



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

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Interoffice Memorandum

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APR 8 1992

**Division of Air
Resources Management**

TO: Pat Comer, OGC
~~Preston Lewis, DAR~~ *Callahan*

FROM: Stephanie Brooks, DER-SED *Stephanie Brooks*

DATE: April 6, 1992

SUBJECT: FPUA Units 6,7, and 8 terms

After review of Gary Perko's proposal, I have the following comments to offer.

1. The combined emission rate takes into account operating Unit 7 for 400 hrs on oil. The rate does not include emissions from Units 6 and 8 on anything other than natural gas. The cover letter to this proposal seems to indicate that they want to be able to operate all three units for up to 400 hours during emergency situations which would give an SO₂ emission rate for just the 400 hours of 714.5 tpy.

2. Individual permits with a grouped emission limit like FPUA proposes are a compliance nightmare and constitute "bubbling" which EPA does not allow. If they want to have individual permits, they must accept individual annual and hourly emission limits.



FPUA's Proposal + UNIT 9

	<u>6-8</u>	<u>9</u>	<u>TOTAL</u>	(1984-1992) <u>Inc</u>	<u>Sq, Inc</u>	
PM	12.8	13.44	26.24	22.002	25	
SO _x	259.3	0.576	259.876	258.94	40	*
NO _x	622.0	172.5	794.5	18.74	40	
VOC	105.9	12.1	118	116.026	40	*
CO	45.3	110.4	155.7	99.29	40	*

#548 P03

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APR-10-'92 12:37 ID: DER WEST PALM

1984 UNITS 6-8 EMISSIONS ACTUAL

	<u>6</u>	<u>7</u>	<u>8</u>	<u>TOTAL</u>
PM	0.0061	0.781	3.451	4.238
SO _x	0.0743	0.16485	0.70002	0.93917
NO _x	0.007854	143.4134	632.338	775.76
VOC	0.000142	0.36507	1.6096	1.974
CO	0.0009	10.43	45.98	56.41

1992 400 hrs fuel oil included Units 6-8

	<u>6</u>	<u>7</u>	<u>8</u>	<u>TOTAL</u>
PM	0.0061	10.067	15.46	25.5331
SO _x	35.0983	258.14	98.42	391.6583
NO _x	0.007854	143.4134	632.338	775.76
VOC	0.000142	0.36507	1.6096	1.974
CO	0.0009	10.43	45.98	56.41

	<u>(1992-1984)</u> <u>Inc</u>	<u>Sig. Inc.</u>
TOTAL	21,2951	25
	390.719	40
	-	
	-	
	-	

1992 UNITS 6-8 400 hrs fuel oil & Unit 9

	<u>6-8</u>	<u>9</u>	<u>TOTAL</u>
PM	25.5331	13.44	38.97
SO _x	391.6583	0.576	392.23
NO _x	775.76	172.5	948.26
VOC	1.974	12.1	14.07
CO	56.41	110.4	166.81

	<u>(1992-1984)</u> <u>Inc</u>	<u>Sig. Inc</u>
	34.74	25 *
	391.295	40 *
	172.5	40 *
	12.1	40
	110.4	40 *

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FT PIERCE UTILITIES AUTHORITY

1984 UNITS 6, 7 & 8 EMISSIONS

	UNIT 6	UNIT 7	UNIT 8	TOTAL
PM	0.0061	0.781	3.451	4.238
SO _x	0.0743	0.16485	0.70002	0.93917
NO _x	0.007854	143.4134	632.338	775.760
VOC	0.000142	0.36507	1.6096	1.974
CO	0.0009	10.43	45.98	56.41

Add UNIT 9 to 1984 Emissions (No Reductions)

	UNIT 6	UNIT 7	UNIT 8	UNIT 9	TOTAL	INCREASE	Sig
PM	0.0061	0.781	3.451	13.44	17.678	13.44	2
SO _x	0.0743	0.16485	0.70002	0.576	1.51517	0.576	4
* NO _x	0.007854	143.4134	632.338	172.5	948.260	172.5	4
VOC	0.000142	0.36507	1.6096	12.1	14.074	12.1	4
* CO	0.0009	10.43	45.98	110.4	146.81	110.4	10

1992

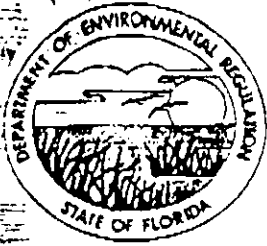
	UNIT 6-8 TOTAL	UNIT 7 400 hrs on oil PROPOSED EMISSIONS	UNIT 9	Total	1992-1984 Inc	Sig
PM	12.8		13.44	26.24	8.562	2
* SO _x	259.3		0.576	259.876	258.36	4
NO _x	622		172.5	794.5	(153.76)	4
* VOC	105.9		12.1	118	103.924	4
CO	45.3		110.4	155.7	(11.11)	10

#548 P02

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✓ CC PAT CONER, OGC
Return to GPL



Florida Department of Environmental Regulation

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Carol M. Browner, Secretary

FAX TRANSMITTAL LETTER

DATE: 4-10-92 NUMBER OF PAGES: 3 1/2
(Including this Page)

FROM: _____
NAME: S Brooks

TO: _____
FAX TELEPHONE NUMBER: 904-922-6979

TRANSMITTAL ON A HITACHI HIFAX #35:
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NAME: Preston Lewis

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AGENCY: DEERIDAR

SENDERS NAME: Brooks

COMMENTS:

F.P.U.A.

Pls share w/Pat
if you think she needs the
info. Stephanie

