

TO: Bob Kriegel
FROM: Ed Svec
DATE: March 13, 2000
SUBJ: Title V Pre-DRAFT Permit Review
Pea Ridge Cogen
1130173-002-AV

Thank you for submitting your pre-DRAFT Title V permit. Our comments follow:

a. Section III. Subsection A.

- (1). **Test Methods and Procedures.** The test frequency requirements in Rule 62-297.310, FAC are missing.
- (2). **Recordkeeping and Reporting Requirements.** The recordkeeping requirements of 40CFR60, Subpart Dc are missing.
- (3). **NSPS Conditions.** It is not acceptable to just say comply with all applicable requirements and list a bunch of rules. All applicable rule requirements must be spelled out as specific conditions as per our program agreement with EPA.

If there are any questions, please give me a call at (850) 921-8985.

EJS/s

copy to: Scott Sheplak

Electronic Notification Cover Memorandum

TO: Barbara Boutwell, Title V Section, Tallahassee
THRU: Ed Middleswart, Administrator, Northwest District Air Program
FROM: Bob Kriegel, Permit Engineer
DATE: March 2, 2000
RE: DRAFT Title V Permit(s) for Tallahassee Review

The following Title V permit(s) and associated documents are made available for your review/comment prior to issuance.

<u>Applicant Name</u>	<u>County</u>	<u>Method of Transmittal</u>	<u>Electronic File Name(s)</u>
Gulf Power Company Pea Ridge Cogeneration Facility	Santa Rosa	electronic	darm_common\t5permit\nwd\1130173\predraft\1130173d.zip

This zipped file contains the following electronic files:

1130173i.doc
1130173d.doc
1130173l.xls
11301732.xls
1130173h.doc
1130173s.doc
1130173sob.doc

Robert G. Moore
V. P. Power Generation/Transmission
Gulf Power Company
One Energy Place
Pensacola FL 32520-0100

Re: DRAFT Title V Permit No.: 1130173-002-AV
Pea Ridge Cogeneration Facility

Dear Mr. Moore:

One copy of the DRAFT Title V Air Operation Permit for the Pea Ridge Cogeneration Facility located at Air Products and Chemicals, Inc., 4575 highway 90 East in Pace, Santa Rosa County, is enclosed. The permitting authority's "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" and the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" are also included.

The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" must be published as soon as possible upon receipt of this letter. Proof of publication, i.e., newspaper affidavit, must be provided to the permitting authority's office within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to Ed K. Middleswart, P.E., at the above letterhead address. If you have any other questions, please contact Andy Allen at 850/595-8364, extension 1223.

Sincerely,

ED K. MIDDLESWART, P.E.
Air Program Administrator

EKM/bkc

Enclosures

[electronic file name: 1130173i.doc]

In the Matter of an
Application for Permit by:

Gulf Power Company
One Energy Place
Pensacola FL 32520-0100

DRAFT Permit No.: 1130173-002-AV
Pea Ridge Cogeneration Facility
Santa Rosa County

INTENT TO ISSUE TITLE V AIR OPERATION PERMIT

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit (copy of DRAFT Permit enclosed) for the Title V source detailed in the application specified above, for the reasons stated below.

The applicant, Gulf Power Company, applied on June 2, 1999, to the permitting authority for a Title V air operation permit for the Pea Ridge Cogeneration Facility located at Air Products and Chemicals, Inc., 4575 Highway 90 East in Pace, Santa Rosa County.

The permitting authority has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. This source is not exempt from Title V permitting procedures. The permitting authority has determined that a Title V air operation permit is required to commence or continue operations at the described facility.

The permitting authority intends to issue this Title V air operation permit based on the belief that reasonable assurances have been provided to indicate that operation of the source will not adversely impact air quality, and the source will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

Pursuant to Sections 403.815 and 403.087, F.S., and Rules 62-110.106 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT." The notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the permitting authority at the address or telephone number listed below. The applicant shall provide proof of publication to the permitting authority's office, Northwest District, 160 Governmental Center, Pensacola, FL 32501-5794 (Telephone: 850/595-8364; Fax: 850/595-8417), within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-110.106, F.A.C.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the enclosed Title V DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of the “PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT.” Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, FL 32399-3900 (Telephone: 850/488-9735; Fax: 850/487-4938). Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under Section 12-60(3), F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person’s right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the permitting authority’s action is based must contain the following information:

(a) The name and address of each agency affected and each agency’s file or identification number, if known;

(b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner’s representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner’s substantial interests will be affected by the agency determination;

(c) A statement of how and when each petitioner received notice of the agency action or proposed action;

(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;

(e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief;

(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency’s proposed action; and,

(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency’s proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation will not be available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
- (c) Each rule or portion of a rule from which a variance or waiver is requested;
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
- (e) The type of action requested;
- (f) The specific facts that would justify a variance or waiver for the petitioner;
- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and,
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within sixty days of the expiration of the Administrator's forty-five day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the thirty day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at 401 M Street, S.W., Washington, D.C. 20460.

Executed in Pensacola, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

ED K. MIDDLESWART, P.E.
Air Program Administrator

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT (including the PUBLIC NOTICE and the DRAFT permit) and all copies were sent by certified mail before the close of business on _____ to the person(s) listed:

Robert G. Moore, Gulf Power Company

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT (including the PUBLIC NOTICE and the DRAFT permit) were sent by U.S. mail or electronically transmitted on the same date to the person(s) listed:

Mr. Gregory N. Terry, P.E., Gulf Power Company
Ms. Gracy Danois, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)
Mr. Scott Sheplak, P.E., Bureau of Air Regulation

FILING AND ACKNOWLEDGMENT FILED, on
this date, pursuant to Section 120.52(7), Florida Statutes,
with the designated agency Clerk, receipt of which is hereby
acknowledged.

(Clerk)

(Date)

PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL PROTECTION NORTHWEST DISTRICT

Title V DRAFT Permit No.: 1130173-002-AV

Gulf Power Company Pea Ridge Cogeneration Facility

Santa Rosa County

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit to Gulf Power Company for the Pea Ridge Cogeneration Facility located at Air Products and Chemicals, Inc., 4575 Highway 90 East in Pace, Santa Rosa County. The applicant's name and address are: Gulf Power Company, One Energy Place, Pensacola FL 32520-0100.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the Title V DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Title V DRAFT Permit issuance action for a period of thirty days from the date of publication of this Notice. Written comments should be provided to the permitting authority's office, Northwest District, 160 Governmental Center, Pensacola, FL 32501-5794 (Telephone: 850/595-8364; Fax: 850/595-8417). Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 of the Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, FL 32399-3900 (Telephone: 850/488-9735; Fax: 850/487-4938). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of the notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the applicable time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code (F.A.C.).

A petition that disputes the material facts on which the permitting authority's action is based must contain the following information:

(a) The name and address of each agency affected and each agency's file or identification number, if known;

(b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;

(c) A statement of how and when each petitioner received notice of the agency action or proposed action;

(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;

(e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief;

(f) A demand for relief.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available for this proceeding.

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within sixty days of the expiration of the Administrator's forty-five day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the thirty day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at 401 M Street, S.W., Washington, D.C. 20460.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Permitting Authority:

Florida Department of Environmental Protection, Northwest District
160 Governmental Center
Pensacola, FL 32501-5794
Telephone: 850/595-8364, press 7
Fax: 850/595-8096

The complete project file includes the DRAFT Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Ed K. Middleswart, P.E., at the above address, or call 850/595-8364, for additional information.

Gulf Power Company
Pea Ridge Cogeneration Facility
Facility ID No.: 1130173
Santa Rosa County

Initial Title V Air Operation Permit
DRAFT Permit No.: 1130173-002-AV

Permitting and Compliance Authority:
Department of Environmental Protection
Northwest District
160 Governmental Center
Pensacola, FL 32501-5794
Telephone: 850/595-8364
Fax: 850/595-8096

March, 2000 Draft

Initial Title V Air Operation Permit
DRAFT Permit No.: 1130173-002-AV

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Permittee:
Gulf Power Company

DRAFT Permit No.: 1130173-002-AV
Facility ID No.: 1130173
SIC Nos.: 49
Project: Initial Title V Air Operation Permit

This permit is for the operation of the Pea Ridge Cogeneration Facility located at the Air Products and Chemicals, Inc., industrial site, Santa Rosa County; UTM Coordinates: Zone 16, 486.87 km East and 3384.32 km North; Latitude: 30° 34' 05" North and Longitude: 87° 09' 05" West.

STATEMENT OF BASIS: This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

Appendix TV-3, Title V Conditions
Appendix SS-1, Stack Sampling Facilities

Effective Date:
Renewal Application Due Date:
Expiration Date:

**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

Ed K. Middleswart, P.E.
Air Program Administrator

EKM/om

Section I. Facility Information.

Subsection A. Facility Description.

The Pea Ridge facility is a cogeneration plant providing electrical power to the Gulf Power transmission grid and supplying steam to Air Products and Chemicals, Inc. The facility is located at the Air Products Pace plant.

This facility consists of three 5 Megawatt combined-cycle turbine powered cogeneration units, manufactured by Solar, model Taurus 60S. The turbines and heat recovery steam generator/duct burners are fueled by natural gas. The heat recovery steam generator/duct burners produce a maximum of 270,000 pounds per hour of 600 psig steam at 650°F supplying steam for manufacturing operations at Air Products and Chemicals, Inc. replacing steam previously generated by a Riley Union Boiler, Permit No. AO57-179644.

Based on the initial Title V permit application received June 2, 1999, this facility is not a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emissions Unit ID No. and Brief Description.

E.U.

ID No. Brief Description

001	Combined-Cycle Turbine Powered Cogeneration and Heat Recovery Steam Generator/Duct Burners (Units A,B, and C)
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Please reference the Permit No., Facility ID No., and appropriate Emissions Unit ID No. on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

Statement of Basis

Table 1-1, Summary of Air Pollutant Standards and Terms

Table 2-1, Summary of Compliance Requirements

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

Appendix H-1, Permit History/ID number changes

These documents are on file with permitting authority:

Initial Title V Permit Application received June 2, 1999

Additional Information Requests dated July 12, 1999 and November 16, 1999

Additional Information Response received October 25, 1999, and February 8, 2000

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-3, TITLE V CONDITIONS, is a part of this permit.

{Permitting note: APPENDIX TV-3, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or otherwise appropriate.}

2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants that cause or contribute to an objectionable odor. Objectionable odor is any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance
[Rules 62-296.320(2) and 62-210.200(203), F.A.C.]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]

4. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

Sandblasting: Tarping is used extensively to reduce particulate emissions from sandblasting in the process areas. When possible, sandblasting is performed at a location that is protected on nearly all side by trees to reduce the dust. Additionally, other methods of cleaning such as needle-gunning or scraping are used when deemed more appropriate by the maintenance experts.

Road Dust: The area around the cogeneration units will be maintained in a manner to reduce fugitive emissions. Vehicular speeds are limited on all roads near the cogeneration plant to minimize fugitive dust generation.

[Rule 62-296.320(4)(c)2., F.A.C.; Proposed by applicant in the Title V permit application received June 2, 1999]

5. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.
[Rule 62-296.320(1)(a), F.A.C.]

6. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.

[Rule 62-213.440, F.A.C.]

7. Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

[Rule 62-297.310(7)(b), F.A.C.]

8. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Northwest District office:

Department of Environmental Protection
Northwest District Office
160 Governmental Center
Pensacola, Florida 32501-5794
Telephone: 850/595-8364, Fax: 850/595-8096

9. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air and EPCRA Enforcement Branch, Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303
Telephone: 404/562-9155, Fax: 404/562-9164

Section III. Emissions Unit and Conditions.

Subsection A. This section addresses the following emissions unit.

E.U.

<u>ID No.</u>	<u>Brief Description</u>
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001	Combined-Cycle Turbine Powered Cogeneration and Heat Recovery Steam Generator/Duct Burners (Units A, B, and C)
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This emissions unit consists of three 5 Megawatt combined-cycle turbine powered cogeneration units, manufactured by Solar, model Taurus 60S with Heat Recovery Steam Generator/Duct Burners. These units (turbines, heat recovery steam generators with duct burner) are fueled by natural gas and combined produce a maximum of 270,000 pounds per hour of 600 psig steam at 650°F for manufacturing operations at Air Products and Chemicals, Inc., and electricity for the Southern grid.

The turbines use both a lean fuel mix and a low NO_x burner design to minimize NO_x emissions. A catalyst is used to reduce carbon monoxide emissions by 90% and volatile organic compound emissions by 50%.

The modes of operation for these turbines include both a “normal” mode, and a “fresh air/duct burner” mode. In the normal operating mode the turbine and cogen unit operate in tandem with the heat recovery steam generator/duct burner to produce both steam and electricity. Units B and C are also capable of operating in a “fresh air/duct burner mode” with the turbine not operating and fresh air replacing the turbine exhaust to the heat recovery steam generator/duct burner. During the normal operating mode the maximum heat input to each combustion turbine is 60 MMBtu/hr, with an additional 90 MMBtu/hr heat input to the heat recovery steam generator/duct burner. During the “fresh air/duct burner” mode, the maximum heat input to each heat recovery steam generator/duct burner is 130 MMBtu/hr.

This emissions unit is not subject to New Source Review as a result of a creditable emissions offset generated by shutting down a previously permitted Air Products Riley Boiler. This emissions unit is subject to 40 CFR 60, Subpart GG, Standards of Performance for Stationary Gas Turbines, and 40 CFR 60 Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units adopted and incorporated by reference in Rule 62-204.800(7), F.A.C.

Since only pipeline quality natural gas with a sulfur content of less than 10 grains/100SCF is used, turbine NO_x and SO₂ emissions are substantially less than the standards contained in 40 CFR 60, Subpart GG. Similarly, the only applicable requirement in 40 CFR 60, Subpart Dc is record keeping.

The following specific conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Capacity. The maximum allowable heat input rate to each turbine unit shall not exceed 150 MMBtu/hr while operating in the “normal” operating mode and 130 MMBtu/hr while operating in the “fresh air/duct burner” operating mode. Daily records shall be maintained and made available for Department inspection of the fuel usage (MCF) to each turbine unit and/or each heat recovery steam generator/duct burner, and of the power output of each generator. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

{Permitting note: The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit’s rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability. Regular record keeping is not required for heat input. Instead, the owner or operator is expected to determine heat input whenever emission testing is required, in order to demonstrate what percentage of the rated capacity that the unit was tested. Rule 62-297.310(5), F.A.C., included in the permit, requires measurement of the process variables for emission tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate average hourly heat input during the test.}

A.2. Emissions Unit Operating Rate Limitation After Testing. See Specific Condition A.13.

A.3. Methods of Operation (Fuel). Fuel is limited to pipeline-quality natural gas with a maximum of 10 grains sulfur per 100 scf. [Rules 62-4.070 and 62-213.440(1), F.A.C.]

A.4. Hours of Operation. This emissions unit is allowed to operate continuously in the normal mode of operation, i.e., 8,760 hours/year. In addition, units B and C may operate in the fresh air/duct burner mode for a combined total of up to 2,400 hours per year. Records shall be maintained and made available for Department inspection of all time operated in the fresh air/duct burner mode. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Construction Permit 1130004-007-AC]

Emission Limitations and Standards

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.5. Visible Emissions. Under no circumstances shall visible emissions exceed 20% opacity except for one six-minute period per hour during which opacity shall not exceed 27%. [Rule 62-96.406(1), F.A.C.; Construction Permit 1130004-007-AC]

A.6. Sulfur dioxide – natural gas sulfur content. The sulfur content of the pipeline quality natural gas shall not exceed 10 grains per 100 SCF.

[Title V Application received June 2, 1999]

A.7. Standard for nitrogen oxides. Nitrogen oxide emissions shall not exceed a total of 40.0 lbs/hr ISO conditions from all three cogeneration turbine and heat recovery steam generator units while operating in the normal mode, or 60.0 lbs/hour ISO conditions from all three cogeneration turbine and heat recovery steam generator units with two operating in the fresh air/duct burner mode (units B, C). Compliance with these limits is satisfactory demonstration of compliance with the nitrogen oxide emission limits contained in 40 CFR 60.332(a)(23).

[Construction Permit 1130004-007-AC; Title V Operating Permit Application received June 2, 1999; additional information received October 25, 1999 and February 8, 2000]

Excess Emissions

{Permitting note: The Excess Emissions Rule, Rule 62-210.700, F.A.C., cannot vary any NSPS requirement}

A.8. Excess emissions resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24-hour period unless specifically authorized by the Department for a longer duration.

[Rule 62-210.700(1), F.A.C.]

A.9. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited.

[Rule 62-210.700(4), F.A.C.]

Monitoring of Operations

A.10. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[40 CFR 60.11(d)]

Test Methods and Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.11. Required Tests. Emissions tests are required on each turbine/heat recovery steam generator to show compliance with the standards of the Department. Emissions shall be determined from both the turbine and heat recovery steam generator units. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. The attached operating curve showing NOx emissions as a function of inlet air temperature may be used with the test results to demonstrate compliance with the NOx limit. Such tests shall be conducted annually between September 1 and October 31. In addition, testing shall be conducted within 90 days of startup of any affected turbine/heat recovery steam generator following maintenance as described in condition A.22. The Department shall be notified at least 15 days prior to testing to allow witnessing. Results shall be submitted to the Department within 45 days after testing.

<u>Pollutant</u>	<u>Test Method</u>	<u>Sampling Time</u>
VE	DEP method 9	60 minutes
NOx	EPA method 20	One hour for each test run

*Need
Test
frequency
from 62-297.310*

[Rules 62-4.070, 62-297.310(7), and 62-297.401(9), F.A.C.]

A.12. Test Reports. The test reports shall comply with applicable portions of Rule 62-297.310, F.A.C., Test Reports. Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing.

[Rules 62-297.310(7) and 62-297.620(1), F.A.C.]

A.13. Test capacity. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of the maximum heat input allowed by this permit achievable for the average ambient temperature during the test. If it is impractical to test at capacity, then the emissions unit may be tested at less than capacity. In such cases, subsequent operation is limited by adjusting downward the entire heat input versus inlet temperature curve by the increment equal to the difference between the permitted maximum heat input value and 110 percent of the value reached during the test. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. Data, curves and calculations necessary to demonstrate the heat input rate correction at both design and test conditions shall be submitted to the Department with the compliance test report.

[Rules 62-297.310(2) and 62-4.070, F.A.C.; 40 CFR 60.335(c)(2)]

A.14. Stack Sampling Requirements. The permittee shall comply with the stack sampling requirements contained in Appendix SS-1, Stack Sampling Facilities (attached).

[Rule 62-297.310(6), F.A.C.]

A.15. Required Number of Test Runs. For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five-day period allowed for the test, the Secretary or his or her designee may accept the results of the two complete runs as proof of compliance, provided that the arithmetic mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.

[Rule 62-297.310(1), F.A.C.]

A.16. Natural gas sulfur monitoring. The natural gas fuel sulfur content shall be determined quarterly. The owner or operator shall determine compliance with the sulfur standard as follows: ASTM D 1072-90(94)E-1, D 3031-81(86), D 4084-94, or D 3246-92 shall be used for the sulfur content of gaseous fuels (incorporated by reference - see 40 CFR 60.17). The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to the approval of the Administrator.

[Construction Permit 1130004-007-AC, 40 CFR 60.335(d)]

Monitoring of Operations

A.17. Operation of each turbine compressor and heat recovery steam generator shall be monitored by a Solar microprocessor system or equivalent system. As a minimum, this system shall maintain a continuous record of heat input and hours of operation.

[Rule 62-4.070, F.A.C.]

Recordkeeping and Reporting Requirements

A.18. Excess emissions recordkeeping. The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; or of any malfunction of the air pollution control equipment.

[40 CFR 60.7(b)]

A.19. Notification of excess emissions: In case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

[Rule 62-210.700(6), F.A.C.]

A.20. Custom Fuel Monitoring Schedule. The sulfur content and nitrogen content of the pipeline quality natural gas shall be monitored based on the following custom schedule approved pursuant to 40 CFR 60.334 as follows:

1. Monitoring of fuel nitrogen content is not required since pipeline quality natural gas is the only fuel fired in the gas turbine.
2. Monitoring of fuel sulfur content shall be done in accordance with condition **A.16**.
3. Records of sample analysis and fuel supply pertinent to this custom schedule shall be retained for a period of three years, and be available for inspection by personnel of state or federal air pollution control agencies.

[Title V Operating Permit Application received June 2, 1999; and additional information received October 25, 1999 and February 8, 2000]

NSPS Conditions.

A.21. Applicable portions of 40 CFR 60, Subpart A - General Provisions Requirements and Subpart GG are incorporated and included by reference as conditions of this permit. This includes but is not limited to the following:

- a. 40 CFR 60.7, Notification and record keeping;
- b. 40 CFR 60.8, Performance tests;
- c. 40 CFR 60.11, Compliance with standards and maintenance requirements
- d. 40 CFR 60.12, Circumvention
- e. 40 CFR 60.13, Monitoring requirements
- f. 40 CFR 60.14, Modification
- g. 40 CFR 60.17, Incorporations by reference

*Spill sent
to condition*

Maintenance.

A.22. Routine maintenance on the three turbine powered co-generation and heat recovery steam generator/duct burners included in this emission unit is required and authorized. Such maintenance typically includes a complete change-out of the combustion turbine. Testing is required in accordance with specific condition **A.11** following any such maintenance. The Department shall be advised of any maintenance associated turbine change-out within seven days of such activity.

[Title V Operating Permit Application received June 2, 1999; and additional information received October 25, 1999 and February 8, 2000]

*Used to call
DC monitoring
equipment
as a condition*

Table 1-1, Summary of Air Pollutant Standards and Terms

**Gulf Power Company
Pea Ridge Plant**

**DRAFT Permit No.: 1130173-002-AV
Facility ID No.: 1130173**

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No. Brief Description

001: Combined-Cycle Turbine Powered Co-generation and Heat Recovery Steam Generator units A, B, and C

Pollutant Name	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See permit condition(s)
			Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
NOx	NG	8760 2400*	See Reg. Citation	40.0 60.0			159.1 27.9	40 CFR 60.332(a)(2); AC 113004-007-AC	A.7.
		* 2400 hours total operation limited to units B and C while in "fresh air/duct burner" mode of operation							
VE (PM)	NG	8760	20% (27% for 6 mins/hr)					FAC Rule 62-296.406	A.5.
Sulfur	NG	8760	10 grains/100 SCF					40 CFR 60.333(b); TV application	A.3
Notes:									
* The "Equivalent Emissions" listed are for informational purposes only.									

[electronic file name: 11301731.xls]

Table 2-1, Summary of Compliance Requirements

Gulf Power Company
Pea Ridge Plant

DRAFT Permit No.: 1130173-002-AV
Facility ID No.: 1130173

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No. Brief Description

001; combined Cycle Turbine Powered Co-generation and heat Recovery Steam Generator Units A, B, and C

Requirement	Fuel(s)	Compliance Method	Testing Time	Frequency	Min. Compliance	CMS**	See permit condition(s)
			Frequency	Base Date *	Test Duration		
Fuel Usage	NG	Recordkeeping	Daily	Permit	NA		A.1.
Power output	NG	Recordkeeping	Daily	Permit	NA		A.1.
Hours Opn	Nat Gas	Recordkeeping	Continuous	Permit	NA		A.4.
SO ₂	NG	Monitoring	Quarterly	Permit	As required		A.6, A.16
NO _x	Nat Gas	EPA Method 20	Annual	9/1/2000	As required		A.7, A.11
VE	NG	EPA Method 9	Annual	9/1/2000	60 minutes		A.5, A.11
Excess emissions		Recordkeeping					A.8, A.9, A.18, A.19
Notes:							
* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.							
**CMS [=] continuous monitoring system							

[electronic file name: 11301732.xls]

Appendix H-1, Permit History/ID Number Changes

Gulf Power Company
Pea Ridge Plant

DRAFT Permit No.: 1130173-002-AV
Facility ID No.: 1130173

Permit History (for tracking purposes):

E.U.

<u>ID No.</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date</u> ^{1,2}	<u>Revised Date(s)</u>
043	Cogeneration units	1130004-007-AC	10/22/96	10/22/01		
043	Cogeneration units	amendment *1, 1130004-007-AC	10/08/97	10/22/01		
043	Cogeneration units	amendment *2, 1130004-007-AC	9/17/98	10/22/01		

*1: amendment concerning PE certification of construction

*2: amendment deleting application of conditions concerning NESHAPS

043	Cogeneration units	amendment *3,	4/27/99	10/22/01		
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*3: amendment transferring permit to Gulf Power, and changing ARMS and EU ID numbers as follows:

001	Cogeneration units	1130173-001-AC	4/27/99	10/22/01		
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ID Number Changes (for tracking purposes):

From: **Facility ID No.:** 1130004, EU ID no 043

To: **Facility ID No.:** 1130173, EU ID no 001

Notes:

1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.

2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.

{Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate under existing valid permits}

STATEMENT OF BASIS

Gulf Power Company
Pea Ridge Plant
Facility ID No.: 1130173
Santa Rosa County

Initial Title V Air Operation Permit
DRAFT Permit No.: 1130173-002-AV

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Facility Description.

The Pea Ridge facility is a cogeneration plant providing electrical power to the Gulf Power transmission grid and supplying steam to Air Products and Chemicals, Inc. The facility is located at the Air Products Pace plant. The facility includes one emission unit with three turbine powered cogeneration and heat recovery steam generator/duct burner units.

Emission Unit 001. Three Combined Cycle Turbine Powered Co-generation and Heat Recovery Steam Generator/Duct Burners (Units A, B, and C)

This emissions unit consists of three 5 Megawatt combined-cycle turbine powered cogeneration units, manufactured by Solar, model Taurus 60S. The turbines and heat recovery steam generator/duct burners are fueled by natural gas. The heat recovery steam generators produce a maximum of 270,000 pounds per hour of 600 psig steam @ 650°F supplying steam for manufacturing operations at Air Products and Chemicals, Inc., replacing steam previously generated by a Riley Union Boiler, Permit No. AO57-179644.

Permit AC 1130173-001-AC was issued October 22, 1996 to Air Products and Chemicals, Inc., for construction of the three units. This permit identified potential emissions of 210 TPY NO_x from the three co-generation units, but PSD/NSR was not required as a result of an offset of 299 TPY NO_x from removing a Riley Union Boiler from steam generation service. The construction permit included both the turbines and the heat recovery steam generators/duct burners in a single emission unit (043) with the applicable emission limits. The cogeneration units were placed in service in April 1998. Initial performance tests were conducted between April 15, 1998 and April 28, 1998, and the testing was accepted by the Department in July, 1998. This permit was transferred to Gulf Power Company April 27, 1999.

The turbines use both a lean fuel mix and a low NO_x burner design to minimize NO_x emissions. A catalyst is used to reduce carbon monoxide emissions by 90% and volatile organic compounds emissions by 50%.

The modes of operation for these turbines include both a "normal" mode, and a "fresh air/duct burner" mode. In the normal operating mode the turbine and cogen unit operate in tandem with the heat recovery steam generator/duct burner to produce both steam and electricity. Units B and C are also capable of operating in a "fresh air/duct burner mode" with the turbine not operating and fresh air replacing the turbine exhaust to the heat recovery steam generator/duct burner. During the normal operating mode the maximum heat input to each combustion turbine is 60 MMBtu/hr, with an additional 90 MMBtu/hr heat input to the heat recovery steam generator/duct burner. During the "fresh air/duct burner" mode, the maximum heat input to each heat recovery steam generator/duct burner is 130 MMBtu/hr.

This emissions unit is not subject to New Source Review as a result of a creditable emissions offset generated by shutting down a previously permitted Air Products Riley Union Boiler. This emissions unit is subject to 40 CFR 60, Subpart GG, Standards of Performance for Stationary Gas Turbines, and 40 CFR 60 Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units adopted and incorporated by reference in Rule 62-204.800(7), F.A.C.

The gas turbines are regulated by NSPS 40 CFR 60 Subpart GG and the heat recovery steam generator/duct burners by Subpart Dc. Since only pipeline quality natural gas with a sulfur content of less than 10 grains/100SCF is used, turbine NO_x and SO₂ emissions are substantially less than the standards contained in 40 CFR 60, Subpart GG. Similarly, since only natural gas is combusted, the Subpart Dc standards for fuel sulfur level, opacity, and SO₂ emissions and particulate matter emissions are not applicable, and the only applicable requirement in 40 CFR 60 Subpart Dc is record keeping.

Emissions are limited to 40.0 pounds/hour NO_x from the three turbine/cogeneration unit combined while operating in the normal mode, and 60.0 pounds/hour from the three units combined with two operating in the fresh air/duct burner mode. Operation in the fresh air mode is limited to a combined total of 2400 hours per year for units B and C.

Visible emissions are limited to 20% opacity except for one six minute period per hour during which opacity shall not exceed 27% in accordance with Rule 62-296.406(1), F.A.C. and construction permit 1130173-001-AC.

Compliance will be demonstrated by annual testing for NO_x and VE, record keeping of hours of operation, fuel usage, power output, and natural gas sulfur content.

Based on the initial Title V permit application received June 2, 1999, this facility is not a major source of hazardous air pollutants (HAPs).

FLORIDA'S Permit Application Summary Form

General Facility Information

Facility name: Gulf Power Company,
Facility address: Pea Ridge Plant

1999

SIC code of major product: 49

AIRS ID: 1130173

Date application received: June 2,

Permit number: 1130173-002-AV

County located: Santa Rosa

Application Type/Permit Activity

☒ Initial issuance

☐ Permit modification

☐ Permit renewal

☐ General permit

☐ Conditional major

Facility Emissions Summary Table

Pollutant	Allowable (tpy)
PM	
SO ₂	
NOx	187
CO	
VOC	
LEAD	
HAP \geq 10 tpy (by CAS)	

Compliance Summary

☐ Source is out of compliance

☒ Compliance certification signed

☐ Compliance schedule included

Applicable Requirements list

☐ PSD

☒ NSPS

☐ NESHAPS

☒ SIP

☐ Other

Miscellaneous

☐ Acid rain source

☐ Facility subject to 112(r)

☐ Facility applied for federally enforceable emissions cap

☐ Facility provided terms for alternative operating scenarios

☐ One or more emissions unit(s) subject to a MACT standard

☐ One or more emissions unit(s) requested case-by-case 112(g) or (j) determination

☐ Application proposes new control technology

☒ Certified by responsible official

☒ Diagrams or drawings included

☐ Confidential business information (CBI) was received