

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
NOTICE OF FINAL PERMIT MODIFICATION

In the Matter of an  
Application for Permit Modification

Mr. W. Jeffrey Pardue, C.E.P.  
Director, Environmental Services Dept.  
Florida Power Corp.  
3201 34th Street South  
St. Petersburg, FL 33711

DEP File No. 1210003  
PSD-FL-014(A)

Enclosed is Permit Modification Number PSD-FL-014(A) to add natural gas firing capability to three existing oil-fired peaking units at the Suwannee Power Plant. This permit modification is issued pursuant to Section 403, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

C.H. Fancy, P.E., Chief  
Bureau of Air Regulation

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT MODIFICATION (including the FINAL permit Modification) was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 5-6-97 to the person(s) listed:

Mr. W. Jeffrey Pardue, FPC \*  
Mr. Ken Kosky, P.E., Golder Associates  
Mr. Brian Beals, EPA  
Mr. John Bunyak, NPS  
Mr. Chris Kirts, NED

Clerk Stamp

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

Kerni Jaber      5-6-97  
(Clerk)                      (Date)

## FINAL DETERMINATION

Florida Power Corporation

Permit No. PSD-FL-014(A), File No. 1210003-002-AC  
Suwannee Facility, Peaking Units P1, P2, P3

An Intent to Issue a permit modification for Florida Power Corporation (FPC), Suwannee Facility, Peaking Units P1, P2, and P3 was distributed on February 14, 1997. The facility is located South of U.S. Route 90, Northwest of Live Oak, Suwannee County. The Public Notice of Intent to Issue was published in the Suwannee Democrat on February 28, 1997. No comments were received in response to the public notice.

Comments were received from Department staff pointing out that the application forms describe the units as presently fired with No. 2 fuel oil and on-spec used oil. No construction (or PSD) permit modifications have been made in the past to incorporate used oil firing. During discussions with FPC it was clarified that the present permit action allows only the addition of natural gas firing capability.

A reconciliation was performed of conditions in the original construction permits issued by the Department in 1978 with the PSD permit issued by EPA in 1979. This primarily affects the sulfur dioxide emissions limit in the PSD permit and is consistent with FPC's application.

The final action of the Department will be to issue the permit as proposed but with the changes indicated above.

P 265 659 206

US Postal Service  
**Receipt for Certified Mail**

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Do not use for International Mail (See reverse)

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Jeffrey Pardue	
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Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
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12/0003 PSD-FI-014GA	

PS Form 3800, April 1995

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**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- 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.
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Consult postmaster for fee.

3. Article Addressed to:  
 Mr. Jeffrey Pardue, CEP  
 Director, Env. Serv. Dept.  
 FPC  
 3201 34th St. South  
 St. Petersburg, FL 33711

4a. Article Number  
 P 265 659 206

4b. Service Type  
 Registered  Certified  
 Express Mail  Insured  
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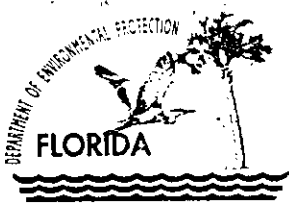
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6. Signature: (Addressee or Agent)  
 Frank Chapp

Thank you for using Return Receipt Service.



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

May 5, 1997

## CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. W. Jeffrey Pardue, C.E.P.  
Director, Environmental Services Dept.  
Florida Power Corp.  
3201 34th Street South  
St. Petersburg, FL 33711

Re: Suwannee Power Plant, Peaking Units P1, P2, and P3  
Modification of Final Determination - PSD-FL-014(A)  
Addition of Natural Gas Capability

Dear Mr. Pardue:

The Department hereby amends the Conditions of Approval related to emissions and fuel use in the subject Final Determination (dated July 9, 1979 as amended on May 22, 1980 by EPA) pursuant to 40CFR52.21 - Prevention of Significant Deterioration (PSD Permit). The PSD permit is amended as follows:

### Introduction

References to the number of turbines are reduced to three from four.

### Condition 1. Standards for Nitrogen Oxides

Add the following section addressing natural gas combustion:

- (3) From any gas turbine, while firing natural gas, any exhaust gases which contain nitrogen oxides in excess of 0.0068 percent by volume at 15 percent oxygen and on a dry basis.

### Condition 2. Standard for Sulfur Dioxide

Incorporate construction permit provisions from AC61-11862, 63, and 64 (issued November 28, 1978 as amended on February 5, 1979 by the Department) as follows:

FROM:

- (a) On and after the date on which the performance test required to be conducted by 40 CFR 60.8 is completed, the applicant shall not cause to be discharged into the atmosphere from any stationary gas

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turbine any gases which contain sulfur dioxide in excess of a 0.015 percent by volume at 15 percent oxygen and on a dry basis.

- (b) The sulfur content of the fuel fired by the gas turbine may be used to determine compliance with paragraph (a) of this section. Under such circumstances, on and after the date on which the performance test required to be conducted by 40 CFR 60.8 is completed, the applicant shall not burn in any stationary gas turbine any fuel which contains sulfur in excess of 0.8 percent by weight.

TO:

- (a) On and after the date on which the performance test required to be conducted by 40 CFR 60.8 is completed, the applicant shall not cause to be discharged into the atmosphere from any stationary gas turbine any gases which contain sulfur dioxide in excess of 0.0095 percent by volume at 15 percent oxygen and on a dry basis. The maximum allowed emission rate shall not to exceed 379 pounds per hour.
- (b) The sulfur content of the fuel fired by the gas turbine may be used to determine compliance with paragraph (a) of this section. Under such circumstances, on and after the date on which the performance test required to be conducted by 40 CFR 60.8 is completed, the applicant shall not burn in any stationary gas turbine any fuel which contains sulfur in excess of 0.5 percent by weight.

Condition 7 (new)

These stationary gas turbines shall burn natural gas and distillate (No. 2) fuel oil only. Burning of other fuels requires review, public notice, and approval through the preconstruction review process (Rules 62-210 and 62-212, F.A.C).

A copy of this modification letter and the General Permit Conditions pursuant to Rule 62-4.160, F.A.C. shall be attached to and shall become a part of Permit PSD-FL-014.

Sincerely,



Howard L. Rhodes, Director  
Division of Air Resources  
Management

HLR/aal/l

Enclosures

**APPENDIX GC**  
**GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]**

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- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- G.2 This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- (a) Have access to and copy and records that must be kept under the conditions of the permit;
  - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
  - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- (a) A description of and cause of non-compliance; and
  - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

**APPENDIX GC**  
**GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]**

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The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

- G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit modification also constitutes:
- (a) Determination of Best Available Control Technology ( )
  - (b) Determination of Prevention of Significant Deterioration ( ); and
  - (c) Compliance with New Source Performance Standards (X).
- G.14 The permittee shall comply with the following:
- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
  - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
  - (c) Records of monitoring information shall include:
    - 1. The date, exact place, and time of sampling or measurements;
    - 2. The person responsible for performing the sampling or measurements;
    - 3. The dates analyses were performed;
    - 4. The person responsible for performing the analyses;
    - 5. The analytical techniques or methods used; and
    - 6. The results of such analyses.
- G.15 When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

# Memorandum

# Florida Department of Environmental Protection

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TO: Howard Rhodes

THRU: Clair Fancy *CHF by mm*

FROM: Al Linero *Al Linero SL*

DATE: May 5, 1997

SUBJECT: FPC Suwannee Natural Gas Use for Peaking Units P1, P2, and P3

Attached is a modification to the EPA-issued PSD construction permit for the three oil-fired peaking units at Suwannee which are slated for addition of natural gas capability.

The revision deletes from the permit one authorized unit which was never constructed, while allowing firing of natural gas which is available to FPC on an interruptible basis.

The key issue is that these units have not operated close to their permitted hours of operation in recent years, yet they are slated for greatly increased service this year whether or not gas capability is added. This additional demand is not related to addition of natural gas capability. Since it is likely that the units will operate near their operating limits at some point, it is reasonable to use past allowable emissions to compare with future potential emissions. This results in no significant emissions increases and therefore the project is not subject to PSD or BACT.

Some discussion of peaking units was included in the WEPCO decision which alluded to the unreasonableness of doing a past actual to future potential emissions comparison when replacing a peaking unit. We consulted with EPA who agreed that our action was proper and they pointed us to a memo sent to GE in the early 1980's for adding natural gas capability to an oil-fired turbine.

FPC agreed to accept a lower NO<sub>x</sub> limit of 56 ppm while firing gas versus the present limit of 98 ppm. Because control of NO<sub>x</sub> to 56 ppm can cause a PSD-significant increase in CO, we have agreed to a NO<sub>x</sub> limit of 68 ppm. This is still a significant reduction in NO<sub>x</sub> emissions compared to fuel oil use.

We have updated the PSD permit to state that the only fuels which can be fired are natural gas and distillate fuel oil. We also took the opportunity to consolidate conditions (e.g. 0.5% sulfur in fuel oil) from the original Florida AC's which had not been included in the EPA-issued PSD permit. FPC is aware of these conditions and had included them in the application. We received no comments as a result of the public notice. I recommend your approval and signature.

AAL/aal/l

Attachments