From: Zuczek, Jeffrey
To: Cascio, Tom
Cc: Washington, Kevin; Mazur, Susan; Rosario, Wilfredo; Peekstok, Kristin; Zuczek, Jeffrey
Subject: RE: Riviera Beach Pre-Draft
Date: Friday, August 15, 2014 2:11:29 PM
Attachments: image003.png
image004.png
image005.png
image006.png
Importance: High

Tom– Below are FPL's eight (8) comments on the Riviera Beach Energy Center (RBEC) Title V "pre-draft" permit. As an FYI, I will be on vacation until the 25th, so please contact Mary Archer (561-691-7057) or Kevin Washington (561-691-2877) if you have any questions on our comments.

FPL comments:

#1: FPL requests the minor correction of the Table of Contents page "i" for Section III, Unit 5C. There exists a typo on the page reference as it currently lists "B" rather than a page number.

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#2: FPL requests an update to the table in Section III, Specific Condition A.26. Currently, this table indicates an "As needed" frequency for the Excess Emission Reporting. Via Specific Conditions A.31(b) and (c), quarterly and semi-annual reporting may be required. To make it clear for operators, FPL requests this table to be amended accordingly.

Recordkeeping and Reporting Requirements

A.26. Reporting Schedule. The following reports and notifications shall be submitted to the Compliance Authority:

Report	Reporting Deadline	Related Condition(s)
Monthly Operations Summary	As requested by the Department.	**A.28.**
Emissions Performance Test Reports	As needed.	**A.30.**
Excess Emissions Reports	Quarterly and Semi-annually.	**A.31.**
Annual Operating Report	Annually.	**A.32.**

#3: FPL Requests Table A.10 to be amended to explicitly state the Subpart KKKK NSPS NOx emission limits as follows. Currently, the NSPS limits are included only in footnote "e" in the pre-draft. Providing the limits in Table A.10 will ensure operators are refreshed on the KKKK limits.

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A.10. Emissions Standards. Emissions from each CTG/DB shall not exceed the following standards developed under state implementation plan (SIP) permitting procedures. Compliance with these limits also assures compliance with the emission limitations in 40 CFR 60, Subpart KKKK.

Pollutant	Fuel	Method of Operation	Initial Stacks Tests ppmvd [a]	Initial Stacks Tests lb/hr [b]	CEMS Rolling Average Limit ppmvd [a]
CO [d]	Oil	CTG	10.0	61.0	10.0, 30 unit operating days [c,d]
	Gas	CTG & DB	7.6	52.7	7.5, 30 unit operating days [c,d]
		CTG Normal Mode	5.0	29.0	
NO_X [e]	Oil	CTG	8.0	80.0	8.0, 30 unit operating days [c,e]
		NSPS KKKK			42.0, 30 unit operating days [c,e]
	Gas	CTG & DB	2.0	22.8	2.0, 30 unit operating days [c,e]
		CTG Normal Model	2.0	19.3	
		NSPS KKKK			15.0, 30 unit operating days [c,e]

#4: FPL Requests the below permitting note to be placed within Specific Condition A.15. This will ensure optimal clarity to operators:

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A.15. Excess Emissions Allowed. As specified in this condition, excess emissions resulting from startup, shutdown, fuel switching and documented malfunctions are allowed provided that operators employ the best operational practices to minimize the amount and duration of emissions during such incidents. For each CTG/HRSG System, excess emissions of NO_X and CO resulting from startup, shutdown, or malfunction may be excluded from CEMS data in any 24-hour period ("any 24-hour period" means a calendar day, midnight to midnight) for the following conditions (these conditions are considered separate events and each event may occur independently within any 24-hour period):

{Permitting Note: The following conditions apply only to the "SIP-based" emissions standards specified in Condition No. 10 of this section. Rule 62-210.700, F.A.C. (Excess Emissions) cannot vary or supersede any federal provision of the NSPS, or Acid Rain programs.}

#5: To be consistent with Specific Condition A.10, FPL requests the updating of Table I in the Appendix for the correct CO "gas" limit to 7.5 ppm (corrected below):

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E.U. ID Nos.	Brief Description
007	Unit 5A – one nominal 265 MW CTG with supplementary-fired HRSG
008	Unit 5B – one nominal 265 MW CTG with supplementary-fired HRSG
009	Unit 5C – one nominal 265 MW CTG with supplementary-fired HRSG

Pollutant Name	Fuel	Allowable Emissions **CEMS Rolling Average Limit ppmvd**	Equivalent Emissions** lbs./hour	Equivalent Emissions** TPY	Regulatory Citation(s)	See permit condition(s)
Carbon Monoxide	Oil	10.0, 30 unit operating days			0090006-005-AC	**A.10.**
	Gas	7.5, 30 unit operating days				
Niitrogen Oxides	Oil	8.0, 30 unit operating days			0090006-005-AC	**A.10.**
	Gas	2.0, 30 unit operating days				
Sulfuric Acid Mist/Sulfur D	Oil	2 gr S/100 SCF of gas, 0.0015% sulfur fuel oil			0090006-005-AC	**A.10.**
	Gas	Visible emissions 10% opacity.				
Particulate Matter/PM10	Oil	2 gr S/100 SCF of gas, 0.0015% sulfur fuel oil			0090006-005-AC	**A.10.**
	Gas	Visible emissions 10% opacity.				

#6: To be consistent with Emission Unit ID numbers, FPL requests the updating of Table I in the Appendix accordingly (corrected below):

E.U. ID Nos.	Brief Description		
013	Two nominal 2,250 kilowatt (kW) liquid fueled emergency generators		**B.7.**
Visible Emission (VE)	10% opacity	0090006-005-AC	
NMHC + NO_X	6.4 g/KW-hr (4.8 g/HP-hr)	40 CFR 60.4205(b), 60.4202(a)(2) & 89.112 Table 1	
CO	3.5 g/KW-hr (2.6 g/HP-hr)	40 CFR 60.4205(b), 60.4202(a)(2) & 89.112 Table 1	
PM	0.2 g/KW-hr (.15 g/HP-hr)	40 CFR 60.4205(b), 60.4202(a)(2) & 89.112 Table 1	

E.U. ID Nos.	Brief Description		
014	One emergency diesel fire pump engine		**C.6.**
NMHC + NO_X	4.0 grams per kilowatt hour (g/kW-hr) (3.0 g/HP-hr)	40 CFR 60.4205(c) & Table 4	
CO	3.5 g/kW-hr (2.6 g/HP-hr)	40 CFR 60.4205(c) & Table 4	
PM	0.2 g/kW-hr (0.15 g/HP-hr)	40 CFR 60.4205(c) & Table 4	

#7: To be consistent with permit Specific Condition numbers, FPL requests the updating of Table 2 in the Appendix accordingly (corrected below):

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Riviera Beach Energy Center **Facility ID No.:** 0990042

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No.	Brief Description
007	Unit 5A – one nominal 265 MW CTG with supplementary-fired HRSG
008	Unit 5B – one nominal 265 MW CTG with supplementary-fired HRSG
009	Unit 5C – one nominal 265 MW CTG with supplementary-fired HRSG

Pollutant Name or Parameter	Fuels	Compliance Method	Base Date *	Test Duration	CMS	See permit condition(s)
Carbon Monoxide	Oil	CEMS			Yes	**A.18.**
	Gas	CEMS			Yes	
Niitrogen Oxides	Oil	CEMS			Yes	**A.18.**
	Gas	CEMS			Yes	
Sulfuric Acid Mist/Sulfur D	Oil	recordkeeping				**A.18.**
	Gas					
Particulate Matter/PM10	Oil	recordkeeping				**A.18.**
	Gas					

#8: Specific Condition B.8 states a Visible Emission limit for EU013. An initial compliance test, per the Compliance Plan, is required within 60 days of maximum production of each unit, or 180 days after startup of each unit. Furthermore, Rule 62-297 F.A.C. requires an annual VE test and renewal VE test. However, these generators will most likely operate less than 400 hours per year for which the "proposed" 62-297 "Revisions" currently pending would exempt VE testing. FPL requests that a condition be added to address future testing requirements.

Thank you for your time and effort in allowing us to review a "pre-draft" of this permit,

Jeff

From: Cascio, Tom [mailto:Tom.Cascio@dep.state.fl.us]
Sent: Tuesday, August 12, 2014 10:58 AM
To: Zuczek, Jeffrey
Subject: RE: Riviera Beach Pre-Draft

Sure, Jeff – here they are.

From: Zuczek, Jeffrey [mailto:Jeffrey.Zuczek@fpl.com]
Sent: Tuesday, August 12, 2014 10:32 AM
To: Cascio, Tom
Cc: Washington, Kevin; Zuczek, Jeffrey
Subject: RE: Riviera Beach Pre-Draft

Tom – At your convenience, could you possibly send for FPL review the Tables normally at the end of the permit for Emission Limits and History. Also, if the Insignificant and Unregulated Lists (and Compliance Plan for the EDG's) are available, that would be very helpful. Thank you!

Jeff

From: Cascio, Tom [mailto:Tom.Cascio@dep.state.fl.us]
Sent: Monday, August 11, 2014 9:42 AM
To: Zuczek, Jeffrey
Subject: FW: Riviera Beach Pre-Draft

Hi Jeff – attached is a pre-draft of the new Riviera Beach Title V permit for review. I sent a copy to Mary, but I see she's out today. I don't know if you are working on this project or not. Thanks for your help.

Tom

From: Cascio, Tom
Sent: Monday, August 11, 2014 9:35 AM
To: 'Archer, Mary'
Subject: Riviera Beach Pre-Draft

Hi Mary – I've attached a pre-draft of the new Title V permit for Riviera Beach. Please review and let me know if you find anything I need to fix. If you could provide comments by Friday that would be great. Hope everything is well. Many thanks.

Tom

Tom Cascio, D.B.A., CPM, Sigma Xi
Engineering Specialist IV
Permitting Group
Office of Permitting and Compliance
Florida Department of Environmental Protection
850-717-9077