

File



Florida Municipal Power Agency

Susan Schumann
Environmental Licensing and Permitting

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JUL 16 2008

BUREAU OF AIR REGULATION

July 14, 2008

Trina Vielhauer, Chief
Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Florida Municipal Power Agency/Cane Island Power Park Unit 4
Air Permit No. PSD-FL-400/Air Permit No. 0970043-014-AC

Dear Trina,

Pursuant to our conference call with Al Linero and David Read on July 2, 2008, FMPA respectfully submits the following comments associated with Air Permit No. PSD-FL-400. These comments are in addition to those submitted by my letter of June 2, 2008.

FMPA requests a rewording of draft permit paragraph 17 Excess Emission Allowed per the attached document titled Suggested Wording for Revised Excess Emission in CI 4 Air Permit. The enclosed uses Word track changes to show suggested edits to the draft permit language. The requested revisions provide clarification of the intent of the article. The 24 hour period is defined and the listing of each allowed excess emission situation as a subparagraph provides clarity that these situations are additive and not mutually exclusive. Also, the 2 hours of excess emissions that are allowed during a hot start are more clearly defined by a separate item rather than included in the generic 2 hours allowed.

Further to our letter of June 2, 2008 and discussions with the FDEP on July 2, 2008, FMPA withdraws our comment to Administrative Requirement #8 on page 4 of 16.

In addition, regarding Specific Condition #33 (page 13 of 16), FMPA emphasizes justification for the recommended revised language and notes that the new AOR form became effective on July 3, 2008. The instructions of the new form indicate the following:

"The annual operating report shall be submitted to the appropriate Department of Environmental Protection (DEP) district or DEP-approved local air pollution control program office by April 1 of the following year, except that the annual operating report for year 2008 shall be submitted by May 1, 2009. If the report is submitted using the department's Electronic Annual Operating Report (EAOR)

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software, there is no requirement to submit a copy to the DEP district or local air program office.”

FMPA understands that it is the Department's intent to take final action on this permit quickly. As discussed with the FDEP during the July 2, 2008 call, FMPA requests that FMPA be provided a revised draft copy of the permit following FDEP's resolution of our comments and prior to the permit being issued as final.

Please contact me via email or telephone, listed below, if any additional clarification is needed regarding the above.

Thank you,

A handwritten signature in black ink that reads "Susan R. Schumann". The signature is written in a cursive style with a large, stylized "S" and "R".

Susan R. Schumann
Florida Municipal Power Agency

Enclosure

cc: Al Linero
Gary Perko
Angela Morrison
Mike Soltys
Stanley Armbruster

Suggested Wording for Revised Excess Emissions in CI 4 Air Permit

17. Excess Emissions Allowed: Excess emissions resulting from startup, shutdown, and documented malfunctions shall be permitted, provided that operators employ the best operational practices to minimize the amount and duration of emissions during such incidents. For the CTG/HRSG system, allowed excess emissions of NO_x and CO emissions resulting from startup, shutdown, or documented malfunctions shall not exceed the following specified time periods in any 24-hour period (for purposes of this condition, "any 24-hour period" means a calendar day, midnight to midnight):

a. STG/HRSG System Cold Startup: For cold startup of the STG/HRSG system, excess NO_x and CO emissions from the CTG/HRSG system shall not exceed six hours in any 24-hour period. A "cold startup of the STG/HRSG system" is defined as startup of the combined cycle system following a shutdown of the steam turbine lasting at least 48 hours.

{Permitting Note: During a cold startup of the steam turbine system, the CTG/HRSG system is brought on line at low load to gradually increase the temperature of the STG and prevent thermal metal fatigue}

b. STG/HRSG System Warm Startup: For warm startup of the STG/HRSG system, excess NO_x and CO emissions shall not exceed four hours in any 24-hour period. A "warm startup of the STG/HRSG system" is defined as a startup of the combined cycle system following a shutdown of the steam turbine lasting at least 8 hours and less than 48 hours.

c. STG/HRSG System Hot Startup: For hot startup of the STG/HRSG system, excess NO_x and CO emissions shall not exceed two hours in any 24-hour period. A "hot startup of the STG/HRSG system" is defined as a startup of the combined cycle system following a shutdown of the steam turbine lasting less than 8 hours.

d. Shutdown: For shutdown of the combined cycle operation, excess NO_x and CO emissions from the CTG/HRSG system shall not exceed three hours in any 24-hour period.

e. Documented Malfunction: For the CTG/HRSG system, excess emissions of NO_x and CO emissions resulting from documented malfunctions shall not exceed two hours in any 24-hour period. A "documented malfunction" means a malfunction that is documented within one working day of detection by contacting the Compliance Authority by telephone, facsimile transmittal, or electronic mail.

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Deleted: except for the following specific cases. A "documented malfunction" means a malfunction that is documented within one working day of detection by contacting the Compliance Authority by telephone, facsimile transmittal, or electronic mail.

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