

# 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

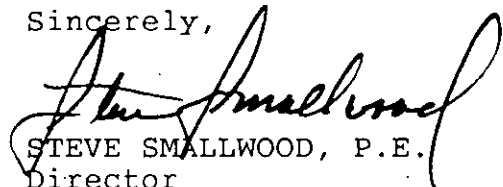
Total heat input for the three existing boilers (Nos. 6, 7, and 8) shall not exceed 4,534,930 MBtu per year.

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,



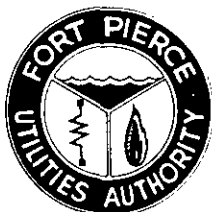
STEVE SMALLWOOD, P.E.  
Director  
Division of Air Resources  
Management

SS/TH/plm

c: Stephanie Brooks, DER

Barry's '91

WATER  
ELECTRIC



GAS  
SEWER

206 S. SIXTH STREET \* P. O. BOX 3191 \* FORT PIERCE, FLORIDA 34948 \* PHONE (407) 464-5600

August 3, 1990

RECEIVED  
AUG 31 1990  
DER-BAQM

Florida Department of Environmental Regulation  
2600 Blairstone Road  
Tallahassee, Florida 32399

Attention: Mr. Barry Andrews

Dear Mr. Andrews:

REFERENCE AIR PERMITS:    Unit #6 - AO-56-113534  
   Unit #7 - AO-56-112679  
   Unit #8 - AO-56-112678  
   Unit #9 - AO-56-175955

Thank you for meeting with us on July 24, 1990 to discuss the permit revisions Fort Pierce Utilities Authority is requesting for our H. D. King Electric Generating Station. As we discussed, the current limitations (restricting the annual operation of Units 6, 7, and 8) of the Unit 9 operating permit may impede our ability to meet our anticipated electric generation requirements. Accordingly, we have authorized our consultant, Black & Veatch, to prepare a Prevention of Significant Deterioration (PSD) permit application for Unit 9 to relieve the limitations.

Currently, Units 6, 7, and 8 are restricted to 12, 1344 and 6384 annual operating hours, respectively. These requirements are a result of Unit 9 construction permit application assumptions for creditable emissions. Subsequently, these restrictions were included as specific conditions in the Unit 9 operating permit.

Due to transmission line restrictions beyond our control and limited availability of purchased power, there is a chance that Unit 8 will exceed 6384 hours of operation this year. Based on the current projected requirements for Unit 8, it is likely that the 6384 hour requirement would be exceeded in mid to late November, 1990. Considering the time required to process a PSD application, we are uncertain that a new Unit 9 permit would be available in time to avoid difficulties with Unit 8 operations this year. Therefore, we proposed a Unit 9 permit amendment that would allow flexibility in our station's operation without violating the essence of existing permit requirements.

The proposed amendment would restrict operation of Units 6, 7, and 8 to a total heat input restriction. The heat inputs (fuel burn rates) for Units 6, 7, and 8 are 218.8 MBtu/h, 470 MBtu/h, and 611 MBtu/h, respectively. Multiplying those heat inputs by

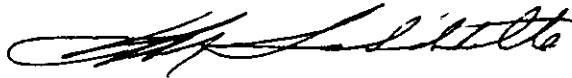
Page 2  
August 3, 1990

the allowable annual hours of operation results in a total allowable heat input for the three units of 4,534,930 MBtu per year. This permit amendment would not affect the creditable emissions analysis that we the basis of the Unit 9 construction permit application.

This permit amendment would allow Fort Pierce Utilities Authority additional flexibility this year to provide electric power to our customers without comprising the restrictions delineated in the Unit 9 operating permit.

We would like to implement this permit amendment as soon as possible to avoid this potentially difficult situation. If you would like to discuss this proposed amendment in more detail, please feel free to cal Mr. Steve Day of Black & Veatch at (913) 339-2880.

Sincerely,



Harry Schindehette, P.E.  
Director of Utilities

HS:kh



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To _____	Location: _____
To _____	Location: _____
To _____	Location: _____
From _____	Date _____

# Interoffice Memorandum

TO: Steve Smallwood

FROM: Clair Fancy *Clair Fancy*

DATE: November 9, 1990

SUBJ: Amendment to Construction Permit No. AC 56-141460

Attached for your approval and signature is a letter amending Specific Condition No. 8 for the above referenced construction permit.

The Bureau recommends approval of this amendment.

CF/TH/plm

Attachment

FILE



Florida Department of Environmental Regulation

Southeast District • 1900 S. Congress Ave., Suite A • West Palm Beach, Florida 33406 • 407-964-9668

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary  
Scott Benyon, Deputy Assistant Secretary

November 7, 1990

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

Dear Mr. Schindehette:

RE: Renewal Requirements for Units 6, 7, and 8

The Department is in receipt of your October 23, 1990 letter. Tom Tittle and I have reviewed your request for fuel oil use in Units 6, 7, and 8 under emergency conditions. Under the Specific Conditions for Unit 9, the use of fuel oil is allowed for Units 6, 7, and 8 if compliance is demonstrated or reasonable assurances provided. Your letter states that Units 6, 7, and 8 cannot comply with the restrictions for particulates and sulfur dioxides, therefore, the use of oil even in emergencies cannot be permitted. Fuel oil may be burned under the following conditions:

- a) The Department's permission is received and the burn is for testing purposes;
- b) Reasonable assurances are provided to the Department that the Units will comply with the permit restrictions; or,
- c) Unit 9's permit is modified to allow the use of fuel oil.

Permits for Units 6, 7, and 8 will be renewed without allowing the use of fuel oil under the present circumstances.

Should you have any questions, call me at (407) 433 - 2650.

Sincerely,

*Stephanie S. Brooks, P.E.*

Stephanie S. Brooks, P.E.  
Professional Engineer II  
Senior Air Permitting Engineer

cc: Dan Nelson

Department of Environmental Regulation  
**Routing and Transmittal Slip**

To: (Name, Office, Location)

1. *Preston Lewis*

2.

3.

4.

Remarks:

**RECEIVED**

**MAY 13 1991**

Division of Air  
Resources Management

From:

*S. Brooks*

Date

*5-10-92*

Phone

*232-2650*

P 256 396 240  
**RECEIPT FOR CERTIFIED MAIL**

NO INSURANCE COVERAGE PROVIDED  
 NOT FOR INTERNATIONAL MAIL  
 (See Reverse).

U.S.G.P.O. 1989-234-555

PS Form 3800, June 1985

Sender <i>Harry Schurdehett</i>	
Street and No. <i>St. Pierce Utilities Auth</i>	
P.O., State and ZIP Code <i>St. Pierce, FL</i>	
Postage	S
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	S
Postmark or Date <i>11-19-90</i> <i>AC 56-141460</i>	

**SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.**  
 Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1.  Show to whom delivered, date, and addressee's address. 2.  Restricted Delivery (Extra charge)

3. Article Addressed to:  
*Harry Schurdehett*  
*St. Pierce Utilities Auth.*  
*P.O. Box 3191*  
*St. Pierce, FL 34948*

4. Article Number:  
*P 256 396 240*

Type of Service:  
 Registered  Insured  
 Certified  COD  
 Express Mail  Return Receipt for Merchandise

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Addressee  
*X*

6. Signature — Agent  
*X* *P. D. Doughty*

7. Date of Delivery  
*11/21/90*

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

DOMESTIC RETURN RECEIPT

U.S.G.P.O. 1989-234-515

PS Form 3817, Apr. 1989