

Florida Department of
Environmental Protection

Memorandum

To: Joseph Kahn

From: Dave Pocengal

Date: December 11, 2000

Re: Testing and CEMS Requirements for Permit PSD-FL-305

The following comments are provided based upon a review of the above permit items 20 through 48:

CO 12 20 ✓
VOC 20 ✓
2-8-00
In the emission limits and control technology chart, the sulfur limit in the PNG is listed as 1 gr S/100 ft³ for SO₂ and SAM. Item 24 states this limit to be 2 gr S/100 ft³. Also, the CO and VOC limits in items 22 and 23, respectively, do not coincide with those listed in the chart.

7. 21. For reporting purposes, it does not appear necessary to include NO_x emissions calculated as NO₂. EPA Methods 20 and 7E base the measurement of NO_x on the measurement of NO. NO is used as the calibration gas and NO_x chemiluminescent analyzers measure NO, converting NO₂ to NO before the detector.

✓ 22. See (20) above.

23. Method 25A should replace Method 25 as stated in item 31. Also, see (20) above. ✓

24. See (20) above. Also, units of 'lb/hr' left out after '16' (p.10 line 3). ✓

✓ 32. Include 'fuel switching' in "Valid hourly emission rates shall not include periods of..."? ✓

✓ 33. The method used for compliance is not mentioned in the 1st sentence. (Determination of sulfur content in gas or oil?) No guidance was provided for determining the sulfur content of fuel oil--should ASTM D 2880-71 be mentioned for this purpose or does item 47 cover this?

7 45. Since this unit is subject to the Title IV Acid Rain provisions, CEMS certification and QA procedures are required pursuant to 40 CFR 75. In many cases, 40 CFR 60 requirements are cited in 40 CFR 75 and the two may intersect in many instances. Possible language: "The continuous emission monitoring system shall be installed, certified, operated, and maintained according to 40 CFR 75.20. The owner or operator shall develop and implement quality assurance and quality control procedures pursuant to 40 CFR 75.21 and 40 CFR 75, Appendix B. Each monitoring component shall comply with the performance specifications of 40 CFR 60, Appendix B as demonstrated by the testing procedures of 40 CFR 75, Appendix A."

47. Consider the following language regarding sulfur content testing of fuel oil: "The owner of operator shall determine the sulfur content of each delivery of diesel fuel received for these

emissions units using ASTM D 4057-88, Standard Practice for Manual Sampling of Petroleum and Petroleum Products; and one of the following test methods for sulfur in petroleum products: ASTM D 129-91, ASTM D 2622-94 or ASTM D 4294-90. These methods are adopted by Rule 62-297.440, F.A.C. The owner or operator may comply with this requirement by receiving records from the fuel supplier that indicate the sulfur content of the fuel delivered complies with the sulfur limit of specific condition 24 of this section. [Rule 62-4.070(3) and 62-297.440, F.A.C.]

Other

- If the unit is allowed to operate in high performance mode (HPM), include applicable criteria.
- Should an initial compliance test for PM be performed? Method 5 or 17.
- Subpart GG [40 CFR 60.335(c)(3)] states that for initial compliance testing Method 20 shall be used to measure NO_x concentrations using a span of 300 ppm. Under 40 CFR 60.8 it may be possible to establish a lower span setting as 10 ppm on a range of 300 ppm may approach the analyzer noise level. However, the facility may be reluctant to adjust the span down for their own purposes.

Come by my office or call me at 921-9577 if you have any questions.

DP/dp



Enron North America Corp.

P.O. Box 1188

Houston, TX 77251-1188

CERTIFIED MAIL

December 5, 2000

Mr. Alvaro A. Linero, P.E.
Administrator, New Source Review Section
Bureau of Air Regulation, Division of Air Resources Management
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED

DEC 08 2000

BUREAU OF AIR REGULATION

RE: DEP File No. 1110099-002-AC (PSD-FL-305)
Midway Energy Center, St. Lucie County

Dear Mr. Linero:

On behalf of Midway Development Company, LLC, an application was filed on November 7, 2000 with the Florida Department of Environmental Protection (DEP), for a 510 megawatt (MW) dual fuel peaking power plant. The Midway Energy Center is proposed to consist of up to three General Electric PG7241FA combustion turbine generators.

After consideration of the filed application and subsequent discussions with the Department, it is our intent to revise our application in order to conform with other dual fuel peaking plant permits that have been issued. Specifically, we would like to make the following changes.

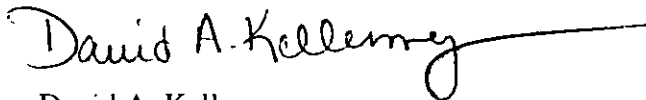
- Reduce the total hours requested for distillate oil use from 1500 hours per turbine annually to 1,000 hours per turbine.
- Reduce the requested NOx emission limit while firing natural gas from 12 ppm @ 15% O₂ to 9 ppm @ 15% O₂. It is our understanding that this concentration limit will be based on a 24-hour block average of the hours that the units operate, exclusive of startup, shutdowns, and malfunctions.

In addition to these changes, we will be modifying our permit application to reflect revised assumptions to be used in the estimation of cost effectiveness in the BACT analysis. Specifically, this will affect the cost effectiveness calculations for the carbon monoxide catalyst and hot selective catalytic reduction for NOx. These revised cost estimates will reflect recent discussions between ENSR with Department personnel regarding the Pompano Beach permit application.

Mr. Al Linero
December 5, 2000
Page 2

Please contact Dave Kellermeyer of Enron North America (713-853-3161) or Bob Iwanchuk of ENSR (978-635-9500) with your questions and comments.

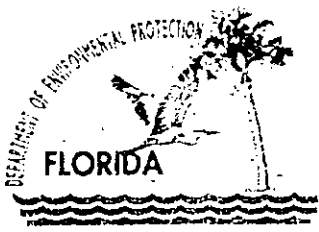
Sincerely,
Enron North America

A handwritten signature in cursive script that reads "David A. Kellermeyer". The signature is written in black ink and has a long horizontal line extending to the right from the end of the name.

David A. Kellermeyer
Director

Cc: Bob Iwanchuk, ENSR
Dave Kellermeyer, Enron North America
Greg Krause, Enron North America

C. Carlson
J. Anderson
EPA
NPS



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

November 17, 2000

Mr. John Bunyak, Chief
Policy, Planning & Permit Review Branch
NPS – Air Quality Division
Post Office Box 25287
Denver, Colorado 80225

RE: Midway Development Company, L.L.C.
Midway Energy Center, St. Lucie County
PSD-FL 305
Facility ID No. 1110099-002-AC

Dear Mr. Bunyak:

Enclosed for your review and comment is an application for construction of a PSD source. The applicant, Midway Development Company, L.L.C., proposes to construct and operate a power generating facility in St. Lucie County, Florida.

Your comments may be forwarded to my attention at the letterhead address or faxed to the Bureau of Air Regulation at 850/922-6979. If you have any questions, please contact me at 850/921-9523.

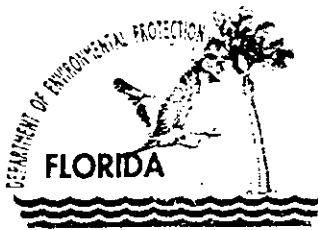
Sincerely,

Patricia Adams

for Al Linero, P.E.
Administrator
New Source Review Section

AAL/pa

Enclosures



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

November 17, 2000

Mr. Gregg Worley, Chief
Air, Radiation Technology Branch
Preconstruction/HAP Section
U.S. EPA – Region 4
61 Forsyth Street
Atlanta, Georgia 30303

RE: Midway Development Company, L.L.C.
Midway Energy Center, St. Lucie County
PSD-FL 305
Facility ID No. 1110099-002-AC

Dear Mr. Worley:

Enclosed for your review and comment is an application for construction of a PSD source. The applicant, Midway Development Company, L.L.C., proposes to construct and operate a power generating facility in St. Lucie County, Florida.

Your comments may be forwarded to my attention at the letterhead address or faxed to the Bureau of Air Regulation at 850/922-6979. If you have any questions, please contact me at 850/921-9523.

Sincerely,

for Al Linero, P.E.
Administrator
New Source Review Section

AAL/pa

Enclosures

"More Protection, Less Process"

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