



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

July 14, 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Robert I. Taylor, Project Manager
Central Florida Power, L.P.
2500 City West Blvd., Suite 150
Houston, Texas 77042

Dear Mr. Taylor:

On June 15, 1992, the Department received a PSD permit application to construct a 206 MW cogeneration power plant at the U.S. Agri-Chemicals Complex near Ft. Meade, Florida and deemed it incomplete. Please provide the following information:

1. Section 1-1 states the electrical output of the cogeneration facility is 206 MW. The gas turbine (GT) is rated at 147 MW and the duct burner is rated at 74 MW giving a total of 221 MW. What is the maximum electrical output you would like to be permitted for this facility?
2. According to Section 1-1, two types of advanced GTs are being considered for this project. The Department must know the exact type of gas turbine you propose to install so that a BACT determination can be made. Accordingly, please submit detailed information of the unit selected. We will also need any available stack test data for that unit.
3. What is the maximum sulfur content of the natural gas you propose to burn? Provide a copy of any sulfur content guarantee that you may have from the supplier.
4. Submit an updated process flow diagram showing steam turbine and volumetric air flow rates.
5. In Section 4-12, Table 4-2, the emissions (25 ppmvd) for advance GT with dry low-NO_x technology appears to be incorrect. Also Table 4-2 should state the turbine size on which these figures are based.
6. Submit all emission calculations and not just an example calculation. These emission calculations shall be based on the selected turbine for this project.

Mr. Robert I. Taylor
Page 2 of 2

7. What is the expected maximum ambient concentrations for the metals emitted?
8. Please provide an air quality related analysis (AQRV) of the impact this project will have on the Chassahowitzka National Wilderness Area (CNWA) for the pollutant NO₂. The AQRV analysis includes impacts to soil, vegetation, and wild life. This analysis also includes an assessment of impacts to the aquatic environment. Since the modeling information already provided with this application shows that the predicted NO₂ impact at the CNWA Class I area is less than the National Park Service (NPS) recommended significance level, the NPS has verbally stated that only a literature review is needed in order to comply with the AQRV analysis requirement.
9. Section 4.3.1.2, page 4-10, states that "While the increased firing temperature increases the thermal NO_x generated, this NO_x increase is controlled through combustion design." How much additional thermal NO_x generated is due to higher temperature?
10. On page 4-3, the estimated cost of SCR is reported to be about \$7400 per ton of NO_x removed and it exceeds \$10,000 per ton of pollutant removed when the net emissions of all pollutants (exclusive of CO₂) are considered. Provide us with the names and addresses of all manufacturers that were contacted while developing capital and annualized cost estimates for this project.

The processing of your application will continue upon receipt of the above requested information. If you have any questions, please contact Mr. Mirza P. Baig at (904) 488-1344.

Sincerely,

For [Signature]

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

CHF/MB/plm

cc: Bill Thomas, SWD
Ken Kosky, P.E., KBN Eng.
Robert Chatham, Destec Eng.
Jewell Harper, EPA, Atlanta
Chris Shaver, NPS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

4APT-AEB

JUL 15 1992

RECEIVED

JUL 20 1992

Bureau of
Air Regulation

Mr. Clair H. Fancy, P.E., Chief
Bureau of Air Regulation
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Central Florida Power Limited Partnership,
Central Florida Cogeneration Plant (PSD-FL-190)

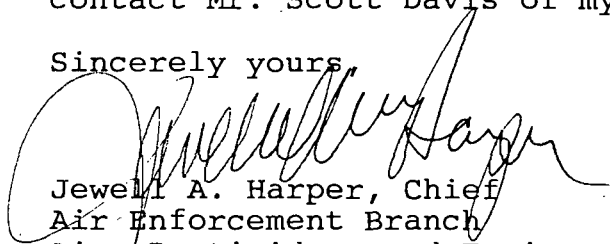
Dear Mr. Fancy:

This is to acknowledge receipt of the Prevention of Significant Deterioration (PSD) permit application package for the above referenced facility. The proposed facility will be a combined cycle cogeneration power plant, nominally rated at 206 megawatts for the facility. The proposed project consists of one advanced technology heavy-duty industrial gas turbine electric generating unit, with a duct burner-fired heat recovery steam generator, and a steam turbine generator.

The applicant proposes to limit NO_x emissions from the combustion turbine through advanced dry low-NO_x combustors and water injection, to limit NO_x emissions from the duct burner through combustion design, to limit CO emissions from the combustion turbine and duct burner through combustion design, and to limit VOC, PM/PM₁₀, Be, and As emissions from the combustion turbine through combustion control and the use of clean fuels.

We have reviewed the package as submitted and have no adverse comments. Thank you for the opportunity to review and comment on the package. If you have any questions or comments, please contact Mr. Scott Davis of my staff at (404) 347-5014.

Sincerely yours,


Jewell A. Harper, Chief
Air Enforcement Branch
Air, Pesticides, and Toxics
Management Division

cc: M. Fagg
C. Hilladay
B. Thomas, Skidell
C. Thomas, NPS
R. Kosky, KBN
CHF/PL



*See Storage Closet
for full submitted*

D. E. R.

August 26, 1992

SEP 4 1992

Mr. Clair H. Fancy, Chief
Bureau of Air Regulation
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

SOUTHWEST DISTRICT
TAMPA

Re: Central Florida Power Limited Partnership
Tiger Bay (formerly Central Florida) cogeneration plant
PSD-FL-190
AC 53-214903

Dear Mr. Fancy:

This correspondence presents the information requested by the Department's July 14, 1992, letter. The responses have been prepared based on phone conversations held on July 15, 1992, with Mr. Mirza Baig, and subsequent discussions held with Mr. Cleve Holladay and Mr. John Glunn.

1. COMMENT: Section 1-1 states the electrical output of the cogeneration facility is 206 MW. The gas turbine (GT) is rated at 147 MW and the duct burner is rated at 74 MW, giving a total of 221 MW. What is the maximum electrical output you would like to be permitted for this facility?

RESPONSE: The maximum electrical output of the cogeneration facility is 258 MW (GE machine) and 246 MW (Westinghouse machine), based on the following conditions: fuel oil firing and an ambient temperature of 27°F. The breakdown of the maximum electrical output for both machines for fuel oil is as follows:

Fuel/Unit	Maximum Rated Electrical Output (MW)	
	GE	Westinghouse
Combustion Turbine	184	172
Steam Turbine	74	74

2. COMMENT: According to Section 1-1, two types of advanced GTs are being considered for this project. The Department must know the exact type of gas turbine you propose to install so that a BACT determination can be made. Accordingly, please submit detailed information of the unit selected. We will also need any available stack test data for that unit.



RESPONSE: The combustion turbine for the project has not been selected. The candidate turbines are currently being evaluated for performance and commercial terms. The air construction application for the project was based on the advanced class of turbines, and performance and emissions are similar for the two turbines under consideration. The information on both turbines is presented in Attachment 1. The information presented in the application was based on performance and emissions characteristics that enveloped these two turbines. Since the performance and emission characteristics are similar for the turbines under consideration, a decision regarding BACT would not be substantially different regardless of which turbine was selected. A similar decision was made by the Department in the BACT determination for the Hardee Power Station. In that project, four combustion turbines were proposed by the applicant, with the Department's BACT determination made on an envelope of performance and emission characteristics.

3. **COMMENT:** What is the maximum sulfur content of the natural gas you propose to burn? Provide a copy of any sulfur content guarantee that you may have from the supplier.

RESPONSE: The maximum sulfur content of the natural gas proposed in the application was 1 grain of sulfur per 100 cubic feet (1 gr/100 cf). This was based on an evaluation of 9 months of sulfur content data supplied by Florida Gas Transmission (FGT). FGT is the only supplier of pipeline natural gas in Florida. The results of the evaluation are presented in Table 1. As shown in this table, the average sulfur content of natural gas was 0.43 gr/100 cf. A 130 percent contingency was used to develop the proposed emission rate of 1 gr/100 cf from the average sulfur content of 0.43 gr/100 cf reported by FGT in natural gas and would statistically account for potentially higher sulfur contents. Sulfur content information supplied by FGT for four sample analyses performed in April and May 1992 indicated a maximum sulfur content of 0.4 gr/100 cf which is within the previously supplied data (see Attachment 2).

There is no guaranteed sulfur content for natural gas that is supplied by FGT.

4. **COMMENT:** Submit an updated process flow diagram showing steam turbine and volumetric air flow rates.

RESPONSE: Updated process flow diagrams showing the steam turbine and the mass energy balance around the steam turbine and gas turbine are presented in Attachment 3 for natural gas and fuel oil firing.

5. **COMMENT:** In Section 4-12, Table 4-2, the emissions (25 ppmvd) for advance GT with dry low-NO_x technology appears to be incorrect. Also, Table 4-2 should state the turbine size on which these figures are based.

RESPONSE: The 25 ppmvd listed for the dry low-NO_x technology in both the conventional and advanced machines is correct. This is the actual level that would be emitted from each machine. The 22.5 ppmvd listed on page 4-11 of the report is for the advanced machine when the emission rate is adjusted based on the same amount of generation (i.e., megawatt-hours) as a conventional gas turbine. As described in the preceding paragraph, the advanced



machine is more efficient and will result in lower NO_x emissions for each megawatt generated. This comparison would be analogous to the amount of particulate per ton of clinker produced by a cement plant.

The sizes of the turbines in Table 4-2 are: conventional--82 MW gas and 84 MW oil; advanced--147.1 MW gas and 159.2 MW oil [for GE PG7221(FA) machine at ambient temperature of 72 °F].

6. COMMENT: Submit all emission calculations and not just an example calculation. These emission calculations shall be based on the selected turbine for this project.

RESPONSE: The detailed emission calculations for the turbine proposed for this project are presented in Attachment 4 to this letter.

7. COMMENT: What is the expected maximum ambient concentrations for the metals emitted?

RESPONSE: The expected maximum ambient concentrations for toxic air pollutants, including metals, are presented in Table 7-5, page 7-9, in the PSD analysis that supports the air construction permit application. Based on the results presented in the table, the highest predicted impacts were below the no-threat levels for all pollutants and averaging times.

8. COMMENT: Please provide an air quality related analysis (AQRV) of the impact this project will have on the Chassahowitzka National Wilderness Area (CNWA) for the pollutant NO_2 . The AQRV analysis includes impacts to soil, vegetation, and wildlife. This analysis also includes an assessment of impacts to the aquatic environment. Since the modeling information already provided with this application shows that the predicted NO_2 impact at the CNWA Class I area is less than the National Park Service (NPS) recommended significance level, the NPS has verbally stated that only a literature review is needed in order to comply with the AQRV analysis requirement.

RESPONSE: KBN has performed air quality analyses to determine the Prevention of Significant Deterioration (PSD) Class I increment consumption and Air Quality Related Values (AQRV) Analyses for the Chassahowitzka National Wilderness Area (NWA) due to emissions from the Tiger Bay cogeneration facility. The facility is located approximately 120 km from the closest part of the Chassahowitzka National Wilderness Area (NWA), a PSD Class I area. The proposed facility alone had a maximum predicted annual average nitrogen dioxide (NO_2) impact of $0.014 \mu\text{g}/\text{m}^3$, which is less than the National Park Service (NPS) significant impact level of $0.025 \mu\text{g}/\text{m}^3$.

Based on verbal communications between the Florida Department of Environmental Regulation (FDER) and NPS, the AQRV analyses for the PSD Class I area of the Chassahowitzka NWA need only address the impacts of increased NO_2 emissions for this project.

The Chassahowitzka NWA is characterized by vegetation which includes flatwoods, brackish-water, marine, and halophytic terrestrial species. Predominant tree species are slash pine,



laurel oak, sweetgum, and palm. Other plants in the preserve include needlegrass rush, seashore saltgrass, marsh hay, and red mangrove. NO_2 concentrations can injure plant tissue with symptoms usually appearing as irregular white to brown collapsed lesions between the leaf veins and near the margins. Conversely, non-injurious levels of NO_2 can be absorbed by plants, enzymatically transformed into ammonia, and incorporated into plant constituents such as amino acids (Matsumaru et al., 1979).

Plant damage can occur through either acute (short-term, high concentration) or chronic (long-term, relatively low concentration) exposure. For plants that have been determined to be more sensitive to NO_2 exposure than others, acute (1, 4, 8 hours) exposure caused 5 percent predicted foliar injury at concentrations ranging from 3,800 to 15,000 $\mu\text{g}/\text{m}^3$ (Heck and Tingey, 1979). Chronic exposure of selected plants (some considered NO_2 -sensitive) to NO_2 concentrations of 2,000 to 4,000 $\mu\text{g}/\text{m}^3$ for 213 to 1,900 hours caused reductions in yield of up to 37 percent and some chlorosis (Zahn, 1975).

By comparison of published toxicity values for NO_2 exposure to short-term (i.e., 1-, 3-, and 8-hour averaging times) and long-term (annual averaging time) modeled concentrations, the possibility of plant damage in the preserve can be examined for both acute and chronic exposure situations, respectively. The 1-, 3-, and 8-hour estimated NO_2 concentrations at the point of maximum impact are 3.65, 2.14, and 1.00 $\mu\text{g}/\text{m}^3$, respectively. These concentrations are approximately 6.7×10^{-5} to 9.6×10^{-4} of the levels that could potentially injure 5 percent of the plant foliage. For a chronic exposure, the annual estimated NO_2 concentration at the point of maximum impact in the preserve (0.014 $\mu\text{g}/\text{m}^3$) is 3.5×10^{-6} to 7.0×10^{-6} of the levels that caused minimal yield loss and chlorosis in plant tissue.

The majority of the soil in the Class I area is classified as Weekiwachee-Durbin muck. This is an euic, hyperthermic typic sulfhemist that is characterized by high levels of sulfur and organic matter. This soil is flooded daily with the advent of high tide, and the pH ranges between 6.1 and 7.8. The upper level of this soil may contain as much as 4 percent sulfur (USDA, 1991).

The greatest threat to soils from increased NO_2 deposition is a decrease in pH or an increase of sulfur to levels considered unnatural or potentially toxic. Although ground deposition was not calculated, it is evident that the amount of NO_2 deposited would be inconsequential in light of the inherent sulfur content. The regular flooding of these soils by the Gulf of Mexico regulates the pH, and any rise in acidity in the soil would be buffered by this activity.

The predicted NO_2 concentrations are well below the lowest observed effects levels in animals (Newman and Schreiber, 1988). Given these conditions, the proposed source's emissions pose no risk to wildlife. Because predicted levels are below those known to cause effects to vegetation, there is also no risk.



References

Heck, W.W. and D.T. Tingey. 1979. Nitrogen Dioxide: Time-Concentration Model to Predict Acute Foliar Injury. EPA-600/3-79-057, U.S. Environmental Protection Agency, Corvallis, OR.

Matsumaru, T., T. Yoneyama, T. Totsuka, and K. Shiratori. 1979. Absorption of Atmospheric NO₂ by Plants and Soils. Soil Sci. Plant Nutr. 25:255-265.

Newman, J.R. and Schreiber. 1988. Air Pollution and Wildlife Toxicology. Environmental Toxicology and Chemistry 7:381-390.

U.S. Department of Agriculture. 1991. Surveys of Hernando and Citrus Counties, Florida. USDA Soil Conservation Service in cooperation with University of Florida, Institute of Food and Agricultural Sciences, Agricultural Experiment Stations, and Soil Science Department.

Zahn, R. 1975. Gassing Experiments with NO₂ in Small Greenhouses. Staub Reinhalt. Luft 35:194-196.

9. COMMENT: Section 4.3.1.2, page 4-10, states that "While the increased firing temperature increases the thermal NO_x generated, this NO_x increase is controlled through combustion design." How much additional thermal NO_x is generated due to higher temperature?

RESPONSE: The increased thermal NO_x emissions, due to the higher firing temperature of the advanced combustion turbine, is about 20 percent higher than a conventional turbine when firing natural gas (from Table 4-2, 150 ppmvd, conventional, compared to 179 ppmvd, advanced) and about 13 percent higher than a conventional turbine when firing oil (from Table 4-2, 245 ppmvd, conventional, compared to 276 ppmvd, advanced).

10. COMMENT: On page 4-3, the estimated cost of SCR is reported to be about \$7,400 per ton of NO_x removed and it exceeds \$10,000 per ton of pollutant removed when the net emissions of all pollutants (exclusive of CO₂) are considered. Provide us with the names and addresses of all manufacturers that were contacted while developing capital and annualized cost estimates for this project.

RESPONSE: The cost for SCR was obtained from a database developed by KBN from this and other projects. The manufacturers contacted were:

Steuler International Corporation
P.O. Box 38
Mertztown, PA 19539-0038
215-682-7171

Hitachi Zosen U.S.A. Ltd.
150 East 52 nd Street
New York, NY 10022
212-355-5650



Mitsubishi International Corporation
2 Houston Center, Suite 3800
Houston, TX 77010
713-652-9200

W. R. Grace & Co.
P.O. Box 2117
Baltimore, MD 21203-2117
410-659-9000

Norton Company
P.O. Box 350
Arkon, OH 44309-0350
216-673-5860

11. COMMENT (via July 15, 1992, telephone conversation): Provide a large-scale site plan similar to Figure 2-2 of the air permit application.

RESPONSE: A full-scale revised plot plan is included in Attachment 5.

12. COMMENT (via July 15, 1992, telephone conversation): Please provide a diagram indicating the proposed location of the sample ports for source sampling purposes. Show these locations with respect to the proposed stack and HRSG unit.

RESPONSE: The stack sample port location is depicted in Figure 1. The sample port will be accessible by ladder from the top of the HRSG to a platform assembly near the port location.

Submittal of this information should clarify all questions raised by the Department in the completeness determination for this project. Please call me at 904-331-9000 if there are any further questions on the material submitted.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Kennard F. Kosky'.

Kennard F. Kosky, P.E.
President

Enclosures
KFK/dmm

cc: Mirza Baig, FDER
Robert I. Taylor, Central Florida Power, L.P.
Robert Chatham, Destec Engineering, Inc.
File (2)

Table 1. Sulfur Content, Heat Content, and SO₂ Emission Factors for Natural Gas

Date	Sulfur Content (gr/100 cf)	Heat Content (Btu)	SO ₂ Emission Factor (lb/10 ⁶ Btu)	SO ₂ Emission Factor (lb/10 ⁶ cf)
2/6/90	0.30	1,031	0.00083	0.857
2/13/90	0.05	1,028	0.00014	0.143
2/20/90	0.35	1,025	0.00098	1.000
2/27/90	0.45	1,024	0.00126	1.286
3/6/90	0.45	1,025	0.00125	1.286
3/13/90	0.30	1,026	0.00084	0.857
3/20/90	0.35	1,026	0.00097	1.000
3/27/90	0.35	1,025	0.00098	1.000
4/3/90	0.60	1,026	0.00167	1.714
4/10/90	0.25	1,022	0.00070	0.714
4/17/90	0.40	1,026	0.00111	1.143
4/24/90	0.30	1,022	0.00084	0.857
5/1/90	0.40	1,020	0.00112	1.143
5/8/90	0.25	1,034	0.00069	0.714
5/15/90	0.20	1,023	0.00056	0.571
6/5/90	0.45	1,020	0.00126	1.286
6/12/90	0.40	1,018	0.00112	1.143
6/19/90	0.70	1,017	0.00197	2.000
6/26/90	0.45	1,019	0.00126	1.286
7/3/90	0.55	1,022	0.00154	1.571
7/10/90	0.35	1,022	0.00098	1.000
7/17/90	0.45	1,021	0.00126	1.286
7/30/90	0.30	1,021	0.00084	0.857
8/7/90	0.50	1,024	0.00140	1.429
8/14/90	0.45	1,022	0.00126	1.286
8/21/90	0.40	1,022	0.00112	1.143
8/28/90	0.70	1,022	0.00196	2.000
9/4/90	0.55	1,029	0.00153	1.571
9/11/90	0.40	1,025	0.00111	1.143
9/18/90	0.45	1,026	0.00125	1.286
9/25/90	0.40	1,026	0.00111	1.143
10/2/90	0.45	1,029	0.00125	1.286
10/9/90	0.45	1,025	0.00125	1.286
10/16/90	0.70	1,028	0.00195	2.000
10/28/90	0.80	1,024	0.00223	2.286
Average:	0.43	1,024	0.00119	1.216
Maximum:	0.80	1,034	0.00223	2.286
Minimum:	0.05	1,017	0.00014	0.143
Std. Dev.	0.15	4	0.00042	0.427

Source: Florida Gas Transmission Company, 1990.

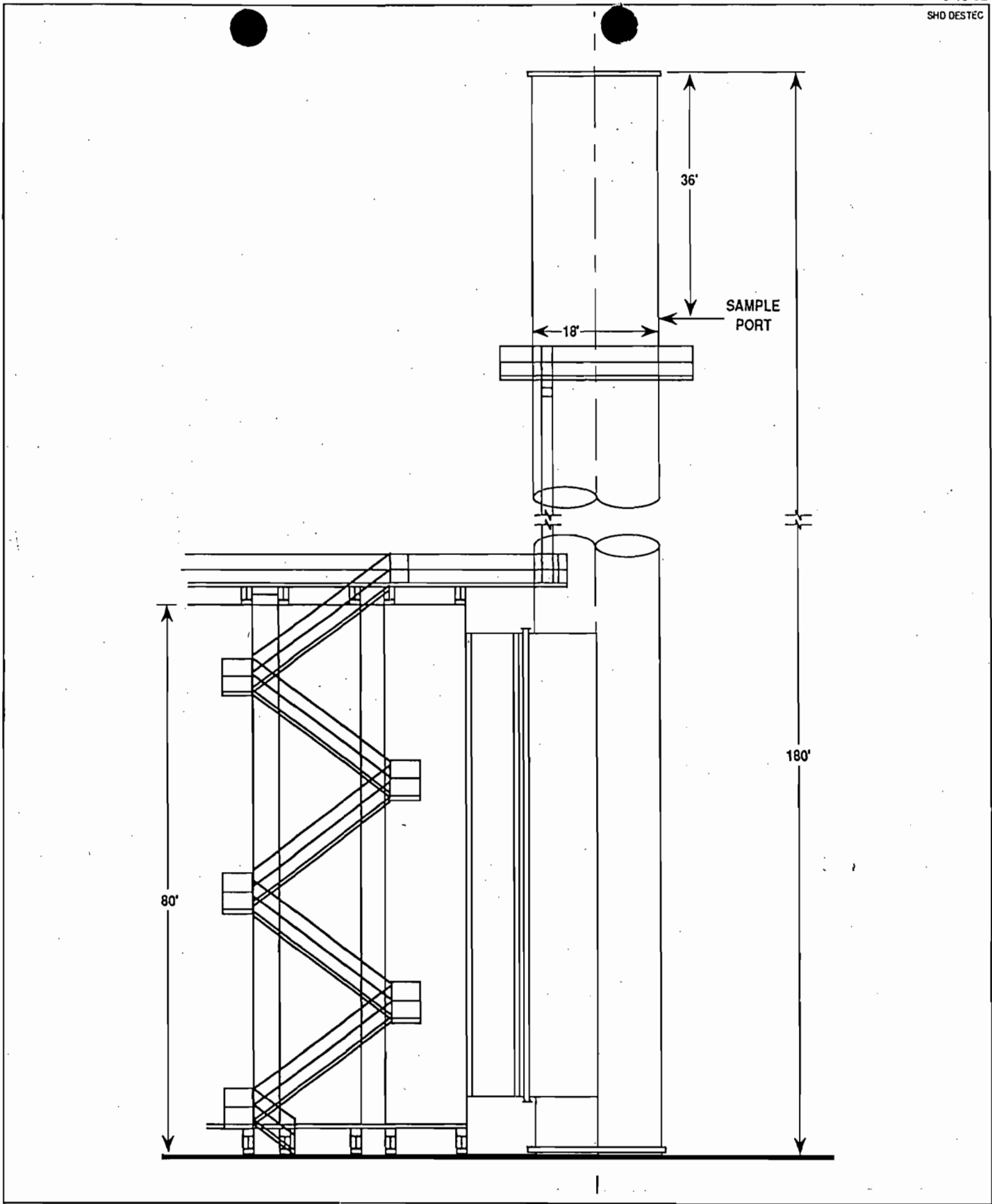


Figure 1 TIGER BAY CONCEPTUAL DRAWING OF STACK AND ADJOINING STRUCTURE





Rec'd 10/12/92

Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

October 9, 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Robert I. Taylor, Project Manager
Central Florida Power, L.P.
2500 City West Blvd., Suite 150
Houston, Texas 77042

Dear Mr. Taylor:

This letter is to confirm the Department's conversation with Mr. Ken Kosky that additional information (updated process flow diagram showing the volumetric flow rates) is needed to complete your application for permit to construct the Tiger Bay Cogeneration Plant (File No. AC53-214903/PSD-FL-190). We are working directly with Mr. Kosky to obtain the needed information and will resume processing this application when it is complete.

If you have any questions on this matter, please write to me or call Mirza Baig, review engineer, at (904) 488-1344.

Sincerely,

for John C. Browner, Jr.
C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/MB/plm

cc: Ken Kosky, KBN



October 16, 1992

Dr. Richard Garrity
Florida Department of Environmental Regulation
Division of Air Resources Management
4520 Oak Fair Boulevard
Tampa, Florida 33610

Re: Tiger Bay cogeneration facility
File #AC53-214903/PSD-FL-190

D.E.

OCT 21 1992

SOUTHWEST

TAMPA

Dear Dr. Garrity:

The attached letter constitutes Polk County's Notice of Interested Party and Notice of Participation in the above-referenced permit application. This letter is being transmitted to you in conformance with a condition placed upon the Tiger Bay cogeneration facility by Polk County as part of the local government permitting process.

Please do not hesitate to call me with any questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Kimball', is written over the typed name.

Amy C. Kimball
Associate Environmental Planner

ACK/dbf.6

Attachment

xc: R. Chatham
P. McLemore, Polk County Division of Development Services
12018-0200

KBN ENGINEERING AND APPLIED SCIENCES, INC.

5680 West Cypress Street Suite 1 Tampa, FL 33607 813/287-1717 FAX: 813/287-1716



Planning Division

Imperial
Polk County

Board of County Commissioners

P.O. Box 1969
330 W. Church St.
Bartow, FL 33830
(813) 534-6084
SUNCOM 569-6084
FAX (813) 534-6021

September 25, 1992

Dr. Richard Garrity
Florida Department of Environmental Regulation
Division of Air Resources Management
4520 Oak Fair Blvd.
Tampa, Florida 33610

RE: Central Florida Power, L.P.
Permit Application

Dear Dr. Garrity:

This letter is to inform you that Polk County is an interested party in the permitting process for the following project:

Applicant: Central Florida Power, L.P.
Non-Certified Electric Generating Facility

Plant Location: Section 31, Township 31, Range 25
The site is located about 3.5 miles west of Fort Meade, on C.R. 630, within the property of U.S. Agri-Chemical Complex.

Please notify us of all meetings as we would like the opportunity to participate in the conditioning of the permit for the purposes of compliance with the Polk County Comprehensive Plan and site specific parameters. If this permit has already been granted or if an intent to issue has been noticed, please contact Don Martin of my staff immediately. Under provisions of Florida Statutes, we would like to comment as it relates to local issues.

Thank you for your cooperation in this matter.

Sincerely,

Robert Anders, AICP
Planning Director

xc: chron file, case file-CUP 92-17/SA 92-02
file name: p:\u\p\cmd\power\ncertpp\der-air.cfp

Donald S. Martin
Principal Planner
Planning Division
P.O. Box 1969
Bartow, Florida 33830

RE: Central Florida Power, L.P.

I have received the permit application pursuant to the above referenced project as well as Polk County's Notice of Interested Party and Notice of Participation. We will keep you informed of all proceedings and decisions in regards to this project.

AGENCY:
Florida Department of Environmental Regulation
Division of Air Resources Management

(Signature of Permit Reviewer)

(date)

(Print Name)

(Address)

(Phone)

(to be retained in Planning's Case/SA File)



Rec'd SWD 1/14/93

Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

January 15, 1993

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Robert I. Taylor, Project Manager
Central Florida Power, Limited Partnership
2500 City West Blvd., Suite 150
Houston, Texas 77042

Dear Mr. Taylor:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit to construct a 258 MW cogeneration facility located 5 miles west of Ft. Meade, Florida.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Preston Lewis of the Bureau of Air Regulation.

Sincerely,

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

CHF/TH/plm

Attachments

cc: Kennard F. Kosky, P.E.
Bill Thomas, SWD
Jewell Harper, EPA
John Bunyak, NPS
Linda Novak, Polk Co.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

CERTIFIED MAIL

In the Matter of an
Application for Permit by:

DER File No. AC53-214903
PSD-FL-190
Polk County

Central Florida Power, Limited Partnership
2500 City West Blvd., Suite 150
Houston, Texas 77042

INTENT TO ISSUE

The Department of Environmental Regulation gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above, for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Central Florida Power, Limited Partnership, applied on June 15, 1992, to the Department of Environmental Regulation for a permit to construct a 258 MW cogeneration facility. The facility is located 5 miles west of Ft. Meade, Polk County, Florida.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes and Florida Administrative Code (F.A.C.) Chapters 17-212 and 17-4. The project is not exempt from permitting procedures. The Department has determined that a construction permit is required for the proposed work.

Pursuant to Section 403.815, Florida Statutes and Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time only within 30 days in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "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. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, 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 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information;

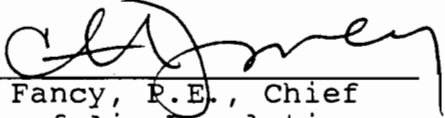
- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this intent. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this intent in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the

approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this INTENT TO ISSUE and all copies were mailed by certified mail before the close of business on 1-15-93 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT
FILED, on this date, pursuant to §120.52(11), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


Clerk 1-15-93
Date

Copies furnished to:
Kennard F. Kosky, P.E.
Bill Thomas, SWD
Jewell Harper, EPA
John Bunyak, NPS
Linda Novak, Polk Co.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF INTENT TO ISSUE PERMIT

The Department of Environmental Regulation gives notice of its intent to issue a PSD permit to Central Florida Power, Limited Partnership (CFPLP), County Road 630, 5 miles west of Ft. Meade, Polk County, Florida, to construct a 258 MW cogeneration facility. A determination of Best Available Control Technology (BACT) was required. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, 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 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information; (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by Petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, 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 decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be

filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

The application 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:

Department of Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Department of Environmental Regulation
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619-8218

Any person may send written comments on the proposed action to Mr. Preston Lewis at the Department's Tallahassee address. All comments received within 30 days of the publication of this notice will be considered in the Department's final determination.

Further, a public hearing can be requested by any person(s). Such requests must be submitted within 30 days of this notice.

Technical Evaluation
and
Preliminary Determination

Central Florida Power, Limited Partnership
Ft. Meade, Polk County, Florida

258 MW Cogeneration Facility

Permit Number: AC53-214903
PSD-FL-190

Department of Environmental Regulation
Division of Air Resources Management
Bureau of Air Regulation

January 15, 1993

SYNOPSIS OF APPLICATION

I. NAME AND ADDRESS OF APPLICANT

Central Florida Power, Limited Partnership
2500 City West Blvd., Suite 150
Houston, Texas 77042

II. REVIEWING AND PROCESS SCHEDULE

Date of Receipt of Application: June 15, 1992.

Completeness Review: Department letters dated July 14 and October 9, 1992.

Response to Incompleteness Letters: Company letters received on August 26, October 9, and October 23, 1992.

Application Completeness Date: October 9, 1992.

III. FACILITY INFORMATION

III.1 Facility Location

This facility is located near Ft. Meade, Polk County, Florida. The UTM coordinates are Zone 17, 416.22 km East and 3069.22 km North.

III.2 Facility Identification Code (SIC)

Major Group No. 49 - Electric, Gas and Sanitary Services.

Industry Group No. 491 - Combination Electric, Gas and Other Utility Services.

Industry Group No. 4911 - Electric and Other Services Combined.

III.3 Facility Category

Central Florida Power, L.P.'s (CFPLP) proposed project near Ft. Meade is classified as a major emitting facility. The proposed project, a 258 MW cogeneration facility, will increase emissions by 702 tons per year (TPY) of nitrogen oxides (NO_x); 33 TPY of sulfur dioxide (SO₂); 243 TPY of carbon monoxide (CO); 45 TPY of particulate matter (PM); 25 TPY of volatile organic compounds

(VOC); 0.000616 TPY of beryllium; 0.00219 TPY of lead; 0.000739 TPY of mercury; and 4.05 TPY of sulfuric acid mist if the combustion turbine is operated at 8,460 hours per year on natural gas, duct burner operated at 8,760 hours per year on natural gas, and the combustion turbine is operated at 300 hours per year on fuel oil (0.05% S) at base load and at 72°F.

IV. PROJECT DESCRIPTION

CFPLP proposes to operate a 258 MW cogeneration facility consisting of one 184 MW combustion turbine generator (CT), one 74 MW steam turbine generator (ST), and one duct burner-fired heat recovery steam generator (HRSG) and ancillary equipment.

The CT will be a GE PG7221FA machine. The CT will be served by a single HRSG, exhausting to an individual stack. There will be no bypass stacks on the CT for simple cycle operation. There will be two electrical generators, which will be individually driven by the CT and the steam turbine. Natural gas will be the primary fuel, maximum 8,760 hours per year, for the cogeneration facility over its lifetime; distillate fuel oil (0.05% S) will be used as a backup fuel for up to 3,742,327 gallons per calendar year. Supplementary firing of only natural gas will occur in the HRSG.

Air emission sources associated with the proposed project consist of the CT and supplemental firing in the HRSG. NO_x emissions will be minimized by using dry low-NO_x technology for the CT and low-NO_x burners when duct firing. The use of natural gas will minimize the emissions of sulfur dioxide (SO₂) and other pollutants.

V. RULE APPLICABILITY

The proposed project is subject to preconstruction review under the provisions of Chapter 403, Florida Statutes, Chapters 17-212 and 17-4, Florida Administrative Code (F.A.C.), and 40 CFR (July, 1992 version).

This facility is located in an area designated attainment for all criteria pollutants in accordance with F.A.C. Rule 17-275.400.

The proposed project will be reviewed under F.A.C. Rule 17-212.400(5), New Source Review (NSR) for Prevention of Significant Deterioration (PSD), because it will be a major new stationary source. This review consists of a determination of Best Available Control Technology (BACT) and unless otherwise exempted, an analysis of the air quality impact of the increased emissions. The review also includes an analysis of the project's impacts on soils, vegetation and visibility; along with air quality impacts

resulting from associated commercial, residential and industrial growth.

The proposed facility shall be in compliance with all applicable provisions of F.A.C. Chapters 17-212 and 17-4 and the 40 CFR 60 (July, 1992 version). The proposed source shall be in compliance with all applicable provisions of F.A.C. Rules 17-210.650: Circumvention; 17-210.700: Excess Emissions; 17-296.800: Standards of Performance for New Stationary Sources (NSPS); 17-296: Stationary Point Source Emission Test Procedures; and, 17-4.130: Plant Operation-Problems.

The proposed facility shall be in compliance with the New Source Performance Standards (NSPS) for Gas Turbines, Subpart GG and NSPS for Industrial Steam Generating Units, Subpart Dc, which are contained in 40 CFR 60, Appendix A, and are adopted by reference in F.A.C. Rule 17-296.800.

The proposed Tiger Bay cogeneration project is less than 75 MW (steam cycle portion) and is therefore exempt from the provisions of the Florida Electrical Power Plant Siting Act.

VI. SOURCE IMPACT ANALYSIS

VI.1 Emission Limitations

The operation of this cogeneration facility burning distillate fuel oil and natural gas will produce emissions of NO_x, SO₂, CO, VOC, sulfuric acid mist, PM, PM₁₀, As, Fluorides, Be, Pb and Hg. The impact of these pollutant emissions are below the Florida ambient air quality standards (AAQS) and/or the acceptable ambient concentration levels (AAC). Table 1 lists each contaminant and its maximum expected emission rates for the 258 MW cogeneration facility.

VI.2 Air Toxics Evaluation

The operation of the sources will produce emissions of chemical compounds that may be toxic in high concentrations. The emission rates of these chemicals shall not create ambient concentrations greater than the No-Threat-Level (NTL) listed in the Department's air toxic list. This project as proposed is in compliance with the Department's air toxic guidelines.

VI.3 Air Quality Analysis

a. Introduction

The operation of the proposed facility will result in emissions increases which are projected to be greater than the PSD significant emission rates for the following pollutants: NO_x, PM,

PM₁₀, Be, CO, and inorganic arsenic. Therefore, the project is subject to the PSD NSR requirements contained in F.A.C. Rule 17-2.500(5) for these pollutants. Part of these requirements is an air quality impact analysis for these pollutants, which includes:

- An analysis of existing air quality;
- A PSD increment analysis (for PM, PM₁₀, and NO_x);
- An Ambient Air Quality Standards analysis (AAQS);
- An analysis of impacts on soils, vegetation, visibility and growth-related air quality impacts; and,
- A Good Engineering Practice (GEP) stack height determination.

The analysis of existing air quality generally relies on preconstruction monitoring data collected in accordance with EPA-approved methods. The PSD increment and AAQS analyses are based on air quality dispersion modeling completed in accordance with EPA guidelines.

Based on these required analyses, the Department has reasonable assurance that the proposed project, as described in this report and subject to the conditions of approval proposed herein, will not cause or contribute to a violation of any PSD increment or ambient air quality standard. A brief description of the modeling methods used and results of the required analyses follow. A more complete description is contained in the permit application on file.

b. Analysis of the Existing Air Quality

Preconstruction ambient air quality monitoring may be required for pollutants subject to PSD review. However, an exemption to the monitoring requirement can be obtained if the maximum air quality impact resulting from the projected emissions increase, as determined through air quality modeling, is less than a pollutant-specific de minimus concentration. The predicted maximum concentration increase for each pollutant subject to PSD (NSR) is given below:

	TSP & PM10	NO _x	CO	Be
PSD de minimus Concentra. (ug/m ³)	10	14	575	0.001
Averaging Time	24-hr	Annual	8-hr	24-hr
Maximum Predicted Impact (ug/m ³)	2.12	0.29	20.8	.00021

There are no monitoring de minimus concentrations for inorganic arsenic. As shown above, the predicted impacts are all less than the corresponding de minimus concentrations; therefore, no preconstruction monitoring is required for these pollutants.

c. Modeling Method

The EPA-approved Industrial Source Complex Short-Term (ISCST2) dispersion model was used by the applicant to predict the impact of the proposed project on the surrounding ambient air. All recommended EPA default options were used. Downwash parameters were used because the stacks were less than the good engineering practice (GEP) stack height. Five years of sequential hourly surface and mixing depth data from the Tampa Florida National Weather Service (NWS) station collected during 1982 through 1986 were used in the model. Since five years of data were used, the highest-second-high (HSH) short-term predicted concentrations are compared with the appropriate ambient air quality standards or PSD increments. For the annual averages, the highest predicted yearly average was compared with the standards.

d. Modeling Results

The applicant first evaluated the potential increase in ambient ground-level concentrations associated with the project to determine if these predicted ambient concentration increases would be greater than specified PSD significant impact levels for criteria pollutants CO, NO₂, PM and PM₁₀. This evaluation was based on the proposed facility operating at load conditions of 100% and 70% and 27°F and 97°F. In addition, the modeling was performed based on the lowest exit velocity and highest emission rate of the two combustion turbine models, Westinghouse and GE, for each load and temperature. Dispersion modeling was performed with receptors placed along the 36 standard radial directions (10 degrees apart) surrounding the proposed units at the following downwind distances: (1) the first 36 receptors were located at the plant property boundaries; (2) subsequent receptors were located at distances of 0.1, 0.3, 0.5, 0.7, 1.0, 1.5, 2.0, 3.0, 4.0 and 5.0 km from the facility. Both screening and refined modeling was done. The results of this modeling presented below show that the increases in ambient ground-level concentrations for all averaging times are less than the PSD significant impact levels for CO, NO₂, PM and PM₁₀.

Avg. Time	NO2	CO		PM and PM ₁₀	
	Annual	1-hr	8-hr	Ann.	24-hr
PSD Signifi. Level (ug/m ³)	1.0	2000	500	1.0	5.0
Ambient Concen. Increase (ug/m ³)	0.29	45.8	20.8	0.022	2.12

Therefore, further dispersion modeling for comparison with AAQS and PSD Class II increment consumption were not required for these pollutants.

Beryllium and inorganic arsenic are noncriteria pollutants, which means that neither national AAQS nor PSD Significant Impacts have been defined for these pollutants. However, the Department does have a draft Air Toxics Permitting Strategy, which defines no threat levels for these pollutants. The Department and the applicant have used the same modeling procedure described above to evaluate the maximum ground level concentrations of these pollutants for comparison with the no-threat levels. The results of this analysis are shown below:

Avg. Time	Be			As		
	Annual	24-hr	8-hr	Annual	24-hr	8-hr
No Threat-Level (ug/m ³)	0.00042	.0048	0.02	0.00023	0.48	2
Max. Concen.	0.000007	.00021	0.00048	0.000011	0.00036	0.00081

All of these values are less than their respective no-threat levels. Other applicable air toxics are also less than their respective no-threat levels.

The nearest PSD Class I area is the Chassahowitzka National Wilderness Area located about 120 km northwest of the facility. The predicted impact of PM and NO₂ emissions from the proposed project on this area was evaluated by first using the ISCST2 model to predict maximum increment consumptions by the source alone and by comparing these predicted values to the appropriate recommended significance levels to determine whether further modeling was necessary. The significance levels used by the Department were the more stringent National Park Service (NPS) recommended levels. The predicted maximum NO₂ and PM increment consumptions for all applicable averaging times were less than these significance levels. Therefore, no further modeling for these time periods was required.

e. Additional Impacts Analysis

A Level-1 screening analysis using the EPA model, VISCREEN was used to determine any potential adverse visibility impacts on the Class I Chassahowitzka National Wilderness Area located about 120km away. Based on this analysis, the maximum predicted visual impacts due to the proposed project are less than the screening criteria both inside and outside the Class I area. A comprehensive air quality related values (AQRV) analysis for this Class I area

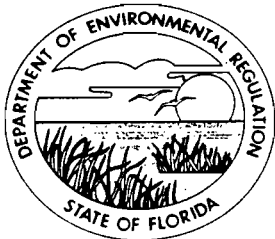
was performed by the applicant. No significant impacts on the Class I area are expected.

In addition, the maximum predicted concentrations from NOx, CO, PM and PM₁₀ are predicted to be less than the AAQS, including the national secondary standards designed to protect public welfare-related values. As such, no harmful effects on soil and vegetation are expected in the area of the project. Also, the proposed modification will not significantly change employment, population, housing or commercial/industrial development in the area to the extent that a significant air quality impact will result.

VII. CONCLUSION

Based on the information provided by CFPLP, the Department has reasonable assurance that the proposed installation of the 258 MW cogeneration facility, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapter 17-212 of the Florida Administrative Code.

[Handwritten signature]
#41755



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

Central Florida Power, L.P.
2500 City West Blvd., Ste. 150
Houston, Texas 77042

Permit Number: AC53-214903

PSD-FL-190

Expiration Date: January 1, 1996

County: Polk

Latitude/Longitude: 27°44'46.7"N

81°51'0.3"W

Project: A 258 MW Cogeneration
Facility

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-210, 212, 275, 296, 297 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Central Florida Power, Limited Partnership, proposes to operate a 258 MW cogeneration facility consisting of one combustion turbine generator, one steam turbine generator, one duct burner-fired heat recovery steam generator and ancillary equipment. This facility is located near Ft. Meade, Polk County, Florida. The UTM coordinates are Zone 17, 416.22 km East and 3069.22 km North.

The sources shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Central Florida Power, Limited Partnership's (CFPLP) application received on June 15, 1992.
2. Department's letters dated July 14 and October 9, 1992.
3. CFPLP's letters received on August 26, October 9, and October 23, 1992.

PERMITTEE:
Central Florida Power, L.P.

Permit Number: AC53-214903
PSD-FL-190
Expiration Date: January 1, 1996

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

PERMITTEE:
Central Florida Power, L.P.

Permit Number: AC53-214903
PSD-FL-190
Expiration Date: January 1, 1996

GENERAL CONDITIONS:

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

PERMITTEE:
Central Florida Power, L.P.

Permit Number: AC53-214903
PSD-FL-190
Expiration Date: January 1, 1996

GENERAL CONDITIONS:

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

- (x) Determination of Best Available Control Technology (BACT)
- (x) Determination of Prevention of Significant Deterioration (PSD)
- (x) Compliance with New Source Performance Standards (NSPS)

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;

PERMITTEE:
Central Florida Power, L.P.

Permit Number: AC53-214903
PSD-FL-190
Expiration Date: January 1, 1996

GENERAL CONDITIONS:

- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS:

Emission Limits

1. The maximum allowable emissions from this source shall not exceed the emission rates listed in Table 1.
2. Visible emissions for full load operation shall not exceed 10% opacity when firing natural gas and 20% opacity when firing distillate fuel oil.

Operating Rates

3. This source is allowed to operate continuously (8,760 hours per year).
4. This source is allowed to use natural gas as the primary fuel for 8,760 hours per year and low sulfur distillate fuel oil (0.05% S) as the secondary fuel up to 3,742,327 gallons per calendar year.
5. The permitted materials and utilization rates for the combined cycle gas turbine system shall be as stated in the application. The operating parameters include, but are not limited to:

184 MW Combustion Turbine
74 MW Steam Turbine

- a) The maximum heat input of 1,849.9 MMBtu/hr (LHV) at 27°F and at base load for distillate fuel oil.
- b) The maximum heat input of 1,614.8 MMBtu/hr (LHV) at 27°F and at base load for natural gas.

PERMITTEE:
Central Florida Power, L.P.

Permit Number: AC53-214903
PSD-FL-190
Expiration Date: January 1, 1996

SPECIFIC CONDITIONS:

Duct Burner

c) The maximum heat input of 100 MMBtu/hr (HHV) of natural gas.

6. Any change in the method of operation, equipment or operating hours pursuant to Rule 17-212.200, F.A.C., Definitions-Modifications, shall be submitted to DER's Bureau of Air Regulation and Southwest District offices.

7. Any other operating parameters established during compliance testing and/or inspection that will ensure the proper operation of this facility shall be included in the operating permit.

Compliance Determination

8. Compliance with the NO_x, SO₂, CO, PM, PM₁₀, and VOC standards shall be determined (while operating at 95-100% of the permitted maximum heat rate input corresponding to the particular ambient conditions) within 180 days of initial operation of the maximum capability of the unit and annually thereafter, by the following reference methods as described in 40 CFR 60, Appendix A (July, 1992 version) and adopted by reference in F.A.C. Rule 17-297.

- Method 1 Sample and Velocity Traverses for Stationary Sources
- Method 2 Determination of Stack Gas Velocity and Volumetric Flow Rate
- Method 3 Gas Analysis
- Method 5 Determination of Particulate Emissions from Stationary Sources
- Method 17 Determination of Particulate Emissions from Stationary Sources
- Method 18 Measurement of Gaseous Organic Compound Emissions by Gas Chromatography
- Method 9 Visual Determination of the Opacity of Emissions from Stationary Sources
- Method 8 Determination of Sulfuric Acid Mist and Sulfur Dioxide Emissions from Stationary Sources
- Method 10 Determination of Carbon Monoxide Emission from Stationary Sources
- Method 20 Determination of Nitrogen Oxides, Sulfur Dioxide, and Diluent Emissions from Stationary Gas Turbines
- Method 25A Determination of Total Gaseous Organic Concentrations Using a Flame Ionization Analyzer

PERMITTEE:
Central Florida Power, L.P.

Permit Number: AC53-214903
PSD-FL-190
Expiration Date: January 1, 1996

SPECIFIC CONDITIONS:

- Method 201A Determination of PM₁₀ Emissions from Stationary and Sources
- Method 201
- Method 12 Determination of Lead Concentrations from or Stationary Sources
- Method 101A
- Method 8 Determination of PM and Gaseous Arsenic Emissions from Stationary Sources

Other DER approved methods may be used for compliance testing after prior Departmental approval.

9. Method 5 or Method 17 or Method 201A and Method 201 must be performed to determine the initial compliance status of particulate matter emissions of the unit. Thereafter, the opacity emissions test, Method 9, may be used unless the applicable opacity is exceeded. Also, the ambient particulate matter entering the gas turbine can be subtracted from the total particulate matter emissions if that quantity can be measured at the inlet of the gas turbine.

10. Compliance with the SO₂ and sulfuric acid mist emission limit can also be determined by calculations based on fuel analysis using ASTM D4294 for the sulfur content of liquid fuels and ASTM D3246-81 for sulfur content of gaseous fuel.

11. Trace elements of Beryllium (Be) shall be tested during initial compliance test using EMTIC Interim Test Method. As an alternative, Method 104 may be used; or Be may be determined from fuel sample analysis using either Method 7090 or 7091, and sample extraction using Method 3040 as described in the EPA solid waste regulations SW 846.

12. Mercury (Hg) shall be tested during initial compliance test using EPA Method 101 (40 CFR 61, Appendix B) or fuel sampling analysis using methods acceptable to the Department.

13. During performance tests, to determine compliance with the proposed NO_x standard, measured NO_x emissions at 15 percent oxygen will be adjusted to ISO ambient atmospheric conditions by the following correction factor:

$$NO_x = (NO_x \text{ obs}) \left(\frac{P_{\text{ref}}}{P_{\text{obs}}} \right)^{0.5} e^{19} (H_{\text{obs}} - 0.00633) \left(\frac{288^\circ K}{T_{\text{AMB}}} \right)^{1.53}$$

where:

PERMITTEE:
Central Florida Power, L.P.

Permit Number: AC53-214903
PSD-FL-190
Expiration Date: January 1, 1996

SPECIFIC CONDITIONS:

NO_x = Emissions of NO_x at 15 percent oxygen and ISO standard ambient conditions.

NO_x obs = Measured NO_x emission at 15 percent oxygen, ppmv.

P_{ref} = Reference combustor inlet absolute pressure at 101.3 kilopascals (1 atmosphere) ambient pressure.

P_{obs} = Measured combustor inlet absolute pressure at test ambient pressure.

H_{obs} = Specific humidity of ambient air at test.

e = Transcendental constant (2.718).

T_{AMB} = Temperature of ambient air at test.

14. Test results will be the average of 3 valid runs. The Southwest District office will be notified at least 30 days in writing in advance of the compliance test(s). The sources, combustion turbine and duct burner, shall operate between 95% and 100% of maximum capacity for the ambient conditions experienced during compliance test(s). Compliance test results shall be submitted to the Southwest District office no later than 45 days after completion.

15. The permittee shall leave sufficient space in the heat recovery steam generator suitable for future installation of SCR equipment should the facility be unable to meet the NO_x standards, if required.

16. The permittee shall install, calibrate, maintain, and operate a continuous emission monitor in the stack to measure and record the nitrogen oxides emissions from this source. The continuous emission monitor must comply with 40 CFR 60, Appendix B, Performance Specification 2 (July 1, 1992).

17. A continuous monitoring system shall be installed to monitor and record the fuel consumption on the CT and duct burner. While water/steam injection is being utilized for NO_x control, the water/steam to fuel ratio at which compliance is achieved shall be incorporated into the permit and shall be continuously monitored. The system shall meet the requirements of 40 CFR Part 60, Subpart GG.

PERMITTEE:
Central Florida Power, L.P.

Permit Number: AC53-214903
PSD-FL-190
Expiration Date: January 1, 1996

SPECIFIC CONDITIONS:

18. Sulfur and nitrogen content and lower heating value of the fuel being fired in the combustion turbines shall be determined as specified in 40 CFR 60.334(b). Any request for a future custom monitoring schedule shall be made in writing and directed to the Southwest District office. Any custom schedule approved by DER pursuant to 40 CFR 60.334(b) will be recognized as enforceable provisions of the permit, provided that the holder of this permit demonstrates that the provisions of the schedule will be adequate to assure continuous compliance. The records of distillate fuel oil usage shall be kept by the company for a two-year period for regulatory agency inspection purposes. For sulfur dioxide, periods of excess emissions shall be reported if the fuel being fired in the gas turbine exceeds 0.05 percent sulfur by weight.

Rule Requirements

19. This source shall comply with all applicable provisions of Chapter 403, Florida Statutes, Chapters 17-210, 212, 275, 296, 297 and 17-4, Florida Administrative Code and 40 CFR 60 (July, 1992 version).

20. The sources shall comply with all requirements of 40 CFR 60, Subpart GG and Subpart Dc, and F.A.C. Rule 17-296.800,(2)(a), Standards of Performance for Stationary Gas Turbines and Standards of Performance for Industrial, Commercial, and Institutional Steam Generating Units.

21. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements and regulations (F.A.C. Rule 17-210.300(1)).

22. This source shall be in compliance with all applicable provisions of F.A.C. Rules 17-210.650: Circumvention; 17-210.700: Excess Emissions; 17-296.800: Standards of Performance for New Stationary Sources (NSPS); 17-297: Stationary Sources-Emissions Monitoring; and, 17-4.130: Plant Operation-Problems.

23. If construction does not commence within 18 months of issuance of this permit, then the permittee shall obtain from DER a review and, if necessary, a modification of the control technology and allowable emissions for the unit(s) on which construction has not commenced (40 CFR 52.21(r)(2)).

24. Quarterly excess emission reports, in accordance with the July 1, 1992 version of 40 CFR 60.7 and 60.334 shall be submitted to DER's Southwest District office.

PERMITTEE:
Central Florida Power, L.P.

Permit Number: AC53-214903
PSD-FL-190
Expiration Date: January 1, 1996

SPECIFIC CONDITIONS:

25. Fugitive dust emissions, during the construction period, shall be minimized by covering or watering dust generation areas.

26. Pursuant to F.A.C. Rule 17-210.300(2), Air Operating Permits, the permittee is required to submit annual reports on the actual operating rates and emissions from this facility. These reports shall include, but are not limited to the following: sulfur content and the lower heating value of the fuel being fired, fuel usage, hours of operation, air emissions limits, etc. Annual reports shall be sent to the Department's Southwest District office by March 1 of each calendar year.

27. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

28. An application for an operation permit must be submitted to the Southwest District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

Issued this _____ day
of _____, 1993

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Carol M. Browner
Secretary

CENTRAL FLORIDA POWER, L.P. - AC53-214903 (PSD-FL-190)
258 MW COMBINED CYCLE GAS TURBINE

Table 1 - Allowable Emission Rates

Pollutant	Fuel ^A	Allowable Emission ^C		Basis
		Standard/Limitation		
NO _x (CT)	Gas	15 ppmvd @ 15% O ₂ (97.2 lbs/hr; 425.7 TPY) ^B		BACT
	Gas	25 ppmvd @ 15% O ₂ (161.9 lbs/hr; 709.1 TPY)		BACT
	Oil	42 ppmvd @ 15% O ₂ (326 lbs/hr; 48.9 TPY)		BACT
NO _x (DB)	Gas	0.1 lbs/MMBtu (10 lbs/hr, 43.8 TPY)		BACT
CO (CT)	Gas	15 ppmvd (48.8 lbs/hr; 213.7 TPY) ^D		BACT
	Oil	30 ppmvd (98 lbs/hr; 14.8 TPY)		BACT
CO (DB)	Gas	10 lbs/hr; 43.8 TPY		BACT
VOC (CT)	Gas	2.8 lbs/hr; 12.3 TPY		BACT
	Oil	7.5 lbs/hr; 1.1 TPY		BACT
VOC (DB)	Gas	2.9 lbs/hr; 12.7 TPY		BACT
PM ₁₀ (CT)	Gas	0.0100 lbs/MMBtu		BACT
	Oil	0.0100 lbs/MMBtu		BACT
PM ₁₀ (DB)	Gas	0.0100 lbs/MMBtu		BACT
SO ₂ (CT)	Gas	4.86 lbs/hr; 21.3 TPY		Appl.
	Oil	99.7 lbs/hr; 15.0 TPY		Appl.
SO ₂ (DB)	Gas	0.3 lbs/hr; 1.32 TPY		Appl.
H ₂ SO ₄ (CT)	Gas	5.9 x 10 ⁻¹ lbs/hr; 2.6 TPY		Appl.
	Oil	1.2 lbs/hr; 0.18 TPY		Appl.
H ₂ SO ₄ (DB)	Gas	3.7 x 10 ⁻² ; 1.6 x 10 ⁻¹		Appl.
Opacity	Gas	10% opacity ^D		BACT
	Oil	20% opacity		BACT
Hg	Oil	3.0 x 10 ⁻¹² lb/MMBtu		Appl.
As	Oil	4.2 x 10 ⁻¹² lb/MMBtu		BACT
Be	Oil	2.0 x 10 ⁻¹² lb/MMBtu		BACT
Pb	Oil	8.9 x 10 ⁻¹² lb/MMBtu		Appl.

A) Fuel: Natural Gas: Emissions are based on 8760 hours per year operating time.

Fuel: No. 2 Distillate Fuel Oil (0.05% S): Emissions are based on fuel usage equivalent to 300 hours per year at maximum capacity (i.e., 3,742,327 gallons per year).

B) The NO_x maximum limit will be lowered to 15 ppmv @ 15% O₂ by 12/31/97 using appropriate combustion technology improvements or SCR.

C) Emission rates are based on 27°F at base load.

D) At full load conditions.

Best Available Control Technology (BACT) Determination
 Central Florida Power, L.P.
 Polk County
 PSD-FL-190

The applicant proposes to construct a cogeneration facility near Ft. Meade, Polk County. This generator system will consist of a 184 MW General Electric PG7221FA combustion turbine generator (CT), equipped with a duct burner-fired heat recovery steam generator (HRSG), which will be used to power a nominal 74 MW steam turbine generator (ST).

The applicant has requested to burn natural gas for 8760 hours per year and distillate fuel oil, with a 0.05 percent sulfur content for a maximum 3,742,327 gallons per year. The applicant has indicated the maximum annual tonnage of regulated air pollutants emitted from the facility at base load, 27°F and type of fuel fired to be as follows:

Pollutant	Emissions (TPY)			Total	PSD Significant Emission Rate (TPY)
	Gas	Duct	Oil		
	PG7221FA (8460 hrs)	Burner (8760 hrs)	PG7221FA (300 hrs)		
NO _x	684.7	43.8	48.9	777.4	40
SO ₂	20.5	1.3	15	36.8	40
PM/PM ₁₀	38.1	4.4	2.6	45.1	25/15
CO	206.5	43.8	14.8	265.1	100
VOC	11.80	12.7	1.1	25.6	40
H ₂ SO ₄	2.5	0.16	1.9	4.5	7
Be	nil	nil	6.94 x 10 ⁻⁴	6.94 x 10 ⁻⁴	0.0004
Hg	nil	nil	8.32 x 10 ⁻⁴	8.32 x 10 ⁻⁴	0.1
Pb	nil	nil	2.47 x 10 ⁻⁴	2.47 x 10 ⁻⁴	0.6
As	nil	nil	1.17 x 10 ⁻³	1.17 x 10 ⁻³	0

Florida Administrative Code (F.A.C.) Rule 17-212.400(2) (f) (3) requires a BACT review for all regulated pollutants emitted in an amount equal to or greater than the significant emission rates listed in the previous table.

Date of Receipt of a BACT Application

June 15, 1992

BACT Determination Requested by the Applicant

<u>Pollutant</u>	<u>Proposed Limits</u>
NO _x	25 ppmvd @ 15% O ₂ (natural gas burning) 42 ppmvd @ 15% O ₂ (for oil firing) Control Technology: Dry Low-NO _x Burners when firing natural gas and steam/water injection when firing distillate oil
SO ₂	0.05% sulfur by weight (fuel oil firing)
CO, VOC	Combustion Control
PM/PM ₁₀	Combustion Control

BACT Determination Procedure

In accordance with Florida Administrative Code Chapter 17-212, this BACT determination is based on the maximum degree of reduction of each pollutant emitted which the Department, on a case by case basis, taking into account energy, environmental and economic impacts, and other costs, determines is achievable through application of production processes and available methods, systems, and techniques. In addition, the regulations state that in making the BACT determination the Department shall give consideration to:

- (a) Any Environmental Protection Agency determination of Best Available Control Technology pursuant to Section 169, and any emission limitation contained in 40 CFR Part 60 (Standards of Performance for New Stationary Sources) or 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants).
- (b) All scientific, engineering, and technical material and other information available to the Department.
- (c) The emission limiting standards or BACT determinations of any other state.
- (d) The social and economic impact of the application of such technology.

The EPA currently stresses that BACT should be determined using the "top-down" approach. The first step in this approach is to determine for the emission source in question the most stringent control available for a similar or identical source or source category. If it is shown that this level of control is technically or economically infeasible for the source in question, then the

next most stringent level of control is determined and similarly evaluated. This process continues until the BACT level under consideration cannot be eliminated by any substantial or unique technical, environmental, or economic objections.

The air pollutant emissions from combined cycle power plants can be grouped into categories based upon what control equipment and techniques are available to control emissions from these facilities. Using this approach, the emissions can be classified as follows:

- o Combustion Products (e.g., particulates). Controlled generally by good combustion of clean fuels.
- o Products of Incomplete Combustion (e.g., CO). Control is largely achieved by proper combustion techniques.
- o Acid Gases (e.g., NO_x). Controlled generally by gaseous control devices.

Grouping the pollutants in this manner facilitates the BACT analysis because it enables the equipment available to control the type or group of pollutants emitted and the corresponding energy, economic, and environmental impacts to be examined on a common basis. Although all of the pollutants addressed in the BACT analysis may be subject to a specific emission limiting standard as a result of PSD review, the control of "nonregulated" air pollutants is considered in imposing a more stringent BACT limit on a "regulated" pollutant (i.e., particulates, sulfur dioxide, fluorides, sulfuric acid mist, etc.), if a reduction in "nonregulated" air pollutants can be directly attributed to the control device selected as BACT for the abatement of the "regulated" pollutants.

BACT POLLUTANT ANALYSIS

COMBUSTION PRODUCTS

Particulate Matter (PM/PM₁₀)

The design of this system ensures that particulate emissions will be minimized by combustion control and the use of clean fuels. The particulate emissions from the combustion turbine when burning natural gas and fuel oil will not exceed 0.01 lb/MMBtu. The Department accepts the applicant's proposed control for particulate matter and heavy metals.

Lead, Mercury, Beryllium, Arsenic (Pb, Hg, Be, As)

The Department agrees with the applicant's rationale that there are no feasible methods to control lead, mercury, arsenic, and beryllium; except by limiting the inherent quality of the fuel.

Although the emissions of these toxic pollutants could be controlled by particulate control devices, such as a baghouse or scrubber, the amount of emission reductions would not warrant the added expense. As this is the case, the Department does not believe that the BACT determination for PM would be affected by the emissions of these pollutants.

PRODUCTS OF INCOMPLETE COMBUSTION

Carbon Monoxide (CO)

The emissions of carbon monoxide exceed the PSD significant emission rate of 100 TPY. The applicant has indicated that the carbon monoxide emissions from the proposed combined cycle turbine is on exhaust concentrations of 15 ppmv for natural gas firing and 30 ppmv for fuel oil firing.

The majority of BACT emissions limitations have been based on combustion controls for carbon monoxide and volatile organic compounds minimization, additional control is achievable through the use of catalytic oxidation. Catalytic oxidation is a postcombustion control that has been employed in CO nonattainment areas where regulations have required CO emission levels to be less than those associated with wet injection. These installations have been required to use LAER technology and typically have CO limits in the 10-ppm range (corrected to dry conditions).

In an oxidation catalyst control system, CO emissions are reduced by allowing unburned CO to react with oxygen at the surface of a precious metal catalyst such as platinum. Combustion of CO starts at about 300°F, with efficiencies above 90 percent occurring at temperatures above 600°F. Catalytic oxidation occurs at temperatures 50 percent lower than that of thermal oxidation, which reduces the amount of thermal energy required. For CT/HRSG combinations, the oxidation catalyst can be located directly after the CT or in the HRSG. Catalyst size depends upon the exhaust flow, temperature, and desired efficiency.

Due to the oxidation of sulfur compounds and excessive formation of H₂SO₄ mist emissions, oxidation catalyst are not considered to be technically feasible for gas turbines fired with fuel oil.

Catalytic oxidation has not been demonstrated on a continuous basis when using fuel oil.

Use of oxidation catalyst technology would be feasible for natural gas-fired unit; however, the cost effectiveness of \$10,000 per ton for the PG7221FA of CO removed will have an economic impact on this project.

The Department is in agreement with the applicant's proposal of combustor design and good operating practices as BACT for CO for this cogeneration project.

ACID GASES

Nitrogen Oxides (NO_x)

The emissions of nitrogen oxides represent a significant proportion of the total emissions generated by this project, and need to be controlled if deemed appropriate. As such, the applicant presented an extensive analysis of the different available technologies for NO_x control.

The applicant has stated that BACT for nitrogen oxides will be met by using water/steam injection (when firing distillate fuel oil) and advanced combustor design to limit emissions to 25 ppmvd (corrected to 15% O₂) when burning natural gas and 42 ppmvd (corrected to 15% O₂) when burning fuel oil.

A review of the EPA's BACT/LAER Clearinghouse indicates that the lowest NO_x emission limit established to date for a combustion turbine is 4.5 ppmvd at 15% oxygen. This level of control was accomplished through the use of water injection and a selective catalytic reduction (SCR) system.

Selective catalytic reduction is a post-combustion method for control of NO_x emissions. The SCR process combines vaporized ammonia with NO_x in the presence of a catalyst to form nitrogen and water. The vaporized ammonia is injected into the exhaust gases prior to passage through the catalyst bed. The SCR process can achieve up to 90% reduction of NO_x with a new catalyst. As the catalyst ages, the maximum NO_x reduction will decrease to approximately 86 percent.

The effect of exhaust gas temperature on NO_x reduction depends on the specific catalyst formulation and reactor design. Generally, SCR units can be designed to achieve effective NO_x control over a 100-300°F operating window within the bounds of 450-800°F, although recently developed zeolite-based catalysts are claimed to be capable of operating at temperatures as high as 950°.

Most commercial SCR systems operate over a temperature range of about 600-750°F. At levels above and below this window, the specific catalyst formulation will not be effective and NO_x reduction will decrease. Operating at high temperatures can permanently damage the catalyst through sintering of surfaces.

Increased water vapor content in the exhaust gas (as would result from water or steam injection in the gas turbine combustor) can shift the operating temperature window of the SCR reactor to slightly higher levels.

Although technically feasible, the applicant has rejected using SCR on the combined cycle because of economic, energy, and environmental impacts. The applicant has identified the following limitations:

- a) Reduced power output.
- b) Emissions of unreacted ammonia (slip).
- c) Disposal of hazardous waste generated (spend catalyst).
- d) Ammonium bisulfate and ammonium sulfate particulate emissions (ammonium salts) due to the reaction of NH₃ with SO₃ present in the exhaust gases.
- e) The energy impacts of SCR will reduce potential electrical power generation of more than 7 million kwh per year.
- f) Incremental cost effectiveness for the application of SCR technology to the Central Florida Power project was considered to be \$7,400 per ton of NO_x removed.

Since SCR has been determined to be BACT for several combined cycle facilities, the EPA has clearly stated that there must be unique circumstances to consider the rejection of such control on the basis of economics.

In a recent letter from EPA Region IV to the Department regarding the permitting of a combined cycle facility (Tropicana Products, Inc.), the following statement was made:

"In order to reject a control option on the basis of economic considerations, the applicant must show why the costs associated with the control are significantly higher for this specific project than for other similar projects that have installed this control system or in general for controlling the pollutant."

For fuel oil firing, the cost associated with controlling NO_x emissions must take into account the potential operating problems that can occur with using SCR in the oil firing mode.

A concern associated with the use of SCR on combined cycle projects is the formation of ammonium bisulfate. For the SCR process, ammonium bisulfate can be formed due to the reaction of sulfur in the fuel and the ammonia injected. The ammonium bisulfate formed has a tendency to plug the tubes of the heat recovery steam generator leading to operational problems. As this is the case, SCR has been judged to be technically infeasible for oil firing in some previous BACT determinations.

The latest information available now indicates that SCR can be used for oil firing provided that adjustments are made in the ammonia to NO_x injection ratio. For natural gas firing operation, NO_x emissions can be controlled with up to a 90 percent efficiency using a 1 to 1 or greater ammonia injection ratio. By lowering the injection ratio for oil firing, testing has indicated that NO_x can be controlled with efficiencies ranging from 60 to 80 percent. When the injection ratio is lowered there is not a problem with ammonium bisulfate formation since essentially all of the ammonia is able to react with the nitrogen oxides present in the combustion gases. Based on this strategy SCR has been both proposed and established as BACT for oil fired combined cycle facilities with NO_x emission limits ranging from 11.7 to 25 ppmvd depending on the efficiency of control established.

The applicant has indicated that the total levelized annual operating cost to install SCR for this project at 100 percent capacity factor and burning natural gas is \$3,364,400 for the PG7221FA. Taking into consideration the total annual cost, a cost/benefit analysis of using SCR can now be developed.

For this project, based on the information supplied by the applicant, it is estimated that the maximum annual NO_x emissions using dry low- NO_x (natural gas) and water injection (oil firing) will be 702.1 tons/year (at 72°F). Assuming that SCR would reduce the NO_x emissions by 65%, about 245.7 TPY would be emitted annually. When this reduction (456.4 TPY) is taken into consideration with the total levelized annual operating cost of \$3,364,400; the cost per ton of controlling NO_x is \$7,400. This calculated cost is higher than has previously been approved as BACT.

A review of the latest DER BACT determinations show limits of 15 ppmvd (natural gas) using low- NO_x burn technology for combined cycle turbines. General Electric is currently developing programs using both steam/water injection and dry low NO_x combustor to achieve NO_x emission control level of 9 ppm when firing natural gas. Therefore, since this technology will likely be available by

1997, the Department has accepted the water/steam injection (for distillate fuel oil firing), the dry low-NO_x burner design, and the 25 ppmvd (natural gas)/42 ppmvd (oil) at 15% O₂ as BACT for a limited time (up to 12/31/97).

BACT Determination by DER

NO_x Control

The information that the applicant presented and Department calculations indicates that the cost per ton of controlling NO_x for this turbine [\$7,400 per ton (natural gas)] is high compared to other BACT determinations which require SCR. Based on the information presented by the applicant, the Department believes that the use of SCR for NO_x control is not justifiable as BACT at this time.

A review of the permitting activities for combined cycle proposals across the nation indicates that SCR has been required and most recently proposed for installations with a variety of operating conditions (i.e., natural gas, fuel oil, and various capacity factors). Although, the cost and other concerns expressed by the applicant are valid, the Department, in this case, is willing to accept water/steam injection and low NO_x burner design as BACT for this project for a limited time (up to 12/31/97).

It is the Department's understanding that General Electric is developing programs for the PG7221FA using either steam/water injection or dry low NO_x combustor technology to achieve a NO_x emission control level of 15 ppm when firing natural gas. Therefore, the Department has determined to revise and lower the allowable BACT limit for this project to 15 ppmvd at 15% O₂ no later than 12/31/97.

CO Control

Combustion control will be considered as BACT for CO and VOC when firing natural gas.

Other Emissions Control

The emission limitations for PM and PM₁₀, Be, Pb, and Hg are based on previous BACT determinations for similar facilities.

The emission limits for the Central Florida Power, L.P. project are thereby established as follows:

258 MW COMBINED CYCLE COMBUSTION TURBINE
100 MMBtu/hr Duct Burner

Pollutant	Emission Standards/Limitations (a)		Method of Control
	Oil (b)	Gas (c)	
NO _x (CT)	42 ppmv at 15% O ₂	25 ppmv (d) at 15% O ₂ 15 ppmv at 15% O ₂	Water Injection/ Dry Low-NO _x Combustor Dry Low-NO _x Combustor or any other NO _x Control Technology
NO _x (DB)		0.1 lbs/MMBtu	
CO (CT)	98 lbs/hr	49 lbs/hr	Combustion
CO (DB)		10 lbs/hr	
PM/PM ₁₀ (CT)	17 lbs/hr	9 lbs/hr	Combustion
PM/PM ₁₀ (DB)		0.01 lbs/MMBtu	
SO ₂ (CT)	99.7 lbs/hr	4.9 lbs/hr	Distillate Fuel Oil (0.05% S)
SO ₂ (DB)		0.3 lbs/hr	
H ₂ SO ₄ (CT)	1.2 lbs/hr	5.9 x 10 ⁻¹ lbs/hr	Distillate Fuel Oil (0.05% S)
H ₂ SO ₄ (DB)		3.7 x 10 ⁻² lbs/hr	
VOC (CT)	7.5 lbs/hr	2.8 lbs/hr	Combustion
VOC (DB)		2.9 lbs/hr	
Hg	3.0 x 10 ⁻¹² lbs/MMBtu		Fuel Quality
Pb	8.9 x 10 ⁻¹² lbs/MMBtu		Fuel Quality
Be	2.5 x 10 ⁻¹² lbs/MMBtu		Fuel Quality
As	4.2 x 10 ⁻¹² lbs/MMBtu		Fuel Quality

- (a) Emissions calculated at base load and 27°F.
 (b) No. 2 fuel oil with a maximum of 0.05% sulfur by weight.
 (c) Natural gas (8460 hours per year), Fuel oil (300 hours per year).
 (d) Initial NO_x emission rates for natural gas firing shall not

BACT-Central Florida Power, L.P.
PSD-FL-190
Page 10

exceed 25 ppmvd at 15% oxygen on a dry basis. The permittee shall achieve NO_x emissions of 15 ppmvd at 15% oxygen at the earliest achievable date based on dry low NO_x combustor injection technology or any other combustion technology, but no later than 12/31/97.

Details of the Analysis May be Obtained by Contacting:

Preston Lewis, BACT Coordinator
Department of Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Recommended by:

Approved by:

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

Carol M. Browner, Secretary
Dept. of Environmental Regulation

Date 1993

Date 1993



United States Department of the Interior



FISH AND WILDLIFE SERVICE
75 Spring Street, S.W.
Atlanta, Georgia
30303

February 5, 1993

Mr. C. H. Fancy
Chief, Bureau of Air Regulation
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED

FEB 08 1993

Division of Air
Resources Management

Dear Mr. Fancy:

We have completed our review of Central Florida Power's (CFP) permit application and the Florida Department of Environmental Regulation's (FDER) Technical Evaluation and Preliminary Determination document regarding the proposed 258 MW Tiger Bay cogeneration project. This facility would be located near Ft. Meade, approximately 120 km southeast of the Chassahowitzka Wilderness Area (WA), a Class I air quality area administered by the Fish and Wildlife Service. The proposed project would be a significant emitter of particulate matter (PM), beryllium (Be), carbon monoxide (CO), arsenic (As), and nitrogen oxides (NO_x). In addition, small amounts of sulfur dioxide (SO₂), volatile organic compounds (VOC), mercury (Hg), lead (Pb), and sulfuric acid mist (H₂SO₄) would be emitted. We are pleased to see that CFP would minimize SO₂ and H₂SO₄ emissions by burning natural gas as the primary fuel, and fuel oil with a maximum sulfur content of 0.05 percent as the backup fuel. This fuel choice allows CFP to avoid the Class I SO₂ increment consumption issue faced by new, high sulfur fuel-burning projects in the vicinity of the Chassahowitzka WA.

CFP proposes to further minimize emissions from the combustion turbine by using proper combustion controls, water injection, and advanced dry low-NO_x combustors. We agree that using proper combustion controls and burning a low sulfur fuel represent best available control technology (BACT) for PM, Be, As, CO, VOC, SO₂, and H₂SO₄. For NO_x, we still believe that either dry low-NO_x combustors, or water injection in combination with Selective Catalytic Reduction (SCR), is BACT for new combined cycle combustion turbine projects. Dry low-NO_x combustors can reduce NO_x levels to less than 15 parts per million (ppm) when firing natural gas, while SCR can achieve flue gas NO_x concentrations as low as 6 ppm when burning gas and 9 ppm when burning oil.


It is evident that the BACT process is driving emissions from combustion turbines downward, and that applicants are looking for ways to inherently lower emissions, rather than opting for add-on flue gas cleaning technologies. The advantages of this approach are obvious. For example, with dry low-NO_x combustors, the potential problems often cited with SCR (i.e., ammonia slip, disposal of spent catalyst, accidental release of stored ammonia, etc.) would not be a factor. Assuming this process continues, and inherently lower emitting systems are developed, such an approach may be preferred from a total environmental standpoint.

Regardless of which control technology is used, we believe that permit conditions should reflect the minimum achievable NO_x emission rates. The Technical Evaluation and Preliminary Determination document for the Tiger Bay project mentions that General Electric (GE) is developing processes, using either steam/water injection or dry-low NO_x combustor technology, to achieve a NO_x control level of 15 ppm when firing natural gas. Accordingly, the FDER proposes to accept CFP's low-NO_x burner design with a maximum NO_x emission limit of 25 ppm (while burning gas) until December 31, 1997. After that date, the maximum permitted limit would be lowered to 15 ppm. In fact, it is our understanding that GE is hoping to design combustors that achieve an even lower rate, 9 ppm. Therefore, while we do not object to the FDER allowing CFP to emit at the 25 ppm NO_x rate until GE develops the combustors, we feel that draft permit condition Number 15 should be revised. As written now, it suggests that SCR may be required if the lower NO_x emission limit of 15 ppm cannot be met. We recommend that this permit condition require CFP to install SCR if the dry low-NO_x combustors cannot meet the 15 ppm rate, and also that it include the statement that the FDER may revise and lower the allowable BACT limit to less than 15 ppm if such a lower rate is achievable.

Regarding CFP's analyses of Tiger Bay's potential impacts on the Chassahowitzka WA, CFP performed a Level I VISCREEN analysis and showed that there would be low potential for plume impacts in the wilderness area. In addition, CFP addressed potential effects on aquatic and terrestrial resources in the Chassahowitzka WA from increased nitrogen input. As we discussed in detail in our recent letter on the Kissimmee project, we are concerned about increased nitrogen input into the wilderness area and potential problems associated with nutrient enrichment in the aquatic ecosystem. However, because CFP's modeling shows that the annual average nitrogen dioxide impacts in the wilderness area from the Tiger Bay facility alone would be 0.014 micrograms per cubic meter (ug/m³), less than our proposed significant impact level of 0.025 ug/m³, we would not expect the project to contribute significantly to this problem.

If you have any questions regarding this matter, please contact Ms. Tonnie Maniero of our Air Quality office in Denver at 303/969-2071.

Sincerely yours,

for 
James W. Pulliam, Jr.
Regional Director

cc: J. Yarn
C. Holladay
B. Thomas, consultant
J. Rungt, NPS
J. Kovak, Park Co.
K. Kasby, RBN
G. Harper, EPA



Dave

February 8, 1993

RECEIVED

FEB 09 1993

Division of Air Resources Management

Mr. Clair H. Fancy
Bureau of Air Regulation
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Central Florida Power Limited Partnership
Tiger Bay Cogeneration Plant
PSD-FL-190
AC 53-214903

Dear Mr. Fancy:

Enclosed please find the Affidavit of Publication for advertisement of the Notice of Intent to Issue Permit for this project. As shown, the advertisement was published in The Polk County Democrat on February 4, 1993 and satisfies the publication requirements of the Intent to Issue.

If you have any questions concerning this material, please call me at your earliest convenience.

Sincerely,

Robert F. Kosky (handwritten signature)

Kennard F. Kosky, P.E.
President

Enclosure

cc: Robert I. Taylor, Central Florida Power, L.P.
Robert Chatham, Destec Energy, Inc.
Teresa Heron, FDER
Project File

C. Holladay
B. Thomas, SW Dist.
D. Harper, EPA
G. Bennett, NPS
H. ...

12018A1/14

KBN ENGINEERING AND APPLIED SCIENCES, INC.

1034 Northwest 57th Street Gainesville, Florida 32605 904/331-9000 FAX: 904/332-4189

Rule 28-5.207, F.A.C. The application 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 Department of Environmental Regulation, Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, Department of Environmental Regulation, Southwest District, 3604 Coconut Palm Drive, Tampa, Florida 33618-8218. Any person may send written comments on the proposed action to Mr. Preston Lewis at the Department's Tallahassee address. All comments received within 30 days of the publication of this notice will be considered in the Department's final determination. Further, a public hearing can be requested by any person(s). Such requests must be submitted within 30 days of this notice. Feb. 4, 1993-0301

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION NOTICE OF INTENT TO ISSUE PERMIT The Department of Environmental Regulation gives notice of its intent to issue a PSD permit to Central Florida Power, Limited Partnership (CFPLP), County Road 630, 5 miles west of Ft. Meade, Polk County, Florida, to construct a 258 MW cogeneration facility. A determination of Best Available Control Technology (BACT) was required. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination. A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, 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 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes. The Petition shall contain the following information: (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by Petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action. If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly 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 decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subse-

AFFIDAVIT OF PUBLICATION
The Polk County Democrat
Published Semi-Weekly
Bartow, Polk County, Florida

Case No. _____

STATE OF FLORIDA
COUNTY OF POLK

Before the undersigned authority personally appeared Linda K. Holcomb, who on oath says that (s)he is Ad Manager of The Polk County Democrat, a newspaper published at Bartow, Polk County, Florida; that the attached copy of advertisement, being a Notice of Intent to Issue Permit in the matter of Central Florida Power in the _____ Court, was published in said newspaper in the issues of February 4, 1993

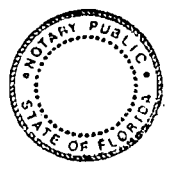
Affiant further says that The Polk County Democrat is a newspaper published at Bartow, in said Polk County, Florida, and that said newspaper has heretofore been continuously published in said Polk County, Florida, each Monday and Thursday, and has been entered as second class matter at the post office in Bartow, in said Polk County, Florida, for a period of one year next preceeding the first publication of the attached copy of advertisement; and affiant further says that 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 said newspaper.

Signed Linda K. Holcomb

The foregoing instrument was acknowledged before me this 5th day of Feb., 1993, by Linda K. Holcomb, who is personally known to me.

Teresa M. Pacetti
(Signature of Notary Public)
Teresa M. Pacetti
(Printed or typed name of Notary Public)
Notary Public

My Commission Expires:



Notary Public, State of Florida
TERESA M. PACETTI
My Comm. Exp. Dec. 19, 1995
Comm. No. CC 169408