

MEMORANDUM

To: Trina Vielhauer  
Through: Al Linero *aal*  
From: David Read  
Date: September 24, 2007  
Re: City of Lake Worth – Tom G. Smith Power Plant  
DRAFT Permit Renewal No. 0990045-005-AV

Attached is the intent-to-issue package to renew the City of Lake Worth Title V Permit. The highlights of this action are given in the enclosed Statement of Basis immediately following this memorandum.

The application was received on July 5, 2007 and became complete on August 31. Today is approximately day 30. We recommend your approval of the intent to issue documents.

AAL/dr

P.E. CERTIFICATION STATEMENT

PERMITTEE

Lake Worth Utilities  
1900 2<sup>nd</sup> Avenue North  
Lake Worth, Florida 33461

City of Lake Worth  
Tom G. Smith Power Plant and  
Lake Worth Water Treatment Plant  
DEP File No. 0990045-005-AV  
Title V Operation Permit Renewal

PROJECT DESCRIPTION

The applicant proposes to renew the Title V Operation Permit for the City of Lake Worth facility that consists of the Tom G. Smith Power Plant and the contiguous Lake Worth Water Treatment Plant. The facility is located at 117 College Street, Lake Worth, Florida 33461.

The facility consists of eight units that range from 2 to 30 megawatts (MW) and use a range of fuel oil grades and natural gas. The key changes in the present renewal compared with the previous one relate to the permanent retirement of several units. Additional changes include a compliance plan that requires the applicant to install permanent stack sampling facilities or to apply for and obtain an alternative sampling procedure from the Department of Environmental Protection. Further details are provided in the statement of basis (SOB) provided within the Intent-to Issue package.

According to the Palm Beach County Public Health Unit, the compliance authority for the facility, there are no compliance or enforcements issues at this time with the exception of the need to install permanent stack sampling facilities. A compliance plan addressing this matter was included in the Draft Permit Renewal as Appendix CP-1.

In my own review I adopted much of the review and analysis conducted by Scott Sheplak, P.E., under whose supervision the initial (1997) and renewal (2002) permits were prepared.

*I HEREBY CERTIFY that the air pollution control 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).*



Alvaro A. Linero, P.E.

Registration Number: 26032

9/24/07  
(Date)

STATEMENT OF BASIS

City of Lake Worth Facility

Tom G. Smith Power Plant and Lake Worth Water Treatment Plant

Facility ID No.: 0990045

Palm Beach County

TITLE V AIR OPERATION PERMIT RENEWAL

DRAFT Permit No.: 0990045-005-AV

This permitting action is the routine renewal of the 5 year Title V Operation Permit (Permit Renewal) for the City of Lake Worth Facility that is comprised of the Tom G. Smith Power Plant and the Lake Worth Water Treatment Plant. The key changes in the present renewal compared with the previous one relate to the permanent retirement of several units as described below.

This Title V air operation permit renewal is issued by the Department of Environmental Protection (Department) under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Two small fossil fuel steam generators designated as S-1 and S-4, (Emissions Units 007 and 010) were permanently retired in 2005. Though retired, S-4 continues to be reported in the Title IV (Acid Rain) portion of the permit together with an active fossil fuel steam generator designated as S-3 and as Emissions Unit (EU) 009.

Following the retirement of S-1 and S-4, the facility now consists of eight regulated emission units with a total nominal generating capacity of 96 megawatts (MW). They are listed in the following table.

EU No.	Brief Description
001 to 005	Five 2000 kilowatts (2 MW) diesel engine generators that comprise a single MP 36 Power Pack. Each diesel generator is a model 567D4 manufactured by GM Electro Motive Division.
006	Gas Turbine # 1, (GT-1), nominally rated at 30 MW, 435 million Btu per hour (mmBtu/hr), capable of burning number 2 fuel oil, with emissions exhausted through a 46 foot stack.
009	Fossil Fuel Steam Generating Unit 3 (S-3), nominally rated at 26.5 MW, 325.1 mmBtu/hr, capable of burning any combination of natural gas and number 6 fuel oil, with emissions exhausted through a 113 ft. stack.
011	Combined Cycle Unit, (GT-2/S-5), nominally rated at 29.5 MW, consists of a gas turbine (GT-2) nominally rated at 20 MW and a heat recovery steam generator (S-5) nominally rated at 10 MW. GT-2 has a maximum heat input of 317.6 mmBtu/hr, capable of burning any combination of natural gas and number 2 fuel oil, with emissions exhausted through a 75 ft. stack.

Individual usage of the eight units ranged from 8 to 775 hours of operation in 2006. Total combined hours of operation for the eight units equaled 1,087 hours. The units are primarily used for peaking purposes during the summer months. Usage has progressively declined since 2001 when total combined hours of operation of the eight units equaled 11,295 hours.

The compliance authority for the facility is the Palm Beach County Health Department, Air Quality Control Section. They conducted an inspection and determined that only EU009 (S-3) has permanent stack sampling facilities that are required in accordance with Rule 62-297.310(6)(a), F.A.C. Most of the units do not require annual testing due to minimal use.

EU011 (GT-2/S-5), the unit of greatest use (302 to 4,695 hours per year since 2001), is tested on a regular basis using temporary facilities such as a cherry picker. The applicant's consultant asserted that the facility has a useful lifetime of less than ten years and that construction of permanent stack sampling facilities is not warranted.

A compliance plan has been included (Appendix CP-1) that requires the applicant to install permanent stack sampling facilities or to apply for and obtain an alternative sampling plan (ASP) from the Department.

The facility has been assigned Department of Energy, Office of Regulatory Information Systems (ORIS) Code 0673. The present status of allowances is given in Section IV, Acid Rain Part, of the permit.

Based on the Permit Renewal application, this facility is not a major source of hazardous air pollutants (HAP).



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

September 25, 2007

*Electronically Sent – Received Receipt Requested.*

[dmulvay@lakeworth.org](mailto:dmulvay@lakeworth.org)

Mr. David L. Mulvay, Plant Manager  
City of Lake Worth Utilities  
1900 2<sup>nd</sup> Avenue North  
Lake Worth, Florida 33461

Re: DEP File No.: 0990045-005-AV  
Tom G. Smith Power Plant and  
Lake Worth Water Treatment Plant  
Facility ID: 0990045; ORIS Code: 0673

Dear Mr. Mulvay:

On July 5, 2007, you submitted an application for a Title V Air Operation Permit renewal for the City of Lake Worth facility comprised of the Tom G. Smith Municipal Power Plant and the Lake Worth Water Treatment Plant. This facility is located at 117 College Street, Lake Worth, Florida 33461; UTM Coordinates: Zone 17, 592.8 km East and 2943.7 km North; Latitude: 26° 36' 45" North and Longitude: 80° 04' 04" West. Enclosed are the following documents: "Statement of Basis", "DRAFT Permit", "Written Notice of Intent to Issue Title V Air Operation Permit Renewal", and "Public Notice of Intent to Issue Title V Air Operation Permit Renewal".

The "Statement of Basis" summarizes the Department's technical review of the application and provides the rationale for making the preliminary determination to issue a DRAFT Permit. The proposed "DRAFT Permit Renewal" includes specific conditions that regulate the emissions units at this facility. The "Written Notice of Intent to Issue Title V Air Operation Permit Renewal" provides important information regarding: the Department's intent to issue a Title V air operation permit (DRAFT Permit); the requirements for publishing a Public Notice of the Department's intent to issue the DRAFT Permit; the procedures for submitting comments on the DRAFT Permit; the requirements for requesting a public meeting; the requirements for filing a petition for an administrative hearing; and the availability of mediation. The "Public Notice of Intent to Issue Title V Air Operation Permit Renewal" is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project.

If you have any questions, please contact the Project Engineer, David Read, at 850-414-7268.

Sincerely,

Trina L. Vielhauer, Chief  
Bureau of Air Regulation

TLV/aal/dlr

Enclosures

*In the Matter of an  
Application for Title V Air Operation Permit Renewal by:*

Mr. David L. Mulvay, Plant Manager  
City of Lake Worth Utilities  
1900 2<sup>nd</sup> Avenue North  
Lake Worth, Florida 33461

DRAFT Air Permit No. 0990045-005-AV  
Tom G. Smith Power Plant and  
Lake Worth Water Treatment Plant  
Title V Operation Permit Renewal  
Palm Beach County, Florida

### **Intent to Issue Title V Air Operation Permit Renewal**

**Facility Location:** The applicant requests renewal of the facility Title V air operation permit (Permit Renewal) to operate the City of Lake Worth Utilities facility, which is located at 117 College Street, Lake Worth, Florida 33461.

**Project:** On July 5, 2007, the applicant applied to the Department of Environmental Protection (Department) for a Permit Renewal.

The facility includes eight regulated emission units with a total nominal generating capacity of 96 megawatts (MW). These include five diesel engine generators, each with a rating of 2 MW; one 26.5 MW fossil fuel steam generating unit; one 30 MW simple cycle gas turbine; and one 29.5 MW combined cycle gas turbine. Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Details of the project are provided in the application and the enclosed "Statement of Basis".

**Permitting Authority:** Applications for Title V air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, 62-213, and 62-214, Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to operate the facility. Department's Bureau of Air Regulation, is the Permitting Authority responsible for making a permit determination regarding this project. The Department's physical address is: Bureau of Air Regulation, 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301. The Department's mailing address is: Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. The Department's telephone number is 850/488-0114 and facsimile 850/921-9533.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. The complete project file includes the DRAFT Permit, the Statement of Basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the DRAFT Permit by visiting the following website: <http://www.dep.state.fl.us/air/eproducts/apds/default.asp> and entering the permit number indicated above. A copy of the complete project file is available at the Department's Southeast District Office, 400 North Congress Ave, Suite 200 West Palm Beach, Florida 33401 (Telephone: 561/681-6600). A copy of the complete project file is also available at the office of the compliance authority, which is the Palm Beach County Health Department, Air Quality Control Section, 901 Evernia Street, West Palm Beach, Florida 33401 (Telephone: 561-840-4500).

**Notice of Intent to Issue Air Permit:** The Department gives notice of its intent to issue a permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the facility will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296, and 62-297, F.A.C. The Department will issue a PROPOSED Permit and subsequent 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 a significant change of terms or conditions.

**Public Notice:** Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed "Public Notice of Intent to Issue Title V Air Operation Permit Renewal" (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet 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 above address or phone number. Pursuant to Rule 62-110.106(5), F.A.C., the applicant shall provide proof of publication to the Department at the above address within seven (7) days of publication. 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 presented 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 Rule 62-110.106(11), F.A.C.

**Comments:** The Department will accept written comments concerning the DRAFT Permit for a period of thirty (30) days from the date of publication of this Public Notice. Written comments must be post-marked, and all e-mail or facsimile comments must be received by the close of business (5 pm), on or before the end of this 30-day period by the Department at the above address, email or facsimile. As part of his or her comments, any person may also request that the Department hold a public meeting on this permitting action. If the Department determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location on the official web site for notices at Florida Administrative Weekly (FAW) at <http://faw.dos.state.fl.us/> and in a newspaper of general circulation in the area affected by the permitting action. Subsequent action on the Title V and Title IV parts of the Permit Renewal may be split if comments are received on the Title V portion of the DRAFT Permit. For additional information, contact the Department at the above address or phone number. If written comments or comments received at a public meeting result in a significant change to the DRAFT Permit, the Department shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this Written Notice of Intent to Issue Title V Air Operation Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen (14) days of publication of the attached Public Notice or within fourteen (14) days of receipt of this Written Notice of Intent to Issue Title V Air Operation Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within fourteen (14) 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 (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

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 each 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 state; (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, including an explanation of how the alleged facts relate to specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon

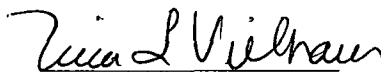
which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

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 Written Notice of Intent to Issue Title V Air Operation Permit. 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:** Mediation is not available in this proceeding.

**Objections:** Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within sixty (60) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Title V air operation permit. Any petition shall be based only on objections to the Permit that were raised with reasonable specificity during the thirty (30) day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding objections, visit the EPA Region 4 web site at: <http://epa.gov/region4/air/permits/Florida.htm>.

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief  
Bureau of Air Regulation

#### **CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Intent to Issue Title V Air Operation Permit Renewal (including the Public Notice, and the DRAFT permit) and all copies were sent electronically (with Received Receipt) before the close of business on 9/27/01 to the persons listed:

David L. Mulvay, Lake Worth Utilities: [dmulvay@lakeworth.org](mailto:dmulvay@lakeworth.org)

Lee Hoefert, Southeast District: [lee.hoefert@dep.state.fl.us](mailto:lee.hoefert@dep.state.fl.us)

Jim Stormer, Palm Beach County Health Department: [james\\_stormer@doh.state.fl.us](mailto:james_stormer@doh.state.fl.us)

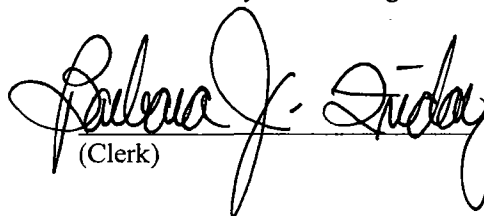
Scott Osbourn, P.E., Golder Associates: [sosbourn@golder.com](mailto:sosbourn@golder.com)

Gracy Danois, EPA Region 4: [danois.gracy@epa.gov](mailto:danois.gracy@epa.gov)

Katy Forney, EPA Region 4: [forney.kathleen@epa.gov](mailto:forney.kathleen@epa.gov)

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

 9/27/01  
(Clerk) (Date)



## PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL

Department of Environmental Protection  
DRAFT Title V Air Operation Permit No.0990045-005-AV  
City of Lake Worth Facility  
Palm Beach County

**Applicant:** The applicant for this project is City of Lake Worth Utilities, 1900 2<sup>nd</sup> Avenue North, Lake Worth, Florida 33461. The applicant's responsible official is Mr. David L. Mulvay, Power Plant Manager.

**Facility Location:** The applicant operates the City of Lake Worth facility comprised of the Tom G. Smith Power Plant and the Lake Worth Water Treatment Plant. The facility is located at 117 College Street, Lake Worth, Florida 33461. It is immediately north of 6<sup>th</sup> Avenue South and east of Interstate 95.

**Project:** The applicant submitted an application for a Title V Air Operation Permit Renewal including an Acid Rain Part pursuant to Title IV of the Clean Air Act. The facility consists of the following emissions units:

The facility includes eight regulated emission units with a total nominal generating capacity of 96 megawatts (MW). These include five diesel engine generators, each with a rating of 2 MW; one 26.5 MW fossil fuel steam generating unit; one 30 MW simple cycle gas turbine; and one 29.5 MW combined cycle gas turbine. Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities. The electrical units at the facility are typically used for peaking purposes or when power is not available from the main provider in the area.

The Permit Renewal recognizes the permanent shutdown in 2005 of two fossil fuel steam generating units not listed above and includes a compliance plan requiring installation of permanent stack sampling facilities on certain units or pursuit and approval of an alternative sampling procedure.

**Permitting Authority:** Applications for Title V air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, 62-213, and 62-214 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to operate the facility. The Department of Environmental Protection, Bureau of Air Regulation, is the Permitting Authority responsible for making a permit determination regarding this project. The Department's physical address is: Bureau of Air Regulation, 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301. The Department's mailing address is: Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. The Department's telephone number is 850/488-0114 and facsimile 850/921-9533.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Department. The complete project file includes the DRAFT Permit, the Statement of Basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the DRAFT Permit by visiting the following website: <http://www.dep.state.fl.us/air/eproducts/apds/default.asp> and entering the permit number indicated above. A copy of the complete project file is available at the Department's Southeast District Office, 400 North Congress Ave, Suite 200, West Palm Beach, Florida 33401 (Telephone: 561/681-6600). A copy of the complete project file is also available at the office of the compliance authority, which is the Palm Beach County Health Department, Air Quality Control Section, 901 Evernia Street, West Palm Beach, Florida 33401 (Telephone: 561/840-4500).

**Notice of Intent to Issue a Permit:** The Department gives notice of its intent to issue a permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the facility will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296, and 62-297, F.A.C. The Department will issue a PROPOSED Permit and subsequent 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 a significant change of terms or conditions.

**Comments:** The Department will accept written comments concerning the DRAFT Permit for a period of thirty (30) days from the date of publication of this Public Notice. Written comments must be post-marked and all e-mail or facsimile comments must be received by the close of business (5 pm) on or before the end of this 30-day period by the Department at the above address, email or facsimile. As part of his or her comments, any person may also request that the Department hold a public meeting on this permitting action. If the Department determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location on the official web site

(Public Notice to be Published in the Newspaper)

for notices at Florida Administrative Weekly (FAW) at <http://faw.dos.state.fl.us/> and in a newspaper of general circulation in the area affected by the permitting action. Subsequent action on the Title V and Title IV parts of the Permit Renewal may be split if comments are received on the Title V portion of the DRAFT Permit. For additional information, contact the Department at the above address or phone number. If written comments or comments received at a public meeting result in a significant change to the DRAFT Permit, the Department shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen (14) days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within fourteen (14) 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 (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

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 rights will be affected by the agency determination; (c) A statement of how and when the 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 state; (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, including an explanation of how the alleged facts relate to specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the 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, F.A.C.

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 Public Notice of intent. 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:** Mediation is not available for this proceeding.

**Objections:** In addition to the above right to petition, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within sixty (60) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Title V air operation permit. Any petition shall be based only on objections to the Permit that were raised with reasonable specificity during the thirty (30) day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding EPA review and objections, visit EPA's Region 4 web site at <http://www.epa.gov/region4/air/permits/Florida.htm> .

City of Lake Worth Utilities  
**Tom G. Smith Power Plant and Lake Worth Water Treatment Plant**

Facility ID No. 0990045  
Palm Beach County

Title V Air Operation Permit Renewal  
Draft Permit No. 0990045-005-AV

Permitting Authority:

State of Florida  
Department of Environmental Protection  
Division of Air Resource Management  
Bureau of Air Regulation  
Permitting South Section

Mail Station #5505  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Telephone: 850/488-0114  
Fax: 850/921-9533

Compliance Authority:

Palm Beach County Health Department  
PO Box 29  
West Palm Beach, Florida 33401

Telephone: 561/840-4500  
Fax: 561/355-2442

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Permittee:  
City of Lake Worth Utilities  
1900 2<sup>nd</sup> Avenue North  
Lake Worth, FL 33461

DRAFT Permit No. 0990045-005-AV  
Facility ID No. 0990045  
SIC Nos.: 49, 4931  
Project: Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V Air Operation Permit for the operation of the Tom G. Smith Power Plant and Lake Worth Water Treatment Plant. This facility is located at 117 College Street, Lake Worth, Florida 33461; UTM Coordinates: Zone 17, 592.8 km East and 2943.7 km North; Latitude: 26° 36' 45" North and Longitude: 80° 04' 04" West.

This Title V air operation permit revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

Appendix CP-1, Compliance Plan  
Appendix U-1, List of Unregulated Emissions Units and/or Activities  
Appendix I-1, List of Insignificant Emissions Units and/or Activities  
Appendix TV-6, Title V Conditions (version dated 6/23/06)  
Appendix SS-1, Stack Sampling Facilities (version dated 10/07/96)  
Table 297.310-1, Calibration Schedule (version dated 10/07/96)  
Alternate Sampling Procedure: ASP Number 97-B-01  
Scrivener's Order dated July 9, 1997 correcting ASP 97-B-01

Renewal Effective Date: January 1, 2008  
Revision Effective Date: September 19, 2005  
Renewal Application Due Date: July 5, 2012  
Expiration Date: December 31, 2012

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Joseph Kahn, Director  
Division of Air Resource Management

JK/tlv/aal/dlr

**Tom G. Smith Power Plant and Lake Worth Water Treatment Plant**

Facility ID No. 0990045

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**Section I. Facility Information.****Subsection A. Facility Description.**

This facility is an electric power generating plant and an adjacent potable water treatment facility and consists of:

Five 2000 kW diesel engine generators; one Fossil Fuel Steam Generating Unit (S-3); one simple cycle Gas Turbine # 1, (GT-1); and one Combined Cycle Gas Turbine Unit, (GT-2/S-5). Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Two fossil fuel steam generators designated as S-1 and S-4, (Emissions Units 007 and 010) were permanently retired in 2005.

No activities at the water treatment plant were required to be included in this permit as emissions units.

Based on the Title V permit renewal application received July 5, 2007, this facility is *not* a major source of hazardous air pollutants (HAPs).

**Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).**

<b>E.U. ID No.</b>	<b>Brief Description</b>
001 to 005	Five 2000 kW diesel engine generators, an MP 36 Power Pack; each diesel generator is a model 567D4 manufactured by GM Electro Motive Division.
009	Fossil Fuel Steam Generating Unit 3 (S-3), nominally rated at 26.5 MW, 325.1 mmBtu/hr, capable of burning any combination of natural gas and number 6 fuel oil, with emissions exhausted through a 113 ft. stack
006	Gas Turbine # 1, (GT-1), nominally rated at 30 MW, 435 mmBtu/hr, capable of burning number 2 fuel oil, with emissions exhausted through a 46 ft. stack
011	Combined Cycle Unit, (GT-2/S-5), nominally rated at 29.5 MW, consists of a gas turbine (GT-2) nominally rated at 20 MW and a heat recovery steam generator (S5) nominally rated at 10 MW. GT-2 has a maximum heat input of 317.6 mmBtu/hr, capable of burning any combination of natural gas and number 2 fuel oil, with emissions exhausted through a 75 ft. stack

***Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.***

**Tom G. Smith Power Plant and Lake Worth Water Treatment Plant**

Facility ID No. 0990045

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**Subsection C. Relevant Documents.**

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

Appendix H-1, Permit History/ID Number Changes

Table 1-1, Summary of Air Pollutant Standards and Terms

Table 2-1, Summary of Compliance Requirements

Statement of Basis

These documents are on file with the permitting authority:

Final Title V Permit Renewal Effective January 1, 2003

Title V Permit Revision Effective September 19, 2005.

These documents are on file with USEPA:

The Responsible Official has certified that the Risk Management Plan was submitted to the RMP Reporting Center.

**Section II. Facility-wide Conditions.****The following conditions apply facility-wide:**

1. Appendix TV-6, Title V Conditions, is a part of this permit.  
{Permitting note: Appendix TV-6, Title V Conditions, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided a copy when requested or otherwise appropriate.}
2. **Not Federally Enforceable**. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C.]
3. **General Particulate Emission Limiting Standards**. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. [Rule 62-296.320(4)(b)1. & 4, F.A.C.]
4. **Prevention of Accidental Releases (Section 112(r) of CAA)**.
  - a. As required by Section 112(r)(7)(B)(iii) of the CAA and 40 CFR 68, the owner or operator shall submit an updated Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center.
  - b. As required under Section 252.941(1)(c), F.S., the owner or operator shall report to the appropriate representative of the Department of Community Affairs (DCA), as established by department rule, within one working day of discovery of an accidental release of a regulated substance from the stationary source, if the owner or operator is required to report the release to the United States Environmental Protection Agency under Section 112(r)(6) of the CAA.
  - c. The owner or operator shall submit the required annual registration fee to the DCA on or before April 1, in accordance with Part IV, Chapter 252, F.S., and Rule 9G-21, F.A.C.

Any required written reports, notifications, certifications, and data required to be sent to the DCA, should be sent to:

Department of Community Affairs  
Division of Emergency Management  
2555 Shumard Oak Boulevard  
Tallahassee, FL 32399-2100  
Telephone: 850/413-9921, Fax: 850/488-1739

Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:

RMP Reporting Center  
Post Office Box 1515  
Lanham-Seabrook, Maryland 20703-1515  
Telephone: 301/429-5018



**Tom G. Smith Power Plant and Lake Worth Water Treatment Plant**

Facility ID No. 0990045

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Any required reports to be sent to the National Response Center, should be sent to:

National Response Center  
EPA Office of Solid Waste and Emergency Response  
USEPA (5305 W)  
401 M Street, SW  
Washington, D.C. 20460  
Telephone: 1/800/424-8802

Send the required annual registration fee using approved forms made payable to:

Cashier  
Department of Community Affairs  
State Emergency Response Commission  
2555 Shumard Oak Boulevard  
Tallahassee, FL 32399-2149

[Part IV, Chapter 252, F.S.; and, Rule 9G-21, F.A.C.]

5. Unregulated Emissions Units and/or Activities. Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit. [Rule 62-213.440(1), F.A.C.]
6. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.  
[Rules 62-213.440(1), 62-213.430(6), and 62-4.040(1)(b), F.A.C.]
7. **Not Federally Enforceable**. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The owner or operator shall:
  - a. Tightly cover or close all VOC or OS containers when they are not in use.
  - b. Tightly cover all open tanks which contain VOC or OS when they are not in use.
  - c. Maintain all pipes, valves, fittings, etc., which handle VOC or OS in good operating condition.
  - d. As soon as practicable, confine and clean up VOC or OS spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.[Rule 62-296.320(1)(a), F.A.C.]
8. **Not Federally Enforceable**. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:
  - a. When performing sandblasting on fixed plant equipment, the facility shall construct temporary enclosures when practical and necessary, in order to prevent unconfined particulate emissions.
  - b. Maintenance of paved areas.
  - c. Regular care of vegetation.
  - d. Limiting access to plant property by unnecessary vehicles.

**Tom G. Smith Power Plant and Lake Worth Water Treatment Plant**

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- e. Bagged chemical products shall be stored in buildings until they are used.
- f. Spills of powdered chemical products are cleaned up as soon as practicable.
- g. Sweeping paved roads with a wet vacuum truck.
- h. Watering, if necessary, the lime backwash residue holding area.

[Rule 62-296.320(4)(c)2., F.A.C.; and Title V Permit Renewal Application received July 5, 2002]

9. When appropriate, any recording, monitoring or reporting requirements that are time-specific shall be in accordance with the effective date of this permit, which defines day one.

[Rule 62-213.440, F.A.C.]

10. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the Department and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C.

[Rules 62-213.440(3) and 62-213.900, F.A.C.]

{Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. (see **Condition 51.** of Appendix TV-6, Title V Conditions).}

11. Submittals. All reports, tests, notifications or other submittals required by this permit shall be submitted to the Palm Beach County Health Department's Air Section, and copies of those submittals shall be sent to the Department of Environmental Protection, Southeast District Office, Air Section. Addresses and telephone numbers are:

Palm Beach County Health Department  
Air Section  
Post Office Box 29  
West Palm Beach, Florida 33401  
Phone: 561/840-4500

Department of Environmental Protection  
Southeast District Office, Air Section  
Post Office Box 15425  
West Palm Beach, Florida 33416  
Phone: 561/681-6600

12. Any reports, data, notifications, certifications and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency  
Region 4  
Air, Pesticides & Toxics Management Division  
Air and EPCRA Enforcement Branch  
61 Forsyth Street  
Atlanta, Georgia 30303-8960  
Telephone: 404/562-9155  
Fax: 404/562-9163

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13. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information. [Rule 62-213.420(4), F.A.C.]

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**Section III. Emissions Unit(s) and Conditions.****Subsection A. This section addresses the following emissions units.**

E.U. ID No.	Brief Description
001 to 005	Five 2000 kW diesel engine generators, an MP 36 Power Pack; each diesel generator is a model 567D4 manufactured by GM Electro Motive Division.

{Permitting note(s): These emissions units are regulated under Rule 62-296.570, F.A.C., NOx RACT.}

Compliance Assurance Monitoring (CAM) *does not apply* to these emissions units.

**The following specific conditions apply to the emissions unit(s) listed above:**

**Essential Potential to Emit (PTE) Parameters**

- A.1. Methods of Operation - (i.e., Fuels).** These emissions units shall burn only diesel fuel.  
[Rule 62-213.410, F.A.C.]

**Emission Limitations and Standards**

{Permitting note: Unless otherwise specified, the averaging time for Specific Condition **A.2.** is based on the specified averaging time of the applicable test method.}

- A.2. NOx RACT.** Emissions of nitrogen oxides (NOx) from these emissions units shall not exceed 4.75 pounds per million Btu. [Rule 62-296.570, F.A.C.]

**Test Methods and Procedures**

- A.3. NOx Testing.** Compliance with the NOx emission limitation shall be demonstrated by annual emission testing in accordance with EPA Test Method 7E or other EPA- or DEP-approved test method. [Rule 62-296.570, F.A.C.]

**Monitoring of Operations**

- A.4. Annual Tests Required - NOx.** Except as provided in specific conditions **E.6** through **E.8** of this permit, emission testing for nitrogen oxide emissions shall be performed annually, no later than the end of each federal fiscal year (September 30), except for units that are not operating because of scheduled maintenance outages and emergency repairs, which will be tested within thirty days of returning to service. Annual compliance testing while firing oil is not required for units that operated on oil for less than 400 hours in the previous federal fiscal year (ending September 30th). [Rules 62-4.070(3) and 62-213.440, F.A.C.]

**Record Keeping and Reporting Requirements**

- A.5.** The owner or operator shall make and keep records of:
- The number of hours each emissions unit operates every year; and
  - The total fuel consumption of all five units combined each year.
- Such records shall be prepared no later than thirty days after the end of each fiscal year.  
[Rule 62-4.070(3), F.A.C.]

**Common Conditions**

- A.6.** This emissions unit is also subject to conditions **E.1** through **E.19**, except for **E.3**, **E.7**, **E.8**, **E.9**, **E.10**, **E.11** and **E.18**, contained in **Subsection E. Common Conditions**.

**Tom G. Smith Power Plant and Lake Worth Water Treatment Plant**

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**Subsection B. Reserved. Formerly addressed Emissions Unit 007 (S-3). Retired August 18, 2005.**

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Facility ID No. 0990045

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**Subsection C. This section addresses the following emissions unit.**

009	Fossil Fuel Steam Generating Unit 3 (S-3), nominally rated at 26.5 MW, 325.1 mmBtu/hr, capable of burning any combination of natural gas and number 6 fuel oil, with emissions exhausted through a 113 ft. stack
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{Permitting note(s): This emissions unit is regulated under Acid Rain, Phase II, Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators with More than 250 million Btu per Hour Heat Input, and Rule 62-296.570, F.A.C., NOx RACT, Power Plant Siting Certification No. PA 74-05, and the modified conditions of PA 74-05 ordered September 28, 1987. Fossil fuel fired steam generator Unit 3 (S-3) began commercial operation in 1966. The permittee reported it operates the following continuous monitors for Unit S-3: NOx, CO<sub>2</sub>, and visible emissions. Emissions Unit 010 also known as S-4 was retired from service on August 18, 2005.}

Compliance Assurance Monitoring (CAM) *does not apply* to these emissions units.

**The following specific conditions apply to the emissions units listed above:**

**Essential Potential to Emit (PTE) Parameters**

**C.1. Permitted Capacity.** The maximum operation heat input rates are as follows:

Unit No.	mmBtu/hr Heat Input	Fuel Type
009	325.1	Natural Gas
		No. 6 Fuel Oil

[Rules 62-4.160(2), 62-210.200(PTE) and 62-296.405, F.A.C.]

{Permitting note: The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability. Regular record keeping is not required for heat input. Instead the owner or operator is expected to determine heat input whenever emission testing is required, to demonstrate at what percentage of the rated capacity that the unit was tested. Rule 62-297.310(5), F.A.C., included in the permit, requires measurement of the process variables for emission tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate average hourly heat input during the test.}

**C.2. Emissions Unit Operating Rate Limitation After Testing.** See specific condition **E.14.**

[Rule 62-297.310(2), F.A.C.]

**C.3. Methods of Operation.** Fuels.

- a. **Startup:** The only fuel(s) allowed to be burned are any combination of natural gas and/or number 6 fuel oil.
- b. **Normal:** The only fuel(s) allowed to be burned are any combination of natural gas and/or number 6 fuel oil.

[Rule 62-213.410, F.A.C.]

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**Emission Limitations and Standards**

{Permitting note: Unless otherwise specified, the averaging time for Specific Conditions C.4. through C.9. are based on the specified averaging time of the applicable test method.}

- C.4.** Visible Emissions. Visible emissions shall not exceed 20 percent opacity, except for one two-minute period per hour during which opacity shall not exceed 40 percent. Emissions units governed by this visible emissions limit shall compliance test for particulate matter emissions annually and as otherwise required by Chapter 62-297, F.A.C. [Rule 62-296.405(1)(a), F.A.C.]
- C.5.** Visible Emissions - Soot Blowing and Load Change. Visible emissions above 60 percent opacity shall be allowed for not more than 4, six (6)-minute periods, during the 3-hour period of excess emissions allowed by this condition. [Rule 62-210.700(3); F.A.C., Note: Unit S-3 has an operational continuous opacity monitor.]
- C.6.** Particulate Matter. Particulate matter emissions shall not exceed 0.1 pound per million Btu heat input, as measured by applicable compliance methods. [Rule 62-296.405(1)(b), F.A.C.]
- C.7.** Particulate Matter - Soot Blowing and Load Change. Particulate matter emissions shall not exceed an average of 0.3 pound per million Btu heat input during the 3-hours in any 24-hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change. [Rule 62-210.700(3), F.A.C.]
- C.8.** Sulfur Dioxide - Sulfur Content. The No. 6 fuel oil sulfur content shall not exceed 2.25 percent, by weight. See specific condition C.11. [Rules 62-4.070(3) and 62-213.440, F.A.C., and Power Plant Siting Certification No. PA 74-05]
- C.9.** NO<sub>x</sub> RACT. Emissions of nitrogen oxides (NO<sub>x</sub>) from these emissions units shall not exceed 0.50 pounds per million Btu while firing natural gas or number 6 fuel oil or combination thereof. [Rule 62-296.570, F.A.C.]

**Test Methods and Procedures**

- C.10.** Particulate Matter. The test methods for particulate emissions shall be EPA Methods 17, 5, 5B, or 5F, incorporated by reference in Chapter 62-297, F.A.C. The minimum sample volume shall be 30 dry standard cubic feet. EPA Method 5 may be used with filter temperature no more than 320 degrees Fahrenheit. For EPA Method 17, stack temperature shall be less than 375 degrees Fahrenheit. The owner or operator may use EPA Method 5 to demonstrate compliance. EPA Method 3 or 3A with Orsat analysis shall be used when the oxygen based F-factor, computed according to EPA Method 19, is used in lieu of heat input. Acetone wash shall be used with EPA Method 5 or 17. [Rules 62-213.440, 62-296.405(1)(e)2., and 62-297.401, F.A.C.]
- C.11.** Sulfur Dioxide - Sulfur Content. The permittee shall demonstrate compliance with the liquid fuel sulfur limit by fuel sampling and analysis. See specific conditions C.8. and C.12. [Rules 62-213.440 and 62-296.406(3), F.A.C.]
- C.12.** Fuel Sampling & Analysis - Sulfur. For each emissions unit, the following fuel sampling and analysis protocol shall be used to demonstrate compliance with the fuel sulfur limitation of specific condition C.8 of this permit:
- a. Sample the as-fired fuel oil each day fuel oil is fired.

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Facility ID No. 0990045

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- b. Composite the daily samples and each month determine and record the as-fired fuel sulfur content, percent by weight, for liquid fuels using either ASTM D2622-94, ASTM D4294-90(95), ASTM D1552-95, ASTM D1266-91, or both ASTM D4057-88 and ASTM D129-95 (or latest editions) to analyze a representative sample of the composite as-fired fuel oil. Each composite sample shall also be analyzed for heating value.
- c. Record monthly the amount of each fuel fired, and maintain records of the monthly analyses of the heating value of each fuel, and the percent sulfur content by weight of each fuel, to enable calculations of sulfur dioxide emissions.

[Rules 62-4.070(3) and 62-213.440, F.A.C., and PPSC PA 74-05]

- C.13. NO<sub>x</sub> Testing.** Compliance with the NO<sub>x</sub> emission limitation shall be demonstrated by a CEMS for emissions unit 009. See specific condition C.16. [Rule 62-296.570, F.A.C.]

**Monitoring of Operations**

- C.14. Annual Tests Required - PM and VE.** Except as provided in specific conditions E.6 through E.8 of this permit, emission testing for particulate matter emissions and visible emissions shall be performed annually, no later than the end of each federal fiscal year (September 30), except for units that are not operating because of scheduled maintenance outages and emergency repairs, which will be tested within thirty days of returning to service.

[Rules 62-4.070(3) and 62-213.440, F.A.C.]

- C.15. NO<sub>x</sub> CEMS Required - Unit 3 (S-3, Emissions Unit 009).** For emissions unit 009, compliance with the NO<sub>x</sub> limitation shall be demonstrated with a continuous emission monitoring system (CEMS). Compliance shall be based on a 30-day rolling average, excluding periods of startup, shutdown or malfunction as provided by Rule 62-210.700, F.A.C., if the CEMS is properly maintained and operated and meets the performance specifications of 40 CFR 60, Appendix B, or 40 CFR 75. The CEMS data shall be maintained on site for inspection by the Department and need not be submitted to the Department unless specifically requested.

If the CEMS is *not properly maintained and operated, as described in the above paragraph*, compliance with the NO<sub>x</sub> limitation shall be demonstrated by annual emission testing in accordance with EPA Test Method 7E.

[Rules 62-4.070(3), 62-213.440, F.A.C. and 62-296.570(4)(a)4., and request of applicant]

**Common Conditions**

- C.16.** This emissions unit is also subject to conditions E.1 through E.19, except for E.2 and E.9, contained in **Subsection E. Common Conditions**.



**Tom G. Smith Power Plant and Lake Worth Water Treatment Plant**

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**Subsection D. This section addresses the following emissions units.**

006	Gas Turbine # 1, (GT-1), manufactured by Westinghouse, nominally rated at 30 MW, 435 mmBtu/hr, capable of burning number 2 fuel oil, with emissions exhausted through a 46 ft. stack
011	Combined Cycle Unit, (GT-2/S-5), nominally rated at 29.5 MW, consists of a gas turbine (GT-2) nominally rated at 20 MW and a heat recovery steam generator (S5) nominally rated at 10 MW. GT-2 has a maximum heat input of 317.6 mmBtu/hr, capable of burning any combination of natural gas and number 2 fuel oil, with emissions exhausted through a 75 ft. stack

{Permitting notes: These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required and Rule 62-296.570, F.A.C., NOx RACT. Emissions unit 011 is also regulated under Power Plant Siting Certification No. PA 74-05, and the modified conditions of PA 74-05 ordered September 28, 1987. Based on information submitted by the applicant in the Title V application, these emissions units are *not subject* to 40 CFR 60, Subpart GG, Standards of Performance for New Stationary Gas Turbines. Each combustion turbine has its own stack. Emissions unit 006 (Unit GT-1) began commercial operation in 1976; and, emissions unit 011 (Unit GT-2/S-5) began commercial operation in 1978.}

Compliance Assurance Monitoring (CAM) *does not apply* to these emissions units.

**The following specific conditions apply to the emissions units listed above:****Essential Potential to Emit (PTE) Parameters**

**D.1. Permitted Capacity.** The maximum operation heat input rates are as follows:

Unit No.	mmBtu/hr Heat Input	Fuel Type
006	435	No. 2 Fuel Oil
011	317.6	Natural Gas
		No. 2 Fuel Oil

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

{Permitting note: The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability. Regular record keeping is not required for heat input. Instead the owner or operator is expected to determine heat input whenever emission testing is required, to demonstrate at what percentage of the rated capacity that the unit was tested. Rule 62-297.310(5), F.A.C., included in the permit, requires measurement of the process variables for emission tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate average hourly heat input during the test.}

**D.2. Emissions Unit Operating Rate Limitation After Testing.** See specific condition **E.14.**  
[Rule 62-297.310(2), F.A.C.]

**D.3. Methods of Operation - Fuels.**

a. Emissions unit 006: Only number 2 fuel oil shall be fired in the combustion turbine.

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Facility ID No. 0990045

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- b. Emissions unit 011: Only any combination of natural gas and/or number 2 fuel oil shall be fired in the combustion turbine.

[Rule 62-213.410, F.A.C.]

**Emission Limitations and Standards**

{Permitting note: Unless otherwise specified, the averaging times for Specific Conditions **D.4.** and **D.5.** are based on the specified averaging time of the applicable test method.}

- D.4.** Sulfur Dioxide - Sulfur Content - Emissions Unit 011. For emissions unit 011 (Unit GT-2/S-5), the No. 2 fuel oil sulfur content shall not exceed 0.35 percent, by weight. See specific condition D.6.

[Rules 62-4.070(3) and 62-213.440, F.A.C., and Power Plant Siting Certification No. PA 74-05]

- D.5.** NOx RACT. Emissions of nitrogen oxides (NOx) from these emissions units shall not exceed 0.50 pounds per million Btu while firing natural gas and 0.90 pounds per million Btu while firing number 2 fuel oil. [Rule 62-296.570, F.A.C.]

**Test Methods and Procedures**

- D.6.** Sulfur Dioxide - Sulfur Content - Emissions Unit 011. The permittee shall demonstrate compliance with the liquid fuel sulfur limit by fuel sampling and analysis. See specific conditions **D.4.** and **D.7.** [Rules 62-213.440 and 62-296.406(3), F.A.C.]

- D.7.** Fuel Sampling & Analysis - Sulfur - Emissions Unit 011. For each emissions unit, the following fuel sampling and analysis protocol shall be used to demonstrate compliance with the fuel sulfur limitation of specific condition **D.4** of this permit:

- a. Sample the as-fired fuel oil each day fuel oil is fired.
- b. Composite the daily samples and each month determine and record the as-fired fuel sulfur content, percent by weight, for liquid fuels using either ASTM D2622-94, ASTM D4294-90(95), ASTM D1552-95, ASTM D1266-91, or both ASTM D4057-88 and ASTM D129-95 (or latest editions) to analyze a representative sample of the composite as-fired fuel oil. Each composite sample shall also be analyzed for heating value.
- c. Record monthly the amount of each fuel fired, and maintain records of the monthly analyses of the heating value of each fuel, and the percent sulfur content by weight of each fuel, to enable calculations of sulfur dioxide emissions.

[Rules 62-4.070(3) and 62-213.440, F.A.C., and PPSC PA 74-05]

- D.8.** NOx Testing. Compliance with the NOx emission limitation shall be demonstrated by annual emission testing in accordance with EPA Test Method 7E. [Rule 62-296.570, F.A.C.]

**Monitoring of Operations**

- D.9.** Annual Tests Required - NOx and VE. Except as provided in specific conditions **E.6** through **E.8** of this permit, emission testing for nitrogen oxide emissions for Unit 006 and 011 and visible emissions for Unit 011 shall be performed annually, no later than the end of each federal fiscal year (September 30), except for units that are not operating because of scheduled maintenance outages and emergency repairs, which will be tested within thirty days of returning to service. Annual compliance testing while firing oil is not required for units that operated on oil for less than 400 hours in the previous federal fiscal year (ending September 30th).

[Rules 62-4.070(3) and 62-213.440, F.A.C.]

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- D.10.** These emissions units are also subject to conditions **E.1** through **E.19**, except for **E.3**, **E.10**, **E.11** and **E.18**, contained in **Subsection E. Common Conditions**.

**Subsection E. Common Conditions.**

<b>E.U. ID No.</b>	<b>Brief Description</b>
001 to 005	Five 2000 kW diesel engine generators
009	Fossil Fuel Steam Generating Unit 3 (S-3)
006	Gas Turbine # 1, (GT-1)
011	Combined Cycle Unit, (GT-2/S-5)

The following conditions apply to the emissions unit(s) listed above:

**Essential Potential to Emit (PTE) Parameters**

- E.1. Hours of Operation. The emissions units may operate continuously, i.e., 8,760 hours/year. [Rule 62-210.200(PTE), F.A.C.]

**Emission Limitations and Standards**

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

**Excess Emissions**

- E.2. (This condition is applicable only to emissions units 001 - 005, 006 and 011.) Excess emissions resulting from startup, shutdown or malfunction shall be permitted provided (1) that 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. [Rule 62-210.700(1), F.A.C.]
- E.3. (This condition is applicable only to emission unit 009) Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized. Excess emissions resulting from malfunction shall be permitted provided (1) that 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. [Rule 62-210.700(1) & (2), F.A.C.]
- E.4. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]

**Monitoring of Operations****E.5. 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.

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- (c) Heat input rate shall be determined by average fuel use during testing (to be determined by fuel flow meters or fuel tank measurements) and the latest fuel analysis available from the vendor or operator (for Btu content of the fuel used).

[Rules 62-297.310(5) and 62-213.440, F.A.C.]

**E.6.** Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

1. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid and/or solid fuel for more than 400 hours other than during startup.
2. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:
  - a. Did not operate; or
  - b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.
4. During each federal fiscal year (October 1 -- September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:
  - a. Visible emissions, if there is an applicable standard;
  - b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and
5. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid and/or solid fuel, other than during startup, for a total of more than 400 hours.
8. Any combustion turbine that does not operate for more than 400 hours per year shall conduct a visible emissions compliance test once per each five-year period, coinciding with the term of its air operation permit.
9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

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- (b) 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 may 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.
- (c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.]

**E.7. When PM Tests Not Required. (This condition is applicable only to emissions units 006, 009, and 011.)** Annual and permit renewal compliance testing for particulate matter emissions is not required for these emissions units while burning:

- a. only gaseous fuel(s); or
- b. gaseous fuel(s) in combination with any amount of liquid fuel(s) for less than 400 hours per year; or
- c. only liquid fuel(s) for less than 400 hours per year.

[Rules 62-297.310(7)(a)3. & 5., F.A.C.; and, ASP Number 97-B-01.]

**E.8. When VE Tests Not Required. (This condition is applicable only to emissions units 006, 009, and 011.)** By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning:

- a. only gaseous fuel(s); or
- b. gaseous fuel(s) in combination with any amount of liquid fuel(s) for less than 400 hours per year; or
- c. only liquid fuel(s) for less than 400 hours per year.

[Rule 62-4.070(3), F.A.C.]

### **Test Methods and Procedures**

{Permitting Note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

**E.9. (This condition is applicable only to emissions units 006 and 011.) Visible Emissions - Turbines.** The test method for visible emissions for emissions units 006 (GT-1) and 011 (GT-2/S-5) shall be EPA Method 9, adopted and incorporated by reference in Rule 62-204.800, F.A.C., and referenced in Chapter 62-297, F.A.C.

[Rules 62-204.800, 62-296.320(4)(b)4.a. and 62-297.401, F.A.C., and modified conditions of PA 74-05 ordered September 28, 1987]

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**E.10. (This condition is applicable only to emissions unit 009) Visible Emissions - Boilers.** The test method for visible emissions for emissions unit 009 (S-3) shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C. A transmissometer may be used and calibrated according to Rule 62-297.520, F.A.C. See specific condition E.11. [Rule 62-296.405(1)(e)1., F.A.C.]

**E.11. (This condition is applicable only to emissions unit 009) DEP Method 9.** The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:

1. EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.
2. EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g., 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g., 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:
  - a. For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard.
  - b. For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the appropriate subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value.

[Rule 62-297.401, F.A.C.]

**E.12. Required Number of Test Runs.** For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five day period allowed for the test, the Secretary or his or her designee may accept the results of the two complete runs as proof of compliance, provided that the arithmetic mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.

[Rule 62-297.310(1), F.A.C.]

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- E.13. Calculation of Emission Rate.** The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the separate test runs unless otherwise specified in a particular test method or applicable rule.  
[Rule 62-297.310(3), F.A.C.]
- E.14. Operating Rate During Testing.** Testing of emissions shall be conducted with each emissions unit operating at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions 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. [Rules 62-297.310(2) & (2)(b), F.A.C.]
- E.15. Applicable Test Procedures.**
- (a) Required Sampling Time.
1. 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.
  2. **Opacity Compliance Tests.** When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:
    - c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.
- (b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.
- (c) Required Flow Rate Range. For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.
- (d) Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1.
- (e) Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube.

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



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- E.16. Required Stack Sampling Facilities.** When a mass emissions stack test is required, the permittee shall comply with the requirements contained in Appendix SS-1, Stack Sampling Facilities, attached to this permit. Temporary stack sampling facilities under Rule 62-297.310(6)(b), F.A.C. may be used in lieu of permanent facilities. [Rule 62-297.310(6), F.A.C.]

**Recordkeeping and Reporting Requirements**

- E.17. Malfunctions - Notification.** In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Palm Beach County Health Department's Air Section in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Palm Beach County Health Department's Air Section. [Rule 62-210.700(6), F.A.C.]
- E.18. (This condition is applicable only to emissions unit 009) Excess Emissions - Report.** Submit to the Palm Beach County Health Department's Air Section a written report of emissions in excess of emission limiting standards as set forth in Rule 62-296.405(1), F.A.C., for each calendar quarter. The nature and cause of the excess emissions shall be explained. This report does not relieve the owner or operator of the legal liability for violations. All recorded data shall be maintained on file by the Source for a period of five years. [Rules 62-213.440 and 62-296.405(1)(g), F.A.C.]
- E.19. Test Reports.**
- (a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Palm Beach County Health Department's Air Section on the results of each such test.
  - (b) The required test report shall be filed with the Palm Beach County Health Department's Air Section as soon as practical but no later than 45 days after the last sampling run of each test is completed.
  - (c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Palm Beach County Health Department's Air Section to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:
    1. The type, location, and designation of the emissions unit tested.
    2. The facility at which the emissions unit is located.
    3. The owner or operator of the emissions unit.
    4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
    5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
    6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
    7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
    8. The date, starting time and duration of each sampling run.

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9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rules 62-213.440 and 62-297.310(8), F.A.C.]

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**Section IV. This section is the Acid Rain Part.**

**Operated by:** City of Lake Worth Utilities

**ORIS code: 0673**

**Subsection A. This subsection addresses Acid Rain, Phase II.**

The emissions unit(s) listed below are regulated under Acid Rain, Phase II.

E.U. ID No.	Brief Description
009	Fossil Fuel Steam Generator S-3

1. The Phase II permit application(s) submitted for this facility, as approved by the Department, is a part of this permit. The owners and operators of these Phase II acid rain unit(s) must comply with the standard requirements and special provisions set forth in the application(s) listed:

- a. DEP Form No. 62-210.900(1)(a), signed by the Designated Representative on 09/25/07.  
[Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

2. Sulfur dioxide (SO<sub>2</sub>) allowance allocations for each Acid Rain unit are as follows:

E.U. ID No.	EPA ID	Year	2008	2009	2010	2011	2012
009	S-3	Table 2, 40CFR73	9*	9*	11*	11*	11*

\* The number of allowances held by an Acid Rain source in a unit account may differ from the number allocated by the USEPA under Table 2 of 40 CFR 73.

3. Emission Allowances. Emissions from sources subject to the Federal Acid Rain Program (Title IV) shall not exceed any allowances that the source lawfully holds under the Federal Acid Rain Program. Allowances shall not be used to demonstrate compliance with a non-Title IV applicable requirement of the Act.

- (1) No permit revision shall be required for increase in emissions that are authorized by allowances acquired pursuant to the Federal Acid Rain Program, provided that such increases do not require a permit revision pursuant to Rule 62-213.400(3), F.A.C.
- (2) No limit shall be placed on the number of allowances held by the source under the Federal Acid Rain Program.
- (3) Allowances shall be accounted for under the Federal Acid Rain Program.

[Rule 62-213.440(1)(c), F.A.C.]

4. Where an applicable requirement of the Act is more stringent than applicable regulations promulgated under Title IV of the Act, both provisions shall be incorporated into the permit and shall be enforceable by the Administrator.

[40 CFR 70.6(a)(1)(ii); and, Rule 62-210.200, F.A.C., Definitions – Applicable Requirements.]

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**Subsection B. This subsection addresses the Retired Unit Exemptions under Acid Rain, Phase II.**

The emissions unit listed below is regulated as *permanently retired units* under Phase II of the Federal Acid Rain Program.

E.U. ID No.	Description
010	Fossil Fuel Fired Steam Generator S-4 (Permanently Retired)

1. The “Retired Unit Exemption” form submitted for this facility constitutes a supplement to the Acid Rain Part application pursuant to 40 CFR 72.8 and is a part of this permit. The owners and operators of these acid rain units shall comply with the standard requirements and special provisions set forth in DEP Form No. 62-210.900(1)(a)3., dated April 16, 2001, and signed by the designated representative on June 29, 2007. This units are subject to the following: 40 CFR 72.1, which requires the unit to have an Acid Rain Part as part of its Title V permit; 40 CFR 72.2, which provides associated definitions; 40 CFR 72.3, which provides measurements, abbreviations, and acronyms; 40 CFR 72.4, which provides the federal authority of the Administrator; 40 CFR 72.5, which provides the authority of the states; 40 CFR 72.6, which makes the boiler a Phase II unit; 40 CFR 72.10, which gives the public access to information about this unit; and 40 CFR 72.13, which incorporates certain ASTM methods into 40 CFR Part 72. [Chapter 62-213, F.A.C. and Rule 62-214.340, F.A.C.]

2. Sulfur dioxide (SO<sub>2</sub>) allowance allocations for the permanently retired Acid Rain units are as follows:

E.U. ID No.	EPA ID	Year	2008	2009	2010	2011	2012
010	S-4	Table 2, 40CFR73	80*	80*	80*	80*	80*

\* The number of allowances held by an Acid Rain source in a unit account may differ from the number allocated by the U.S. EPA under Table 2 of 40 CFR 73.

3. Emission Allowances. Emissions from sources subject to the Federal Acid Rain Program (Title IV) shall not exceed any allowances that the source lawfully holds under the Federal Acid Rain Program. Allowances shall not be used to demonstrate compliance with a non-Title IV applicable requirement of the Act.

a. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the Federal Acid Rain Program, provided that such increases do not require a permit revision pursuant to Rule 62-213.440(3), F.A.C.

b. No limit shall be placed on the number of allowances held by the source under the Federal Acid Rain program.

c. Allowances shall be accounted for under the Federal Acid Rain Program.

[Rule 62-213.440(1)(c), F.A.C.]

4. The designated representative of these acid rain units applied for an exemption from the requirements of the Federal Acid Rain Program by submitting a completed and signed “Retired Unit Exemption” form (DEP Form No. 62-210.900(1)(a)3., F.A.C., attached) to the Department. The date of permanent retirement was January 1, 2002. [Rule 62-214.340(2), F.A.C.; and, 40 CFR 72.8.]

5. Where an applicable requirement of the Act is more stringent than applicable regulations promulgated under Title IV of the Act, both provisions shall be incorporated into the permit and shall be enforceable by the Administrator.

[40 CFR 70.6(a)(1)(ii); and, Rule 62-210.200, F.A.C., Definitions – Applicable Requirements.]

## Appendix CP-1, Compliance Plan

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### **Background**

This facility has one noncompliance issue at the time of its Title V Air Operation permit renewal application. The issue was reported by the compliance authority, which is the Palm Beach County Health Department Air Quality Control Section.

Pursuant to Rule 62-297.310(6)(a), F.A.C., permanent stack sampling platforms are required at this facility to conduct annual compliance testing on units that exceed 400 hours of operation.

There are no permanent stack sampling platforms on the following emissions units:

- The five diesel generators (EU001 to 005);
- The simple cycle combustion turbine (CT) (EU006); and
- The combined cycle CT (EU011).

The diesel generators, which are peaking units, rarely require annual NO<sub>x</sub> emissions tests because they are typically operated much less than 400 hours per year.

The simple cycle CT has predominately operated less than 400 hours per year and has not required NO<sub>x</sub> emissions testing during most years.

The combined cycle CT usually operates more than 400 hours per year and thus has required annual NO<sub>x</sub> emissions testing.

A temporary sampling platform such as a cherry picker is typically used to access the stack for the purpose of conducting the tests.

### **Compliance Plan**

The following options address this compliance issue:

- Option-1: Operate the units less than 400 hours per year;
- Option-2: Install permanent stack sampling facilities (platforms) on a unit-by-unit basis by the time the next tests are required; or
- Option-3: Apply for and obtain from the Department by the time of the next required test an alternate sampling procedure (ASP) from the Department that authorizes other safe stack access practices when conducting NO<sub>x</sub> tests. The procedures for obtaining an ASP are listed below:

#### **Rule 62-297.620, F.A.C. Exceptions and Approval of Alternate Procedures and Requirements.**

- (1) The owner or operator of any emissions unit subject to the provisions of this chapter may request in writing a determination by the Secretary or his/her designee that any requirement of this chapter (except for any continuous monitoring requirements) relating to emissions test procedures, methodology, equipment, or test facilities shall not apply to such emissions unit, and shall request approval of an alternate procedure or requirement.
- (2) The request shall set forth the following information, at a minimum:
  - (a) Specific emissions unit and permit number, if any, for which exception is requested.
  - (b) The specific provision(s) of this chapter from which an exception is sought.
  - (c) The basis for the exception, including but not limited to any hardship which would result from compliance with the provisions of this chapter.
  - (d) The alternate procedure(s) or requirement(s) for which approval is sought and a demonstration that such alternate procedure(s) or requirement(s) shall be adequate to demonstrate compliance with applicable emission limiting standards contained in the rules of the Department or any permit issued pursuant to those rules.

## Appendix I-1, List of Insignificant Emissions Units and/or Activities

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, or that meet the criteria specified in Rule 62-210.300(3)(b)1., F.A.C., Generic Emissions Unit Exemption, are exempt from the permitting requirements of Chapters 62-210, 62-212 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining the potential emissions of the facility containing such emissions units. Emissions units and pollutant-emitting activities exempt from permitting under Rules 62-210.300(3)(a) and (b)1., F.A.C., shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if they are contained within a Title V source; however, such emissions units and activities shall be considered insignificant for Title V purposes provided they also meet the criteria of Rule 62-213.430(6)(b), F.A.C. No emissions unit shall be entitled to an exemption from permitting under Rules 62-210.300(3)(a) and (b)1., F.A.C., if its emissions, in combination with the emissions of other units and activities at the facility, would cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

The below listed emissions units and/or activities are considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

<b>Brief Description of Emissions Units and/or Activities</b>
1. Dust collector hopper discharge valve for Unit S-3.
2. Liquid propane gas emergency generator.
3. Portable electrical generators that can be moved by hand from one location to another.
4. Air compressors and pneumatically operated equipment, including hand tools.
5. Storage tanks, vessels, and containers that hold or store liquid substances that will not have the potential to emit VOC or HAPs greater than the de minimis quantities.
6. Janitorial services and consumer use of janitorial products.
7. Diesel-fired generator
8. Diesel tank (6,000 gallons)
9. Mechanical draft cooling towers (2)

### Appendix H-1, Permit History/ID Number Changes

**Permit History (for tracking purposes):**

E.U. ID No.	Description	Permit No.	Issue Date	Expiration Date	Revised Date(s)
001	Diesel Generator #1 Peaking Unit	AO 50-172357	01/18/90	07/17/94	
002	Diesel Generator #2 Peaking Unit	AO 50-172357	01/18/90	07/17/94	
003	Diesel Generator #3 Peaking Unit	AO 50-172357	01/18/90	07/17/94	
004	Diesel Generator #4 Peaking Unit	AO 50-172357	01/18/90	07/17/94	
005	Diesel Generator #5 Peaking Unit	AO 50-172357	01/18/90	07/17/94	
006	Combustion Gas Turbine #1 (GT-1)	AO 50-219177 AC 50-2168A AC 50-2168	11/06/92 09/10/76 09/28/73	10/30/97 09/01/77 03/01/75	
007	Fossil Fuel Steam Generator Unit #1 (S-1)	AO 50-169444	01/31/96	09/15/96	
008	Fossil Fuel Steam Generator Unit #2 (S-2)*				
009	Fossil Fuel Steam Generator Unit #3 (S-3)	AO 50-169444 PA - 74-05	01/31/96 05/18/76	09/15/96	09/28/87 03/27/96
010	Fossil Fuel Steam Generator Unit #4 (S-4)	AO 50-169444 PA - 74-05	01/31/96 05/18/76	09/15/96	09/28/87 03/27/96
011	Combined Cycle Gas Turbine (GT-2/S-5)	PA - 74-05	05/18/76		09/28/87 03/27/96
001-005, 006, 007, 009, 010	Diesel engine generators #1 - 5 GT-1 S-1 S-3 S-4	0990045-001-AO (amendment of AO 50-169444, AO 50-172357, AO 50-219177, for NOx RACT)	01/31/96		
	All of the above.	0990045-002-AV	01/01/98	12/31/02	
	All of the above.	0990045-003-AV	01/01/03	12/31/07	
	All of the above plus shutdown of the SO2 CEMS on EU 009, Fossil Fuel Steam Generating Unit (S-3)	0990045-004-AV	01/01/03	12/31/07	09/19/05

**ID Number Changes (for tracking purposes):**

From: **Facility ID No.:** 50PMB500045

To: **Facility ID No.:** 0990045

\* Units S-1, S-2 and S-4 are not in service. Operation of these units is not permitted by this permit.

## Appendix U-1, List of Unregulated Emissions Units and/or Activities

Unregulated Emissions Units and/or Activities. An emissions unit which emits no “emissions-limited pollutant” and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

The below listed emissions units and/or activities are neither ‘regulated emissions units’ nor ‘insignificant emissions units’.

<b>E.U. ID No.</b>	<b>Brief Description of Emissions Units and/or Activity</b>
012	Fuel oil storage tanks (tanks 10 & 11, both 20,134 gallons capacity, and tank 12, 140,785 gallons capacity) subject to NSPS, Subpart Kb.*
013	Fuel oil storage tanks (tanks 3, 4, 5, 6, and 8), lube oil tanks, fittings and pumps.

\*The owner or operator shall keep readily accessible records showing the dimension of each storage vessel (tank) and an analysis showing the capacity of each storage vessel (tank), and shall retain the records as long as each tank remains at the facility.



## Appendix CP-1, Compliance Plan

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### **Background**

This facility has one noncompliance issue at the time of its Title V Air Operation permit renewal application. The issue was reported by the compliance authority, which is the Palm Beach County Health Department Air Quality Control Section.

Pursuant to Rule 62-297.310(6)(a), F.A.C., permanent stack sampling platforms are required at this facility to conduct annual compliance testing on units that exceed 400 hours of operation.

There are no permanent stack sampling platforms on the following emissions units:

- The five diesel generators (EU001 to 005);
- The simple cycle combustion turbine (CT) (EU006); and
- The combined cycle CT (EU011).

The diesel generators, which are peaking units, rarely require annual NO<sub>x</sub> emissions tests because they are typically operated much less than 400 hours per year.

The simple cycle CT has predominately operated less than 400 hours per year and has not required NO<sub>x</sub> emissions testing during most years.

The combined cycle CT usually operates more than 400 hours per year and thus has required annual NO<sub>x</sub> emissions testing. A temporary sampling platform such as a cherry picker is typically used to access the stack for the purpose of conducting the tests.

### **Compliance Plan**

The following options address this compliance issue:

- Option-1: Operate the units less than 400 hours per year;
- Option-2: Install permanent stack sampling facilities (platforms) on a unit-by-unit basis by the time the next tests are required; or
- Option-3: Apply for and obtain from the Department by the time of the next required test an alternate sampling procedure (ASP) from the Department that authorizes other safe stack access practices when conducting NO<sub>x</sub> tests. The procedures for obtaining an ASP are listed below:

#### **Rule 62-297.620, F.A.C. Exceptions and Approval of Alternate Procedures and Requirements.**

- (1) The owner or operator of any emissions unit subject to the provisions of this chapter may request in writing a determination by the Secretary or his/her designee that any requirement of this chapter (except for any continuous monitoring requirements) relating to emissions test procedures, methodology, equipment, or test facilities shall not apply to such emissions unit, and shall request approval of an alternate procedure or requirement.
- (2) The request shall set forth the following information, at a minimum:
  - (a) Specific emissions unit and permit number, if any, for which exception is requested.
  - (b) The specific provision(s) of this chapter from which an exception is sought.
  - (c) The basis for the exception, including but not limited to any hardship which would result from compliance with the provisions of this chapter.
  - (d) The alternate procedure(s) or requirement(s) for which approval is sought and a demonstration that such alternate procedure(s) or requirement(s) shall be adequate to demonstrate compliance with applicable emission limiting standards contained in the rules of the Department or any permit issued pursuant to those rules.

**Tom G. Smith Power Plant and Lake Worth Water Treatment Plant**

Facility ID No. 0990045

**Appendix I-1, List of Insignificant Emissions Units and/or Activities**

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, or that meet the criteria specified in Rule 62-210.300(3)(b)1., F.A.C., Generic Emissions Unit Exemption, are exempt from the permitting requirements of Chapters 62-210, 62-212 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining the potential emissions of the facility containing such emissions units. Emissions units and pollutant-emitting activities exempt from permitting under Rules 62-210.300(3)(a) and (b)1., F.A.C., shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if they are contained within a Title V source; however, such emissions units and activities shall be considered insignificant for Title V purposes provided they also meet the criteria of Rule 62-213.430(6)(b), F.A.C. No emissions unit shall be entitled to an exemption from permitting under Rules 62-210.300(3)(a) and (b)1., F.A.C., if its emissions, in combination with the emissions of other units and activities at the facility, would cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

The below listed emissions units and/or activities are considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

<b>Brief Description of Emissions Units and/or Activities</b>
1. Dust collector hopper discharge valve for Unit S-3.
2. Liquid propane gas emergency generator.
3. Portable electrical generators that can be moved by hand from one location to another.
4. Air compressors and pneumatically operated equipment, including hand tools.
5. Storage tanks, vessels, and containers that hold or store liquid substances that will not have the potential to emit VOC or HAPs greater than the de minimis quantities.
6. Janitorial services and consumer use of janitorial products.
7. Diesel-fired generator
8. Diesel tank (6,000 gallons)
9. Mechanical draft cooling towers (2)

**Tom G. Smith Power Plant and Lake Worth Water Treatment Plant**

Facility ID No. 0990045

**Appendix H-1, Permit History/ID Number Changes****Permit History (for tracking purposes):**

E.U. ID No.	Description	Permit No.	Issue Date	Expiration Date	Revised Date(s)
001	Diesel Generator #1 Peaking Unit	AO 50-172357	01/18/90	07/17/94	
002	Diesel Generator #2 Peaking Unit	AO 50-172357	01/18/90	07/17/94	
003	Diesel Generator #3 Peaking Unit	AO 50-172357	01/18/90	07/17/94	
004	Diesel Generator #4 Peaking Unit	AO 50-172357	01/18/90	07/17/94	
005	Diesel Generator #5 Peaking Unit	AO 50-172357	01/18/90	07/17/94	
006	Combustion Gas Turbine #1 (GT-1)	AO 50-219177 AC 50-2168A AC 50-2168	11/06/92 09/10/76 09/28/73	10/30/97 09/01/77 03/01/75	
007	Fossil Fuel Steam Generator Unit #1 (S-1)	AO 50-169444	01/31/96	09/15/96	
008	Fossil Fuel Steam Generator Unit #2 (S-2)*				
009	Fossil Fuel Steam Generator Unit #3 (S-3)	AO 50-169444 PA - 74-05	01/31/96 05/18/76	09/15/96	09/28/87 03/27/96
010	Fossil Fuel Steam Generator Unit #4 (S-4)	AO 50-169444 PA - 74-05	01/31/96 05/18/76	09/15/96	09/28/87 03/27/96
011	Combined Cycle Gas Turbine (GT-2/S-5)	PA - 74-05	05/18/76		09/28/87 03/27/96
001-005, 006, 007, 009, 010	Diesel engine generators #1 - 5 GT-1 S-1 S-3 S-4	0990045-001-AO (amendment of AO 50-169444, AO 50-172357, AO 50-219177, for NOx RACT)	01/31/96		
	All of the above.	0990045-002-AV	01/01/98	12/31/02	
	All of the above.	0990045-003-AV	01/01/03	12/31/07	
	All of the above plus shutdown of the SO2 CEMS on EU 009, Fossil Fuel Steam Generating Unit (S-3)	0990045-004-AV	01/01/03	12/31/07	09/19/05

**ID Number Changes (for tracking purposes):**

From: Facility ID No.: 50PMB500045

To: Facility ID No.: 0990045

\* Units S-1, S-2 and S-4 are not in service. Operation of these units is not permitted by this permit.

**Tom G. Smith Power Plant and Lake Worth Water Treatment Plant**

Facility ID No. 0990045

**Appendix U-1, List of Unregulated Emissions Units and/or Activities**

Unregulated Emissions Units and/or Activities. An emissions unit which emits no “emissions-limited pollutant” and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

The below listed emissions units and/or activities are neither ‘regulated emissions units’ nor ‘insignificant emissions units’.

<b>E.U. ID No.</b>	<b>Brief Description of Emissions Units and/or Activity</b>
012	Fuel oil storage tanks (tanks 10 & 11, both 20,134 gallons capacity, and tank 12, 140,785 gallons capacity) subject to NSPS, Subpart Kb.*
013	Fuel oil storage tanks (tanks 3, 4, 5, 6, and 8), lube oil tanks, fittings and pumps.

\*The owner or operator shall keep readily accessible records showing the dimension of each storage vessel (tank) and an analysis showing the capacity of each storage vessel (tank), and shall retain the records as long as each tank remains at the facility.

**Table 1-1, Summary of Air Pollutant Emission Standards**

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

Emissions Unit		Brief Description							
001 - 005		Five 2000 kW diesel engine generators							
			Allowable Emissions			Equivalent Emissions <sup>1</sup>			
Pollutant	Fuel(s)	Hours per Year	Standard(s)	lbs./hour	TPY	lbs./hour	TPY	Regulatory Citations	See Permit Condition(s)
<b>VE</b>	Diesel Fuel	8760	20% opacity					Rule 62-296.320(4)(b), F.A.C.	Section II, Condition 3
<b>NO<sub>x</sub></b>	Diesel Fuel	8760	4.75 lb/mmBtu			99.8	436.91	Rules 62-296.570., F.A.C.	A.2

Note for EU 001 - 005: Equivalent emissions are listed for each diesel generator.



**Tom G. Smith Power Plant and Lake Worth Water Treatment Plant**

Facility ID No. 0990045

**Table 1-1, Continued**

Emissions Unit		Brief Description							
009		Fossil Fuel Steam Generating Unit 3 (S-3), nominally rated at 26.5 MW, 325.1 mmBtu/hr, capable of burning any combination of natural gas and number 6 fuel oil							
010		Fossil Fuel Steam Generating Unit 4, (S-4), nominally rated at 33 MW, 419.1 mmBtu/hr, capable of burning any combination of natural gas and number 6 fuel oil → <b>UNIT RETIRED FROM SERVICE PERMENENTLY ON AUGUST 18, 2005</b>							
		Allowable Emissions				Equivalent Emissions <sup>1</sup>			
Pollutant	Fuel(s)	Hours per Year	Standard(s)	lbs./hour	TPY	lbs./hour	TPY	Regulatory Citations	See Permit Condition(s)
<b>VE</b> Steady State	Oil, Natural Gas	8760	20% opacity, except for 40% for 2 min. each hour					Rule 62-296.405(1)(a), F.A.C.	C.4
<b>VE</b> Soot Blowing or Load Change	Oil, Natural Gas	8760	60 % opacity (>60% opacity for not more than 4, six-minute periods per hour during 3 hours allowed for sootblowing/load change)					Rule 62-210.700(3), F.A.C.	C.5
<b>PM</b> Steady State	Oil, Natural Gas	8760	0.1 lb/mmBtu			33 (EU 009)	142 (EU 009)	Rule 62-296.405(1)(b), F.A.C.	C.6
<b>PM</b> Soot Blowing or Load Change	Oil, Natural Gas	8760	0.3 lb/mmBtu			99 (EU 009)	426 (EU 009)	Rule 62-210.700(3), F.A.C.	C.7

**Tom G. Smith Power Plant and Lake Worth Water Treatment Plant**

Facility ID No. 0990045

**Table 1-1, Continued, Emissions Units 009**

Pollutant	Fuel(s)	Hours per Year	Allowable Emissions			Equivalent Emissions <sup>1</sup>		Regulatory Citations	See Permit Condition(s)
			Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
SO <sub>2</sub>	Oil, Natural Gas	8760	2.25% S by weight, fuel oil			832 (EU 009) (oil)	1072 (EU 009) (oil)	Rule 62-213.440, F.A.C. & PPSC No. PA 74-05	C.8
NO <sub>x</sub>	Oil, Natural Gas	8760	0.5 lb/mmBtu			163 (EU 009)	712 (EU 009)	Rules 62- 296.570, F.A.C.	C.9



**Tom G. Smith Power Plant and Lake Worth Water Treatment Plant**

Facility ID No. 0990045

**Table 1-1, Continued**

Emissions Unit		Brief Description							
006		Gas Turbine # 1, (GT-1), nominally rated at 30 MW, 435 mmBtu/hr, capable of burning number 2 fuel oil							
011		Combined Cycle Unit, (GT-2/S-5), nominally rated at 29.5 MW, consists of a gas turbine (GT-2) nominally rated at 20 MW and a heat recovery steam generator (S5) nominally rated at 10 MW. GT-2 has a maximum heat input of 317.6 mmBtu/hr, capable of burning any combination of natural gas and number 2 fuel oil							
			Allowable Emissions			Equivalent Emissions <sup>1</sup>			
Pollutant	Fuel(s)	Hours per Year	Standard(s)	lbs./hour	TPY	lbs./hour	TPY	Regulatory Citations	See Permit Condition(s)
VE	Oil <sup>a</sup> , Natural Gas <sup>b</sup>	8760	20% Opacity					Rule 62-296.320(4)(b), F.A.C.	Section II, Condition 3
SO <sub>2</sub> (EU 011 only)	Oil, Natural Gas	8760	0.35% S by weight, fuel oil			109 (oil)	478 (oil)	Rule 62-213.440, F.A.C. & PPSC No. PA 74-05	D.4
NO <sub>x</sub> (EU 006)	Oil <sup>a</sup> , Natural Gas <sup>b</sup>	8760	0.90 lb/mmBtu (fuel oil) 0.50 lb/mmBtu (natural gas)			392 218	1715 953	Rules 62-570, F.A.C.	D.5
NO <sub>x</sub> (EU 011)	Oil <sup>a</sup> , Natural Gas <sup>b</sup>	8760	0.90 lb/mmBtu (fuel oil) 0.50 lb/mmBtu (natural gas)			286 159	1252 696	Rules 62-570, F.A.C.	D.5

a Number 2 fuel oil may be fired in emissions unit 006 or 011.

b Natural gas may be fired in emissions unit 011.

**Table 1-1, Continued**

Emissions Unit		Brief Description							
012		Fuel oil storage tanks (tanks 10 & 11, both 20,134 gallons capacity, and tank 12, 140,785 gallons capacity) subject to NSPS, Subpart Kb							
			Allowable Emissions			Equivalent Emissions <sup>1</sup>			
Pollutant	Fuel(s)	Hours per Year	Standard(s)	lbs./hour	TPY	lbs./hour	TPY	Regulatory Citations	See Permit Condition(s)
None		8760	No emission limits - record keeping only						F.2, F.3

Notes for all tables:

<sup>1</sup> The "Equivalent Emissions" listed are for informational purposes only.

**Tom G. Smith Power Plant and Lake Worth Water Treatment Plant**

Facility ID No. 0990045

**Table 2-1, Summary of Compliance Requirements**

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

Emissions Unit	Brief Description
001 to 005	Five 2000 kW diesel engine generators

Pollutant or Parameter	Fuel(s)	Compliance Method	Testing Frequency	Frequency Base Date <sup>1</sup>	Minimum Compliance Test Duration	CMS <sup>2</sup>	See Permit Condition(s)
NO <sub>x</sub>	Diesel Fuel	EPA Test Method 7E	Annual		3 hours	No	A.3 & A.4
VE	Diesel Fuel	EPA Method 9	Annual		30 min.	No	A.4 & E.9

Emissions Unit	Brief Description
007	Fossil Fuel Steam Generating Unit 1 (S-1), nominally rated at 7.5 MW, 111 mmBtu/hr, capable of burning any combination of natural gas and number 6 fuel oil

Pollutant or Parameter	Fuel(s)	Compliance Method	Testing Frequency	Frequency Base Date <sup>1</sup>	Minimum Compliance Test Duration	CMS <sup>2</sup>	See Permit Condition(s)
SO <sub>2</sub>	Oil, Natural Gas	Fuel sampling & analysis	Sampling daily, analysis of monthly composite			No	B.7, B9 & B.10
NO <sub>x</sub>	Oil, Natural Gas	EPA Test Method 7E	Annual		3 hours	No	B.11 & B.12
VE	Oil, Natural Gas	DEP Method 9	Annual		1 hour	No	B.12 & E.10

**Tom G. Smith Power Plant and Lake Worth Water Treatment Plant**

Facility ID No. 0990045

**Table 2-1, Continued**

Emissions Unit		Brief Description					
009		Fossil Fuel Steam Generating Unit 3 (S-3), nominally rated at 26.5 MW, 325.1 mmBtu/hr, capable of burning any combination of natural gas and number 6 fuel oil					
010		Fossil Fuel Steam Generating Unit 4, (S-4), nominally rated at 33 MW, 419.1 mmBtu/hr, capable of burning any combination of natural gas and number 6 fuel oil → <b>UNIT RETIRED FROM SERVICE PERMENENTLY ON AUGUST 18, 2005</b>					
Pollutant or Parameter	Fuel(s)	Compliance Method	Testing Frequency	Frequency Base Date <sup>1</sup>	Minimum Compliance Test Duration	CMS <sup>2</sup>	See Permit Condition(s)
SO <sub>2</sub>	Oil, Natural Gas	Fuel sampling & analysis	Sampling daily, analysis of monthly composite			No	C.8, C.11 & C.12
NO <sub>x</sub> (EU 009)	Oil, Natural Gas	CEMS	Continuous			Yes	C.13 & C.16
PM	Oil, Natural Gas	EPA Test Methods 17,5,5B or 5F	Annual		3 hours	No	C.10 & C.14
VE	Oil, Natural Gas	DEP Method 9	Annual		1 hour	Yes	C.14 & E.10

**Tom G. Smith Power Plant and Lake Worth Water Treatment Plant**

Facility ID No. 0990045

**Table 2-1, Continued**

Emissions Unit	Brief Description
006	Gas Turbine # 1, (GT-1), nominally rated at 30 MW, 435 mmBtu/hr, capable of burning number 2 fuel oil
011	Combined Cycle Unit, (GT-2/S-5), nominally rated at 29.5 MW, consists of a gas turbine (GT-2) nominally rated at 20 MW and a heat recovery steam generator (S5) nominally rated at 10 MW. GT-2 has a maximum heat input of 317.6 mmBtu/hr, capable of burning any combination of natural gas and number 2 fuel oil

Pollutant or Parameter	Fuel(s)	Compliance Method	Testing Frequency	Frequency Base Date <sup>1</sup>	Minimum Compliance Test Duration	CMS <sup>2</sup>	See Permit Condition(s)
<b>SO<sub>2</sub></b> <b>(Emissions Unit 011 only)</b>	Oil, Natural Gas	Fuel sampling & analysis	Sampling daily, analysis of monthly composite			No	D.4, D.6 & D.7
<b>NO<sub>x</sub></b>	Oil, Natural Gas	EPA Test Method 7E	Annual		3 hours	No	D.8 & D.9
<b>VE</b>	Oil, Natural Gas	EPA Method 9	Annual		1 hour	No	D.9 & E.9

Table 2-1, Continued

Emissions Unit	Brief Description
012	Fuel oil storage tanks (tanks 10 & 11, both 20,134 gallons capacity, and tank 12, 140,785 gallons capacity) subject to NSPS, Subpart Kb

Pollutant or Parameter	Fuel(s)	Compliance Method	Testing Frequency	Frequency Base Date <sup>1</sup>	Minimum Compliance Test Duration	CMS <sup>2</sup>	See Permit Condition(s)
Capacity		Record keeping					F.2 & F.3

Notes for all tables:

<sup>1</sup> Frequency base date established for planning purposes only; see Rule 62-297.310, F.A.C.<sup>2</sup> CMS = continuous monitoring system

**Friday, Barbara**

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**To:** mjohnstone@lakeworth.org; Hoefert, Lee; 'James\_Stormer@doh.state.fl.us'; 'sosbourn@golder.com'  
**Cc:** Read, David  
**Subject:** DRAFT/PROPOSED Title V Permit Renewal No.: 0990045-005-AV - City of Lake Worth Utilities - Tom G. Smith Plant and Lake Worth Water Treatment Plant  
**Attachments:** 0990045.005.AV.D\_pdf[1].zip

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

DEP, Bureau of Air Regulation

*" We now have an opportunity to expedite Title V permits by doing what is called a "parallel review" in Florida. We have a guidance memorandum on this (see attached Guidance Memorandum DARM-PER-41 dated 11/20/2006).*

*Based on our review of the subject Title V permit renewal application, this one is a candidate for "parallel review." This process works well where there will be no significant comments. This permit application is not controversial and is routine.*

*Essentially, this new process saves about 1 month of time to issue the FINAL permit. The EPA review period is performed with the public comment period. The actual permit being publicly noticed is a "DRAFT/PROPOSED" permit. The PROPOSED permit stage is combined with the DRAFT permit stage hence the reference to a "parallel review." Like before a FINAL permit would be issued after the end of the EPA review period. This renewed permit has a planned future effective date of January 1, 2008. By using the parallel review process, you can receive the FINAL permit well before December 31, 2007.*

***The proof of publication of the Public Notice must be received no later than October 30th."***

10/17/2007

Friday, Barbara

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**From:** Exchange Administrator  
**Sent:** Wednesday, October 17, 2007 1:26 PM  
**To:** Friday, Barbara  
**Subject:** Delivery Status Notification (Relay)

**Attachments:** ATT241230.txt; DRAFT/PROPOSED Title V Permit Renewal No.: 0990045-005-AV - City of Lake Worth Utilities - Tom G. Smith Plant and Lake Worth Water Treatment Plant



ATT241230.txt  
(296 B)

DRAFT/PROPOSED  
Title V Permit ...

This is an automatically generated Delivery Status Notification.

Your message has been successfully relayed to the following recipients, but the requested delivery status notifications may not be generated by the destination.

James\_Stormer@doh.state.fl.us



## Friday, Barbara

---

**From:** System Administrator  
**To:** Read, David  
**Sent:** Wednesday, October 17, 2007 1:24 PM  
**Subject:** Delivered:New Posting #0990045

Your message

**To:** Gracy Danois; Kathleen Forney; Walker, Elizabeth (AIR)  
**Cc:** Read, David  
**Subject:** New Posting #0990045  
**Sent:** 10/17/2007 1:24 PM

was delivered to the following recipient(s):

Read, David on 10/17/2007 1:24 PM

**Friday, Barbara**

---

**From:** System Administrator  
**To:** Hoefert, Lee  
**Sent:** Wednesday, October 17, 2007 1:26 PM  
**Subject:** Delivered:DRAFT/PROPOSED Title V Permit Renewal No.: 0990045-005-AV - City of Lake Worth Utilities - Tom G. Smith Plant and Lake Worth Water Treatment Plant

Your message

**To:** 'mjohnstone@lakeworth.org'; Hoefert, Lee; 'James\_Stormer@doh.state.fl.us'; 'sosbourn@golder.com'  
**Cc:** Read, David  
**Subject:** DRAFT/PROPOSED Title V Permit Renewal No.: 0990045-005-AV - City of Lake Worth Utilities - Tom G. Smith Plant and Lake Worth Water Treatment Plant  
**Sent:** 10/17/2007 1:25 PM

was delivered to the following recipient(s):

Hoefert, Lee on 10/17/2007 1:25 PM

**Friday, Barbara**

---

**From:** System Administrator  
**To:** Read, David  
**Sent:** Wednesday, October 17, 2007 1:26 PM  
**Subject:** Delivered:DRAFT/PROPOSED Title V Permit Renewal No.: 0990045-005-AV - City of Lake Worth Utilities - Tom G. Smith Plant and Lake Worth Water Treatment Plant

Your message

**To:** 'mjohnstone@lakeworth.org'; Hoefert, Lee; 'James\_Stormer@doh.state.fl.us'; 'sosbourn@golder.com'  
**Cc:** Read, David  
**Subject:** DRAFT/PROPOSED Title V Permit Renewal No.: 0990045-005-AV - City of Lake Worth Utilities - Tom G. Smith Plant and Lake Worth Water Treatment Plant  
**Sent:** 10/17/2007 1:25 PM

was delivered to the following recipient(s):

Read, David on 10/17/2007 1:25 PM

## Friday, Barbara

---

**From:** Hoefert, Lee  
**To:** Friday, Barbara  
**Sent:** Wednesday, October 17, 2007 1:26 PM  
**Subject:** Read: DRAFT/PROPOSED Title V Permit Renewal No.: 0990045-005-AV - City of Lake Worth Utilities - Tom G. Smith Plant and Lake Worth Water Treatment Plant

### Your message

**To:** 'mjohnstone@lakeworth.org'; Hoefert, Lee; 'James\_Stormer@doh.state.fl.us'; 'sosbourn@golder.com'  
**Cc:** Read, David  
**Subject:** DRAFT/PROPOSED Title V Permit Renewal No.: 0990045-005-AV - City of Lake Worth Utilities - Tom G. Smith Plant and Lake Worth Water Treatment Plant  
**Sent:** 10/17/2007 1:25 PM

was read on 10/17/2007 1:26 PM.

**Friday, Barbara**

---

**From:** Hoefert, Lee  
**Sent:** Wednesday, October 17, 2007 1:26 PM  
**To:** Friday, Barbara  
**Subject:** RE: DRAFT/PROPOSED Title V Permit Renewal No.: 0990045-005-AV - City of Lake Worth Utilities - Tom G. Smith Plant and Lake Worth Water Treatment Plant

Lee C. Hoefert, P.E.  
Air Program Administrator  
Florida Department of Environmental Protection  
Southeast District  
400 N. Congress Ave., Suite 200  
West Palm Beach, FL 33401  
561-681-6626(Phone), 561-681-6790(Fax)

---

**From:** Friday, Barbara  
**Sent:** Wednesday, October 17, 2007 1:25 PM  
**To:** 'mjohstone@lakeworth.org'; Hoefert, Lee; 'James\_Stormer@doh.state.fl.us'; 'sosbourn@golder.com'  
**Cc:** Read, David  
**Subject:** DRAFT/PROPOSED Title V Permit Renewal No.: 0990045-005-AV - City of Lake Worth Utilities - Tom G. Smith Plant and Lake Worth Water Treatment Plant

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

DEP, Bureau of Air Regulation

*" We now have an opportunity to expedite Title V permits by doing what is called a "parallel review" in Florida. We have a guidance memorandum on this (see attached Guidance Memorandum DARM-PER-41 dated 11/20/2006).*

*Based on our review of the subject Title V permit renewal application, this one is a candidate for "parallel review." This process works well where there will be no significant comments. This permit application is not controversial and is routine.*

*Essentially, this new process saves about 1 month of time to issue the FINAL permit. The EPA review*

10/17/2007

*period is performed with the public comment period. The actual permit being publicly noticed is a "DRAFT/PROPOSED" permit. The PROPOSED permit stage is combined with the DRAFT permit stage hence the reference to a "parallel review." Like before a FINAL permit would be issued after the end of the EPA review period. This renewed permit has a planned future effective date of January 1, 2008. By using the parallel review process, you can receive the FINAL permit well before December 31, 2007.*

***The proof of publication of the Public Notice must be received no later than October 30th."***

## Friday, Barbara

---

**From:** Read, David  
**To:** Friday, Barbara  
**Sent:** Wednesday, October 17, 2007 1:26 PM  
**Subject:** Read: DRAFT/PROPOSED Title V Permit Renewal No.: 0990045-005-AV - City of Lake Worth Utilities - Tom G. Smith Plant and Lake Worth Water Treatment Plant

### Your message

**To:** 'mjohnstone@lakeworth.org'; Hoefert, Lee; 'James\_Stormer@doh.state.fl.us'; 'sosbourn@golder.com'  
**Cc:** Read, David  
**Subject:** DRAFT/PROPOSED Title V Permit Renewal No.: 0990045-005-AV - City of Lake Worth Utilities - Tom G. Smith Plant and Lake Worth Water Treatment Plant  
**Sent:** 10/17/2007 1:25 PM

was read on 10/17/2007 1:26 PM.

## Friday, Barbara

---

**From:** Mail Delivery System [MAILER-DAEMON@sophos.golder.com]  
**Sent:** Wednesday, October 17, 2007 1:26 PM  
**To:** Friday, Barbara  
**Subject:** Successful Mail Delivery Report

**Attachments:** Delivery report; Message Headers



Delivery report.txt  
(461 B)

Message  
Headers.txt (2 KB)

This is the mail system at host sophos.golder.com.

Your message was successfully delivered to the destination(s) listed below. If the message was delivered to mailbox you will receive no further notifications. Otherwise you may still receive notifications of mail delivery errors from other systems.

The mail system

<sosbourn@golder.com>: delivery via 127.0.0.1[127.0.0.1]:10025: 250 OK, sent  
47164592\_14960\_301\_2



**Friday, Barbara**

---

**From:** System Administrator  
**To:** Margaret Johnstone  
**Sent:** Wednesday, October 17, 2007 1:27 PM  
**Subject:** Delivered:DRAFT/PROPOSED Title V Permit Renewal No.: 0990045-005-AV - City of Lake Worth Utilities - Tom G. Smith Plant and Lake Worth Water Treatment Plant

Your message

**To:** mjohnstone@lakeworth.org; Hoefert, Lee; James\_Stormer@doh.state.fl.us; sosbourn@golder.com  
**Cc:** Read, David  
**Subject:** DRAFT/PROPOSED Title V Permit Renewal No.: 0990045-005-AV - City of Lake Worth Utilities - Tom G. Smith Plant and Lake Worth Water Treatment Plant  
**Sent:** 10/17/2007 1:25 PM

was delivered to the following recipient(s):

Margaret Johnstone on 10/17/2007 1:26 PM

## Friday, Barbara

---

**From:** James\_Stormer@doh.state.fl.us  
**To:** Friday, Barbara  
**Sent:** Wednesday, October 17, 2007 1:27 PM  
**Subject:** Read: DRAFT/PROPOSED Title V Permit Renewal No.: 0990045-005-AV - City of Lake Worth Utilities - Tom G. Smith Plant and Lake Worth Water Treatment Plant

Your message

**To:** James\_Stormer@doh.state.fl.us  
**Subject:**

was read on 10/17/2007 1:27 PM.

**Friday, Barbara**

---

**From:** Osbourn, Scott [Scott\_Osbourn@golder.com]  
**To:** undisclosed-recipients  
**Sent:** Wednesday, October 17, 2007 1:36 PM  
**Subject:** Read: DRAFT/PROPOSED Title V Permit Renewal No.: 0990045-005-AV - City of Lake Worth Utilities - Tom G. Smith Plant and Lake Worth Water Treatment Plant

Your message

**To:** Scott\_Osbourn@golder.com  
**Subject:**

was read on 10/17/2007 1:36 PM.

## PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL

Department of Environmental Protection  
DRAFT/PROPOSED Title V Air Operation Permit No.0990045-005-AV  
City of Lake Worth Facility  
Palm Beach County

**Applicant:** The applicant for this project is City of Lake Worth Utilities, 1900 2<sup>nd</sup> Avenue North, Lake Worth, Florida 33461. The applicant's responsible official is Mr. David L. Mulvay, Power Plant Manager.

**Facility Location:** The applicant operates the City of Lake Worth facility comprised of the Tom G. Smith Power Plant and the Lake Worth Water Treatment Plant. The facility is located at 117 College Street, Lake Worth, Florida 33461. It is immediately north of 6<sup>th</sup> Avenue South and east of Interstate 95.

**Project:** The applicant submitted an application for a Title V Air Operation Permit Renewal including an Acid Rain Part pursuant to Title IV of the Clean Air Act. The facility consists of the following emissions units:

The facility includes eight regulated emission units with a total nominal generating capacity of 96 megawatts (MW). These include five diesel engine generators, each with a rating of 2 MW; one 26.5 MW fossil fuel steam generating unit; one 30 MW simple cycle gas turbine; and one 29.5 MW combined cycle gas turbine. Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities. The electrical units at the facility are typically used for peaking purposes or when power is not available from the main provider in the area.

The Permit Renewal recognizes the permanent shutdown in 2005 of two fossil fuel steam generating units not listed above and includes a compliance plan requiring installation of permanent stack sampling facilities on certain units or pursuit and approval of an alternative sampling procedure.

**Permitting Authority:** Applications for Title V air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, 62-213, and 62-214 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to operate the facility. The Department of Environmental Protection, Bureau of Air Regulation, is the Permitting Authority responsible for making a permit determination regarding this project. The Department's physical address is: Bureau of Air Regulation, 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301. The Department's mailing address is: Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. The Department's telephone number is 850/488-0114 and facsimile 850/921-9533.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Department. The complete project file includes the DRAFT/PROPOSED Permit, the Statement of Basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the DRAFT/PROPOSED Permit by visiting the following website: <http://www.dep.state.fl.us/air/eproducts/ards> and entering the permit number indicated above. A copy of the complete project file is available at the Department's Southeast District Office, 400 North Congress Ave, Suite 200, West Palm Beach, Florida 33401 (Telephone: 561/681-6600). A copy of the complete project file is also available at the office of the compliance authority, which is the Palm Beach County Health Department, Air Quality Control Section, 901 Evernia Street, West Palm Beach, Florida 33401 (Telephone: 561/840-4500).

**Notice of Intent to Issue a Permit:** The Department gives notice of its intent to issue a permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the facility will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296, and 62-297, F.A.C. The Department will issue a FINAL Permit in accordance with the conditions of the DRAFT/PROPOSED Permit unless a response received in accordance with the following procedures results in a different decision or a significant change of terms or conditions.

**Comments:** The Department will accept written comments concerning the DRAFT/PROPOSED Permit for a period of thirty (30) days from the date of publication of this Public Notice. Written comments must be post-marked and all e-mail or facsimile comments must be received by the close of business (5 pm) on or before the end of this 30-day period by the Department at the above address, email or facsimile. As part of his or her comments, any person may also request that the Department hold a public meeting on this permitting action. If the Department determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location on the official web site for notices at Florida Administrative Weekly (FAW) at <http://faw.dos.state.fl.us/> and in a

(Public Notice to be Published in the Newspaper)

newspaper of general circulation in the area affected by the permitting action. Subsequent action on the Title V and Title IV parts of the Permit Renewal may be split if comments are received on the Title V portion of the DRAFT/PROPOSED Permit. For additional information, contact the Permitting Authority at the above address or phone number. If written comments or comments received at a public meeting result in a significant change to the DRAFT/PROPOSED Permit, the Permitting Authority shall issue a Revised DRAFT/PROPOSED Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen (14) days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within fourteen (14) 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 (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

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 rights will be affected by the agency determination; (c) A statement of how and when the 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 state; (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, including an explanation of how the alleged facts relate to specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the 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, F.A.C.

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 Public Notice of intent. 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:** Mediation is not available for this proceeding.

**EPA Review & Objections:** EPA has agreed to treat the DRAFT Title V Permit as a PROPOSED Title V Permit and to perform its 45-day review provided by the law and regulations concurrently with the public comment period. Although EPA's 45-day review period will be performed concurrently with the public comment period, the deadline for submitting a citizen petition to object to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended. The FINAL Title V Air Operation Permit will be issued after the conclusion of the 45-day EPA review period so long as no adverse comments are received that result in a different decision or significant change of terms or conditions.

The status regarding EPA's 45-day review of this project and the deadline for submitting a citizen petition can be found at the following web site address <http://epa.gov/region4/air/permits/Florida.htm>

Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within sixty (60) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Title V air operation permit. Any

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petition shall be based only on objections to the Permit that were raised with reasonable specificity during the thirty (30) day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding EPA review and objections, visit EPA's Region 4 web site at [www.epa.gov/region4/air/permits/Florida.htm](http://www.epa.gov/region4/air/permits/Florida.htm) .

**(Public Notice to be Published in the Newspaper)**

**Friday, Barbara**

---

**To:** Hoefert, Lee; dmulvay@lakeworth.org; 'James\_Stormer@doh.state.fl.us';  
sosbourn@golder.com

**Cc:** Read, David

**Subject:** DRAFT Title V Permit Renewal No.: 0990045-005-AV - City of Lake Worth Utilities - Tom G.  
Smith Power Plant

**Attachments:** 0990045.005.AV.D\_pdf[1].zip

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

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Thank you,

DEP, Bureau of Air Regulation

9/27/2007

**Friday, Barbara**

---

**From:** System Administrator  
**To:** Hoefert, Lee  
**Sent:** Thursday, September 27, 2007 11:28 AM  
**Subject:** Delivered: DRAFT Title V Permit Renewal No.: 0990045-005-AV - City of Lake Worth Utilities - Tom G. Smith Power Plant

Your message

**To:** Hoefert, Lee; 'dmulvay@lakeworth.org'; 'James\_Stormer@doh.state.fl.us'; 'sosbourn@golder.com'  
**Cc:** Read, David  
**Subject:** DRAFT Title V Permit Renewal No.: 0990045-005-AV - City of Lake Worth Utilities - Tom G. Smith Power Plant  
**Sent:** 9/27/2007 11:27 AM

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Hoefert, Lee on 9/27/2007 11:28 AM



**Friday, Barbara**

---

**From:** System Administrator  
**To:** Read, David  
**Sent:** Thursday, September 27, 2007 11:28 AM  
**Subject:** Delivered:DRAFT Title V Permit Renewal No.: 0990045-005-AV - City of Lake Worth Utilities - Tom G. Smith Power Plant

Your message

**To:** Hoefert, Lee; 'dmulvay@lakeworth.org'; 'James\_Stormer@doh.state.fl.us'; 'sosbourn@golder.com'  
**Cc:** Read, David  
**Subject:** DRAFT Title V Permit Renewal No.: 0990045-005-AV - City of Lake Worth Utilities - Tom G. Smith Power Plant  
**Sent:** 9/27/2007 11:27 AM

was delivered to the following recipient(s):

Read, David on 9/27/2007 11:28 AM

**Friday, Barbara**

---

**From:** Exchange Administrator  
**Sent:** Thursday, September 27, 2007 11:28 AM  
**To:** Friday, Barbara  
**Subject:** Delivery Status Notification (Relay)

**Attachments:** ATT360591.txt; DRAFT Title V Permit Renewal No.: 0990045-005-AV - City of Lake Worth Utilities - Tom G. Smith Power Plant



ATT360591.txt  
(296 B)

DRAFT Title V  
Permit Renewal N...

This is an automatically generated Delivery Status Notification.

Your message has been successfully relayed to the following recipients, but the requested delivery status notifications may not be generated by the destination.

James\_Stormer@doh.state.fl.us

## Friday, Barbara

---

**From:** Read, David  
**To:** Friday, Barbara  
**Sent:** Thursday, September 27, 2007 11:29 AM  
**Subject:** Read: DRAFT Title V Permit Renewal No.: 0990045-005-AV - City of Lake Worth Utilities - Tom G. Smith Power Plant

### Your message

**To:** Hoefert, Lee; 'dmulvay@lakeworth.org'; 'James\_Stormer@doh.state.fl.us'; 'sosbourn@golder.com'  
**Cc:** Read, David  
**Subject:** DRAFT Title V Permit Renewal No.: 0990045-005-AV - City of Lake Worth Utilities - Tom G. Smith Power Plant  
**Sent:** 9/27/2007 11:27 AM

was read on 9/27/2007 11:28 AM.

## Friday, Barbara

---

**From:** Hoefert, Lee  
**To:** Friday, Barbara  
**Sent:** Thursday, September 27, 2007 11:32 AM  
**Subject:** Read: DRAFT Title V Permit Renewal No.: 0990045-005-AV - City of Lake Worth Utilities - Tom G. Smith Power Plant

Your message

**To:** Hoefert, Lee; 'dmulvay@lakeworth.org'; 'James\_Stormer@doh.state.fl.us'; 'sosbourn@golder.com'  
**Cc:** Read, David  
**Subject:** DRAFT Title V Permit Renewal No.: 0990045-005-AV - City of Lake Worth Utilities - Tom G. Smith Power Plant  
**Sent:** 9/27/2007 11:27 AM

was read on 9/27/2007 11:32 AM.

## Friday, Barbara

---

**From:** Dave Mulvay [DMulvay@LakeWorth.org]  
**To:** Friday, Barbara  
**Sent:** Thursday, September 27, 2007 11:26 AM  
**Subject:** Read: DRAFT Title V Permit Renewal No.: 0990045-005-AV - City of Lake Worth Utilities - Tom G. Smith Power Plant

Your message

To: DMulvay@LakeWorth.org  
Subject:

was read on 9/27/2007 11:26 AM.

**Friday, Barbara**

---

**From:** System Administrator  
**To:** Dave Mulvay  
**Sent:** Thursday, September 27, 2007 1:31 PM  
**Subject:** Delivered: DRAFT Title V Permit Renewal No.: 0990045-005-AV - City of Lake Worth Utilities - Tom G. Smith Power Plant

Your message

**To:** Hoefert, Lee; dmulvay@lakeworth.org; James\_Stormer@doh.state.fl.us; sosbourn@golder.com  
**Cc:** Read, David  
**Subject:** DRAFT Title V Permit Renewal No.: 0990045-005-AV - City of Lake Worth Utilities - Tom G. Smith Power Plant  
**Sent:** 9/27/2007 11:27 AM

was delivered to the following recipient(s):

Dave Mulvay on 9/27/2007 11:26 AM

## Friday, Barbara

---

**From:** Mail Delivery System [MAILER-DAEMON@sophos.golder.com]  
**Sent:** Thursday, September 27, 2007 11:26 AM  
**To:** Friday, Barbara  
**Subject:** Successful Mail Delivery Report

**Attachments:** Delivery report; Message Headers



Delivery report.txt  
(461 B)



Message  
Headers.txt (2 KB)

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Your message was successfully delivered to the destination(s) listed below. If the message was delivered to mailbox you will receive no further notifications. Otherwise you may still receive notifications of mail delivery errors from other systems.

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<sosbourn@golder.com>: delivery via 127.0.0.1[127.0.0.1]:10025: 250 OK, sent  
46FBCB9F\_26813\_108\_1

## Friday, Barbara

---

**From:** Osbourn, Scott [Scott\_Osbourn@golder.com]  
**To:** Friday, Barbara  
**Sent:** Thursday, September 27, 2007 11:30 AM  
**Subject:** Read: DRAFT Title V Permit Renewal No.: 0990045-005-AV - City of Lake Worth Utilities - Tom G. Smith Power Plant

Your message

**To:** Scott\_Osbourn@golder.com  
**Subject:**

was read on 9/27/2007 11:30 AM.



## Friday, Barbara

---

**From:** James\_Stormer@doh.state.fl.us  
**To:** Friday, Barbara  
**Sent:** Thursday, September 27, 2007 11:27 AM  
**Subject:** Read: DRAFT Title V Permit Renewal No.: 0990045-005-AV - City of Lake Worth Utilities - Tom G. Smith Power Plant

Your message

To: James\_Stormer@doh.state.fl.us  
Subject:

was read on 9/27/2007 11:27 AM.

**Friday, Barbara**

---

**From:** Margaret Johnstone [mjohnstone@LakeWorth.org]  
**Sent:** Wednesday, October 17, 2007 1:37 PM  
**To:** Friday, Barbara  
**Subject:** RE: DRAFT/PROPOSED Title V Permit Renewal No.: 0990045-005-AV - City of Lake Worth Utilities - Tom G. Smith Plant and Lake Worth Water Treatment Plant

I have received this document, thank you.

---

**From:** Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]  
**Sent:** Wednesday, October 17, 2007 1:25 PM  
**To:** Margaret Johnstone; Hoefert, Lee; James\_Stormer@doh.state.fl.us; sosbourn@golder.com  
**Cc:** Read, David  
**Subject:** DRAFT/PROPOSED Title V Permit Renewal No.: 0990045-005-AV - City of Lake Worth Utilities - Tom G. Smith Plant and Lake Worth Water Treatment Plant

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Thank you,

DEP, Bureau of Air Regulation

*" We now have an opportunity to expedite Title V permits by doing what is called a "parallel review" in Florida. We have a guidance memorandum on this (see attached Guidance Memorandum DARM-PER-41 dated 11/20/2006).*

*Based on our review of the subject Title V permit renewal application, this one is a candidate for "parallel review." This process works well where there will be no significant comments. This permit application is not controversial and is routine.*

*Essentially, this new process saves about 1 month of time to issue the FINAL permit. The EPA review period is performed with the public comment period. The actual permit being publicly noticed is a "DRAFT/PROPOSED" permit. The PROPOSED permit stage is combined with the DRAFT permit stage hence the reference to a "parallel review." Like before a FINAL permit would be issued after the end of the EPA review period. This renewed permit has a planned future effective date of January 1, 2008. By using the parallel review process, you can receive the FINAL permit well before December 31, 2007.*

10/18/2007

***The proof of publication of the Public Notice must be received no later than October 30th."***

*The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.*

**Friday, Barbara**

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**From:** Margaret Johnstone [mjohnstone@LakeWorth.org]  
**To:** undisclosed-recipients  
**Sent:** Wednesday, October 17, 2007 1:34 PM  
**Subject:** Read: DRAFT/PROPOSED Title V Permit Renewal No.: 0990045-005-AV - City of Lake Worth Utilities - Tom G. Smith Plant and Lake Worth Water Treatment Plant

Your message

To: mjohnstone@LakeWorth.org  
Subject:

was read on 10/17/2007 1:34 PM.