

Date: 7/22/97 6:23:15 PM
From: Marjane Monahan TAL
Subject: Ft. Pierce Draft Title V Permit
To: Scott Sheplak TAL
CC: Jeffrey E. Brown TAL
Ed Svec TAL

Re: Fort Pierce Draft Title V Permit No. 1110003-003-AV
H.D. King Power Plant

On July 3, 1997, OGC received a request for extension of time to file a petition for administrative hearing concerning the above referenced matter. Ft. Pierce Utilities Authority is requesting an extension until July 30, 1997.

I am not sure who the processor is, but Ed (Svek) was mentioned in the letter. Would one of you (either Scott or Ed), please send a copy of the notice that was published and also a copy of the green certified mail receipt? The letter states that the notice was published June 20, 1997.

Please let Jeff and me know if someone else is the processor, otherwise, please let us know if you have any objections to granting an extension of time.

*The Draft permit and Notice package were received
8/28/97 (green card). Scott and I recommend
denial of the request for extension of time
to file for hearing*

*Please contact me if you require any further
information*

Ed Svec



H. D. KING POWER PLANT

311 North Indian River Drive
Fort Pierce, Florida 34950
(407) 464-5792

July 21, 1997

Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Mail Station #5505
Tallahassee, Florida 32399-2400

Subject: **H. D. King Power Plant**
Title V Draft Permit No. 1110003-003-AV Signature pages

The certification statements of our Authorized Representative and the Professional Engineer are attached.

Sincerely,

A handwritten signature in black ink, appearing to read "H. Lamb", written over a horizontal line.

Harry Lamb, Superintendent
Power Resources

HL/js

Enclosure

RECEIVED

JUL 23 1997

BUREAU OF
AIR REGULATION

RECEIVED

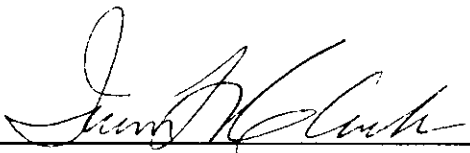
JUL 24 1997

BUREAU OF
AIR REGULATION

PROFESSIONAL ENGINEER STATEMENT:

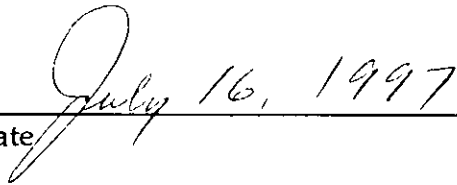
I, the undersigned, hereby certified, that:

- (1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollutant control equipment described in the subject draft Title V permit and the enclosed comments, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and
- (2) To the best of my knowledge, any emission estimates reported or relied on in the application for the subject Title V permit are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in the application, based solely upon the materials, information and calculations submitted with the application.



Signature

Ivan L. Clark
Florida P.E. #0049777



Date

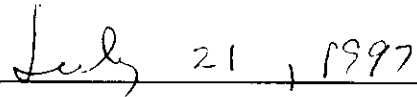
OWNER/AUTHORIZED REPRESENTATIVE OR RESPONSIBLE OFFICIAL STATEMENT:

I, the undersigned, am the owner or authorized representative of the Title V source addressed in these comments to the draft Title V Permit. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in these comments are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in these comments are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this draft permit and associated comments will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions units.



Signature

Thomas W. Richards
Director of Operations



Date



H. D. KING POWER PLANT

311 North Indian River Drive
Fort Pierce, Florida 34950
(407) 464-5792

RECEIVED

JUL 18 1997

**BUREAU OF
AIR REGULATION**

July 17, 1997

Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Mail Station #5505
Tallahassee, Florida 32399-2400

Subject: **H. D. King Power Plant**
Title V Draft Permit No. 1110003-003-AV Comments

The following comments are submitted with respect to the Title V Draft Permit for the H. D. King Power Plant. In accordance with the timely requirement for comments, we will submit this document. The certification statements of our Authorized Representative and the Professional Engineer are not attached. These certification statements will be sent to your office in a future correspondence.

Sincerely,

A handwritten signature in black ink, appearing to read "H. Lamb", written over a horizontal line.

Harry Lamb, Superintendent
Power Resources

HL/js

Enclosure



H. D. KING POWER PLANT

311 North Indian River Drive
Fort Pierce, Florida 34950
(407) 464-5792

July 17, 1997

Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Mail Station #5505
Tallahassee, Florida 32399-2400

Subject: **H.D. King Power Plant**
Title V Draft Permit No. 1110003-003-AV

The following comments are submitted with respect to the Title V Draft Permit for the H. D. King Power Plant.

1. Only one condition is noted as being not federally enforceable: General Pollutant Emission Limiting Standards, Objectionable Odor Prohibited. It is our understanding that tons per year limitations are also not federally enforceable as they do not meet the criteria of "practical enforceability" because continual compliance can not be demonstrated. We are requesting that it be indicated in the permit that the tons per year limitations are also not federally enforceable.
2. Additionally, based on information contained in a letter dated June 20, 1997, from the Florida Coordinating Group to the Florida DEP, the reference to F.A.C. 62-4.160 in specific conditions A.1., B.1., C.1., and D.1. of the draft permit is not considered federally enforceable because it is not contained in Florida's SIP. We are requesting that it be noted as not federally enforceable in the permit.
3. The facility-wide condition 7. specifically restricts the permittee from using small quantities of products that result in very small VOC emissions. It is requested that a de minimus/quantities be included in this condition to allow for such usage.
4. Specific condition A.1. specifies a maximum process/operation rate of 415 MMBtu per hour which was used in the application to calculate the annual potential to emit for the unit. This limitation was not specified in the previous operating or construction permit and would therefore be considered a new limitation. It has been our understanding that new limitations would not be imposed through the Title V permitting process. We are requesting that this new limitation be removed from the permit.

Should it not be possible for this limitation to be removed, we are requesting that the limitation be placed on an annual basis (415 MMBtu per hour * 8760 hours = 3.64×10^6 MMBtu per year) since the number was used in this way to calculate an annual potential to emit.

Since Unit #9 normally operates as a combined cycle unit in which the combustion turbine unit operates well below its maximum potential heat input of 415 MMBtu, Fort Pierce Utility Authority plans to conduct its annual compliance testing to establish its normal combined cycle maximum heat input value, in accordance with Specific Condition No. 25 on page 11 of this draft permit.

5. Specific condition A.2 references condition A.24. The reference should be to A.25 instead.
6. Specific condition A.5. In the next to the last line of this condition it is requested that the statement "or 84 ppm at 15 percent oxygen on a dry basis." be replaced by the following: "Based on the above calculation the allowable emission will be 84 ppm, ISO corrected."
7. Specific condition A.16 is redundant assuming conditions A.5 and A.17 are included in the permit. Therefore, we request deletion of A.16.
8. Specific condition A.17 specifies the adjustment to ISO ambient atmospheric conditions as per the equation in 40 CFR 60.335(c)(1). The regulations contained under 40 CFR 60.335 also allow for the option of using manufacturer correction factors to adjust the nitrogen oxides to ISO standard conditions. This option is specified in 40 CFR 60.335(f)(1). It is requested that this regulatory citation be included in the permit.
9. Specific condition A.17 contains an equation to correct NO_x emissions to ISO conditions. Based on the information contained in 40 CFR 60 Subpart GG, the equation is incorrectly written as indicated below:

reads:

$$\text{NO}_x = [\text{NO}_x \text{ obs}] [(P_{\text{ref}})^{0.5} / P_{\text{obs}}] e^{19[\text{H}_{\text{obs}} - 0.00633]} [288^\circ\text{K} / T_{\text{amb}}]^{1.53}$$

should read:

$$\text{NO}_x = [\text{NO}_x \text{ obs}] [P_{\text{ref}} / P_{\text{obs}}]^{0.5} e^{19(\text{H}_{\text{obs}} - 0.00633)} [288^\circ\text{K} / T_{\text{amb}}]^{1.53}$$

10. Specific condition A.18 indicates that emission testing for demonstrating compliance with NO_x permit limits shall be conducted at 30, 50, 75 and 100 percent of peak load. This testing requirement, which is based on Subpart GG under 40 CFR 60.332, is only to determine compliance with NO_x standards under New Source Performance Standards at the time of initial testing, not on an annual testing basis. For this reason we request deletion of this testing condition and inclusion of language requiring annual testing at 100 percent of peak load, which is consistent with the provisions of the existing permit.
11. Specific condition A.19 indicates span value shall be 300 ppm. This is incorrect and should be 100 ppm.
12. Specific condition A.24 specifies a test method for carbon monoxide (CO). All past annual compliance tests for the units at this plant have consistently demonstrated CO emissions at or near zero. For this reason testing requirements for CO are requested to be deleted from this permit for all units. If this is not deleted, this condition should specify Method 10 instead of Method 20 for carbon monoxide testing.

13. With respect to air emission test methods for all units, we are requesting that a sentence be added for all units which states that test methods other than those specified in the permit may be used upon prior approval by the Department.
14. Specific condition A.30.4.b. and 4.c. specifically limits emissions of lead and NESHAP pollutants. In the application it was documented that such emissions, if they occurred, were essentially zero. For that reason it is requested that these conditions be deleted from the permit.
15. The sentence contained in specific condition A.30.8. is incomplete. It should read that "Any combustion turbine that does not operate for more than 400 hours per year shall *conduct a visible emission compliance test once per each five-year period, coinciding with the term of its air operation permit*".
16. Specific condition A.30.10.b. In the next to the last full line of this condition, the word "regulated" should be inserted before the word pollutant.
17. Specific condition A.36.7. should be modified to incorporate the alternate procedures for location of stack test ports in accordance with Method 1 in 40 CFR Part 60.
18. Specific condition B.19. It is requested that a new sentence be added to this condition as follows: "The testing requirements for particulates shall be waived when burning natural gas fuel for all units."
19. The last sentence of specific conditions B.30(a)2., C.30(a)2., and D.33(a)2. should read "does not burn liquid *fuel* for more than 400 hours".
20. Under the general description portion Section III, Subsection D, it is stated that the emissions are discharged through a multicyclone collector. Emission unit number 8 does not have a cyclone collector. We are requesting that this portion of the description be deleted.
21. Specific condition D.4 contains a 7,422 hour per year limitation on the operation of E.U. ID No. - 008. The previous permit contained only a limitation on the total combined annual heat input of units 6, 7 and 8 and did not contain an operating hour limitation for unit 8. Due to the size of unit 8, the heat input limitation would amount to 7,422 hours per year if operated alone *and at full load*. However, the unit could operate more than 7,422 hours and still remain below emission and heat input limitations if it were to be operated at part load. The fundamental limitation here is the combined heat input, not a limitation on hours of operation. Therefore, the hour limitation is redundant and not required to demonstrate compliance with the applicable limitations of emission rates and heat input. Compliance with the combined heat input of units 6, 7 and 8 can be demonstrated through fuel usage records, therefore an hour limitation is not necessary. We are requesting that the hour limitation on unit 8 be removed.
22. Specific condition D.20. Add the following sentence to this condition: "In accordance with specific condition D.33. testing for particulates shall be waived for units that burn fuel oil < 400 hours per year."
23. Specific condition D.36 specifies a CEM for NO_x and O₂ to meet 40 CFR Subpart D requirements. Subpart D allows for either O₂ or CO₂ diluent monitors and the facility currently has a CO₂ monitor. The facility has installed a monitor which meets the requirements of 40 CFR 75 and has

petitioned and received permission to discontinue the use of the part 60 monitor. A copy of the approval from the DEP is attached. We are requesting that a statement or clarification of these monitoring issues be included in the permit.

24. The first equation for F contained in specific condition D.39 should state 227.2 (pct H) instead of 227.2 (pct II).
25. There are two different equations for F_c in SI units contained in specific condition D.39 as indicated below. Based on the equations contained in 40 CFR 60 Appendix A Method 19, it appears that the first equation is correct. Please clarify the inclusion of the second equation.

$$F_c = 2.0 \times 10^{-5} (\text{pct C}) / \text{GCV}$$

$$F_c = 20.0 (\%C) / \text{GCV}$$

26. The combined heat input stated in specific condition E.1 for emission units -004, -007, and -008 should be 4,534,930 instead of 4,534,903. The combined heat input number of 4,534,930 was contained in the previous permit to operate.
27. The general purpose internal combustion engines listed in Appendix U-1 should be classified as exempt instead of unregulated per F.A.C. 62-210.300(3)(a)21. As per the regulations, the total fuel usage of all the units is less than 32,000 gallons per year of diesel fuel, 4,000 gallons per year of gasoline, 4.4 million standard cubic feet per year of natural gas or propane, or an equivalent prorated amount if multiple fuels are used.
28. Table 1.1 E.U. ID No. -007 the limitation for VOC should read 0.266 pounds per hour instead of 0.226 as per the previous operating permit.
29. Table 1-1, E.U. ID No. -007 and E.U. ID No. -008 standard for PM of 0.1 lb/MMBtu should not specify 3 hours in a 24 hour period. The previous operating permit contained the 0.1 lb/MMBtu limitation but did not specify 3 hours in a 24 hour period. The 3 hours in a 24 hour period is applicable only to the limitation which states that the particulate emissions shall not exceed an average of 0.3 pounds per million Btu during this time period for soot blowing as per F.A.C. 62-210.700(3).
30. Table 2.1 E.U. ID No. -003 specified fuel analysis as a SO₂ compliance method for oil firing. Fuel analysis is also the compliance method currently used for gas firing. We are requesting that the table be revised to indicate that fuel analysis is an available compliance method for gas firing in addition to the indicated stack testing according to Method 20.
31. Table 2.1 E.U. ID NO. -009 CO test method should be 10 instead of 20.
32. Table 2.1 E.U. ID No. -004, -007 and -008 currently states that particulate matter testing is required at permit renewal time. ASP No. 97-B-01 Order on Request for Alternate Procedures and Requirements states that: 1) Annual particulate compliance tests are not required for a fuel burning unit that does not burn liquid or solid fuel for more than 400 hours, and 2) In renewing an air operation permit the Department shall not require submission of particulate matter emission test results for any fossil fuel steam generator that burned liquid or solid fuel for no more than 400 hours during the year prior to renewal. Although it states under specific conditions B.32, C.32, and D.35 that particulate emissions tests will not be required if the units do not burn liquid fuel for

Florida Department of Environmental Protection
Bureau of Air Regulation
July 17, 1997
Page 5

more than 400 hours per year, Table 2.1 specifies a particulate emission test requirement at renewal time. We are requesting that this be clarified to state that the test is not required at renewal time if the unit does not burn liquid fuel for more than 400 hours in the year prior to renewal.

Any questions or comments with respect to the above issues can be directed to Jim Stevens, phone number (561) 466-1600 ext. 5220 and fax number (561) 465-7596.

Sincerely,

Thomas W. Richards
Director of Operations
Fort Pierce Utilities Authority

Attachments (2)



Department of Environmental Protection

Lawton Chiles
Governor

Southeast District
P.O. Box 15425
West Palm Beach, Florida 33416

Virginia B. Wetherell
Secretary

SEP 20 1995

Mr. Jim Stevens
H. D. King Power Plant
311 North Indian River Drive
Fort Pierce, Florida 34950

Re: NSPS CEM Certification vs. Acid Rain Certification

Dear Mr. Stevens:

In response to your letter dated April 7, 1995 regarding the replacement of the 40 CFR Part 60, Subparts D, Da, and Db (New Source Performance Standards (NSPS)) continuous emissions monitoring systems (CEMS) with the 40 CFR Part 75 (Acid Rain) CEMs, please review the attached memorandum from the EPA.

Please specifically note the statement, "Stationary Source Compliance Division (SSCD) has determined that since the CEMS requirements of 40 CFR Part 75 are equivalent to or more stringent than the requirements of 40 CFR Part 60, EPA can accept Acid Rain CEMS as NSPS CEMS provided that the utility demonstrates compliance with all applicable NSPS regulations."

It is the Departments' understanding that the 40 CFR Part 75 (Acid Rain) CEMS certification has been approved by the EPA. Therefore, since the Part 75 requirements are equal to or more stringent than the Part 60 requirements, the Part 75 CEMS may replace the Part 60 CEMS. Please be advised that even though the Part 60 CEMS may be replaced, the utility must continue to demonstrate compliance with all applicable NSPS regulations in addition to complying with all applicable 40 CFR Part 75 (Acid Rain) requirements.

If there are any questions please contact Terri Hilliard at telephone number (407) 433-2650, extension 130.

Sincerely,

Thomas Tittle
Compliance/Enforcement Supervisor

TT:th

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

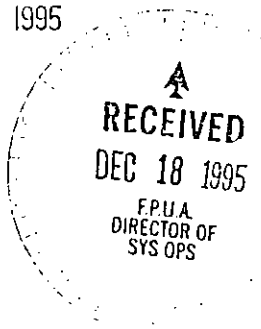


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

DEC - 1 1995

Mr. Thomas W. Richards
Designated Representative
Fort Pierce Utilities Auth
P.O. Box 3191
Fort Pierce, FL 34948-3191

OFFICE OF
AIR AND RADIATION



Re: Henry D King, Units 7, 8

Dear Mr. Richards:

The United States Environmental Protection Agency (EPA) has determined that your Acid Rain Continuous Emissions Monitoring Systems Certification Application is complete and that the monitoring systems indicated in Enclosure 1 meet the performance requirements of 40 CFR Part 75.

The certified monitoring systems are identified with their approved components on the official certificate contained in Enclosure 1. No other components may be substituted or added for emissions measurement under the Acid Rain Program without Agency approval under the certification or recertification requirements of Part 75. EPA has also recorded the Maximum Potential Concentration/Rate and span values for each unit or stack and has determined the relative accuracy frequency and the bias adjustment factor (BAF) for each system. This information is listed in Enclosure 2. You must apply the BAF to the relevant emissions data reported to the Agency from the date and time of the conclusion of the relative accuracy test until the test is repeated as part of the regular quality assurance requirements for the monitoring system under the Acid Rain Program. If you believe that Enclosures 1 or 2 contain any erroneous information, please contact your EPA Regional representative.

Enclosure 3 contains tips on submitting your electronic quarterly report. EPA requests that you make any necessary corrections before submitting your next quarterly report.

Enclosure 4 contains comments on your certification application from the Florida Department of Environmental Protection.

In conclusion, I would like to thank you for your considerable effort in meeting your monitoring obligations under the Acid Rain Program. We believe that by working together, we can achieve the significant reductions of SO₂ and NO_x emissions mandated under the Clean Air Act.

Sincerely,

Brian J. McLean, Director
Acid Rain Division

Enclosures

cc: David McNeal, EPA Region 4
Louis Nichols, Florida Dept of Environmental Regulation
Kim Nguyen, EPA Acid Rain Division

RECEIVED

DEC 17 1995

POWER PLANT



H. D. KING POWER PLANT

311 North Indian River Drive
Fort Pierce, Florida 34950
(407) 464-5792

RECEIVED

FEB 21 1997

BUREAU OF
AIR REGULATION

February 18, 1997

Mr. John C. Brown, Jr., P.E.
Administrator, Title V Section
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Additional Information for the Fort Pierce Utilities Authority Title V
Permit Application

Dear Mr. Brown:

Enclosed please find the additional information requested for Fort Pierce Utilities Authority's Title V permit application. With regard to Item 1 of your letter dated January 27, the information enclosed includes four (4) copies of the following documents:

1. Precautions to Prevent Emissions of Unconfined Particulate Matter.
2. List of Proposed Exempt Activities.
3. List of Equipment/Activities Regulated under Title VI.
4. Alternative Methods of Operation.
5. Compliance Report and Plan.

With respect to Item 2 of your letter, the storage tanks are included with Item 2 above, List of Proposed Exempt Activities.

The Fort Pierce Utilities Authority is also submitting a new certification form. If you have any questions concerning the information submitted please contact Jim Stevens at (561) 464-5792.

Sincerely,

A handwritten signature in black ink, appearing to read "T. Richards".

Thomas W. Richards, P.E.
Director of Operations

Enclosures

pc: H. Lamb
E. Leongomez
S. Treece
J. Stevens
L. Long

2/25/97
Isidore Goldeman - Southeast District
Ed. Svec

**FORT PIERCE UTILITIES AUTHORITY POWER PLANT
Precautions to Prevent Emissions of Unconfined Particulate Matter**

The only potential source of unconfined particulate emissions is from vehicular traffic. Precautions to prevent and control unconfined emissions consist of paved fuel delivery roads and parking lots.

**FORT PIERCE UTILITIES AUTHORITY POWER PLANT
LIST OF INSIGNIFICANT ACTIVITIES/UNITS**

ACTIVITY/UNIT	RATIONALE FOR INSIGNIFICANCE
I.C. Engine - ~10 hp gasoline fired pump	Exempt pursuant to Rule 62-210.300(3)(a)20., FAC
I.C. Engine - ~10 hp gasoline fired pump	Exempt pursuant to Rule 62-210.300(3)(a)20., FAC
I.C. Engine - ~ 5 hp gasoline fired pump	Exempt pursuant to Rule 62-210.300(3)(a)20., FAC
I.C. Engine - 65 hp MWM Murphy diesel pump	Exempt pursuant to Rule 62-210.300(3)(a)20., FAC
I.C. Engine - ~16 hp gas powered portable welder	Exempt pursuant to Rule 62-210.300(3)(a)20., FAC
I.C. Engine - 11 hp gasoline fired power washer	Exempt pursuant to Rule 62-210.300(3)(a)20., FAC
No. 2 Fuel Oil Storage Tank #5 - 630,000 gallons	Exempt pursuant to Rule 62-213.430(6), FAC; Potential VOC emissions 1036 lbs/yr
Diesel Fuel Storage Tank - 65,000 gallons	Exempt pursuant to Rule 62-213.430(6), FAC; Potential VOC emissions 275 lbs/yr
No. 6 Fuel Oil Storage Tank #6 - 945,000 gallons	Exempt pursuant to Rule 62-213.430(6), FAC; Potential VOC emissions 5 lbs/yr
No. 6 Fuel Oil Storage Tank #7 - 945,000 gallons	Exempt pursuant to Rule 62-213.430(6), FAC; Potential VOC emissions 10 lbs/yr
Waste Oil Storage Tank	Exempt pursuant to Rule 62-213.430(6), FAC
Compressed nitrogen bottles	Exempt pursuant to Rule 62-213.430(6), FAC; No emissions
Storage & use of chemicals solely for water treatment	Exempt pursuant to Rule 62-213.430(6), FAC
55 gallon drum trichloroethylene and Perchloroethylene	Exempt pursuant to Rule 62-213.430(6), FAC
Lube Oil Storage Area	Exempt pursuant to Rule 62-213.430(6), FAC; Oil stored in closed 55 gallon drums; No emissions
Parts Washer (aliphatic hydrocarbon solvent)	Exempt pursuant to Rule 62-210.300(3)(a)24., FAC
Miscellaneous painting activities	Exempt pursuant to Rule 62-210.300(3)(a)22., FAC
Miscellaneous welding activities	Exempt pursuant to Rule 62-210.300(3)(a)16., FAC
Oil/Water Separator	Exempt pursuant to Rule 62-213.430(6), FAC; Very low vapor pressures, no emissions

FORT PIERCE POWER PLANT

List of Equipment/Activities Regulated under Title VI

Equipment that contains more than 50 lbs of charge of any Class I or Class II ozone-depleting substance regulated under Title VI of the CAA:

- 1) Office Air Conditioner - York 30 tons, contains 180 lbs R22

FORT PIERCE UTILITIES AUTHORITY

ALTERNATIVE METHODS OF OPERATION - UNITS 6 THROUGH 9

UNIT 6

Alternative Method #1: Unit 6 will fire 100 percent natural gas

Alternative Method #2: Unit 6 will fire 100 percent residual No. 6 fuel oil

Alternative Method #3: All units will fire a mixture of Natural Gas and Fuel oil
Normally in 25% increments.

UNIT 7

Alternative Method #1: Unit 7 will fire 100 percent natural gas

Alternative Method #2: Unit 7 will fire 100 percent residual No. 6 fuel oil

Alternative Method #3: All units will fire a mixture of Natural Gas and Fuel oil
Normally in 25% increments.

UNIT 8

Alternative Method #1: Unit 8 will fire 100 percent natural gas

Alternative Method #2: Unit 8 will fire 100 percent residual No. 6 fuel oil

Alternative Method #3: All units will fire a mixture of Natural Gas and Fuel oil
Normally in 25% increments.

UNIT 9

Alternative Method #1: Unit 9 will fire 100 percent natural gas

Alternative Method #2: Unit 9 will fire 100 percent distillate No. 2 fuel oil

Alternative Method #3: All units will fire a mixture of Natural Gas and Fuel oil
Normally in 25% increments.

FORT PIERCE UTILITIES AUTHORITY POWER PLANT Compliance Report and Plan

Each emissions unit (diesel units 1&2, boilers 6, 7 & 8, and combined cycle unit 9) is in full compliance with each applicable federal, state and local regulation, as detailed under Subsection III-B. Emissions Unit Regulations and with all additional applicable requirements (compliance with current operating permits No. AO 56-175955 and AO 56-190275) as detailed under Subsection III-B. Emissions Unit Supplemental Information.

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official :

Name : Thomas W. Richards
Title : Director of Operations

2. Owner or Authorized Representative or Responsible Official Mailing Address :


Organization/Firm : Fort Pierce Utilities Authority
Street Address : P.O. Box 3191
City : Fort Pierce
State : FL Zip Code : 34948-____

3. Owner/Authorized Representative or Responsible Official Telephone Numbers :

Telephone : (407)466-1600 Fax : (407)465-6984

4. Owner/Authorized Representative or Responsible Official Statement :

I, the undersigned, am the owner or authorized representative of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions units.*


Signature

2/19/97
Date

* Attach letter of authorization if not currently on file.



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

January 29, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Thomas W. Richards
Director of Operations
Fort Pierce Utilities Authority
P. O. Box 3191
Fort Pierce, Florida 34948

Re: Request for Additional Information Regarding Initial Title V Permit Application
File No. 1110003-003-AV
H. D. King Power Plant, St. Lucie County

Dear Mr. Richards:

Your initial Title V permit application for the H. D. King Power Plant was "timely and complete" for purposes of the initial Title V application submission (see Rules 62-213.420(1)(a)1. and (b)2., F.A.C.).

However, in order to continue processing your application, the Department will need the below additional information pursuant to Rule 62-213.420(1)(b)3., F.A.C., and Rule 62-4.070(1), F.A.C. The additional information requested is organized by topic.

Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

E. Facility Supplemental Information

1. Several documents were referenced in the application which were not included with the hard copy figures and attachments or could not be found on the ELSA submittals. Please provide four copies of: Precautions to Prevent Emissions of Unconfined Particulate Matter; List of Proposed Exempt Activities; List of Equipment/Activities Regulated under Title VI; Alternative Methods of Operation; and, Compliance Report and Plan.


Mr. Thomas W. Richards
January 29, 1997
Page 2 of 2

2. Figure 2. shows several storage tanks which are not addressed in the application. Please classify all tanks at the facility as regulated or unregulated and provide all of the applicable Title V application information for each tank.

The Department must receive a response from you within 90 (ninety) days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)6., F.A.C.

If you should have any questions, please call Edward Svec or me at 904/488-1344.

Sincerely,


John C. Brown, Jr., P.E.
Administrator
Title V Section

JCB/es

copy to:

Isidore Goldman, P.E., FDEP, SED

Ivan L. Clark, P.E., R. W. Beck

Harry Lamb, Fort Pierce Utilities Authority

1/29/97 Reading File
ed svec
file

[electronic file name: 11100031.ltr]

Z 311 902 872



Receipt for Certified Mail

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

Sent to	Mr. Thomas W. Richards
Street and No.	P.O. Box 3191
P.O., State and ZIP Code	Fort Pierce, Florida 34948
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	1/29/97
	H.D. King Power Plant
	1110003-003-AV

PS Form 3800, March 1993

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 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 below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

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

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Mr. Thomas W. Richards
Director of Operations
Fort Pierce Utilities Authority
P.O. Box 3191
Fort Pierce, Florida 34948

4a. Article Number
Z 311 902 872

4b. Service Type
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

7. Date of Delivery
FEB 04 1997

5. Signature (Addressee)

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

6. Signature (Agent)

Vanelle Ellis

PS Form 3811, December 1991

*U.S. GPO: 1993-352-714

DOMESTIC RETURN RECEIPT

Thank you for using Return Receipt Service.