

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit by:

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


Permit No. PSD-FL-266A
Project No. 0990568-002-AC
Modification of VOC Emission Standards
Lake Worth Generation Plant
Palm Beach County, Florida

Authorized Representative:
Brian Chatlosh, Manager

Enclosed is final PSD Permit No. PSD-FL-266A for Project No. 0990568-002-AC. This permit authorizes a slight increase in VOC emissions for the recently permitted combined cycle unit under construction at the Lake Worth Generation Plant located at 117 College Street in Lake Worth, Palm Beach County, Florida. As noted in the Final Determination (attached), the Department made only minor changes to the draft permit. The final permit is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.


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

CERTIFICATE OF SERVICE

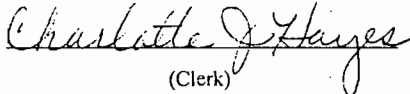
The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 8/30/00 to the persons listed:

Mr. Brian Chatlosh, Manager*
Mr. Paul Doherty, LWG
Mr. Ken Kosky, Golder Associates
Mr. Buck Oven, PPSO

Mr. Jim Stormer, PBCHD
Mr. Isidore Goldman, SED
Mr. Gregg Worley, EPA Region 4
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.


(Clerk)

8/30/00
(Date)

FINAL DETERMINATION
Lake Worth Generation, L.L.C. – VOC Modification
Palm Beach County

PROJECT DESCRIPTION

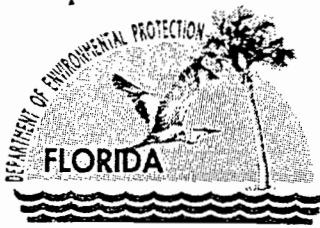
The Department distributed a public notice package on July 21, 2000 to Lake Worth Generation, L.L.C. for a recently permitted combined cycle plant under construction at 117 College Street in Lake Worth, Palm Beach County, Florida. The applicant requested a permit modification authorizing an increase in the VOC emission standards for combined cycle operation of Emissions Unit 001. The requested change will result in a net VOC emissions increase of 3.8 tons per year, which brings total VOC emissions from the new plant to 20.1 tons per year. Therefore, VOC emissions from this modification, as well as the original project, remain below the significant emission rate of 40 tons per year and a BACT determination is not required. The requested change does not alter any of the ambient impacts modeled in the original Air Quality Analysis. The Public Notice of Intent to Issue Permit was published in The Palm Beach Post on July 28, 2000. The Department received the proof of publication on August 7, 2000.

COMMENTS

The Department received no adverse comments from the public, the Palm Beach County Health Department, the Department's Southeast District Office, EPA Region 4, or the National Park Service.

CONCLUSION

The final action of the Department is to issue the final permit with the changes mentioned above and to correct minor typographical errors. Only pages 1, 3, and 14 of original permit No. PSD-FL-266 were revised.



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

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

Project No. 0990568-002-AC (PSD-FL-266A) revised Permit PSD-FL-266 to authorize an increase in the VOC 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

8/29/00

(Revision Date)

"More Protection, Less Process"

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 emission standards for the combined emissions from the gas turbine and duct burner.

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 by Project No. 0990568-002-AC (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.

Florida Department of Environmental Protection

Memorandum

TO: Howard L. Rhodes *CHX*
THRU: Clair Fancy *aaz* 8/28
Al Linero
FROM: Jeff Koerner *JK*
DATE: August 28, 2000
SUBJECT: Project No. 0990568-002-AC (PSD Permit No. PSD-FL-266A)
Lake Worth Generation, L.L.C.
Modification of Combined Cycle VOC Emission Standards

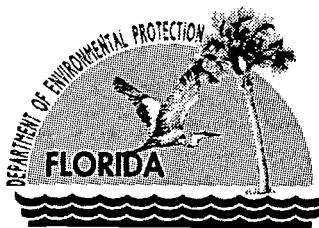
The Final Permit is attached for your approval and signature for a project that will allow a slight increase in the VOC emission standards for a previously permitted combined cycle gas turbine. On November 4, 1999, the Department issued a PSD permit to Lake Worth Generation, L.L.C. to construct a new combined cycle plant located at 117 College Street in Lake Worth, Florida. The final design specification for the duct burner system indicates that the VOC emissions will be higher than previously expected. The proposed change will result in a net VOC emissions increase of 3.8 tons per year, which brings total VOC emissions from the new plant to 20.1 tons per year. Therefore, VOC emissions from the modification, as well as the original project, remain below the significant emission rate of 40 tons per year and a BACT determination is not required. The proposed change would not alter any of the ambient impacts modeled 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.

The Public Notice of Intent to Issue Permit was published in The Palm Beach Post on July 28, 2000. The Department received the proof of publication on August 7, 2000. No adverse comments were received from the public, the Palm Beach County Health Department, the Department's Southeast District Office, EPA Region 4, or the National Park Service regarding the Draft Permit. A more detailed description of the modification is provided in the attached Final Determination.

I recommend your approval and signature. Day 90 is October 12, 2000.

Attachments

CHF/AAL/jfk



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

7-27-00

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

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J. Kaerner
P.B. Co.
EPA
WPS

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

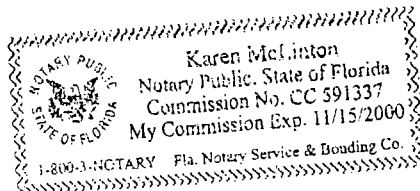
Before the undersigned authority personally appeared Tyler Dixon who on oath says that she is Classified Advertising Manager, Inside Sales of The Palm Beach Post, a daily and Sunday newspaper published at West Palm Beach in Palm Beach County, Florida; that the attached copy of advertising, being a Notice 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 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, 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

Florida Department of Environmental Protection

Memorandum

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-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.

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)

PS Form 3800, April 1995

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	

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

2. Article Number (Copy from service label)

Z 031 392 033

PS Form 3811, July 1999

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

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

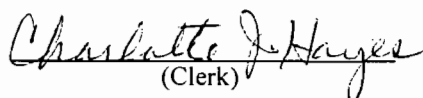
CERTIFICATE OF SERVICE

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.


(Clerk) 7/21/00
(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.

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.

Golder Associates Inc.

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



June 20, 2000

9839537

Mr. C. H. Fancy, P.E., Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED
JUN 21 2000

BUREAU OF AIR REGULATION

Attention: Mr. A.A. Linero, P.E., New Source Review Section

RE: DEP FILE NO. 099-0568-001-AC / PSD-FL-266
LAKE WORTH GENERATION, L.L.C. COMBINED CYCLE PROJECT

Dear Al:

This correspondence and attached application is submitted on behalf of Lake Worth Generation, L.L.C. (LWG) to request a change in the volatile organic compounds (VOCs) emission rate for the Alternative Methods of Operation listed in Condition 19 of Section III of the Final Permit. The change is required due to the final guaranteed emission rate for VOCs from the duct burner system.

The VOC emission rate in Condition 19 is 1.7 parts per million of volume weight (ppmvw) and 3.8 pounds per hour (lb/hr) with both the gas turbine and duct burner operating. The VOC emission rate for the gas turbine is 1.4 ppmvw and 3.2 lb/hr (Condition 16). The VOC emission rate in the original permit application and the basis for the VOC emission limit in Condition 19 was 0.003-lb VOC/mmBtu for the duct burner system. The duct burner system would add about 0.6 lb/hr and 0.3 ppmvw. The duct burner system is limited to a maximum of 350,000 mmBtu/year in Condition 5.(b), which is equivalent to 2,000 hr/year at the maximum heat input of 175 mmBtu/hr.

The corresponding Nitrogen Oxide (NO_x) and Carbon Monoxide (CO) emission rates were 0.1 lb/mmBtu for the duct burner system. The current design of the duct burner system will achieve a NO_x emission rate of 0.08 lb/mmBtu, which is lower than the basis in the original application. The CO emission rate will be 0.1 lb/mmBtu. However, the guaranteed VOC emission rate is 0.025 lb/mmBtu. Based on the permitted heat input limit of 175 mmBtu/hr [Condition 3.(b)], the maximum potential emissions is 4.375 lb/hr (175 mmBtu/hr x 0.025 lb/mmBtu) and 4.375 tons/year (4.375 lb/hr x 2,000 hr/year x ton/2,000).

The combined VOC emissions from the gas turbine and duct burner system would be 7.6 lb/hr (i.e., 3.2 lb/hr from the gas turbine and 4.375 lb/hr from the duct burner system). The VOC concentration is 3.3 ppmvw based on the ratio of gas turbine concentration and

emissions to that of the combined gas turbine and duct burner emissions (i.e., $1.4 \text{ ppmvw} \times 7.6 \text{ lb/hr} \times 1/3.2 \text{ lb/hr} = 3.3 \text{ ppmvw}$). Therefore, the requested change to Condition 19 of the Final Permit is to increase the VOC emission rate from 1.7 ppmvw and 3.8 lb/hr to 3.3 ppmvw and 7.6 lb/hr.

The maximum potential annual VOC emission in the current permit is 16 tons/year (from Appendix C, 3.0 PSD Applicability Review). The requested change to Condition 19 would increase the annual VOC emissions from the project by about 4 tons/year [$(0.025 \text{ lb/mmBtu} - 0.003 \text{ lb/mmBtu}) \times 350,000 \text{ mmBtu/year} \times \text{ton}/2,000 \text{ lb} = 3.85 \text{ tons/year}$]. The total VOC emissions from the project would be 20 tons/year, which is still less than the PSD significant emission rate of 40 tons/year for VOCs.

Please feel free to call if you have questions. Your expeditious review is appreciated.

Sincerely,

GOLDER ASSOCIATES INC.



Kennard F. Kosky, P.E.
Principal

KFK/jkw/tla

Enclosures

cc: Paul Doherty, LWG
Brian Chatlosh, LWG
Leonard Shaperio, Energy Resources Group, Inc.
Jeffery F. Koerner, P.E., FDEP Tallahassee
Richard Zwolak, GAI
EPA

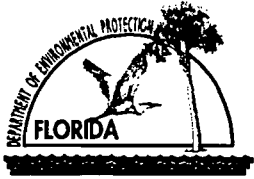
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RECEIVED

JUN 21 2000

BUREAU OF AIR REGULATION



Department of Environmental Protection

Division of Air Resources Management

APPLICATION FOR AIR PERMIT - TITLE V SOURCE

See Instructions for Form No. 62-210.900(1)

I. APPLICATION INFORMATION

Identification of Facility

1. Facility Owner/Company Name: Lake Worth Generation, L.L.C.	
2. Site Name: Lake Worth Generation	
3. Facility Identification Number: 099-0568 [] Unknown	
4. Facility Location: Tom G. Smith Power Plant Street Address or Other Locator: 117 College Street City: Lake Worth County: Palm Beach Zip Code: 33461	
5. Relocatable Facility? [] Yes [X] No	6. Existing Permitted Facility? [X] Yes [] No

Application Contact

1. Name and Title of Application Contact: Brian Chatlosh, Manager	
2. Application Contact Mailing Address: Organization/Firm: Lake Worth Generation, L.L.C. Street Address: 245 Winter Street, Suite 300 City: Waltham State: MA Zip Code: 02451	
3. Application Contact Telephone Numbers: Telephone: (781) 370 - 1500 Fax: (781) 370 - 1501	

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	10-21-00
2. Permit Number:	0990568-002-AC
3. PSD Number (if applicable):	PSD-FL-266A
4. Siting Number (if applicable):	

Purpose of Application

Air Operation Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

- ☐ Initial Title V air operation permit for an existing facility which is classified as a Title V source.
- ☐ Initial Title V air operation permit for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number: _____

- ☐ Title V air operation permit revision to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number: _____

Operation permit number to be revised: _____

- ☐ Title V air operation permit revision or administrative correction to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)

Operation permit number to be revised/corrected: _____

- ☐ Title V air operation permit revision for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit number to be revised: _____


Reason for revision: _____

Air Construction Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

- ☒ Air construction permit to construct or modify one or more emissions units.
- ☐ Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.
- ☐ Air construction permit for one or more existing, but unpermitted, emissions units.

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: Brian Chatlosh, Manager
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Lake Worth Generation, L.L.C. Street Address: 245 Winter Street, Suite 300 City: Waltham State: MA Zip Code: 02451
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (781) 370 - 1500 Fax: (781) 370 - 1501
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [X], if so) or the responsible official (check here [], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i>  Signature <u>6/19/00</u> Date

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: Kennard F. Kosky Registration Number: 14996
2. Professional Engineer Mailing Address: Organization/Firm: Golder Associates Inc. Street Address: 6241 NW 23rd Street, Suite 500 City: Gainesville State: FL Zip Code: 32653-1500
3. Professional Engineer Telephone Numbers: Telephone: (352) 336 - 5600 Fax: (352) 336 - 6603

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

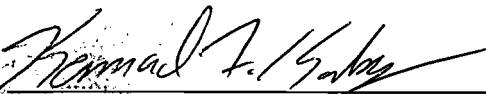
(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [], if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [X], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.



Signature

20 June 2000

Date

(Seal)

* Attach any exception to certification statement.

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type	Processing Fee
002	HRS G-Duct Burners	ACM2	\$250.00

Application Processing Fee

Check one: ☒ Attached - Amount: \$: 250.00 ☐ Not Applicable

Construction/Modification Information

1. Description of Proposed Project or Alterations:

This application is submitted to request an increase in the VOC emission limit for the HRSG duct burners. The emission increase is less than 5 tons/year.

2. Projected or Actual Date of Commencement of Construction:

3. Projected Date of Completion of Construction:

Application Comment

The facility received final permit No. 0990568-001-AC (PSD-FL-266) to construct a 186-MW combined cycle gas turbine project. The project will repower up to 74 MW of existing steam generating capability at the City of Lake Worth Tom G. Smith Power Plant. The project consists of two emission units: 001-combustion turbine and 002-HRSG duct burners. This application is submitted to increase emissions of VOC from the duct burners.

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates: Zone: 17 East (km): 592.8 North (km): 2943.7			
2. Facility Latitude/Longitude: Latitude (DD/MM/SS): 26 / 36 / 45 Longitude (DD/MM/SS): 80 / 04 / 04			
3. Governmental Facility Code: 0	4. Facility Status Code: A	5. Facility Major Group SIC Code: 49	6. Facility SIC(s): 4911
7. Facility Comment (limit to 500 characters): The facility received final permit No. 0990568-001-AC (PSD-FL-266) to construct a 186-MW combined cycle gas turbine project.			

Facility Contact

1. Name and Title of Facility Contact: Paul Doherty, P.E., Project Engineer		
2. Facility Contact Mailing Address: Organization/Firm: Lake Worth Generation, L.L.C. Street Address: 245 Winter Street, Suite 300 City: Waltham State: MA Zip Code: 02154		
3. Facility Contact Telephone Numbers: Telephone: (781) 370 - 1500 Fax: (781) 370 - 1501		

Facility Regulatory Classifications

Check all that apply:

1. <input type="checkbox"/> Small Business Stationary Source?	<input type="checkbox"/> Unknown
2. <input checked="" type="checkbox"/> Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?	
3. <input type="checkbox"/> Synthetic Minor Source of Pollutants Other than HAPs?	
4. <input type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)?	
5. <input type="checkbox"/> Synthetic Minor Source of HAPs?	
6. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS?	
7. <input type="checkbox"/> One or More Emission Units Subject to NESHAP?	
8. <input type="checkbox"/> Title V Source by EPA Designation?	
9. Facility Regulatory Classifications Comment (limit to 200 characters): The duct burners are subject to NSPS Subpart Db.	

List of Applicable Regulations

Requested change in VOC emissions does not change applicable regulations for facility as listed in Air Construction Permit.	

B. FACILITY POLLUTANTS

List of Pollutants Emitted

1. Pollutant Emitted	2. Pollutant Classif.	3. Requested Emissions Cap		4. Basis for Emissions Cap	5. Pollutant Comment
		lb/hour	tons/year		

C. FACILITY SUPPLEMENTAL INFORMATION

Supplemental Requirements

1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Facility Plot Plan: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Process Flow Diagram(s): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
6. Supplemental Information for Construction Permit Application: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
7. Supplemental Requirements Comment: Requested change is for VOC emissions.

Additional Supplemental Requirements for Title V Air Operation Permit Applications

8. List of Proposed Insignificant Activities: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
9. List of Equipment/Activities Regulated under Title VI: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed <input type="checkbox"/> Not Applicable
10. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
12. Identification of Additional Applicable Requirements: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
13. Risk Management Plan Verification: <input type="checkbox"/> Plan previously submitted to Chemical Emergency Preparedness and Prevention Office (CEPPO). Verification of submittal attached (Document ID: _____) or previously submitted to DEP (Date and DEP Office: _____) <input type="checkbox"/> Plan to be submitted to CEPPO (Date required: _____) <input type="checkbox"/> Not Applicable
14. Compliance Report and Plan: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
15. Compliance Certification (Hard-copy Required): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)			
<input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one)			
<input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.			
<input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):			
HRSG – Duct Burners			
4. Emissions Unit Identification Number:		<input type="checkbox"/> No ID <input type="checkbox"/> ID Unknown	
ID: 002			
5. Emissions Unit Status Code:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
C	2001	49	<input checked="" type="checkbox"/>
9. Emissions Unit Comment: (Limit to 500 Characters)			
HRSG – Duct Burner system rated at 175 mmBtu/hour.			

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Low – NO_x Burner System2. Control Device or Method Code(s): **024****Emissions Unit Details**

1. Package Unit:

Manufacturer:

Model Number:

2. Generator Nameplate Rating:

MW

3. Incinerator Information:

Dwell Temperature:

°F

Dwell Time:

seconds

Incinerator Afterburner Temperature:

°F

**B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)****Emissions Unit Operating Capacity and Schedule**

1. Maximum Heat Input Rate:	175	mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:		
4. Maximum Production Rate:		
5. Requested Maximum Operating Schedule:		
	hours/day	days/week
	weeks/year	2,000 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters): Operation is limited to 350,000 mmBtu/year by Specific Condition 5.(b) of Section III of Final Permit.		

C. EMISSIONS UNIT REGULATIONS (Regulated Emissions Units Only)

List of Applicable Regulations

[illegible]

D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)**Emission Point Description and Type**

1. Identification of Point on Plot Plan or Flow Diagram? Not Applicable		2. Emission Point Type Code: 2	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): DB only operates when CT is operating. DB and CT gases will exhaust through a single HRSG stack.			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code: V	6. Stack Height: feet	7. Exit Diameter: feet	
8. Exit Temperature: °F	9. Actual Volumetric Flow Rate: acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters): Proposed change will not affect stack parameters. Refer to emission unit description in Final Permit.			

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**Segment Description and Rate:** Segment 1 of 1

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Natural Gas		
2. Source Classification Code (SCC): 1-01-006-01		3. SCC Units: million cubic feet burned
4. Maximum Hourly Rate: 0.171	5. Maximum Annual Rate: 341.8	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: 1024
10. Segment Comment (limit to 200 characters): Maximum annual rate based on final permit limit of 350,000 mmBtu/year.		

Segment Description and Rate: Segment ____ of ____

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
VOC	024		EL

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**(Regulated Emissions Units -****Emissions-Limited and Preconstruction Review Pollutants Only)****Potential/Fugitive Emissions**

1. Pollutant Emitted: VOC	2. Total Percent Efficiency of Control:
3. Potential Emissions: 4.375 lb/hour 4.375 tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 0.025 lb/mmBtu Reference: HRSG - Vendor	7. Emissions Method Code: 2
8. Calculation of Emissions (limit to 600 characters): 0.025 lb/mmBtu x 175 mmBtu/hr = 4.375 lb/hr 4.375 lb/hr x 2,000 hr/year x ton/2,000 lb = 4.375 TPY	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 3.3 ppmvw/7.6 lb/hr*	4. Equivalent Allowable Emissions: 4.375 lb/hour 4.375 tons/year
5. Method of Compliance (limit to 60 characters): 3-hour test average; Methods 18, 25, or 25A	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): * Combined emissions from gas turbine at 3.2 lb/hour and 1.4 ppmvw.	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: [] Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: _____ % Exceptional Conditions: _____ % Maximum Period of Excess Opacity Allowed: _____ min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters): Not Applicable	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[] Rule [] Other
4. Monitor Information: Manufacturer: _____ Model Number: _____ Serial Number: _____	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters): Not Applicable	

J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)**Supplemental Requirements**

1. Process Flow Diagram [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
2. Fuel Analysis or Specification [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
3. Detailed Description of Control Equipment [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
4. Description of Stack Sampling Facilities [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
5. Compliance Test Report [] Attached, Document ID: _____ [] Previously submitted, Date: _____ [X] Not Applicable
6. Procedures for Startup and Shutdown [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
7. Operation and Maintenance Plan [] Attached, Document ID: _____ [X] Not Applicable [] Waiver Requested
8. Supplemental Information for Construction Permit Application [] Attached, Document ID: _____ [X] Not Applicable
9. Other Information Required by Rule or Statute [] Attached, Document ID: _____ [X] Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input type="checkbox"/> Not Applicable

THE PALM BEACH POST

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

PROOF OF PUBLICATION

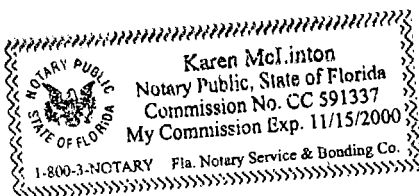
STATE OF FLORIDA
COUNTY OF PALM BEACH

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 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 ppmv and 3.8 pounds per hour be increased to 3.3 ppmv 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, 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

BEST AVAILABLE COPY

Z 031 392 033

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

PS Form 3800, April 1995

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	

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

2. Article Number (Copy from service label)

Z 031 392 033

PS Form 3811, July 1999

COMPLETE THIS SECTION ON DELIVERY

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

C. Signature
X *R. Pennington* ☐ Agent ☐ Addressee

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

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

4. Restricted Delivery? (Extra Fee) ☐ Yes

Domestic Return Receipt

102595-99-M-1789

**STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF FINAL PERMIT**

In the Matter of an
Application for Permit by:

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


Authorized Representative:
Brian Chatlosh, Manager

Permit No. PSD-FL-266A
Project No. 0990568-002-AC
Modification of VOC Emission Standards
Lake Worth Generation Plant
Palm Beach County, Florida

Enclosed is final PSD Permit No. PSD-FL-266A for Project No. 0990568-002-AC. This permit authorizes a slight increase in VOC emissions for the recently permitted combined cycle unit under construction at the Lake Worth Generation Plant located at 117 College Street in Lake Worth, Palm Beach County, Florida. As noted in the Final Determination (attached), the Department made only minor changes to the draft permit. The final permit is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

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 Notice of Final Permit (including the Final permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 8/30/00 to the persons listed:

Mr. Brian Chatlosh, Manager*
Mr. Paul Doherty, LWG
Mr. Ken Kosky, Golder Associates
Mr. Buck Oven, PPSO

Mr. Jim Stormer, PBCHD
Mr. Isidore Goldman, SED
Mr. Gregg Worley, EPA Region 4
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.


(Clerk)

8/30/00
(Date)

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

Article Sent To:

Brian Chatlosh, Mgr.

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

8/29/00
 Lake Worth Gen.

Postmark
 Here

Name (Please Print Clearly) (to be completed by mailer)

Brian Chatlosh, Mgr.

Street, Apt. No., or PO Box No.

245 Winter St., Ste. 300

City, State, ZIP+4

Waltham, MA 02451

PS Form 3800, July 1999

See Reverse for Instructions

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:

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

2. Article Number (Copy from service label)

7099 3400 0000 1453 2542

PS Form 3811, July 1999

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

9/5/00

C. Signature

x R. Sereniville

☐ 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

102595-99-M-1789

FINAL DETERMINATION
Lake Worth Generation, L.L.C. – VOC Modification
Palm Beach County

PROJECT DESCRIPTION

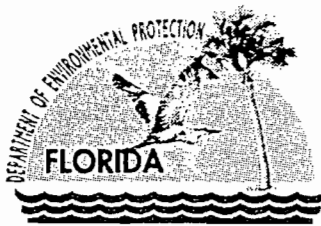
The Department distributed a public notice package on July 21, 2000 to Lake Worth Generation, L.L.C. for a recently permitted combined cycle plant under construction at 117 College Street in Lake Worth, Palm Beach County, Florida. The applicant requested a permit modification authorizing an increase in the VOC emission standards for combined cycle operation of Emissions Unit 001. The requested change will result in a net VOC emissions increase of 3.8 tons per year, which brings total VOC emissions from the new plant to 20.1 tons per year. Therefore, VOC emissions from this modification, as well as the original project, remain below the significant emission rate of 40 tons per year and a BACT determination is not required. The requested change does not alter any of the ambient impacts modeled in the original Air Quality Analysis. The Public Notice of Intent to Issue Permit was published in The Palm Beach Post on July 28, 2000. The Department received the proof of publication on August 7, 2000.

COMMENTS

The Department received no adverse comments from the public, the Palm Beach County Health Department, the Department's Southeast District Office, EPA Region 4, or the National Park Service.

CONCLUSION

The final action of the Department is to issue the final permit with the changes mentioned above and to correct minor typographical errors. Only pages 1, 3, and 14 of original permit No. PSD-FL-266 were revised.



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

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

Project No. 0990568-002-AC (PSD-FL-266A) revised Permit PSD-FL-266 to authorize an increase in the VOC 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

8/29/00

(Revision Date)

"More Protection, Less Process"

Printed on recycled paper.

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 emission standards for the combined emissions from the gas turbine and duct burner.

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 by Project No. 0990568-002-AC (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.

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

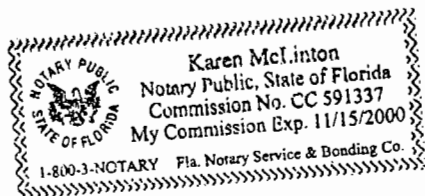
Before the undersigned authority personally appeared Tyler Dixon who on oath says that she is Classified Advertising Manager, Inside Sales of The Palm Beach Post, a daily and Sunday newspaper published at West Palm Beach in Palm Beach County, Florida; that the attached copy of advertising, being a Notice 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 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 standard 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.
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Mediation is not available in this proceeding.
A person whose substantial in-

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





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

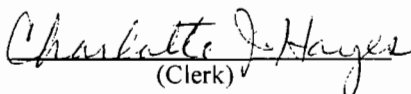
CERTIFICATE OF SERVICE

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 NOx 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-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.

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.

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.



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

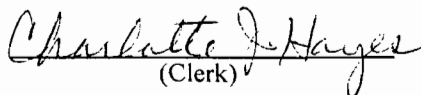
CERTIFICATE OF SERVICE

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 (NO_x), 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, NO_x, 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 NOx 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-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.

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.

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.

Golder Associates Inc.

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



June 20, 2000

9839537

Mr. C. H. Fancy, P.E., Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED

JUN 22 2000

BUREAU OF AIR REGULATION

Attention: Mr. A.A. Linero, P.E., New Source Review Section

RE: DEP FILE NO. 099-0568-001-AC / PSD-FL-266
LAKE WORTH GENERATION, L.L.C. COMBINED CYCLE PROJECT

Dear Al:

This correspondence and attached application is submitted on behalf of Lake Worth Generation, L.L.C. (LWG) to request a change in the volatile organic compounds (VOCs) emission rate for the Alternative Methods of Operation listed in Condition 19 of Section III of the Final Permit. The change is required due to the final guaranteed emission rate for VOCs from the duct burner system.

The VOC emission rate in Condition 19 is 1.7 parts per million of volume weight (ppmvw) and 3.8 pounds per hour (lb/hr) with both the gas turbine and duct burner operating. The VOC emission rate for the gas turbine is 1.4 ppmvw and 3.2 lb/hr (Condition 16). The VOC emission rate in the original permit application and the basis for the VOC emission limit in Condition 19 was 0.003-lb VOC/mmBtu for the duct burner system. The duct burner system would add about 0.6 lb/hr and 0.3 ppmvw. The duct burner system is limited to a maximum of 350,000 mmBtu/year in Condition 5.(b), which is equivalent to 2,000 hr/year at the maximum heat input of 175 mmBtu/hr.

The corresponding Nitrogen Oxide (NO_x) and Carbon Monoxide (CO) emission rates were 0.1 lb/mmBtu for the duct burner system. The current design of the duct burner system will achieve a NO_x emission rate of 0.08 lb/mmBtu, which is lower than the basis in the original application. The CO emission rate will be 0.1 lb/mmBtu. However, the guaranteed VOC emission rate is 0.025 lb/mmBtu. Based on the permitted heat input limit of 175 mmBtu/hr [Condition 3.(b)], the maximum potential emissions is 4.375 lb/hr (175 mmBtu/hr x 0.025 lb/mmBtu) and 4.375 tons/year (4.375 lb/hr x 2,000 hr/year x ton/2,000).

The combined VOC emissions from the gas turbine and duct burner system would be 7.6 lb/hr (i.e., 3.2 lb/hr from the gas turbine and 4.375 lb/hr from the duct burner system). The VOC concentration is 3.3 ppmvw based on the ratio of gas turbine concentration and

emissions to that of the combined gas turbine and duct burner emissions (i.e., $1.4 \text{ ppmvw} \times 7.6 \text{ lb/hr} \times 1/3.2 \text{ lb/hr} = 3.3 \text{ ppmvw}$). Therefore, the requested change to Condition 19 of the Final Permit is to increase the VOC emission rate from 1.7 ppmvw and 3.8 lb/hr to 3.3 ppmvw and 7.6 lb/hr.

The maximum potential annual VOC emission in the current permit is 16 tons/year (from Appendix C, 3.0 PSD Applicability Review). The requested change to Condition 19 would increase the annual VOC emissions from the project by about 4 tons/year $[(0.025 \text{ lb/mmBtu} - 0.003 \text{ lb/mmBtu}) \times 350,000 \text{ mmBtu/year} \times \text{ton}/2,000 \text{ lb} = 3.85 \text{ tons/year}]$. The total VOC emissions from the project would be 20 tons/year, which is still less than the PSD significant emission rate of 40 tons/year for VOCs.

Please feel free to call if you have questions. Your expeditious review is appreciated.

Sincerely,

GOLDER ASSOCIATES INC.



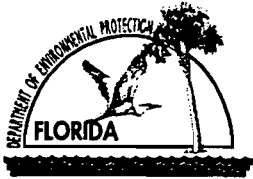
Kernard F. Kosky, P.E.
Principal

KFK/jkw/tla

Enclosures

cc: Paul Doherty, LWG
Brian Chatlosh, LWG
Leonard Shaperio, Energy Resources Group, Inc.
Jeffery F. Koerner, P.E., FDEP Tallahassee
Richard Zwolak, GAI

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Department of Environmental Protection

Division of Air Resources Management

APPLICATION FOR AIR PERMIT - TITLE V SOURCE

See Instructions for Form No. 62-210.900(1)

RECEIVED

JUN 22 2000

I. APPLICATION INFORMATION

BUREAU OF AIR REGULATION

Identification of Facility

1. Facility Owner/Company Name: Lake Worth Generation, L.L.C.	
2. Site Name: Lake Worth Generation	
3. Facility Identification Number: 099-0568 [] Unknown	
4. Facility Location: Tom G. Smith Power Plant Street Address or Other Locator: 117 College Street City: Lake Worth County: Palm Beach Zip Code: 33461	
5. Relocatable Facility? [] Yes [X] No	6. Existing Permitted Facility? [X] Yes [] No

Application Contact

1. Name and Title of Application Contact: Brian Chatlosh, Manager	
2. Application Contact Mailing Address: Organization/Firm: Lake Worth Generation, L.L.C. Street Address: 245 Winter Street, Suite 300 City: Waltham State: MA Zip Code: 02451	
3. Application Contact Telephone Numbers: Telephone: (781) 370 - 1500 Fax: (781) 370 - 1501	

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	
2. Permit Number:	
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

Purpose of Application

Air Operation Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

- ☐ Initial Title V air operation permit for an existing facility which is classified as a Title V source.
- ☐ Initial Title V air operation permit for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number: _____

- ☐ Title V air operation permit revision to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number: _____

Operation permit number to be revised: _____

- ☐ Title V air operation permit revision or administrative correction to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)

Operation permit number to be revised/corrected: _____

- ☐ Title V air operation permit revision for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit number to be revised: _____

Reason for revision: _____

Air Construction Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

- ☒ Air construction permit to construct or modify one or more emissions units.
- ☐ Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.
- ☐ Air construction permit for one or more existing, but unpermitted, emissions units.

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: Brian Chatlosh, Manager
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Lake Worth Generation, L.L.C. Street Address: 245 Winter Street, Suite 300 City: Waltham State: MA Zip Code: 02451
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (781) 370 - 1500 Fax: (781) 370 - 1501
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [], if so) or the responsible official (check here [], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i> _____ Signature _____ Date

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: Kennard F. Kosky Registration Number: 14996
2. Professional Engineer Mailing Address: Organization/Firm: Golder Associates Inc. Street Address: 6241 NW 23rd Street, Suite 500 City: Gainesville State: FL Zip Code: 32653-1500
3. Professional Engineer Telephone Numbers: Telephone: (352) 336 - 5600 Fax: (352) 336 - 6603

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [], if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [X], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Signature

Date

(seal)

* Attach any exception to certification statement.

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type	Processing Fee
002	HRS G-Duct Burners	ACM2	\$250.00

Application Processing Fee

Check one: ☒ Attached - Amount: \$: 250.00 ☐ Not Applicable

Construction/Modification Information

1. Description of Proposed Project or Alterations:

This application is submitted to request an increase in the VOC emission limit for the HRSG duct burners. The emission increase is less than 5 tons/year.

2. Projected or Actual Date of Commencement of Construction:

3. Projected Date of Completion of Construction:

Application Comment

The facility received final permit No. 0990568-001-AC (PSD-FL-266) to construct a 186-MW combined cycle gas turbine project. The project will repower up to 74 MW of existing steam generating capability at the City of Lake Worth Tom G. Smith Power Plant. The project consists of two emission units: 001-combustion turbine and 002-HRSG duct burners. This application is submitted to increase emissions of VOC from the duct burners.

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates: Zone: 17 East (km): 592.8 North (km): 2943.7			
2. Facility Latitude/Longitude: Latitude (DD/MM/SS): 26 / 36 / 45 Longitude (DD/MM/SS): 80 / 04 / 04			
3. Governmental Facility Code: 0	4. Facility Status Code: A	5. Facility Major Group SIC Code: 49	6. Facility SIC(s): 4911
7. Facility Comment (limit to 500 characters): The facility received final permit No. 0990568-001-AC (PSD-FL-266) to construct a 186-MW combined cycle gas turbine project.			

Facility Contact

1. Name and Title of Facility Contact: Paul Doherty, P.E., Project Engineer			
2. Facility Contact Mailing Address: Organization/Firm: Lake Worth Generation, L.L.C. Street Address: 245 Winter Street, Suite 300 City: Waltham State: MA Zip Code: 02154			
3. Facility Contact Telephone Numbers: Telephone: (781) 370 - 1500 Fax: (781) 370 - 1501			

Facility Regulatory Classifications

Check all that apply:

1. <input type="checkbox"/> Small Business Stationary Source?	<input type="checkbox"/> Unknown
2. <input checked="" type="checkbox"/> Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?	
3. <input type="checkbox"/> Synthetic Minor Source of Pollutants Other than HAPs?	
4. <input type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)?	
5. <input type="checkbox"/> Synthetic Minor Source of HAPs?	
6. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS?	
7. <input type="checkbox"/> One or More Emission Units Subject to NESHAP?	
8. <input type="checkbox"/> Title V Source by EPA Designation?	
9. Facility Regulatory Classifications Comment (limit to 200 characters): The duct burners are subject to NSPS Subpart Db.	

List of Applicable Regulations

Requested change in VOC emissions does not change applicable regulations for facility as listed in Air Construction Permit.	

B. FACILITY POLLUTANTS

List of Pollutants Emitted

1. Pollutant Emitted	2. Pollutant Classif.	3. Requested Emissions Cap		4. Basis for Emissions Cap	5. Pollutant Comment
		lb/hour	tons/year		

C. FACILITY SUPPLEMENTAL INFORMATION

Supplemental Requirements

1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Facility Plot Plan: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Process Flow Diagram(s): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
6. Supplemental Information for Construction Permit Application: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
7. Supplemental Requirements Comment: Requested change is for VOC emissions.

Additional Supplemental Requirements for Title V Air Operation Permit Applications

8. List of Proposed Insignificant Activities: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
9. List of Equipment/Activities Regulated under Title VI: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed <input type="checkbox"/> Not Applicable
10. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
12. Identification of Additional Applicable Requirements: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
13. Risk Management Plan Verification: <input type="checkbox"/> Plan previously submitted to Chemical Emergency Preparedness and Prevention Office (CEPPO). Verification of submittal attached (Document ID: _____) or previously submitted to DEP (Date and DEP Office: _____) <input type="checkbox"/> Plan to be submitted to CEPPO (Date required: _____) <input type="checkbox"/> Not Applicable
14. Compliance Report and Plan: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
15. Compliance Certification (Hard-copy Required): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)			
<input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one)			
<input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.			
<input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):			
HRSG – Duct Burners			
4. Emissions Unit Identification Number:		<input type="checkbox"/> No ID <input type="checkbox"/> ID Unknown	
ID: 002			
5. Emissions Unit Status Code:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code:	8. Acid Rain Unit?
C	2001	49	<input checked="" type="checkbox"/>
9. Emissions Unit Comment: (Limit to 500 Characters)			
HRSG – Duct Burner system rated at 175 mmBtu/hour.			

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Low – NO_x Burner System2. Control Device or Method Code(s): **024****Emissions Unit Details**

1. Package Unit:

Manufacturer:

Model Number:

2. Generator Nameplate Rating:

MW

3. Incinerator Information:

Dwell Temperature:

°F

Dwell Time:

seconds

Incinerator Afterburner Temperature:

°F

**B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)****Emissions Unit Operating Capacity and Schedule**

1. Maximum Heat Input Rate:	175	mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:		
4. Maximum Production Rate:		
5. Requested Maximum Operating Schedule:		
	hours/day	days/week
	weeks/year	2,000 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters): Operation is limited to 350,000 mmBtu/year by Specific Condition 5.(b) of Section III of Final Permit.		

C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**List of Applicable Regulations**

Requested change does not affect applicable regulations.	

D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)**Emission Point Description and Type**

1. Identification of Point on Plot Plan or Flow Diagram? Not Applicable		2. Emission Point Type Code: 2	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): DB only operates when CT is operating. DB and CT gases will exhaust through a single HRSG stack.			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code: V	6. Stack Height: feet	7. Exit Diameter: feet	
8. Exit Temperature: °F	9. Actual Volumetric Flow Rate: acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters): Proposed change will not affect stack parameters. Refer to emission unit description in Final Permit.			

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**Segment Description and Rate:** Segment 1 of 1

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Natural Gas		
2. Source Classification Code (SCC): 1-01-006-01		3. SCC Units: million cubic feet burned
4. Maximum Hourly Rate: 0.171	5. Maximum Annual Rate: 341.8	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: 1024
10. Segment Comment (limit to 200 characters): Maximum annual rate based on final permit limit of 350,000 mmBtu/year.		

Segment Description and Rate: Segment of

1. Segment Description (Process/Fuel Type) (limit to 500 characters): 		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): 		

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
VOC	024		EL

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**(Regulated Emissions Units -****Emissions-Limited and Preconstruction Review Pollutants Only)****Potential/Fugitive Emissions**

1. Pollutant Emitted: VOC	2. Total Percent Efficiency of Control:
3. Potential Emissions: 4.375 lb/hour 4.375 tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 0.025 lb/mmBtu Reference: HRSG - Vendor	7. Emissions Method Code: 2
8. Calculation of Emissions (limit to 600 characters): 0.025 lb/mmBtu x 175 mmBtu/hr = 4.375 lb/hr 4.375 lb/hr x 2,000 hr/year x ton/2,000 lb = 4.375 TPY	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 3.3 ppmvw/7.6 lb/hr*	4. Equivalent Allowable Emissions: 4.375 lb/hour 4.375 tons/year
5. Method of Compliance (limit to 60 characters): 3-hour test average; Methods 18, 25, or 25A	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): * Combined emissions from gas turbine at 3.2 lb/hour and 1.4 ppmvw.	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: [] Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: _____ % Exceptional Conditions: _____ % Maximum Period of Excess Opacity Allowed: _____ min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters): Not Applicable	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[] Rule [] Other
4. Monitor Information: Manufacturer: _____ Model Number: _____ Serial Number: _____	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters): Not Applicable	

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)****Supplemental Requirements**

1. Process Flow Diagram <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation

☐ Attached, Document ID: _____ ☐ Not Applicable

12. Alternative Modes of Operation (Emissions Trading)

☐ Attached, Document ID: _____ ☐ Not Applicable

13. Identification of Additional Applicable Requirements

☐ Attached, Document ID: _____ ☐ Not Applicable

14. Compliance Assurance Monitoring Plan

☐ Attached, Document ID: _____ ☐ Not Applicable

15. Acid Rain Part Application (Hard-copy Required)

☐ Acid Rain Part - Phase II (Form No. 62-210.900(1)(a))

Attached, Document ID: _____

☐ Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)

Attached, Document ID: _____

☐ New Unit Exemption (Form No. 62-210.900(1)(a)2.)

Attached, Document ID: _____

☐ Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)

Attached, Document ID: _____

☐ Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.)

Attached, Document ID: _____

☐ Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.)

Attached, Document ID: _____

☐ Not Applicable