

Atmospheric Dispersion Modeling
Air Pollution Permitting
Landscape Design
Graphic Arts

January 4, 2008

RECEVED

Mr. Jeff Koerner, P. E. Florida Department of Environmental Protection 2600 Blair Stone Road Tallahassee, FL 32399-2400 JAN 07 2008

BUREAU OF AIR REGULATION

Re:

Application for Air Permit – Long Form

Kissimmee Utility Authority - Roy B. Hansel Power Facility - Facility ID: 0970001

Dear Mr. Koerner:

I have enclosed four (4) copies of the relevant pages of the Application for Air Permit – Long Form to revise Title V Permit number 0970001-007-AV for the above referenced facility. Please call me at (407) 333-7374 if you have any questions regarding this submittal.

Very truly yours,

PERIGEE TECHNICAL SERVICES, INC.

Jerome J. Guidry, P.E., Q.E.P.

President

JJG:emc

cc:

Larry Mattern

Mike Siefert

Jay Butters

Enclosures

via Federal Express airbill number 8132 1390 8790



Department of Environmental Protection

Division of Air Resource Management CONNIC APPLICATION FOR AIR PERMIT - LONG FORM AND 0.7 2008

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for any air construction permit at a facility operating under a serious federally enforceable state air operation permit (FESOP) or Title V air permit. Also use this form to apply for an air construction permit:

- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- Where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- Where the applicant proposes to establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

• An initial federally enforceable state air operation permit (FESOP); or

1. Facility Owner/Company Name: Kissimmee Utility Authority

• An initial/revised/renewal Title V air operation permit.

Air Construction Permit & Title V Air Operation Permit (Concurrent Processing Option) - Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

Identification of Facility

2.	Site Name: Roy B. Hansel Power Facility
3.	Facility Identification Number: 0970001
4.	Facility Location
	Street Address or Other Locator: 102 Lakeshore Boulevard
	City: Kissimmee County: Osceola Zip Code: 34741
5.	Relocatable Facility? 6. Existing Title V Permitted Facility?
	☐ Yes X No X Yes ☐ No
<u>A</u> r	oplication Contact
1.	Application Contact Name: Larry Mattern, Vice President of Power Supply
2.	Application Contact Mailing Address
	Organization/Firm: Kissimmee Utility Authority
	Street Address: P. O. Box 423219
	City: Kissimmee State: Florida Zip Code: 34742-3219
3.	Application Contact Telephone Numbers
	Telephone: (407) 933 - 7777 ext. 1233 Fax: (407) 847 - 0787
4.	Application Contact Email Address: Imattern@kua.com
Aı	oplication Processing Information (DEP Use)
1.	Date of Receipt of Application: //7/08 3. PSD Number (if applicable):
2.	Project Number(s): 0170001 - 008-At 4. Siting Number (if applicable):
	0970001-009-AV

DEP Form No. 62-210.900(1) - Form

Purpose of Application

This application for air permit is submitted to obtain: (Check one)
Air Construction Permit
☐ Air construction permit.
Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.
Air Operation Permit
☐ Initial Title V air operation permit.
Title V air operation permit revision.
Title V air operation permit renewal.
Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.
Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)
X Air construction permit and Title V permit revision, incorporating the proposed project.
Air construction permit and Title V permit renewal, incorporating the proposed project.
Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:
I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

The purpose of this application is (1) to advise the Department of KUA's intention to install a 40 CFR 75 Appendix E Data Acquisition and Handling System to comply with the monitoring requirements of the Clean Air Interstate Rule and to replace the existing continuous monitoring equipment (see Attachment B); (2) to remove the inlet air fogging system from the permit; (3) to remove fuel oil as a permitted fuel; and (4) to request a reduced frequency of compliance testing. Suggested changes to the permit are listed in Attachment C. No emissions unit information section has been submitted with this application since no other parameters associated with the emissions unit will change.

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Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Proc. Fee
001	Combined Cycle Combustion Turbine		N/A
 			
			
A 1° 4°	Processing Fee	<u> </u>	<u> </u>

Check one: Attached - Amount: \$ X Not Applicable

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP. N/A 1. Owner/Authorized Representative Name: 2. Owner/Authorized Representative Mailing Address... Organization/Firm: Street Address: State: Zip Code: City: 3. Owner/Authorized Representative Telephone Numbers... Fax: () -Telephone: () ext. 4. Owner/Authorized Representative Email Address: 5. Owner/Authorized Representative Statement: I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other requirements identified in this application to which the facility is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Signature Date

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Application Responsible Official Certification

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1.	Application Responsible Official Name: Larry Mattern, Vice President of Power Supply		
2.	Application Responsible Official Qualification (Check one or more of the following options, as applicable):		
	For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.		
	For a partnership or sole proprietorship, a general partner or the proprietor, respectively.		
	X For a municipality, county, state, federal, or other public agency, either a principal executive		
	officer or ranking elected official. The designated representative at an Acid Rain source.		
3.	Application Responsible Official Mailing Address		
J.	Organization/Firm: Kissimmee Utility Authority		
	Street Address: P. O. Box 423219		
	City: Kissimmee State: Florida Zip Code: 34742-3219		
4.	Application Responsible Official Telephone Numbers Telephone: (407) 933 - 7777 ext. 1234 Fax: (407) 847 - 0787		
5.	Application Responsible Official Email Address:		
6.	Application Responsible Official Certification:		
	I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.		
	La. M. At		

DEP Form No. 62-210.900(1) - Form

<u>Pr</u>	ofessional Engineer Certification
1.	Professional Engineer Name: Jerome J. Guidry, P. E., Q. E. P.
	Registration Number: 32589
2.	Professional Engineer Mailing Address
	Organization/Firm: Perigee Technical Services, Inc.
	Street Address: 3214 Deer Chase Run
	City: Longwood State: FL Zip Code: 32779-3173
3.	Professional Engineer Telephone Numbers
	Telephone: (407) 333 - 7374 ext. Fax: (407) 479 - 3433
4.	Professional Engineer Email Address:
5.	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 air pollutant emissions
	unit(s) and the air pollution control equipment described in this application for air permit, when
	properly operated and maintained, will comply with all applicable standards for control of air
	pollutant emissions found in the 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 hazardous air pollutants not regulated for an
	emissions unit addressed in this application, based solely upon the materials, information and
	calculations submitted with this application.
	(3) If the purpose of this application is to obtain a Title V air operation permit (check here \square , if
	so), I further certify that each emissions unit described in this application for air permit, when
	properly operated and maintained, will comply with the applicable requirements identified in this
	application to which the unit is subject, except those emissions units for which a compliance plan
	and schedule is submitted with this application.
	(4) If the purpose of this application is to obtain an air construction permit (check here \square , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit
	revision or renewal for one or more proposed new or modified emissions units (check here $\overline{\mathbf{X}}$), if
	so), I further certify that the engineering features of each such emissions unit described in this
	application have been designed or examined by me or individuals under my direct supervision and
	found to be in conformity with sound engineering principles applicable to the control of emissions
	of the air pollutants characterized in this application.
	(5) If the purpose of this application is to obtain an initial air operation permit or operation
	permit revision or renewal for one or more newly constructed or modified emissions units (check
•	here [], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance
	with the information given in the corresponding application for air construction permit and with
	all provisions-contained in such permit.
	1-3-08
; ·	Signature
3/	Smooth Control of the

Aftach any exception to certification statement.

DEP Form No. 62-210,900(1) - Form

Effectives 2/2/06

A. GENERAL FACILITY INFORMATION

Facility Location and Type NO CHANGES

Zone East (km) Latitude (DE North (km) Longitude (E	,
North (km) Longitude (I	
	DD/MM/SS)
3. Governmental 4. Facility Status 5. Facility Major	
Facility Code: Code: Group SIC C	Code:
7. Facility Comment:	
Facility Contact	
1. Facility Contact Name: Same as Application Contact	
2. Facility Contact Mailing Address	
Organization/Firm:	
Street Address:	
City: State:	Zip Code:
3. Facility Contact Telephone Numbers:	
Telephone: () - ext. Fax: () -	
4. Facility Contact Email Address:	
Facility Primary Responsible Official	
Complete if an "application responsible official" is identified	in Section I. that is not the
facility "primary responsible official."	
1. Facility Primary Responsible Official Name:	
Same as Application Contact	
2. Facility Primary Responsible Official Mailing Address	
Organization/Firm:	
Street Address:	
City: State:	Zip Code:
3. Facility Primary Responsible Official Telephone Numbers	
Telephone: () - ext. Fax: () -	
Totophono. () - OAL. Tax. () -	

DEP Form No. 62-210.900(1) - Form

Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a "major source" and a "synthetic minor source."

1. Small Business Stationary Source Unknown
2. Synthetic Non-Title V Source
3. X Title V Source
4. X Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)
5. Synthetic Minor Source of Air Pollutants, Other than HAPs
6. Major Source of Hazardous Air Pollutants (HAPs)
7. Synthetic Minor Source of HAPs
8. X One or More Emissions Units Subject to NSPS (40 CFR Part 60)
9. One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)
10. One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)
11. Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))
12. Facility Regulatory Classifications Comment:

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List of Pollutants Emitted by Facility

2. Pollutant Classification	3. Emissions Cap [Y or N]?
Α	N
A	N
SM	N
Α	N
SM	N
В	N
В	N
SM	N
	A SM SM B B

B. EMISSIONS CAPS N/A

Facility-Wide or Multi-Unit Emissions Caps

Tuemey Wide	or Multi-Chit	emissions cups			
1. Pollutant Subject to Emissions Cap	2. Facility Wide Cap [Y or N]? (all units)	3. Emissions Unit ID No.s Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap
	/	 	· · · · · · · · · · · · · · · · · · ·	·	
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	,				
7. Facility-W	ide or Multi-Un	it Emissions Cap C	Comment:		
		•			

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C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated N/A

1.	permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) Attached, Document ID: Previously Submitted, Date:
2.	Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) Attached, Document ID: Previously Submitted, Date:
3.	Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) Attached, Document ID: Previously Submitted, Date:
Ac	dditional Requirements for Air Construction Permit Applications N/A
1.	Area Map Showing Facility Location: Attached, Document ID: Not Applicable (existing permitted facility)
2.	Description of Proposed Construction, Modification, or Plantwide Applicability Limit (PAL): Attached, Document ID:
3.	Rule Applicability Analysis: Attached, Document ID:
4.	List of Exempt Emissions Units (Rule 62-210.300(3), F.A.C.): Attached, Document ID: Not Applicable (no exempt units at facility)
	Fugitive Emissions Identification: Attached, Document ID: Not Applicable
:	Air Quality Analysis (Rule 62-212.400(7), F.A.C.): Attached, Document ID: Not Applicable
7.	Source Impact Analysis (Rule 62-212.400(5), F.A.C.): Attached, Document ID: Not Applicable
8.	Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.): Attached, Document ID: Not Applicable
9.	Attached, Document ID: Not Applicable
10	Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): Attached, Document ID: Not Applicable

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Additional Requirements for FESOP Applications N/A

1.	List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.):
	Attached, Document ID: Not Applicable (no exempt units at facility)
Ad	ditional Requirements for Title V Air Operation Permit Applications
1.	List of Insignificant Activities (Required for initial/renewal applications only): Attached, Document ID: X Not Applicable (revision application)
2.	Identification of Applicable Requirements (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought): 40 CFR 75 Appendix E Attached, Document ID:
	☐ Not Applicable (revision application with no change in applicable requirements)
3.	Compliance Report and Plan (Required for all initial/revision/renewal applications): X Attached, Document ID: Attachment A Note: A compliance plan must be submitted for each emissions unit that is not in
	compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.
4.	List of Equipment/Activities Regulated under Title VI (If applicable, required for initial/renewal applications only): Attached, Document ID:
	Equipment/Activities On site but Not Required to be Individually Listed Not Applicable
5.	Verification of Risk Management Plan Submission to EPA (If applicable, required for initial/renewal applications only):
	Attached, Document ID: X Not Applicable
6.	Requested Changes to Current Title V Air Operation Permit: X Attached, Document ID: Attachment C Not Applicable
Ad	Iditional Requirements Comment

DEP Form No. 62-210.900(1) - Form

Attachment A Kissimmee Utility Authority – Roy B. Hansel Power Facility (0970001)

Compliance Report and Plan

This facility remains in compliance with all emissions limitations, work practice standards and monitoring provisions identified in Title V Operating Permit 0970001-007-AV and there were no reportable incidents of deviations from applicable requirements associated with any malfunction or breakdown of process, fuel burning or emission control equipment or monitoring systems.

I, the undersigned, am the responsible official as defined in Chapter 62-210.200, F.A.C., of the Title V source for which this application is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and data contained in this report are true, accurate, and complete.

Larry Mattern, Vice President of Power Supply

7 / Date

Attachment B

Kissimmee Utility Authority - Roy B. Hansel Power Facility (0970001)

Description of Monitoring Equipment

A General Electric Energy Services 40 CFR 75 Appendix E compliant Data Acquisition and Handling System (DAHS) will be installed on the Hansel combustion turbine. Signals from the combustion turbine control system will be sent to a GE 90-30 PLC or equivalent which will communicate with the DAHS. This system will replace the existing continuous monitoring system, including the strip chart recorder, which records fuel consumption and water-to-fuel ratio. These parameters will continue to be recorded electronically by the Appendix E DAHS or equivalent monitoring system.

Attachment C

Kissimmee Utility Authority – Roy B. Hansel Power Facility (0970001)

Requested Changes to Current Title V Air Operation Permit (Proposed deletions are stricken and proposed additions are underscored)

Subsection A. Facility Description.

This facility includes one 30.9 MW combined cycle combustion turbine with an unfired heat recovery steam generator and two 9.5 MW steam turbines which utilize steam produced by recovering waste heat from the combustion turbine exhaust gases. Emissions of nitrogen oxides (NOX) are controlled by using low nitrogen content fuels and water injection. An inlet air fogging system consisting of a high-pressure, direct water spray system provides evaporative cooling of the compressor inlet air decreasing the inlet air temperature and allowing a higher mass flow rate. This results in a slight increase in power production of two to five megawatts.

The facility also includes eight internal combustion engines that have been decommissioned and removed from the permit at the request of the applicant. The Title V permit must be revised before these units may operate again.

The eight engines have been removed from the facility. The fogger has been removed from service.

- A1. Capacity. The maximum heat <u>fuel</u> input to the emission unit shall not exceed 441.7 MMbtu/hour (3,869,292 MMbtu per any consecutive 12-month period) for no. 2 fuel oil or 0.491 million cubic feet/hour (4301.2 million cubic feet per any consecutive 12-month period) for natural gas.
- A2. Methods of Operation Fuels. Only natural gas or distillate no. 2 fuel oil having a maximum sulfur content of 0.5 percent by weight shall be fired in the emission unit. Each combustor is allowed to use natural gas, no. 2 oil, or any combination of the two.
- A3. Hours of Operation. This combined cycle combustion turbine is allowed to operate continuously. The inlet air fogging system is allowed to operate no more than 1255 hours during any consecutive 12-month period.
- A7. Sulfur dioxide (SO2) emissions from the turbine shall not exceed 255 pounds/hour and the sulfur content in the fuel oil shall not exceed 0.5% by weight for the turbine and for the boilers.

Attachment C

Kissimmee Utility Authority – Roy B. Hansel Power Facility (0970001)

Requested Changes to Current Title V Air Operation Permit (Proposed deletions are stricken and proposed additions are underscored)

A8. Nitrogen oxides emissions from the turbine shall not exceed 79 ppmvd at 15% oxygen (O2) ISO while firing natural gas. Nitrogen oxides emissions from the turbine shall not exceed 129 ppmvd at 15% O2 ISO while firing distillate fuel oil or any combination of the two.

Delete Conditions A11 and A12.

A17. The owner or operator of any stationary gas turbine subject to the provisions of 40 CFR 60, Subpart GG and using water injection to control NOX emissions shall install and operate a continuous monitoring system (CMS) to monitor and record the fuel consumption and the ratio of water to fuel being fired in the turbine. This system shall be accurate to within +5.0 percent and shall be approved by the Administrator. Since the continuous monitoring system installed to comply with 40 CFR 75, Appendix E, monitors and records the fuel consumption and the ratio of water to fuel being fired in the turbine, the equipment previously required for compliance with Subpart GG is no longer required.

A23. For purposes of demonstrating compliance with NSPS - 40 CFR 60, Subpart GG, the monitoring device installed to comply with 40 CFR 75, Appendix E, will monitor fuel consumption and water-to-fuel ratio. of 40 CFR 60.334(a) shall be used to determine the fuel consumption and the water-to-fuel ratio necessary to comply with the permitted NOX standard 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.

Delete Condition A25

Attachment C

Kissimmee Utility Authority – Roy B. Hansel Power Facility (0970001)

Requested Changes to Current Title V Air Operation Permit (Proposed deletions are stricken and proposed additions are underscored)

A35. Frequency of Compliance Tests. Compliance testing for PM, SO2, NOX, and CO emissions from this combustion turbine is required <u>prior to permit renewal</u>. If the combustion turbine fails to qualify as a 40 CFR 75, Appendix E unit during any calendar year, this testing must be conducted during the first 90 days of the following calendar year. at yearly intervals on or within 90 days prior to the date of September 30. If the combustion turbine operates no more than 400 hours per year, then only the VE testing required by condition A34 is required prior to permit renewal.

A38. For the purpose of reports required under 40 CFR 60.7(c), periods of excess emissions that shall be reported are defined as follows: 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 the permitted nitrogen oxide standard by the initial performance test required in 40 CFR 60.8 or any period during which the fuel-bound nitrogen of the fuel is greater than the maximum nitrogen content allowed by the fuelbound nitrogen allowance used during the initial performance test. 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). shall be computed in accordance with the procedures described in 40 CFR 75, Appendix E.

- A39. The owner or operator required to install a continuous monitoring system (CMS) or monitoring device shall submit an excess emissions and monitoring systems performance report (excess emissions are defined in applicable subparts) and/or a summary report form ...
 - (a) The magnitude of excess emissions computed in accordance with 40 CFR 60.13(h) or 40 CFR 75, Appendix E, any conversion factor(s) used...

A43. In order to demonstrate compliance with conditions no. A1, A2, and A3, the permittee shall maintain a log at the facility. The log at a minimum shall contain the following: Monthly

- a) month
- b) consecutive 12-month total of fuel usage and heat input rates, and fuel sulfur content by weight
- c) consecutive 12-month hours of operation of the inlet air fogging system