

# Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

June 28, 1991

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Harry Schindehette  
Director of Utilities  
Fort Pierce Utilities Authority  
Post Office Box 3191  
Fort Pierce, Florida 34948

Dear Mr. Schindehette:

Re: 1) AC 56-141460, 31.6 MW Combined Cycle Gas Turbine  
2) Letter Dated 11/9/90 from Smallwood to Schindehette

The Department is in receipt of Hopping Boyd Green & Sam's letter dated June 11, 1991, requesting a permit modification to burn fuel oil in existing boilers Nos. 6, 7, and 8. The Department has reviewed your proposal and has determined, based on our discussions at the June 4, 1991, meeting, to amend Specific Condition No. 8 of your permit (AC 56-141460) as requested.

Specific Condition No. 8 is amended to further include the following:

Fort Pierce Utilities Authority (FPUA) shall be permitted to burn residual fuel oil in Units 6, 7, and 8 in order to avoid curtailing electric power service to its customers. FPUA must provide written notification to the Department's Southeast District office within 24 hours after the commencement of oil firing and furnish the following information:

- a. Duration or projected duration of the event.
- b. Quantity of fuel oil burned or projected to be burned.
- c. A description of significant circumstances precipitating the event. The description shall include the following information:
  1. Availability of power for purchase.
  2. Availability of electric transmission capacity relating to power purchases.
  3. Availability of natural gas.
  4. Availability of FPUA's generation resources.

Mr. Harry Schindehette  
Page Two  
June 28, 1991

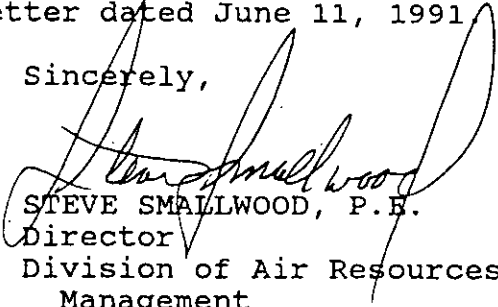
When burning residual fuel oil in Units 6, 7, and 8, the sulfur dioxide (SO<sub>2</sub>), particulate matter (PM), and volatile organic compound (VOC) emission limits currently set forth in the permit shall not apply. In lieu of those emission limits, the following emission limits will apply to Units 6, 7, and 8:

	SO <sub>2</sub> (lb/MMBtu)	PM (lb/MMBtu)	VOC
Unit 6	0.80	n/a	n/a
Unit 7	2.75	0.1	n/a
Unit 8	0.80	0.1	n/a

**Attachment to be Incorporated:**

Hopping Boyd Green & Sam's letter dated June 11, 1991

Sincerely,

  
STEVE SMALLWOOD, P.E.  
Director  
Division of Air Resources  
Management

SS/PL/plm

c: Stephanie Brooks, DER  
Carol A. Forthman, OGC  
Gary C. Smallridge, OGC  
Peter Cunningham, HBGS  
Gary V. Perko, HBGS

HOPPING BOYD GREEN & SAMS

ATTORNEYS AND COUNSELORS

123 SOUTH CALHOUN STREET

POST OFFICE BOX 6526

TALLAHASSEE, FLORIDA 32314

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RICHARD D. MELSON  
WILLIAM D. PRESTON  
CAROLYN S. RAEPPLE  
GARY P. SAMS  
ROBERT P. SMITH, JR.  
CHERYL G. STUART

June 11, 1991

*1 - fax to Stephanie Brooks.  
2 - Let's establish a  
conference call date &  
time if appropriate.*

BY HAND DELIVERY

Ms. Patricia E. Comer, Esq.  
Assitant General Counsel  
Florida Department of Environmental  
Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Re: Fort Pierce Utilities Authority  
H. D. King Electric Generating Plant-Units 6, 7, 8  
Permit No.: AC 56-141460

Dear Pat:

To follow up on our recent meeting, we are writing on behalf of the Fort Pierce Utilities Authority ("FPUA") to propose a permit modification that would allow FPUA to burn fuel oil in Units 6, 7, and 8 at the H. D. King plant in order to avoid curtailment of electric service in emergency circumstances. As discussed, a permit modification would provide the necessary authority while avoiding the need for the emergency order requested by FPUA on May 2, 1991.

We propose that the following language be added to the end of Specific Condition 8 of the original construction permit for Unit 9 (AC 56-141460), as amended by the attached letter from Steve Smallwood dated November 9, 1990:

FPUA shall be permitted to burn residual fuel oil in Units 6, 7, and 8 in order to avoid curtailing electric power service to its customers. FPUA must notify the DER within 24 hours after the commencement of oil firing and furnish the following information:

Ms. Patricia E. Comer, Esq.  
June 11, 1991  
Page 2

- a. Duration or projected duration of the event.
- b. Quantity of fuel oil burned or projected to be burned.
- c. A description of significant circumstances precipitating the event. The description shall include the following information:
  1. Availability of power for purchase.
  2. Availability of electric transmission capacity relating to power purchases.
  3. Availability of natural gas.
  4. Availability of FPUA generation resources.

When burning residual fuel oil in Units 6, 7, and 8, the sulfur dioxide ("SO<sub>2</sub>"), particulate matter ("PM"), and volatile organic compound ("VOC") emission limits currently set forth in the permit shall not apply. In lieu of those emission limits, the following emission limits will apply to Units 6, 7, and 8:

	Sulfur Dioxide (lb/MBTu)	Particulate Matter (lb/MBTu)	VOC
Unit 6	0.80	n/a	n/a
Unit 7	2.75	0.1	n/a
Unit 8	0.80	0.1	n/a

Although we believe this language reflects the consensus reached at our recent meeting, we would be happy to meet with you to discuss any changes the Department feels appropriate. However, we cannot overemphasize FPUA's critical need for

*This looks like compare to the existing permit conditions in Units 6-8?*

Ms. Patricia E. Comer, Esq.  
June 11, 1991  
Page 3

authority to burn oil in emergency circumstances, which could arise at any time throughout the summer.

Thank you for the opportunity to meet with you and the other Department and Public Service Commission officials on Tuesday, June 4, 1991. We appreciate the Department's cooperation in this matter of great importance to FPUA.

Sincerely,

HOPPING BOYD GREEN & SAMS

By: 

Peter C. Cunningham  
Gary V. Perko

Attorneys for FORT PIERCE  
UTILITIES AUTHORITY

Attachment

cc: Carol A. Forthman, Esq.  
Gary C. Smallridge, Esq. ✓

GVP/ltrComer



# Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

November 9, 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Harry Schindehette  
Director of Utilities  
Ft. Pierce Utilities Authority  
P. O. Box 3191  
Ft. Pierce, Florida 34948

Dear Mr. Schindehette:

Re: 31.6 MW Combined Cycle Gas Turbine  
AC 56-141460

The Department is in receipt of your letter dated August 3, 1990, requesting to delete the annual operating hours for existing boilers No. 6, No. 7, and No. 8 from the above mentioned permit's specific condition No. 8.

The Department has reviewed your proposal and has determined, based on our discussions at the July 24, 1990 meeting, to amend your permit (AC 56-141460) as requested. In order to allow flexibility in your facility's operation without increasing permitted emissions, we will be limiting the total annual emissions and the total annual heat input to the three boilers. Specific condition No. 8 will reflect this modification. Therefore, specific condition No. 8 of permit AC 56-141460 will be changed as follows:

FROM:

The operating permits emissions limits for this facility's existing boilers shall not exceed the following rates:

Parameter	Unit 6		Unit 7		Unit 8	
	lbs/hr	tons/yr	lbs/hr	tons/yr	lbs/hr	tons/yr
Part.	0.4	0.0024	0.568	0.382	0.945	3.017
SOx	12.38	0.0743	0.1199	0.0806	0.1917	0.617
NOx	1.31	0.007854	104.35	70.126	173.20	552.86
VOC	0.0236	0.000142	0.266	0.179	0.441	1.407
CO	0.15	0.0009	7.589	5.100	12.59	40.20

hrs/yr

12

1344

6384

Mr. Harry Schindehette  
Page 2

TO:

The operating permits emissions limits for this facility's existing boilers (unit No. 6, unit No. 7, and unit No. 8) shall not exceed the following rates:

<u>Parameter</u>	<u>lbs/hr</u>	<u>tons/yr</u>
PM	1.9	3.4
SO <sub>2</sub>	12.7	0.8
NO <sub>x</sub>	278.9	622.0
VOC	0.7	1.6
CO	20.3	45.3

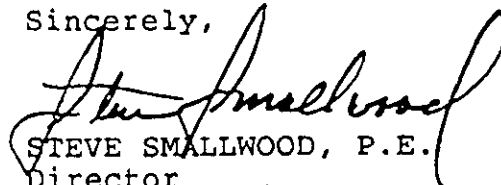
Total heat input for the three existing boilers (Nos. 6, 7, and 8) shall not exceed 4,534,930 MBtu per year.

The operating permit's emission limits for these boilers (Nos. 6, 7, and 8) shall be modified as stated above.

Attachment to be Incorporated:

- Mr. Harry Schindehette's letter dated August 3, 1990.

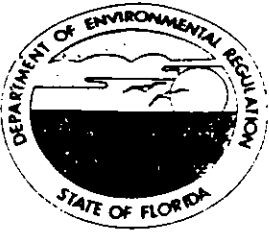
Sincerely,



STEVE SMALLWOOD, P.E.  
Director  
Division of Air Resources  
Management

SS/TH/plm

c: Stephanie Brooks, DER



# Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

## FAX TRANSMITTAL LETTER

DATE: 6/13/91

TO:

NAME: STEPHANIE BROOKS

AGENCY: DER - WEST PALM

TELEPHONE: ~~(904) 922-6929~~ (407) 433-2666

# OF PAGES (INCLUDE COVER SHEET): ~~(407) 433-2666~~ 6

FROM:

NAME: Proctor Linn

AGENCY: DER - Tallahassee

IF ANY PAGES ARE NOT CLEARLY RECEIVED, PLEASE CALL IMMEDIATELY. PHONE NO. (904) 488-1344

SENDER'S NAME: SPR

COMMENTS:

Please Call me! Gary wants us to "solve" the problem.



P 832 539 856



# Certified Mail Receipt

No Insurance Coverage Provided  
Do not use for International Mail  
(See Reverse)

PS Form 3800, June 1990

Sent to	
Mr. Harry Schindehette, Ft.	
Street & No. Pierce Utilities	
P. O. Box 3191	
P.O. State & ZIP Code	
Fort Pierce, FL 34949	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	
Mailed: 6-28-91	
Permit: AC 56-141460	

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece next to the article number.

1. I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:  
Mr. Harry Schindehette  
Director of Utilities  
Fort Pierce Utilities Authority  
P. O. Box 3191  
Fort Pierce, FL

4a. Article Number  
P 832 539 856

4b. Service; Type

<input type="checkbox"/> Registered	<input type="checkbox"/> Insured
<input checked="" type="checkbox"/> Certified	<input type="checkbox"/> COD
<input type="checkbox"/> Express Mail	<input type="checkbox"/> Return Receipt for Merchandise

7. Date of Delivery  
A 1

5. Signature (Addressee)  
*[Signature]*

6. Signature (Agent)  
*[Signature]*

8. Addressee's Address (Only if requested and fee is paid)

PERCE, FL 34949  
JUL 2 1991  
USPS

PS Form 3811, October 1990 U.S. GPO 1990-273-961

**DOMESTIC RETURN RECEIPT**