

11/27/96
cc - Ed Swec
General Fik

FILE

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

FEB 22 1996

Z 359 641 821 2/22/96

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

WARNING LETTER
WL96-0005AS56SED
AP - St. Lucie County

Harry Lamb, Superintendent
Fort Pierce Utilities Authority
H.D. King Power Plant
311 North Indian River Drive
Fort Pierce, Florida 34950

Subject: SO₂ and NO_x Emission Exceedances at the H.D. King Power Plant

Dear Mr. Lamb:

The purpose of this letter is to advise you of possible violations of law for which you may be responsible, and to seek your cooperation in resolving the matter. A review of information submitted to the Department indicates that a violation of Florida Statutes and Rules may exist at the above described facility.

Section 403.161 (1)(b), Florida Statutes, provides that it is a violation to fail to comply with any rule, regulation, order, permit or certification adopted or issued by the Department pursuant to its lawful authority. It is a violation of Specific Condition 2.a) (2) A) of Permit AO56-190275 for SO₂ emissions to exceed 0.1917 lb per hour for Unit # 8 and 0.1199 lb per hour for Unit # 7; and for NO_x to exceed 104.35 lb per hour for Unit # 7. The submitted information showed September 27 and November 29, 1995 stack tests exceeded the permit limitation for SO₂ emissions, and exceeded the permit limitation for NO_x.

The above incidents and any other activities at your facility that may be contributing to violations of the above described statutes and rules should be ceased immediately. Continued activity in violation of state statutes or rules may result in liability for excess emissions.

You are requested to contact Rich Hofmann or Tom Tittle of this office at 407/433-2650, ext 266 or ext 262, within 15 days of receipt of this Warning Letter to arrange a meeting with Department personnel to discuss this matter. The Department is interested in reviewing any facts you may have that will assist in determining whether any violations have occurred. You may bring anyone with you to the meeting that you feel may help resolve this matter.

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Ft. Pierce Utilities
WL96-0005AS56SED
Page 2 of 2

PLEASE BE ADVISED that this Warning Letter is part of an agency investigation preliminary to agency action in accordance with Section 120.57(4), Florida Statutes. We look forward to your cooperation in completing the investigation and resolution of this matter.

Sincerely,

Carlos Rivero-deAguilar 2/22/96

Carlos Rivero-deAguilar Date
Director of District Management

CRA:IG:rh

cc: Luna Ergas, Office of General Counsel, FDEP, Tallahassee
Dianne Spingler, DARM, DEP, Tallahassee
Air Enforcement Files, DEP, West Palm Beach

Table 1 Particulate and Sulfur Dioxide Emission Summary
 Unit 7 - Boiler
 Ft. Pierce Utilities Authority
 H.D. King Generating Station
 Ft. Pierce, Florida
 September 9, 1993

Run Number	Time	Flow Rate SCFMD	Oxygen %	Particulate Emissions		CO Emissions		NOx Emissions		VOC Emissions	
				gr/DSCF	lbs/Hr	ppm	lbs/Hr	ppm	lbs/Hr	ppm	lbs/Hr Carbon
1	1015-1118	97796	6.5	0.0007	0.56	0	0	161.61	113.23	0.006	0.003
2	1210-1311	93947	6.5	0.0005	0.36	0	0	175.39	118.04	0.006	0.003
3	1415-1516	93128	6.5	0.0002	0.20	0	0	174.43	116.37	0.006	0.003
AVERAGE	---	94957	6.5	0.0005	0.37	0	0	170.48	115.97	0.006	0.003

lbs/Hr = ppm (2.595 x 10⁻⁹) MW (60) SCFMD

prmt. 0.568

104.35

MW CO = 28, MW NOx = 46, MW C = 12.011

Allowable Emissions: (Units 6, 7, and 8 total lbs/Hr)

PM = 1.9 → correct prmt ##
 NOx = 278.9 → 0.568 #/hr
 VOC = 0.700 → 104.35
 CO = 20.3 → 0.266
 SO2 = 12.7 → 7.589
 SO2 = 12.7 → 0.1199

Additional information for case referral (Unit #7).

This table was given me during my 1st Qtr CEM inspection in 1996 by Jim Stevens (Ft. P. Ut. Auth.).

The Department failed to identify the permit limitations error and violation during our initial review of the test report for Unit #7 in 1993. Nox emission was 115.97 #/hr which exceeded the NOx permit allowable ~~exceedance~~ #/hr).
 R.N.

Table 1 Emission Summary
 Unit 7 - Compliance Testing - Natural Gas Firing
 Ft. Pierce Utilities Authority - Henry D. King Electric Station
 Ft. Pierce, Florida
 November 29, 1995

Run No.	Time	Volumetric Flow SCFMD	PM lbs/Hr	NO _x lbs/Hr	NO _x lbs/MMBTU	SO ₂ lbs/Hr	VOC lbs/Hr	CO lbs/Hr	Visible Emissions
1	1105-1212	102656	0.00	135.83	0.290	0.483	0.03	0.00	0%
2	1401-1509	102024	0.00	80.84	0.186	0.732	0.03	0.00	-
3	1546-1654	102010	0.54	80.42	0.185	0.249	0.03	0.00	-
AVERAGE		102230	0.18	99.03	0.220	0.488	0.03	0.00	0%

Allowable Emissions:

PM = 0.568 lbs/Hr
 SO₂ = 0.1199 lbs/Hr
 NO_x = 104.35 lb/Hr
 VOC = 0.266 lbs/Hr
 CO = 7.589 lbs/Hr
 VE = 5% opacity

Gaseous Emissions:

ppm_v gas (see Appendix B) x (2.593 x 10⁻⁹)(M)(SCFMD)(60)
 Where M = 46 for NO_x
 64.02 for SO₂
 36 for VOC as Carbon
 28 for CO

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Department of
Environmental Protection

FILE

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

October 7, 1996

Harry Lamb, Superintendent
Fort Pierce Utilities Authority
H.D. King Power Plant
311 North Indian River Drive
Fort Pierce, Florida 34950

RE: SO₂ and NO_x Emission Exceedances at the H. D. King Power Plant

Dear Mr. Lamb:

This letter is a follow-up to our February 22, 1996 warning letter regarding the above referenced subject. Based on additional information provided by Fort Pierce Utilities (FPU) on September 4, 1996, a revised penalty of \$7100 + \$500 c/e is determined to be appropriate. The penalty calculation sheets are enclosed with this letter for your information.

FPU has proposed settling this issue with an in-kind settlement, as referenced in your July 30, 1996 letter. Department policy requires an in-kind settlement to be at least 1.5 times the original penalty amount + c/e, which would necessitate FPU spending \$10,650 (1.5 x \$7100) on the proposed in-kind project and \$500 c/e, for a total expenditure of \$11,150.

The proposed settlement is to equip Unit # 7 with a NO_x continuous emission monitoring system (CEMS). This settlement is acceptable provided Unit # 7 does not exceed 10% of their annual capacity within the next 5 years. In this eventuality FPU must submit a pro-rated cash payment equal to the percent of 5 years remaining after 10% capacity was exceeded times the original \$7100 penalty.

Please respond in writing by November 8, 1996 to Tom Tittle regarding your decision to pursue the in-kind settlement outlined above. Thank you for your cooperation in helping the Department settle this issue.

Sincerely,

Paul R. ... 10/8/96