

Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

P.E. CERTIFICATION STATEMENT

PERMITTEE

Lake Worth Generation, L.L.C.
245 Winter Street, Suite 300
Waltham, MA 02451

ARMS Permit No.	0990568-002-AC
PSD Permit No.	PSD-FL-266A
Facility ID No.	0990568
SIC No.	4911

Authorized Representative:
Brian Chatlosh, Manager

PROJECT DESCRIPTION

On November 4, 1999, the Department issued a PSD permit to Lake Worth Generation, L.L.C. to construct a new combined cycle plant located at 117 College Street in Lake Worth, Florida. The project consists of a 170 MW combustion turbine with electrical generator set, a heat recovery steam generator (HRSG) with duct burners, an absorption or evaporative cooling system, continuous monitoring equipment, and two exhaust stacks. The final design specification for the duct burner system indicates that the VOC emissions will be higher than expected. The low-NOx duct burners selected will be capable of 0.08 lb/mmBTU in accordance with the BACT determination. However, the VOC emissions for this equipment will be 4.4 pounds per hour and not 0.6 pounds per hour as reported in the initial application. The applicant requests increasing the VOC standards from 1.7 ppmvw and 3.8 pounds per hour to 3.3 ppmvw and 7.6 pounds per hour for the combined emissions from the gas turbine and duct burners.

VOC emissions from the original project were below the significant emission rate of 40 tons per year, so a BACT determination was not required. The proposed change will result in a net emissions increase of 3.8 tons per year bringing total VOC emissions from the project to 20.1 tons per year, which continues to remain well below the significant emissions rate. Therefore, PSD does not apply and a determination of Best Available Control Technology is not required in accordance with Rule 62-212.400, F.A.C. The proposed change would not alter any of the previously modeled scenarios in the original Air Quality Analysis. I believe the request is reasonable and have revised pages 1, 3, and 14 of the permit as requested.

***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).*

Jeffery F. Koerner, P.E.
Registration Number: 49441

7-21-00

Date

DARM - New Source Review Section
Florida Department of Environmental Protection

"More Protection, Less Process"

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
Telephone (352) 336-5600
Fax (352) 336-6603



August 4, 2000

RECEIVED

9937586

AUG 07 2000

Mr. C.H. Fancy, P.E. Chief,
Bureau of Air Regulation
Department of Environmental Protection
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301

BUREAU OF AIR REGULATION

Re: Lake Worth Generation
Proof of Public Notice
Project No. 0990568-002-AC (PSD-FL-266A)
Modification of VOC Standards for Duct Firing

Dear Mr. Fancy:

Golder Associates Inc. on behalf of Lake Worth Generation L.L.C. is transmitting herein the official notarized proof of Public Notice of Intent to Issue Air Construction Permit Modification as required by Section 403.815, and 403.0815 F.S. DEP Rules 62-110.106(7)(a), F.A.C. for your files.

Sincerely,

GOLDER ASSOCIATES INC.

Benny Susi, P.E.
Associate

Enclosure: Proof of Public Notice

cc: K. Kosky, GAI-Gainesville
B. Chatlosh, LWG, L.L.C.
P. Doherty, LWG, L.L.C.
R. Zwolak, GAI-Tampa

P:\Projects\99\9937\9937586a Sea Ray\09\#091tr.doc

J. Kalmer
P.B. Co.
EPA
NPS

THE PALM BEACH POST

Published Daily and Sunday
West Palm Beach, Palm Beach County, Florida

PROOF OF PUBLICATION

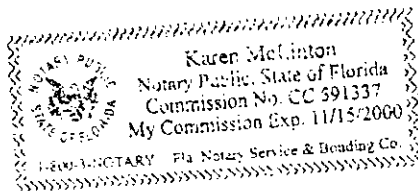
STATE OF FLORIDA
COUNTY OF PALM BEACH

Before the undersigned authority personally appeared Tyler Dixon, who on oath says that she is Classified Advertising Manager, Inside Sales of The Palm Beach Post, a daily and Sunday newspaper published at West Palm Beach in Palm Beach County, Florida; that the attached copy of advertising, being a Notice in the matter of Intent to Issue Air Construction Permit Modification -- in the Court, was published in said newspaper in the issues of July 28, 2000.

Affiant further says that the said The Post is a newspaper published at West Palm Beach, in said Palm Beach County, Florida, and that the said newspaper has heretofore been continuously published in said Palm Beach County, Florida, daily and Sunday and has been entered as second class mail matter at the post office in West Palm Beach, in said Palm Beach County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that she/he has neither paid nor promised any person, firm or corporation any discount rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before this 28 day of July A.D. 2000.

Personally known XX or Produced Identification _____
Type of Identification Produced _____



NO. 719954
PUBLIC NOTICE OF INTENT
TO ISSUE AIR CONSTRUCTION
PERMIT MODIFICATION
STATE OF FLORIDA
DEPARTMENT
OF ENVIRONMENTAL
PROTECTION
Project No. 0990568-002-AC
(PSD-FL-266A)
Lake Worth Generation, L.L.C.
Modification of Duct Burner
VOC Emissions
Palm Beach County
The Department of Environ-
mental Protection (Depart-
ment) gives notice of its intent
to issue an air construction
permit modification to Lake
Worth Generation, L.L.C. The
applicant requests that the
current VOC standards of 1.7
ppmv and 3.8 pounds per
hour be increased to 3.3
ppmv and 7.6 pounds per
hour for the combined emis-
sions from the gas turbine and
duct burners. The applicant's
mailing address is Lake Worth
Generation, L.L.C., 245 Winter
Street, Suite 300, Waltham,
MA 02451. The authorized
representative is Brian Chat-
losh, Manager.
On November 4, 1999, the De-
partment issued an initial PSD
permit to Lake Worth Genera-
tion, L.L.C. to construct a new
combined cycle plant located
at 117 College Street in Lake
Worth, Florida. The project
consists of a 170 MW combus-
tion turbine with electrical
generator set, a heat recovery
steam generator (HRSG) with
duct burners, an absorption or
evaporative cooling system,
continuous monitoring equip-
ment, and two exhaust stacks.
The final design specification
for the duct burner system in-
dicates that the VOC emis-
sions will be higher than ex-
pected. The low-NOx duct
burners selected will be capa-
ble of 0.08 lb/mmBTU in ac-
cordance with the BACT de-
termination. However, the
VOC emissions for this equip-
ment will be 4.4 pounds per
hour and not 0.6 pounds per
hour as reported in the initial
application.
The Department believes the
request is reasonable and has
revised pages 1, 3 and 14 of
the permit accordingly. The
proposed change will result in
a net emissions increase of
4.4 tons per year bringing to-
tal VOC emissions from the
project to 20.1 tons per year,
which continues to remain
well below the VOC significant
emissions rate of 40 tons per
year. Therefore, PSD does not
apply and a determination of
Best Available Control Tech-
nology is not required in ac-
cordance with Rule 62-
212.400, F.A.C. The proposed
change would not alter any of
the previously modeled sce-
narios of the original Air Quali-
ty Analysis.
The Department will issue the
Final Permit with the attached
conditions unless a response
received in accordance with
the following procedures re-
sults in a different decision or
significant change of terms or
conditions. The Department
will accept written comments
and requests for public meet-
ings concerning the proposed
permit issuance action for a
period of thirty (30) days from
the date of publication of this
Public Notice. Written com-
ments and requests for public
meetings should be provided
to the Department's Bureau of
Air Regulation at 2600 Blair
Stone Road, Mail Station
#5505, Tallahassee, FL
32399-2400. Any written com-
ments filed shall be made
available for public inspection.
If written comments received
result in a significant change
in the proposed agency ac-
tion, the Department shall re-
vise the proposed permit and
require, if applicable, another
Public Notice.
The Department will issue the
permit with the attached con-
ditions unless a timely petition
for an administrative hearing
is filed pursuant to sections
120.569 and 120.57 F.S., be-
fore the deadline for filing a
petition. The procedures for
petitioning for a hearing are
set forth below.

Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900

Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section

120.60(3) of the Florida Statutes must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

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 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 indicate; (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; and (g) A statement of the relief sought by the petitioner, stating precisely the action 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 ac-

tion, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. 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.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida, 32301
Telephone: 850/488-0114
Dept. of Environmental Protection Southeast District
400 North Congress Avenue
West Palm Beach, Florida 33401
Telephone: 561/681-6600
Air Pollution Control Section
Palm Beach County
Health Department
901 Evernia Street
West Palm Beach, Florida 33401
Telephone: 561/355-3070

The complete project file includes the application, technical evaluations, Draft Permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the project engineer, Jeff Koerner, at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114 for additional information.

PUB: The Palm Beach Post
July 28, 2000

Memorandum

Florida Department of Environmental Protection

TO: Clair Fancy, Chief – Bureau of Air Regulation
THROUGH Al Linero, Administrator - New Source Review Section
FROM: Jeff Koerner, Project Engineer - New Source Review Section JK
DATE: July 12, 2000
SUBJECT: Project No. 0990568-002-AC (PSD-FL-266A)
Modification to Increase Duct Burner VOC Emissions
Lake Worth Generation, L.L.C.

On November 4, 1999, the Department issued a PSD permit to Lake Worth Generation, L.L.C. to construct a new combined cycle plant located at 117 College Street in Lake Worth, Florida. The project consists of a 170 MW combustion turbine with electrical generator set, a heat recovery steam generator (HRSG) with duct burners, an absorption or evaporative cooling system, continuous monitoring equipment, and two exhaust stacks. The final design specification for the duct burner system indicates that the VOC emissions will be higher than expected. The low-NO_x duct burners selected will be capable of 0.08 lb/mmBTU in accordance with the BACT determination. However, the VOC emissions for this equipment will be 4.4 pounds per hour and not 0.6 pounds per hour as reported in the initial application. The applicant requests increasing the VOC standards from 1.7 ppmvw and 3.8 pounds per hour to 3.3 ppmvw and 7.6 pounds per hour for the combined emissions from the gas turbine and duct burners.

VOC emissions from the original project were below the significant emission rate of 40 tons per year, so a BACT determination was not required. The proposed change will result in a net emissions increase of 3.8 tons per year bringing total VOC emissions from the project to 20.1 tons per year, which continues to remain well below the significant emissions rate. Therefore, PSD does not apply and a determination of Best Available Control Technology is not required in accordance with Rule 62-212.400, F.A.C. The proposed change would not alter any of the previously modeled scenarios in the original Air Quality Analysis. I believe the request is reasonable and have revised pages 1, 3, and 14 of the permit as requested.

Day #74 of the 90-day permitting time clock is September 2, 2000. I recommend your approval of the attached Intent to Issue package for this project.

JFK
Attachments

Z 031 392 033

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to Mr. Brian Chatlosh	
Street & Number 245 Winter St., Suite 300	
Post Office, State, & ZIP Code Waltham, MA 02451	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date 0990568-002-AC PSD-FL-266A Mailed: 7-21-00	

PS Form 3800, April 1995

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Brian Chatlosh
Manager
Lake Worth Generation, L.L.C.
245 Winter Street, Ste. 300
Waltham, MA 02451

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery
7/25/00

C. Signature
X *[Signature]* ☐ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Copy from service label)

Z 031 392 033

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

July 21, 2000

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Brian Chatlosh, Manager
Lake Worth Generation, L.L.C.
245 Winter Street, Suite 300
Waltham, MA 02451

Re: Project No. 0990568-002-AC (PSD-FL-266A)
Modification of VOC Standards for Duct Firing
Lake Worth Generation, L.L.C.


Dear Mr. Chatlosh:

Enclosed is one copy of the Draft Air Construction Permit Modification for the new Lake Worth Generation Plant to be located at 117 College Street in Lake Worth, Florida. This is a revision of original Permit No. PSD-FL-266 issued on November 4, 1999. The following revised documents are also included: Intent to Issue Air Construction Permit Modification, Technical Evaluation and Preliminary Determination, and the Public Notice of Intent to Issue Air Construction Permit.

The Public Notice must be published one time only, as soon as possible, in the legal advertisement section of a newspaper of general circulation in the area affected, pursuant to the requirements Chapter 50, Florida Statutes. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within seven days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the Department's proposed action to the project engineer, Jeff Koerner of the New Source Review Section, at the above letterhead address. If you have any other questions, please contact Mr. Koerner at 850/414-7268.

Sincerely,


C. H. Fancy, P.E., Chief,
Bureau of Air Regulation

CHF/jfk

Enclosures

*In the Matter of an
Application for Permit by:*

Mr. Brian Chatlosh, Manager
Lake Worth Generation, L.L.C.
245 Winter Street, Suite 300
Waltham, MA 02451

Project No. 0990568-002-AC
PSD Permit No. PSD-FL-266A
Duct Burner VOC Modification
Palm Beach County

INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION

For the reasons stated below, the Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit modification (copy attached) for the proposed project as detailed in the application and the enclosed Technical Evaluation and Preliminary Determination, .

On November 4, 1999, the Department issued a PSD permit to Lake Worth Generation, L.L.C. to construct a new combined cycle plant located at 117 College Street in Lake Worth, Florida. The project consists of a 170 MW combustion turbine with electrical generator set, a heat recovery steam generator (HRSG) with duct burners, an absorption or evaporative cooling system, continuous monitoring equipment, and two exhaust stacks. The final design specification for the duct burner system indicates that the VOC emissions will be higher than expected. The low-NOx duct burners selected will be capable of 0.08 lb/mmBTU in accordance with the BACT determination. However, the VOC emissions for this equipment will be 4.4 pounds per hour and not 0.6 pounds per hour as reported in the initial application.

The applicant requests revised VOC standards of 3.3 ppmvw and 7.6 pounds per hour for the combined emissions from the gas turbine and duct burners. The Department believes the request is reasonable and has revised pages 1, 3, and 14 of the permit accordingly. The proposed change will result in a net emissions increase of 4.4 tons per year bringing total VOC emissions from the project to 20.1 tons per year, which remains well below the significant emissions rate.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-212. The above actions are not exempt from permitting procedures. The Department has determined that an air construction permit is required to construct the proposed project.

The Department intends to issue this air construction permit based on the belief that reasonable assurances have been provided to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1., F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Construction Permit Modification. The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C., requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting 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 the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114; Fax 850/ 922-6979). You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C. 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 prescribed 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 Rules 62-110.106(9) & (11), F.A.C.

The Department will issue the final permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments and requests for public meetings concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of Public Notice of Intent to Issue Air Permit Modification. Written comments and requests for public meetings should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

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 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 indicate; (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; and (g) A statement of the relief sought by the petitioner, stating precisely the action 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.

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 notice. 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 is not available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542 F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2) F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Executed in Tallahassee, Florida.


C. H. Fancy, P.E., Chief
Bureau of Air Regulation

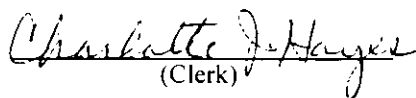
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Intent to Issue Air Construction Permit Modification (including the Public Notice of Intent to Issue Air Construction Permit Modification, Technical Evaluation and Preliminary Determination, and the Draft Permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 7/21/00 to the persons listed:

Mr. Brian Chatlosh, LWG*
Mr. Paul Doherty, Thermo ECOtek
Mr. Ken Kosky, Golder Associates
Mr. Jim Stormer, PBCHD
Mr. Isidore Goldman, DEP-SED
Mr. Gregg Worley, EPA
Mr. John Bunyak, NPS

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

 7/21/00
(Clerk) (Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Project No. 0990568-002-AC (PSD-FL-266A)

Lake Worth Generation, L.L.C.
Modification of Duct Burner VOC Emissions

Palm Beach County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit modification to Lake Worth Generation, L.L.C. The applicant requests that the current VOC standards of 1.7 ppmvw and 3.8 pounds per hour be increased to 3.3 ppmvw and 7.6 pounds per hour for the combined emissions from the gas turbine and duct burners. The applicant's mailing address is Lake Worth Generation, L.L.C., 245 Winter Street, Suite 300, Waltham, MA 02451. The authorized representative is Brian Chatlosh, Manager.

On November 4, 1999, the Department issued an initial PSD permit to Lake Worth Generation, L.L.C. to construct a new combined cycle plant located at 117 College Street in Lake Worth, Florida. The project consists of a 170 MW combustion turbine with electrical generator set, a heat recovery steam generator (HRSG) with duct burners, an absorption or evaporative cooling system, continuous monitoring equipment, and two exhaust stacks. The final design specification for the duct burner system indicates that the VOC emissions will be higher than expected. The low-NOx duct burners selected will be capable of 0.08 lb/mmBTU in accordance with the BACT determination. However, the VOC emissions for this equipment will be 4.4 pounds per hour and not 0.6 pounds per hour as reported in the initial application.

The Department believes the request is reasonable and has revised pages 1, 3 and 14 of the permit accordingly. The proposed change will result in a net emissions increase of 4.4 tons per year bringing total VOC emissions from the project to 20.1 tons per year, which continues to remain well below the VOC significant emissions rate of 40 tons per year. Therefore, PSD does not apply and a determination of Best Available Control Technology is not required in accordance with Rule 62-212.400, F.A.C. The proposed change would not alter any of the previously modeled scenarios of the original Air Quality Analysis.

The Department will issue the Final Permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions. The Department will accept written comments and requests for public meetings concerning the proposed permit issuance action for a period of thirty (30) days from the date of publication of this Public Notice. Written comments and requests for public meetings should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), 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 TO BE PUBLISHED IN THE NEWSPAPER

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION

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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

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 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 indicate; (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; and (g) A statement of the relief sought by the petitioner, stating precisely the action 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 notice. 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.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida, 32301
Telephone: 850/488-0114

Dept. of Environmental Protection
Southeast District
400 North Congress Avenue
West Palm Beach, Florida 33401
Telephone: 561/681-6600

Air Pollution Control Section
Palm Beach County Health Department
901 Evernia Street
West Palm Beach, Florida 33401
Telephone: 561/355-3070

The complete project file includes the application, technical evaluations, Draft Permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the project engineer, Jeff Koerner, at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114 for additional information.

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

**TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION**

LAKE WORTH GENERATION, L.L.C.

Modification of VOC Emissions Standards
For Emission Units 001 and 002
Lake Worth, Palm Beach County, Florida

Facility I.D. No. 0990568

Project No. 0990568-002-AC
Permit No. PSD-FL-266A

Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
New Source Review Section

July 21, 2000

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

1.0 APPLICATION INFORMATION

1.1 Applicant Name and Address

Lake Worth Generation, L.L.C.
245 Winter Street, Suite 300
Waltham, MA 02451

Authorized Representative:

Brian Chatlosh, Manager

1.2 Reviewing and Process Schedule

06/21/00: Department received application: complete

2.0 FACILITY INFORMATION

2.1 Facility Description

The new 186 MW combined cycle combustion turbine will be located at 117 College Street in Lake Worth, Florida 33461, within the boundaries of the existing Tom G. Smith Power Plant, which is owned and operated by the City of Lake Worth. This site is approximately 104 km north of the Everglades National Park, a Class I PSD Area. The UTM Coordinates are Zone 17, 592.8 km E, 43.7 km N.

2.2 Standard Industrial Classification Codes (SIC)

Industry Group No.	49	Electric, Gas, and Sanitary Services
Industry No.	4911	Electric Services

2.3 Regulatory Categories

Power Plant Siting: The new facility is not regulated pursuant to the Electric Power Plant and Transmission Line Siting Act because less than 75 MW of steam-generated electrical power will be produced by this project. Therefore it is not subject to requirements of Chapter 403, Part II, F.S. or Chapter 62-17, F.A.C.

Title III – HAP: A case-by-case determination of Maximum Available Control Technology (MACT) in accordance with Section 112(g) does not apply because the new facility is not expected to be a major source of hazardous air pollutants.

Title IV - Acid Rain: The gas turbine is subject to Title IV, the federal Acid Rain program.

Title V – Major Source: The new facility is classified as a Title V major source of air pollution because emissions of at least one regulated air pollutant, such as carbon monoxide (CO), nitrogen oxides (NOx), particulate matter (PM/PM₁₀), sulfur dioxide (SO₂), or volatile organic compounds (VOC) exceeds 100 tons per year (TPY).

PSD Major Source: The new facility is classified as a fossil fuel-fired steam electric plant, which is one of the source categories listed in Table 62-212.400-2, F.A.C. Because emissions of at least one pollutant exceed 100 tons per year, the existing facility is considered a major source of air pollution with respect to PSD. Therefore, new projects must be reviewed for PSD applicability. Each potential emission increase greater than the Significant Emissions Rates specified in Table 62-212.400-2, F.A.C. requires a determination of Best Available Control Technology (BACT). The original PSD permit contains BACT determinations for CO, NOx, PM/PM₁₀, SAM/SO₂ emissions from the gas turbine.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

NSPS Sources: This project includes New Source Performance Standards in 40 CFR 60 for the gas turbines (Subpart GG) and the duct burners in the heat recovery steam generator (Subpart Db).

3.0 PROPOSED PROJECT

3.1 Project Description

This permit addresses the following emissions units:

ARMS ID No.	EMISSIONS UNIT DESCRIPTION
001	The combustion turbine is a General Electric Model Frame 7FA primarily fired with natural gas. It has a direct electrical generating capacity of 186 MW in simple cycle.
002	The heat recovery steam generator (HRSG) with supplemental low NO _x duct burners converts waste heat from the combustion turbine into steam during the combined cycle mode to produce an additional 74 MW of electricity from existing steam turbines.

On November 4, 1999, the Department issued a PSD permit to Lake Worth Generation, L.L.C. to construct a new combined cycle plant located at 117 College Street in Lake Worth, Florida. The project consists of a 170 MW combustion turbine with electrical generator set, a heat recovery steam generator (HRSG) with duct burners, an absorption or evaporative cooling system, continuous monitoring equipment, and two exhaust stacks. The final design specification for the duct burner system indicates that the VOC emissions will be higher than expected. The low-NO_x duct burners selected will be capable of 0.08 lb/mmBTU in accordance with the BACT determination. However, the VOC emissions for this equipment will be 4.4 pounds per hour and not 0.6 pounds per hour as reported in the initial application. The applicant requests revised VOC standards of 3.3 ppmvw and 7.6 pounds per hour for the combined emissions from the gas turbine and duct burners.

3.2 Project Emissions

The following table summarizes the PSD applicability for this project.

Pollutant	Emissions Rate In Tons Per Year				Subject To BACT?
	Current Potential Emissions ^a	Proposed Potential Emissions ^b	Net Emissions Increase	Significant Emissions Rate	
VOC	16.3	20.1	3.8 ^c / 20 ^d	40	No

Table Notes:

- a - Based on current Permit No. PSD-FL-266.
- b - Based on applicant's request.
- c - Based on potential-to-potential emissions because this unit is not yet in operation.
- d - Because this project has not yet been built, the total emissions must be compared to the significant emissions rate to determine whether or not BACT is triggered for VOC emissions.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

4.0 RULE APPLICABILITY

As previously discussed, the newly permitted facility is considered a PSD major source and original Permit No. PSD-FL-266 established emissions standards for CO, NO_x, PM/PM₁₀ and SO₂ that represent a determination of the Best Available Control Technology (BACT). The PSD major facility is located in Palm Beach County, an area that is currently in attainment or designated as unclassifiable for all air pollutants subject to a National Ambient Air Quality Standard (AAQS). Therefore, the project is subject to a review for the Prevention of Significant Deterioration of Air Quality accordance with Rule 62-212.400, F.A.C. The PSD review consists of two parts. The first part requires the Department to establish the Best Available Control Technology (BACT) for each significant pollutant exceeding the Significant Emission Rates defined in Table 212.400-2, F.A.C. The second part requires an Air Quality Analysis for any pollutants with significant emission rates. As shown in Section 3.2, the proposed changes will result in total VOC emissions well below the Significant Emission Rate of 40 tons per year. Therefore, this project is not subject to PSD and does not require a BACT determination.

The emission units affected by this PSD permit shall comply with all applicable provisions of the Florida Administrative Code and the applicable requirements of the Code of Federal Regulations.

4.1 State Regulations

Chapter 62-4	Permits.
Rule 62-204.220	Ambient Air Quality Protection
Rule 62-204.240	Ambient Air Quality Standards
Rule 62-204.260	Prevention of Significant Deterioration Increments
Rule 62-204.800	Federal Regulations Adopted by Reference
Rule 62-210.300	Permits Required
Rule 62-210.350	Public Notice and Comments
Rule 62-210.370	Reports
Rule 62-210.550	Stack Height Policy
Rule 62-210.650	Circumvention
Rule 62-210.700	Excess Emissions
Rule 62-210.900	Forms and Instructions
Rule 62-212.300	General Preconstruction Review Requirements
Rule 62-212.400	Prevention of Significant Deterioration
Chapter 62-213	Operation Permits for Major Sources of Air Pollution
Chapter 62-214	Requirements For Sources Subject To The Federal Acid Rain Program
Rule 62-296.320	General Pollutant Emission Limiting Standards
Rule 62-296.406	Fossil Fuel Fired Steam Generators With < 250 mmBTU Per Hour Of Heat Input
Rule 62-297.310	General Test Requirements
Rule 62-297.401	Compliance Test Methods
Rule 62-297.520	EPA Continuous Monitor Performance Specifications

4.2 Federal Rules

40 CFR 52.21	Prevention of Significant Deterioration
40 CFR 60	NSPS Subparts Db and Gg
40 CFR 60	NSPS Subpart A. General Provisions
40 CFR 72	Acid Rain Permits (applicable sections)
40 CFR 73	Allowances (applicable sections)
40 CFR 75	Monitoring (applicable sections including applicable appendices)
40 CFR 77	Acid Rain Program-Excess Emissions (future applicable requirements)

5.0 DEPARTMENT'S REVIEW

The applicant requests that the current VOC standards of 1.7 ppmvw and 3.8 pounds per hour be increased to 3.3 ppmvw and 7.6 pounds per hour for the combined emissions from the gas turbine and duct burners. VOC emissions from the original project were below the significant emission rate of 40 tons per year, so a BACT determination was not required. The proposed change will result in a net emissions increase of 3.8 tons per year bringing total VOC emissions from the project to 20.1 tons per year, which continues to remain well below the significant emissions rate. Therefore, PSD does not apply and a determination of Best Available Control Technology is not required in accordance with Rule 62-212.400, F.A.C. The proposed change would not alter any of the previously modeled scenarios in the original Air Quality Analysis. The Department believes the request is reasonable and has revised page 14 of the permit as requested.

7. CONCLUSION

Based on the technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the Draft Permit, the Department makes a preliminary determination that the proposed project is capable of complying with all applicable state and federal air pollution regulations. Jeff Koerner, P.E., is the project engineer responsible for reviewing the application, recommending this determination, and drafting the permit.

New Source Review Section, Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road, MS #5505
Tallahassee, FL 32399-2400
Telephone: 850/414-7268

DRAFT

PERMITTEE

Lake Worth Generation, L.L.C.
245 Winter Street, Suite 300
Waltham, MA 02451

Authorized Representative:
Brian Chatlosh, Manager

ARMS ID No.	099-0568
PSD Permit No.	PSD-FL-266
ARMS Permit No.	099-0568-001-AC
Permit Expires:	May 1, 2001
SIC No.	4911

PROJECT AND LOCATION

This permit authorizes Lake Worth Generation, L.L.C. to construct a gas-fired combustion turbine with electrical generator set and associated equipment in accordance with the application and conditions of this permit. The new electrical generating power plant will be located within the boundaries of the existing Tom G. Smith Power Plant (owned and operated by the City of Lake Worth) at 117 College Street in Lake Worth, Florida 33461. The UTM Coordinates are Zone 17, 592.8 km E. 43.7 km N.

MODIFICATION

The original Permit PSD-FL-266 was revised on (DRAFT) to increase the VOC emissions standard for combined emissions from the gas turbine and duct burner on page 14.

STATEMENT OF BASIS

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The above named permittee is authorized to construct the emissions units in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

APPENDICES

The attached appendices are a part of this permit:

- Appendix A: Terminology
- Appendix B: Construction Permit General Conditions
- Appendix C: Department's BACT Determination
- Appendix D: NSPS General Provisions
- Appendix E: NSPS Subpart Db (HRSG Duct Burner)
- Appendix F: NSPS Subpart GG (Gas Turbine)
- Appendix G: Summary Report - Gaseous Excess Emission & Monitoring System Performance

Howard L. Rhodes, Director
Division of Air Resources Management

SECTION I. FACILITY INFORMATION

09/20/99 Distributed revised Intent to Issue Draft PSD Permit package.
09/24/99 Public Notice of Intent to Issue Permit published in the Palm Beach Post.
10/20/99 Received comments from the applicant requesting minor changes.
10/22/99 Received comments from EPA Region 4 requesting substantial changes, primarily to the NOx BACT determination.
10/28/99 Teleconference with EPA, the applicant, and the Department.
11/01/99 Teleconference with EPA Region 4 and the Department.

RELEVANT DOCUMENTS

The documents listed below are the basis of the permit and are on file with the Department. They specifically relate to this permitting action.

- Permit application received 03/15/99 and associated correspondence.
- National Park Service's comments dated 04/16/99 and 06/21/99.
- Department's initial Intent to Issue Draft Permit package dated 07/09/99.
- Letter dated 07/23/99 from the City of Lake Worth requesting consideration of retiring the boilers coupled with steam-electrical generating units S-1, S-2 and S-4 and limiting operation of the boiler coupled with steam unit S-3 to only those periods when steam is not available from LWG.
- Written request received 08/09/99 from the applicant to modify the initial Intent to Issue Draft Permit package.
- Letter received 08/19/99 from the City of Lake Worth requesting consideration of the repowering nature of this project along with the site-specific conditions related to an ammonia release in the vicinity of this plant:
- Final written comments received 08/20/99 from the Palm Beach County Local Air Program regarding the initial Intent to Issue Draft Permit package.
- Department's revised Intent to Issue and Public Notice Package dated 09/20/99.
- Department's Final Determination and Best Available Control Technology Determination issued concurrently with this Final Permit.
- Project No. 0990568-002-AC (PSD-FL-266A) revised the VOC emissions standards for the combined emissions from the gas turbine and duct burner on (DRAFT).

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

EMISSIONS UNITS 001/002. COMBUSTION TURBINE AND HRSG DUCT BURNER

- Operation of steam-electrical generator units S-1 and S-2 is prohibited.
- Operation of each boiler coupled with steam-electrical generator units S-1, S-2, and S-4 is prohibited.
- The boiler coupled with steam-electrical generator unit S-3 shall only be fired when steam is not available for purchase from the Lake Worth Generation Plant. Operation of the boiler for Unit S-3 may include periods of startup, shutdown and malfunction of the combustion turbine or heat recovery steam generator at the Lake Worth Generation Plant.

Prior to the City of Lake Worth obtaining the final Title V permit containing these conditions, operation in any of the alternate methods of operation is prohibited. [Applicant Request and Rule 62-4.070(3), F.A.C.]

19. **Alternate Methods of Operation:** Once specific condition #18 of this permit has been satisfied, the following limited alternate methods of operation are authorized when firing natural gas in the combined cycle mode: steam injection for power augmentation *or* firing the supplemental HRSG duct burner *or* both. The specific conditions of this permit effectively limit the alternate methods of operation to a total of 2000 hours per year. Emissions from these units shall not exceed the following standards during these alternate methods of operation. [Rules 62-212.400 (BACT) and 62-4.070(3), F.A.C.]

Natural Gas Firing, Combined Cycle Operation, Alternate Methods of Operation

Pollutant	Operation/Controls ⁶	Emission Standard
<i>EU-001/002: Combustion Turbine With Power Augmentation Or HRSG Duct Firing Or Both</i>		
CO ¹	CC / DLN PA or DF or Both	15.0 ppmvd corrected to 15% O ₂ based on a 24-hour rolling average (24-hour average is equivalent to 54.0 pounds per hour) 20.0 ppmvd corrected to 15% O ₂ based on a 3-hour rolling average 72.0 pounds per hour based on a 3-hour test average
NOx ²	CC / DLN PA or DF or Both	9.4 ppmvd corrected to 15% O ₂ based on a 24-hour rolling average (24-hour average is equivalent to 74.7 pounds per hour) 12.0 ppmvd corrected to 15% O ₂ based on a 3-hour rolling average 88.0 pounds per hour based on a 3-hour test average
PM/PM ₁₀ ³	CC / CF / CD	Visible emissions shall not exceed 10% opacity (< 0.01 grains/dscf)
SAM/SO ₂ ⁴	CC / CF / CD	1 grain per 100 SCF of gas (fuel specification requirement)
VOC ⁵	CC / CD	3.3 ppmvw (as methane) based on a 3-hour test average 7.6 pounds per hour (as methane) based on a 3-hour test average (Permitting Note: Revised on (DRAFT) by PSD-FL-266A.)
<i>EU-002: Emissions From Duct Burner Only, Gas Firing</i>		
NOx ⁷	CC / DLN / DF	0.08 pounds per mmBTU of heat input from duct firing only

¹ Compliance with the 3-hour and 24-hour rolling CO standards shall be demonstrated by data collected from the certified continuous emissions monitoring system (CEMS) required by this permit. The CEMS shall calculate and record emissions for each 1-hour block of operation and maintain rolling 3-hour and 24-hour averages. Compliance with the 3-hour test average shall be determined by EPA Method 10 and results reported in units of ppmvd @ 15% O₂ and pounds per hour.