vapors much less than 1 tpy
Condensate and Transfer	Condensate Storage Tanks (115,000 gal.) Vent w/Filter	Water vapor	No regulated pollutants emitted
	¾" Vents to Atmosphere	Water vapor	
Blowdown	HRSB Blowdown Flash Tanks 14" Vent to Atmosphere	Steam	Steam only Exempted by D.E.P. Assessment Chart Item 11
Lube Oil	Lube Oil Storage Tanks Vent	Lube oil vapors	Lube Oil VOC emissions Exempted by D.E.P. Assessment Chart Item 31
	4" Steam Turbine Lube Oil Reservoir Vapor Extractor Vent	Lube oil vapors	
	8" C.T. Lube Oil Skid Vent	Lube oil vapors	

UNITS 3 & 4 COMBINED CYCLE POWER BLOCK			
Equipment/System	Size/Source	Type of Emission	Rationale
Condenser Air Removal & Water Box Priming	1" Water Box Vacuum Tank Vent	Water vapor	No regulated pollutants emitted
	¾" Seal Water Coolers Vent	Water vapor	
	6" Condenser Air Water Separators Vent	Water vapor	
	1½" Water Box Air Water Separators Vent	Water vapor	
Circulating Water	1" Vents to Atmosphere	Water vapor	No regulated pollutants emitted
	Vacuum Tank Relief Valve	Water vapor	
	Vacuum Pump Vent	Water vapor	
Closed & Open Cooling Water	¾" Vents to Atmosphere	Water vapor	No regulated pollutants emitted
	2" Vent for Closed Cooling Water Surge Tanks	Water vapor	
	¾" Vent for Chemical Feed Tanks	Water vapor, molybdates	
	Cooler Vents	water vapor	No regulated pollutants emitted
	Cooler Vents	water vapor	

UNITS 3 & 4 COMBINED CYCLE POWER BLOCK			
Equipment/System	Size/Source	Type of Emission	Rationale
Compressed Air	Service Air Compressors Relief Valve	Water vapor	No regulated pollutants emitted
	Service Air Receivers Relief Valve		
	Instrument Air Receivers Relief Valve		
	Instrument Air Dryers Relief Valve		
	Instrument Air Compressors Relief Valve		
	Instrument Air Aftercoolers Relief Valve		
Fire Protection	¾" Vents to Atmosphere	Water vapor	No regulated pollutants emitted
	Diesel Engine Exhaust	Combustion emissions	Exempted by FDEP Rules 62-210.300 (3)(u)(t), F.A.C.
	2" Diesel Day Tank Vent	Diesel fumes (VOC)	Exempted by D.E.P. Assessment Chart Item 40
C.T. Lube Seal Trip, and Hydraulic Oil	3" Bearing Drain Enlargement Exhausters Vent to Atmosphere	Lube oil vapors	Lube Oil VOC emissions presumtively Exempted by D.E.P. Assessment Chart Item 31

UNITS 3 & 4 COMBINED CYCLE POWER BLOCK			
Equipment/System	Size/Source	Type of Emissions	Rationale
C.T. Inlet Air Heating and Instrument Air	¾" Vents to Atmosphere	Water vapors	No regulated pollutants emitted
Pond Water Supply	Treated Water Storage Tank (494,000 gal.) Vent/Filter	Water vapor	No regulated pollutants emitted
Makeup Condensate and Transfer	Makeup Condensate Storage Tank (4,500,000 gal.) 6" Vent/Filter	Water vapor	No regulated pollutants emitted
Auxiliary Steam	Fuel Gas Relief Valve	V.O.C.	Insignificant Volume
	Superheater	Combustion Gases	
	Auxiliary Boiler Relief Valve - 2½"	Steam	Steam only Exempted by D.E.P.Assessment Chart Item 26
	Superheater Relief Valve - 2½"	Steam	
	¾" Vents	Water Vapor/Steam	
	5" Auxiliary Boiler Blowdown Tank Vent	Steam	
Control Building H.V.A.C.	Vent/Exhaust Systems for:	Toilet vapors, air, kitchen vapors	Exempted by D.E.P. Assessment Chart Items 17,22,23 & D.E.P. rule 62-213.400 & 62-210.300(3) F.A.C.
	Women's Toilet		
	Men's Toilet		
	Elevator Machinery Room		
	Battery Rooms		
	Kitchen		
	Toilet		

UNITS 3 & 4 COMBINED CYCLE POWER BLOCK			
Equipment/System	Size/Source	Type of Emissions	Rationale
Auxiliary Buildings H.V.A.C.	Vent/Exhaust System for Switchgear Rooms Toilet Area Chemical Storage Room Water Chemistry Lab Fume Hoods Auxiliary Boiler Building	air, toilet vapors	Exempted by D.E.P. Assessment Chart Items 17,22,23 & D.E.P. rule 62-213.400 & 62-210.300(3) F.A.C.
Combustion Turbine	Enclosure Venting	Air Turbine Vapors	Exempted by D.E.P. Assessment Chart Item 18
Main Liquid Fuel	¾" Vents to Atmosphere	Fuel oil vapors (VOC)	Exempted by E.P.A. Tanks 2 Program Results
	2" Liquid Fuel Drain Tank Vent (235 gal.)	Fuel oil vapors (VOC)	
	8" Vent w/Filter for Units 3&4 Liquid Fuel Storage Tank (2,000,000 gal.)		
Control Buildings, Potable and Sanitary	Sanitary Vents	Toilet vapors	Exemption by D.E.P. Assessment Chart Item 23
H. R. S. G.	Steam Relief Valves	Steam	Steam only Exempted by D.E.P. Assessment Chart Item 26
	1", 2" Vents to Atmosphere	Steam	
	C.E.M. Gases	NOx, CO2	Exempted by D.E.P. Assessment Chart Item 15
Service Water	¾" Vents to Atmosphere	Water vapor	No regulated pollutants emitted
Fire Protection System	1" Vents to Atmosphere	Water vapors	Exempted by F.D.E.P. Rule 62-210.300(3)(u) F.A.C.
	CO ₂ Control System	CO ₂	Exempted by F.D.E.P. Rule 62-210.300(3)
Emergency Diesel Generator System	Day Tank (500 Gal.) 1½" Vent	Fuel Oil Vapors (VOC)	Exempted by D.E.P. Assessment Chart Item 40

UNITS 3 & 4 COMBINE CYCLE POWER BLOCK			
Equipment/System	Size/Source	Type of Emissions	Rationale
Miscellaneous Activities	Plant Grounds Maintenance		Exempted by D.E.P. Chart Item 8
	Routine Maintenance/Repair Activities	Air, Various Vapors	Exempted by D.E.P. Chart Item 10
	Non-Halogenated Solvent Cleaning Operations	Vapors	Exempted by D.E.P. Chart Item 13
	Internal Combustion Engines Which Drive compressors, Generators, Water Pumps or other Auxiliary Equipment	Propane, Gasoline or Diesel Fuel Combustion Products	Exempted by D.E.P. Chart Item 16
	Transformers, Switches and Switchgear, Processing & Venting	Air	Exempted by D.E.P. Chart Item 19
	Electrically Heated Equipment Used for Heat Treating, Tracing, Drying, Soaking, Case Hardening or Surface Conditioning	Various	Exempted by D.E.P. Chart Item 24
	Air compressors and Centrifuges Used for Compressing Air	Mostly air	Exempted by D.E.P. Chart Item 34
	Storage of Product in Sealed Containers	Various	Exempted by D.E.P. Chart Item 41
Miscellaneous Mobile Vehicle Operation	Cars, Light Trucks, Heavy Duty Trucks, Back Hoes, Tractors, Forklifts, Cranes, Etc.	Combustion Emissions	Exempted by D.E.P. Rule FDEP 62-210.300(3)
Miscellaneous Mobile Equipment Operation	Compressors, Chain Saws, Small Generators, (< 100kw) Welding Machines, Electric Saws & Drills, Etc.	Mostly air	Exempted by D.E.P. Chart Item 16

GENERAL SITE/LAND UTILIZATION			
Equipment/System	Size/Source	Type of Emissions	Rationale
Water Treatment (Unit 1 & 2)	½" Carbon Filter Vents	Water vapor	No regulated emissions emitted
	½" Sand Pressure Filter Vents		
	Clearwell Vent	Water vapor	
	Lime Silo Overflow/Vent	Mostly water vapor, particulate	
Water Treatment	Brine Measuring Tank Vent	Mostly water vapor, sodium chloride	10% Brine Vapors Emissions much less than 1 tpy+
Raw Water	Raw Water Storage Tank Vent (500,000 gal.)	Water vapor	No regulated emissions emitted
	2" Vents to atmosphere	Water vapor	
	4" Well Water Pump Casing Vents	Water vapor	
Service Water	Treated Water Storage Tank 6" Vent (500,000 gal.)	Water vapor	No regulated emissions emitted
	1" Vent to Atmosphere	Water vapor	
	6" Relief Valves	Water vapor	
Gas Metering Area (Units 1 & 2)	Gas Oil Separator Tank 8" Exhaust Vent	Natural gas	Methane Vapors and V.O.C. Emissions much less than 1 tpy
	Gas Oil Separator Filter 1½" Vent	Natural gas	
	Relief Valve	Natural gas	
	6" Blowdown Valve		
	Gas Scrubber Relief Valve		
Condensate Tank with Filter	water vapor, natural gas		

GENERAL SITE/LAND UTILIZATION			
Equipment/System	Size/Source	Type of Emissions	Rationale
Waste Water (Unit 1 & 2)	Solids Settling Basin	Mostly water vapor, some fuel oil and lube oil vapors (VOC)	Presumptive Exemption by D.E.P. Assessment Chart 28
	Precipitation Basins		
	Drying Basin		
	Storm Basin		
	Neutralization Basins		
	Recovered Service Water Basin		
	Oil Separators		
	Oil Separator Inlet Lift Station		
	Oil Separator Disch. Lift Station		
	Reactivator and Filter Backwash Sump Pit		
	Demineralizer Waste Caustic Sump Pit (includes tank overflows)		
	Demineralizer and Mixed Bed Waste Acid Sump Pit (includes tank overflows)		
Oil Holding Tank 3" Vent (1,000 gal.)	Water Vapor, some VOC	V.O.C. Emissions much less than 1 typ	
Boiler Blowdown (Unit 1 & 2)	2" Vent (Air Release Valve)	Mostly water vapor	No regulated pollutants emitted
	Blowdown Lift Station	mostly water vapor	Presumptive Exemption by D.E.P. Assessment Chart 28
	1" Vents to Atmosphere	Water vapor	No regulated pollutants emitted

GENERAL SITE/LAND UTILIZATION			
Equipment/System	Size/Source	Type of Emissions	Rationale
Service Building H.V.A.C. Unit 1 & 2)	Roof Mounted Exhaust Fans	Air	Presumptive Exemption by D.E.P. Assessment Chart Item 17,18, & DEP rule 62-210.300(3), F.A.C.
	Flash Tank 2½" Vent to Atmosphere		
	Locker Room Exhaust Fan		
	Electrical Equipment Room Exhaust Fan		
	Tool Room Exhaust Fan		
	Electric Shop Exhaust Fan		
	M&S Store Exhaust Fans		
	Machine Shop Exhaust Fan		
	Maintenance Warehouse Exhaust Fan		
	Motor Repair Shop Exhaust Fan		
2½" Station Heating Piping Vent			

GENERAL SITE/LAND UTILIZATION			
Equipment/System	Size/Source	Type of Emissions	Rationale
Miscellaneous Buildings H.V.A.C. (Unit 1 & 2)	Change House Buildings Exhaust Fans	Mostly air, some oil fumes and paint fumes	Presumptive Exemption by D.E.P. Assessment Chart Item 17 & 18; DEP rule 62-210.300(3) F.A.C.
	Oil and Paint Storage Building Roof Exhaust Fans		
	Satellite Accumulation Building Roof Exhaust Fans		
	Hazardous Waste Accumulation Building Roof Exhaust Fans		
	Satellite Hazardous Waste Accumulation Building Roof Exhaust Fans		
	Motorcycle Shack		
Storm Water Basins	Retention and Detention Ponds	Water vapor	Presumptive Exemption by D.E.P. Assessment Chart 28
Sandblast Facility (Unit 1 and 2)	Sandblast Shed	Air	Presumptive Exemption by D.E.P. Assessment Chart 2

GENERAL SITE/LAND UTILIZATION			
Equipment/System	Size/Source	Type of Emissions	Rationale
Miscellaneous Building H.V.A.C. (Unit 1 & 2)	Switchgear Building Exhaust Hood	Air, toilet vapor	Presumptive Exemption by D.E.P. Assessment Chart Item 17,18; DEP rule 62-210.300(3) F.A.C.
	I&C Shop Toilet Room Exhaust Fan		
	Chlorination Building Exhaust Roof Mounted Exhaust Fan		
	Elevator Towers Exhaust Fans		
	Chemical Storage Building Roof Mounted Exhaust Fan		
	Fire Equipment Storage Building Roof Mounted Exhaust Fan		
	Freight Elevator Roof Mounted Exhaust Fan		
Control, Auxiliary and miscellaneous buildings portable and sanitary	Sanitary vents	Air, toilet vapor	Presumptive exemption by D.E.P. Assessment Chart Item 23
"Donkey boiler"	Less than 10 mmBtu/Hour	Combustion gases	Exempt by 62-213.300(3)
Miscellaneous	Painting of plant equipment	Paint fumes	Presumptive exemption by D.E.P. Assessment Chart Item 10
Natural Gas	Pressure Reduction Station (not owned by FPL)	Natural Gas Vapors	Methane Vapors & V.O.C. Emissions less than 1 typ

GENERAL SITE/LAND UTILIZATION			
Equipment/System	Size/Source	Type of Emissions	Rationale
Recreational Pavilion	L.P. Gas Tank for Grill	LP Gas, Air, toilet vapor	Presumptive Exemption by D.E.P. Assessment Chart Item 22 and 23
	Smoker with (3) 3" Stacks		
	Kitchen Exhaust Fan		
	Rest Rooms Sanitary Vent		
Plant Services Construction and Equipment Yard	Parts Cleaner Heat and Water Process	Water vapors, air	H ₂ O not a Pollutant
	Sandblasting Machine w/Filter	Air	Presumptive exemption by D.E.P. Assessment Chart Item 2
	Rest Rooms Sanitary Vents	Toilet vapor	Presumptive exemption by D.E.P. Assessment Chart Item 23
	Roof Mounted Exhaust Fans	Air	Presumptive exemption by D.E.P. Assessment Chart Item 17 & 18
	Routine Maintenance/Repair Activities	Various	Exempted by D.E.P. Assessment Chart Item 10
	Storage of Products in sealed containers	Various	Exempted by D.E.P. Assessment Chart Item 41
Weld Lab.	Roof Mounted Exhaust Fan	Mostly air, welding fumes	Presumptive exempted by D.E.P. Assessment Chart Item 18
Sewerage Treatment Skids	Open	Sewerage fumes	Sewerage Gases Presumptively Exempted by D.E.P. Assessment Chart Items 23 and 25

GENERAL SITE/LAND UTILIZATION			
Equipment/System	Size/Source	Type of Emissions	Rationale
Water Treatment (Unit 3 & 4)	Neutralization Tank 4" Vent (12' Ø X 30' High)	Water vapors, sulfuric acid vapors, sodium hydroxide vapors	No regulated pollutants emitted
	Pretreatment Cartridge Filters ½" Vent	Water vapor	
	R.O. Clean up Tank 1½" Vent		
	R.O. Effluent Tank Decarbonator Tower Blowers Exhaust	Water vapor	
	R.O. Potable Cartridge Filters ¼" Vent	Water vapor	No regulated pollutants emitted
	R.O. Clean up Cartridge Filter ½" Vent		
	Caustic Day Tank Vent (3' Ø X 3' High)	Sodium hydroxide vapors	
	Forced Draft Decarbonator Tower Blowers Exhaust	Water vapor	
	Potable Water Storage Tank Vent/Filter (12' Ø X 25' High)	Water vapor	
	Bulk Caustic Storage Tank Vent (8' Ø X 13'-6" High)	Sodium hydroxide vapors	50% NaOH Vapors much less than 1 tpy
	Bulk Acid Storage Tank Vent with Descant Breather (8' Ø X 13'-6" High)	Sulfuric acid vapors	98% H ₂ S ₀₄ NaOH Vapors much less than 1 tpy
	Acid Day Tank Vent (3' Ø X 3' High)	Sulfuric acid vapors	H ₂ S ₀₄ Vapors much less than 1 tpy
	Anti-Scalant Day Tank 1½" Vent (3' Ø X 3' High)	Anti-scalant vapors	Vapors much less than 1 tpy
	Sodium Hypochlorite Feed Tank 1" Vent (7,056 gal.)	sodium hypochlorite vapors	12% NaOCL Vapors much less than 1 tpy
	Corrosion Inhibitor Feed Tank ¾" Vent (100 gal.)	Corrosion inhibitor vapors	Vapors much less than 1 tpy

GENERAL SITE/LAND UTILIZATION			
Equipment/System	Size/Source	Type of Emissions	Rationale
Water Treatment (Units 3 & 4)	Magnesium Hydroxide Day Tank 3' - 2" Ø x 5' High	Mostly water vapor, magnesium hydroxide	Presumptively Exempted by D.E.P. Assessment Chart Item 27
	Coagulant Feed Tank 3' - 2" Ø x 4' High	Mostly water vapor	Presumptively Exempted by D.E.P. Assessment Chart Item 27
	Coagulant Aid Feed Tank 3' - 2" Ø x 4' High	Mostly water vapor	Presumptively Exempted by D.E.P. Assessment Chart Item 27
	Coagulant Aid Mix Tank 3' - 2" Ø x 4' - 2" High	Mostly water vapor	Presumptively Exempted by D.E.P. Assessment Chart Item 27
	Coagulant Mix Tank 3' - 2" Ø x 4' - 0" High	Mostly water vapor	Presumptively Exempted by D.E.P. Assessment Chart Item 27
	Filter Aid Feed Tank 3' x 2" Ø x 3' - 2" High	Mostly water vapor	Presumptively Exempted by D.E.P. Assessment Chart Item 27
	Permanganate Day Tank 3' - 0" Ø x 3' - 0" High	Mostly water vapor	Presumptively Exempted by D.E.P. Assessment Chart Item 27

GENERAL SITE/LAND UTILIZATION			
Equipment/System	Size/Source	Type of Emissions	Rationale
Waste Water Collection and Treatment (Unit 3 & 4)	PH Adjustment Tanks A & B 4" Vents (8' Ø X 18' High)	Water vapor, sulfuric acid vapor, sodium hydroxide vapor	No regulated pollutants emitted
	Waste Sump	Water vapor	No regulated pollutants emitted
	Clarifier Clearwell 8" Vent (12' Ø X 18' Height)	Water vapor	No regulated pollutants emitted
	Water Clarifier (28' Ø X 22' High)		
	Transportable Sludge Bins		
	Sludge Thickener (8' Ø X 5'-6" High)		
	Waste Water Collection Tank (64' Ø X 26' High)		
	Sumps with Liquid Level Activated Pumps	Water vapor	Presumptively exempt under DEP item 28
	Rainfall Runoff Collection Tank Vent/Filter (55,000 gal.)		
	2" Waste Oil Collection Tank Vent (100 gal.)		
¾" Vents to Atmosphere	Water vapor		
Oil/Water Separator	Mostly water vapor, some waste oil vapors	Presumptively exempt under DEP item 28	
Oily Waste Water Collection Tank Vent(25'-6" Ø X 22' High)			

GENERAL SITE/LAND UTILIZATION			
Equipment/System	Size/Source	Type of Emissions	Rationale
Bulk Gas (Hydrogen) (Unit 3 & 4)	1" Vent to Atmosphere	hydrogen	H ₂ Non-Regulated Substance
	Relief Valves	hydrogen	
Bulk Gas (Carbon Dioxide) (Unit 3 & 4)	1" Vent to Atmosphere	Carbon dioxide	CO ₂ Non-Regulated Substance
	Relief Valves	Carbon dioxide	
Bulk Gas (Nitrogen) (Unit 3 & 4)	2" Vent to Atmosphere	Nitrogen	Nitrogen Non-Regulated Substance
	Rupture Disks	Nitrogen	
	Relief Valves		
Sewage Treatment (Unit 3 & 4)	Service Building Sewage Lift Station Vent	Toilet vapors	Exempted by D.E.P. Assessment Chart Item 23 or 25 (presumptively exempt)
	Water Chemistry Building Sewage Lift Station Vent		
	Control Building Sewage Lift Station Vent		
Miscellaneous Buildings H.V.A.C. (Unit 3 & 4)	Vent/Exhaust Systems for G.E. Warehouse	air, water vapors	Exempted by D.E.P. Assessment Chart Item 23 ,17 & 18 (presumptively exempt)
	Zachary Warehouse		
	P.M.G. South Construction Warehouse		
	P.M.G. Project Field Office		
	Service Building		
	Switchyard Building		
	Satellite Hazardous Waste Accumulation Building Roof Exhaust Fans		
	Paint and Oil Storage Building Roof Exhaust Fans		
	Waste Water Area Control Room		

GENERAL SITE/LAND UTILIZATION			
Equipment/System	Size/Source	Type of Emissions	Rationale
Miscellaneous Activities	Plant Grounds Maintenance	Air, particulate	Exempted by D.E.P. Chart Item 8
	Routine Maintenance/Repair Activities	Air, Various Vapors	Exempted by D.E.P. Chart Item 10
	Non-Halogenated Solvent Cleaning Operations	Vapors	Exempted by D.E.P. Chart Item 13
	Internal Combustion Engines Which Drive compressors, Generators, Water Pumps or other Auxiliary Equipment	Propane, Gasoline or Diesel Fuel Combustion Products	Exempted by D.E.P. Chart Item 16
	Transformers, Switches and Switchgear, Processing & Venting	Air	Exempted by D.E.P. Chart Item 19
	Electrically Heated Equipment Used for Heat Treating, Tracing, Drying, Soaking, Case Hardening or Surface Conditioning	Air	Exempted by D.E.P. Chart Item 24
	Air compressors and Centrifuges Used for Compressing Air	Air	Exempted by D.E.P. Chart Item 34
	Storage of Product in Sealed Containers	Various	Exempted by D.E.P. Chart Item 41
Miscellaneous Mobile Vehicle Operation	Cars, Light Trucks, Heavy Duty Trucks, Back Hoes, Tractors, Forklifts, Cranes, Etc.	Combustion Emissions	Exempted by D.E.P. Rule FDEP 62-210.300(3)
Miscellaneous Mobile Equipment Operation	Compressors, Chain Saws, Small Generators, (< 100kw) Welding Machines, Electric Saws & Drills, Etc.	Various	Exempted by D.E.P. Chart Item 16

GENERAL SITE/LAND UTILIZATION			
Equipment/System	Size/Source	Type of Emissions	Rationale
Miscellaneous & Maintenance Facilities	Sand Blasting Units	Air	Presumptive exemption by D.E.P. Assessment Chart Item 2
	Lawn/Activities	Air, dust, particulate	Presumptive exemption by D.E.P. Assessment Chart Item 32
	Indoor Fugitives	Air, various chemicals	Presumptive exemption by D.E.P. Assessment Chart Item 14
	Application of Herbicides & Pesticides	Herbicide and pesticide fumes (Usage Approximately 700 Gallon per Year & 900 lbs per Year)	Presumptive exemption by D.E.P. Assessment Chart Item 33
Miscellaneous Vent/Exhaust Systems (Land Utilization)	Maintenance Shop: Open Air & Ceiling Fans	Air, herbicide fumes, laboratory fumes, toilet vapors	Presumptively Exempted by D.E.P. Assessment Chart Item 18
	Carpenter Shop: Open Air, Ceiling Fans & 36" Exhaust Fan		
	Herbicide Shed: One 36" Exhaust Fan		
	Lab: Fume Hood with Exhaust Fan		
	Kitchen: Exhaust Vent		
	Sewerage Vents & Stacks	Presumptively exempted by D.E.P. Assessment Chart Item 23	

GENERAL SITE/LAND UTILIZATION			
Equipment/System	Size/Source	Type of Emissions	Rationale
Miscellaneous H.V.A.C. (Land Utilization)	Cooling/Heating	Air	Exempted by D.E.P. Assessment Chart Item 17 & DEP rule 62-210.300(3) F.A.C.
Waste Oil Storage Building (Land Utilization)	467 Gallon Tank	Waste oil vapors (VOC)	Presumptively Exempted by D.E.P. Assessment Chart Item 40 (If Tank Closed)
Cooling Ponds	6600 Acres	Water vapor	Presumptively exempted by D.E.P. Assessment Chart Item 4



Lawton Chiles
Governor

117

Environmental Protection

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

Virginia H. Wetmorell
Secretary

Jim K...
- [Signature]
- [Signature]
- [Signature]

(at 5/24/94) - T I

May 20, 1994

RECEIVED

MAY 25 1994

MANAGER
ENVIRONMENTAL AFF.

Ms. Angela R. Morrison
Hopping, Boyd, Green & Sams
123 South Calhoun Street
Tallahassee, Florida 32314

Dear Ms. Morrison:

The enclosed revised Title V insignificant source summary is provided in response to your letter of April 29, 1994. Based on the additional information you provided in your letter regarding the quantity and types of non-halogenated solvents (item 13 on the insignificant source summary), the Department recommendation has been changed from "Not Exempt" to "Presumptive exemption, provided Rule 17-213.420(3)(c)3.b is complied with". Mineral spirits, for example, may contain air toxics such as benzene and xylenes in relatively small quantities.

Please advise if you have any questions or contact John Brown at (904) 488-1344.

Sincerely,

Howard L. Rhodes
Director
Division of Air Resources
Management

HLR/DO/bjb

Enclosure

cc: Elsa R. Bishop

le V Insignificant Source Summary

Electric Power Plants

Site Visit: Crist Power Plant, Gulf Power Corporation

Date of Visit: November 23, 1993

DEP Personnel: Doug Outlaw

Group Representatives: Dwain Waters
Senior Environmental Affairs Specialist
Gulf Power Corporation
(904) 444-6527

John Dominey
Senior Plant Environmental Specialist
Crist Power Plant
(904) 478-5900, Ext. 2219

Angela Morrison
Attorney
Hopping, Boyd, Green & Sams
(904) 222-7500

EMISSIONS UNIT	UNIT TYPE	DEPARTMENT RECOMMENDATIONS
1. All sources listed in 17-210.300(3)		Exempted by Rule 17-213.400 and 17-210.300(3).
2. Indoor sand blasting and abrasive grit blasting where temporary total enclosures are used to contain particulates	Shop sand blasting equipment with/filter; other totally enclosed areas	Presumptive exemption.
3. Fresh water/reuse water cooling towers	Cooling towers	Presumptive exemption.
4. Cooling ponds	Unlined ponds	Presumptive exemption.
5. Coal pile runoff ponds	Unlined ponds	Presumptive exemption.

Site Visit: Crist Power Plant (Cont'd)

EMISSIONS UNIT	UNIT TYPE	DEPARTMENT RECOMMENDATIONS
6. Open stockpiling of material.	Sand, grit, limestone, etc.	Presumptive exemption.
7. Unpaved road	Fugitive dust from vehicular traffic on unpaved roads	Fugitive dust, not exempt, subject to 17-296.310(3). Vehicles not covered under Title V and exempt under Rule 17-210.300(3)(e), F.A.C.
8. Plant grounds maintenance		Presumptive exemption.
9. Movable drop transfer point	Coal pile	Not exempt. Should be included in permit conditions for coal pile.
10. Routine maintenance/repair activities	Cleaning, Painting, Welding, Coating, applications, Non-asbestos insulation removal Hand held tools/ equip., meter repair/ maintenance, on-line/off-line cleaning of equip.	Presumptive exemption except for painting/coating applications. Surface coating facilities in ozone attainment areas are exempt if 6 gal/day or less are applied (17-210.300(3)(v)).
11. Main steam pressure/relief valves; steam from boiler operations	Valves	Steam exempt - not a pollutant.
12. Fugitive emissions from the loading or unloading of mobile sources, such as boats, tankers, trains, trucks	Material handling	Not exempt. Emissions can be estimated for these activities within the source boundary limits. Some are subject to unconfined emissions rule (Rule 296.310(3); others to RACT (Rule 17-296.711).
13. Non-halogenated solvent cleaning operations	Maintenance/repair	Presumptive exemption, if Rule 17-213.420(3)(c)3.b is complied with. (HAPs limits - 174)
14. Indoor fugitives	Vacuum cleaning Solvent storage Office supplies/equipment	Presumptive exemption. Presumptive exemption for closed containers. Presumptive exemption.

Site Visit: Crist, Power Plant (Cont'd)

EMISSIONS UNIT	UNIT TYPE	DEPARTMENT RECOMMENDATIONS
15. Testing equipment	CEMs, stack sampling calibration gases, oxygen detector	Presumptive exemption.
16. Internal combustion engines which drive compressors, generators, water pumps, or other auxiliary equipment	Natural gas, propane, gasoline, or diesel fuel combustion products	Exempt by Rule 17-210.300(3)(c) if diesel and operated less than 400 hrs/yr, otherwise presumptively exempt at time of application.
17. HVAC (heating, ventilation, and air conditioning systems)	Cooling/heating	Exempt by rule 17-213.400 and 17-210.300(3).
18. Vent/exhaust systems for: Print room storage cabinets Transformer vaults/ bldg. Maint./welding bldgs. Operating equipment vents Degasifier/deaerators/ decarbonators Air blowers/ evacuators/air locks Feedwater heater vents	Steam/condensate	Presumptive exemption. Presumptive exemption. Presumptive exemption. Presumptive exemption. Presumptive exemption. Presumptive exemption.
19. Transformers, switches, and switchgear processing (including cleaning and changing) and venting.	Maintenance activities	Presumptive exemption.
20. Use of nitrogen cap during boiler shut-down	Nitrogen	Exempt, not a criteria or regulated substance.

EMISSIONS UNIT	UNIT TYPE	DEPARTMENT RECOMMENDATIONS
21. Generator venting	Hydrogen, then CO ₂ , then air	Exempt, if only H ₂ , CO ₂ and air - non-regulated substances.
22. Vent/exhaust from kitchen		Exempt.
23. Vents/stacks for sewer lines or enclosed areas req. for safety or by code	Sewerage gases Office ventilation	Exempt.
24. Electrically heated equipment used for heat treating, tracing, drying, soaking, case hardening or surface conditioning	Electric heaters, heat tape or devices that use electricity as the heat source	Exempt.
25. Sewage treatment fac./equip. ranging in size from Porta-John to sewage treatment plants	Sewage gases plus treatment emissions	Presumptive exemption.
26. Steam releases	Steam	Exempt, not a pollutant.
27. Storage and use of chemicals solely for water/waste water treatment * SEE NOTE	Cl, H ₂ SO ₄ , anhydrous ammonia plus others	Storage in closed containers is exempt, but may be subject to accidental release plan under Section 112r, CAA. Use of such chemicals for water treatment is presumptively exempt.
28. Neutralization basins/ponds, ash pits/ponds, TETP/ENU, percolation		Presumptive exemption.
29. Transfer sumps	Structure used to retain industrial wastewater	Presumptive exemption.
30. Firefighting training facilities		Presumptive exemption, if Rule 17-256.700(5), F.A.C. is complied with and Title V permit requires same.
31. Turbine vapor extractor	Lube oil spray	Presumptive exemption.

Site Visit: Crist Power Plant (Cont'd)

EMISSIONS UNIT	UNIT TYPE	DEPARTMENT RECOMMENDATIONS
✓ 32. Lawn maintenance equipment/activities	Engine emissions, fertilizers	Presumptive exemption.
✓ 33. Application of fungicide, herbicide, pesticide.		Presumptive exemption.
✓ 34. Air compressors and centrifuges used for compressing air		Presumptive exemption.
✓ 35. Handling and removal of clinkers, slag and bottom ash.	Off-line maintenance to remove material from boiler	Presumptive exemption.
✓ 36. Recovered materials recycling systems incl: bulb crushers, solvent stills, aerosol can puncturing		Exempt.
37. Contraband drug disposal for law enforcement agencies	In boilers	Exempt.
✓ 38. Waste accumulation/consolidation	Accumulation and consolidation in 55 gal. drums that are otherwise closed	Presumptive exemption.
✓ 39. Compressed air system		Presumptive exemption.
✓ 40. Storage tanks less than 550 gal	300 gal used oil tanks	Presumptive exemption, if closed.
✓ 41. Storage of products in sealed containers.		Presumptive exemption.
42. Nuclear gauges used for the purpose of process monitoring		Presumptive exemption.

EMISSIONS UNIT	UNIT TYPE	DEPARTMENT RECOMMENDATIONS
43. Flue gas desulfurization system absorber feed tank mist eliminator/spray header vent.		Presumptive exemption.
44. Renovation/demolition of asbestos.		Exempt from Title V permit; Permit must state that 40 CFR Part 61, Subpart M applies under Rule 17-296.810, F.A.C.

*The non-halogenated solvents are deemed presumptively exempt for the following substances if they are utilized in quantities not more than 300 gallons of mineral spirits and 115 gallons of the other solvents in a twelve-month period.

Non-Halogenated Solvents

Manufacturer's Product
Type or Trade Name

✓ Mineral Spirits

Regular Mineral Spirits
Unocal Chemicals Division
Schaumburg, IL

✓ Grease Strippers

Grease Strip - GC 1003330
Gold Coast Chemical
Corporation, Hollywood, FL

✓ Dispersive Cleaners

NSC 375PL Dispersive
Cleaners
Newton Supply Company
Miami, FL

✓ Electron Aerosols

ELECTRON Aerosol
Part #0632 or Part #0336
Sentry Chemical Company,
Stone Mountain, GA

Sodium Silicate

Sodium Silicate, B&B RES-1
B&B Trittech, Inc.
Hialeah, FL

Petroleum Solvents

Low Odor Paraffin Solvent.
131608 - 00608
Exxon Company
Houston, TX

✓ Industrial Cleaners

Blue Gold Industrial
Cleaners
Carroll Company
Garland, TX
ATTACK
SUNRISE LEUV
RENO, NV

Site Visit: Crist Power Plant (Co.)

EMISSIONS UNIT	UNIT TYPE	DEPARTMENT RECOMMENDATIONS
43. Flue gas desulfurization system absorber feed tank mist eliminator/spray header vent.		Presumptive exemption.
44. Renovation/demolition of asbestos.		Exempt from Title V permit; Permit must state that 40 CFR Part 61, Subpart M applies under Rule 17-296.810, F.A.C.

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Regular Mineral Spirits
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Dispersive Cleaners

NSC 375PL Dispersive
Cleaners
Newton Supply Company
Miami, FL

Electron Aerosols

ELECTRON Aerosol
Part #0632 or Part #0296
Sentry Chemical Company,
Stone Mountain, GA

Sodium Silicate

Sodium Silicate, B&B REB-2
B&B Trittech, Inc.
Hialeah, FL

Petroleum Solvents

Low Odor Paraffin Solvent,
131608 - 00608
Exxon Company
Houston, TX

Industrial Cleaners

Blue Gold Industrial
Cleaners
Carroll Company
Garland, TX

Allowable Emissions (Pollutant identified on front page)

A.

1. Basis for Allowable Emissions Code: Rule
2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 0.8 Units : lb/mmBtu
4. Equivalent Allowable Emissions: 6,920 lbs/hr30,309.6 tons/yr
5. Method of Compliance: Continuous Emissions Monitor
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode): The 6,920 lb/hour limitation is for oil firing only. This emission unit is a new source subject to 40 CFR 60.42 requirements.

Allowable Emissions (Pollutant identified on front page)

A.

1. Basis for Allowable Emissions Code: Rule
2. Future Effective Date of Allowable Emissions: NA
3. Requested Allowable Emissions and Units: 0.3 Units : lb/mmBtu
4. Equivalent Allowable Emissions: 2,595 lbs/hr 11,366.1 tons/yr
5. Method of Compliance: Continuous Emissions Monitor
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode): This emission unit is currently permitted for 0.30 lb/mmBtu and 2,595 lb/hour while firing distillate oil; 0.20 lb/mmBtu and 1,808 lb/hour while firing natural gas. The emissions while firing both fuels are to be limited based on the prorated amounts of each, but are not to exceed 2,595 pounds per hour, under current permit conditions.

Allowable Emissions (Pollutant identified on front page)

A.

1. Basis for Allowable Emissions Code:
2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: Units :
4. Equivalent Allowable Emissions: lbs/hr tons/yr
5. Method of Compliance: None
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode): This emissions unit does not currently have an emissions limitation for formaldehyde.

Attachment PMRU1_10.doc
Alternative Methods of Operation

Operation at Various Capacities and heat input rates

The Martin Unit 1 boiler may be operated up to 8760 hours per year at heat input rates from zero to 8,760 MMBtu per hour on #6 oil, and from zero to 9,040 MMBtu per hour on natural gas. When a blend of fuel oil and natural gas are burned, the heat input is prorated based upon the percent heat input of each fuel.

Different Fuel Types

The unit may burn low sulfur fuel oil containing a maximum of 0.7% sulfur (by weight), natural gas, or a mixture of low sulfur fuel oil containing a maximum of 1.0% sulfur by weight and natural gas in a ratio which will result in a maximum sulfur dioxide emission rate of 0.80 lbs/MMBtu heat input. The unit may also burn on-specification used oil meeting EPA specifications under 40 CFR 279.11 The unit may occasionally utilize propane fuel to light off (start up) the boiler, then switch to another fuel, such as #6 residual oil.

Current emissions limitations are as follows:

<u>Pollutant</u>	<u>Emission Limit</u>
Particulate matter	0.1 lb/MMBtu and 865* lb/hr
Sulfur dioxide	0.80 lb/MMBtu and 6,920 lb/hr
Nitrogen oxides	0.30 lb/MMBtu and 2,595 lb/hr on oil 0.20 lb/MMBtu and 1,808 lb/hr on nat. gas The emissions limit on the fuel blend is prorated, but no greater than 2,595 lb/hr.

Sootblowing

The unit may blow soot for up to 24 hours per day, so long as applicable excess emissions limitations for startup, shutdown and malfunction as given by 40 CFR 60.40 and 62-210.700 are complied with (no more than 2 hours of excess emissions per 24-hour period, so long as excess emissions are minimized and Best Operating Practices are followed).

Utilization of Magnesium Oxide

Magnesium oxide ("magox") is added to the boiler periodically at various loads. The MgO slurry is injected into the boiler via the I.K. sootblower lances and through manual hand lances on a batch basis, rather than continuously. The dosage rate is based on the quantity of fuel burned and the amount of ash in the fuel.