



Florida Municipal Power Agency

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BUREAU OF AIR REGULATION

January 19, 2010

Jeff Koerner, P.E.
New Source Review Program Administrator
Bureau of Air Regulation
Florida Dept. of Environmental Protection
2600 Blair Stone Road, MS 5505
Tallahassee, FL 32399-2400

Jonathan Holtom, P.E., CPM
Title V Program Administrator
Bureau of Air Regulation
Florida Dept. of Environmental Protection
2600 Blair Stone Road, MS 5505
Tallahassee, FL 32399-2400

Re: FMPA Treasure Coast Energy Center – Facility ID No. 1110121
Revision request for 1110121-003-AC and 1110121-002-AV


Dear Mr. Koerner:

Dear Mr. Holtom:

In response to your January 9 letter, enclosed please find the completed FDEP permit application form for the above referenced permit revision requests. Also enclosed is a copy of our original letter which lists the requested revisions.

Please contact Amy Deese at 321-239-1004 if you have any questions or require additional information.

Sincerely,


Edward S. Leongomez
Responsible Official,
Treasure Coast Energy Center

cc: Lennon Anderson, FDEP SE District
Lee Hoefert, FDEP SE District
Jerome Guidry, Perigee Technical Services, Inc.
Stanley Armbruster, Black & Veatch
Amy Deese, FPMA
Jerusha Gibson, FMPA



Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

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BUREAU OF AIR REGULATION

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit:

- For any required purpose at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air operation permit;
- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment new source review, or maximum achievable control technology (MACT);
- To assume a restriction on the potential emissions of one or more pollutants to escape a requirement such as PSD review, nonattainment new source review, MACT, or Title V; or
- To establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial, revised, or renewal Title V air operation permit.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: Florida Municipal Power Agency	
2. Site Name: Treasure Coast Energy Center	
3. Facility Identification Number: 1110121	
4. Facility Location... Street Address or Other Locator: 4545 Energy Lane City: Fort Pierce County: St. Lucie Zip Code: 34981	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Application Contact

1. Application Contact Name: Amy Deese	
2. Application Contact Mailing Address... Organization/Firm: Florida Municipal Power Agency Street Address: 8553 Commodity Circle City: Orlando State: FL Zip Code: 32819	
3. Application Contact Telephone Numbers... Telephone: (321) 239-1004 ext. Fax: (321) 355-5796	
4. Application Contact E-mail Address: amy.deese@fmpa.com	

Application Processing Information (DEP Use)

1. Date of Receipt of Application: 1-21-10	3. PSD Number (if applicable):
2. Project Number(s): 1110121-004-AC 1110121-005-AV	4. Siting Number (if applicable):

APPLICATION INFORMATION

Purpose of Application

This application for air permit is being submitted to obtain: (Check one)

Air Construction Permit

- Air construction permit.
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

Air Operation Permit

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

Please see attached letter for the list of requested revisions.

APPLICATION INFORMATION

Owner/Authorized Representative Statement

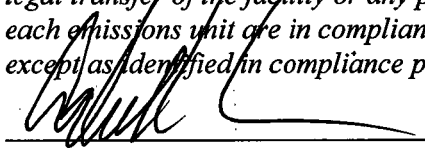
Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name :
2. Owner/Authorized Representative Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Owner/Authorized Representative Telephone Numbers... Telephone: () - ext. Fax: () -
4. Owner/Authorized Representative E-mail Address:
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.</i> _____ Signature _____ Date

APPLICATION INFORMATION

Application Responsible Official Certification

Complete if applying for an initial, revised, or renewal Title V air operation permit or concurrent processing of an air construction permit and revised or renewal Title V air operation permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: Edward S. Leongomez
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source, CAIR source, or Hg Budget source.
3. Application Responsible Official Mailing Address. Treasure Coast Energy Center Organization/Firm: Fort Pierce Utilities Authority Street Address: 4545 Energy Lane City: Fort Pierce State: FL Zip Code: 34981
4. Application Responsible Official Telephone Numbers... Telephone: (772) 429-8141 ext. Fax: (772) 429-8145
5. Application Responsible Official E-mail Address: eleongomez@fpua.com
6. Application Responsible Official Certification: <i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. 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 and all other applicable requirements identified in this application to which the Title V source is subject. 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 the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i>  Signature 11/19/2010 Date

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: Stanley A. Armbruster, P.E. Registration Number: 30562
2. Professional Engineer Mailing Address... Organization/Firm: Black & Veatch, CA 8132 Street Address: 11401 Lamar Avenue City: Overland Park State: KS Zip Code: 66211
3. Professional Engineer Telephone Numbers... Telephone: (913) 458-2763 ext. Fax: (913) 458-2934
4. Professional Engineer E-mail Address: ArmbrusterSA@bv.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, 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</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application 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 this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input checked="" type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all applicable requirements in such permit.</i> Signature: <u>Stanley A. Armbruster</u> Date: <u>1/15/10</u> * Attach any exceptions to certification statement.



Florida Municipal Power Agency

December 14, 2009

Jeff Koerner, P.E.
New Source Review Program Administrator
Bureau of Air Regulation
Florida Dept. of Environmental Protection
2600 Blair Stone Road, MS 5505
Tallahassee, FL 32399-2400

Jonathan Holtom, P.E., CPM
Title V Program Administrator
Bureau of Air Regulation
Florida Dept. of Environmental Protection
2600 Blair Stone Road, MS 5505
Tallahassee, FL 32399-2400

Re: FMPA Treasure Coast Energy Center – Facility ID No. 1110121
Revision request for 1110121-003-AC and 1110121-002-AV

Dear Mr. Koerner:

Dear Mr. Holtom:

We would like to request the following revisions to the above referenced construction and operation permits for Treasure Coast Energy Center.

1110121-003-AC Condition 18.e and 1110121-002-AV Condition A.14.e:

Fuel Switching: Excess emissions due to oil-to-gas fuel switching shall not exceed 1 hour in a 24-hour block.

Since excess emissions can occur during fuel switching between oil and gas and vice-versa, for clarification purposes, we are requesting to reword these conditions as follows:

Excess emissions due to oil-to-gas and gas-to-oil fuel switching shall not exceed 1 hour each, respectively, in a 24-hour block.

1110121-003-AC Condition 20 and 1110121-002-AV Condition A.20:

DLN Tuning. CEMS data collected during initial or other major dry low nitrogen oxides (DLN) tuning sessions shall be excluded from the CEMS compliance demonstration provided the tuning session is performed in accordance with the manufacturer's specifications. A "major tuning session" would occur after completion of initial construction, a combustor change-out, a major repair or maintenance to a combustor, or other similar circumstances. Prior to performing any major tuning session, the permittee shall provide the Compliance Authority with an advance notice of at least 14 days that details the activity and proposed tuning schedule. The notice may be by telephone, facsimile transmittal, or electronic mail.

We are requesting to reword the "major tuning session" description as follows:

A "major tuning session" would occur after completion of initial construction, a combustor change-out, a major repair or maintenance to a combustor, or circumstances as identified or requested by the equipment vendor.

1110121-003-AC Condition 23 and 1110121-002-AV Condition A.26:

Annual Compliance Tests. During each federal fiscal year (October 1st, to September 30th), the gas turbine shall be tested to demonstrate compliance with the emission standard for visible emissions. NOX and CO emissions data collected during the required continuous monitor Relative Accuracy Test Audits (RATAs) may be used to demonstrate compliance with the CO and NOX standards. Annual testing to determine the ammonia slip shall be conducted while firing the primary fuel. NOX emissions recorded by the CEMS shall be reported for each ammonia slip test run. CO emissions recorded by the CEMS shall be reported for the visible emissions observation period.

We are requesting to reduce the frequency of ammonia slip testing to every five years in accordance with 62-297.310(a)4, based on the following potential to emit (PTE) calculations, which verify that the ammonia slip PTE is **74 tons per year** (less than 100 tons per year).

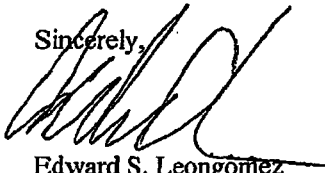
$\text{NH}_3\text{-Oil} = (5 \text{ ppm}) * (4.42\text{E-}8 \text{ lb/dscf/ppm}) * (9190 \text{ dscf/mmBtu}) * (1986 \text{ mmBtu/hr}) * (20.9/(20.9-15)) * (500 \text{ hrs}) / (2000 \text{ lb/ton}) = 3.6 \text{ tons}$
$\text{NH}_3\text{-Gas-CT} = (5 \text{ ppm}) * (4.42\text{E-}8 \text{ lb/dscf/ppm}) * (8710 \text{ dscf/mmBtu}) * (1900 \text{ mmBtu/hr}) * (20.9/(20.9-15)) * (8260 \text{ hrs}) / (2000 \text{ lb/ton}) = 53.5 \text{ tons}$
$\text{NH}_3\text{-Gas-DB} = (5 \text{ ppm}) * (4.42\text{E-}8 \text{ lb/dscf/ppm}) * (8710 \text{ dscf/mmBtu}) * (565.3 \text{ mmBtu/hr}) * (20.9/(20.9-15)) * (8760 \text{ hrs}) / (2000 \text{ lb/ton}) = 16.9 \text{ tons}$

Therefore, we would like to revise the above permit conditions by removing the underlined sentences and to revise 1110121-002-AV Condition A.27 by adding the underlined wording as shown here:

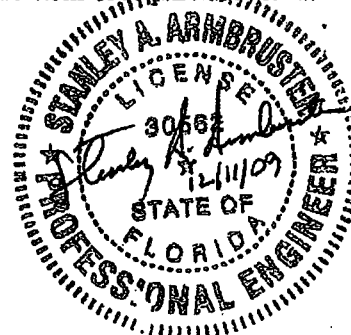
Compliance Tests Prior To Renewal. Compliance tests shall be performed for PM/PM10, ammonia slip, and SAM/SO2 once every 5 years. NOX emissions recorded by the CEMS shall be reported for each ammonia slip test run. The tests shall occur prior to obtaining a renewed operating permit to demonstrate compliance with the emission limits in Specific Condition A.13

Please contact Amy Deese at 321-239-1004 if you have any questions or require additional information.

Sincerely,



Edward S. Leongomez
Responsible Official,
Treasure Coast Energy Center



cc: Lennon Anderson, FDEP SE District
Lee Hoefert, FDEP SE District
Jerome Guidry, Perigee Technical Services, Inc.
Stanley Armbruster, Black & Veatch
Amy Deese, FPMA
Jerusha Gibson, FMPA

Engineer of Record
Black & Veatch, CA 8132
11401 Lamar Ave.
Overland Park, Kansas 66211