

Memorandum

Florida Department of
Environmental Protection

RECEIVED

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MAR 19 1999

BUREAU OF
AIR REGULATION

TO : Howard Rhodes
FROM : Clair Fancy



DATE : March 19, 1999

SUBJECT: Amendment to AC 61-11862, 61-11863, & 61-11864/PSD-FL-014(A) Permits
NSPS Custom Fuel Monitoring Schedule
Florida Power Corporation
Suwannee River Plant

Attached for your approval and signature is an amendment to construction permits prepared by the Bureau of Air Regulation for the FPC Suwannee River Plant. The purpose of this amendment is to specify a custom fuel monitoring schedule for sulfur dioxide and nitrogen oxides in natural gas used as fuel at this facility. As per 40 CFR 60.334(b)(2), the request for a custom fuel monitoring schedule, with data which demonstrated consistent compliance with all the conditions of this permit and 40 CFR 60, Subpart GG, was approved by the Administrator of the U.S. EPA. This amendment will not cause an increase in annual allowable emission limits or result in any equipment change.

This amendment is recommended for your approval and signature.

CF/RBM

Attachment

* Scanned in 1210003-001-Av
- Also scanned as "amendment"
under PSD-014(A)



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

March 19, 1999

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

RE: Amendment to AC 61-11862, 61-11863, & 61-11864/PSD-FL-014(A) Permits
NSPS Custom Fuel Monitoring Schedule
Florida Power Corporation
Suwannee River Plant

Dear Mr. Pardue:

The Department has reviewed your September 10, 1997 letter requesting an NSPS Custom Fuel Monitoring Schedule, which was submitted to EPA, and natural gas analysis data received by the Department on January 20, 1998. The schedule would only apply to a monitoring schedule for sulfur dioxide (SO₂) and nitrogen oxide (NO_x) when natural gas is being fired at the subject facility (Refer to Attachments Nos. 1 & 4). The facility is required by the permit to comply with Subpart GG of the New Source Performance Standards (NSPS) 40 CFR 60. For sources utilizing pipeline quality natural gas, 40 CFR 60.334(b) and 60.334(b)(2) state that a custom fuel monitoring schedule, if supported by data which demonstrates compliance with NSPS emission limits, may be approved by the Administrator of EPA. This authority has been delegated to EPA's regional offices and, the EPA Region IV will provide their determination of this request to the Department. The Department received a letter, dated October 25, 1997, from EPA on November 3, 1997, stating that a custom fuel monitoring schedule for this facility was acceptable, since it complied with all items of the attachment to the custom fuel monitoring guidance memo issued by EPA Headquarters on August 14, 1987 (Refer to Attachments Nos. 2 & 3). The results from a minimum of one sampling event each month for six months were provided by the permittee, which demonstrated consistent compliance with the allowable SO₂ emissions limits specified under 40 CFR 60.333 and this permit. Therefore, upon issuance of the amended permit, the permittee shall begin monitoring the sulfur content of natural gas once per quarter for six quarters as specified in 2.b. of the Custom Fuel Monitoring Schedule for Natural Gas. In accordance with the EPA and Department determination, the permit specific condition will be amended as follows:

Is your RETURN ADDRESS completed on the reverse side?

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. ■ Write "Return Receipt Requested" on the mailpiece below the article number. ■ The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
3. Article Addressed to: Mr. W. Jeffrey Pardue, C.E.P. Director of Environmental Services Florida Power Corporation 3201 Thirty-fourth Street South St. Petersburg, Florida 33733		4a. Article Number P 263 585 292	
		4b. Service Type <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD	
		7. Date of Delivery MAR 24 1999	
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6. Signature (Addressee or Agent) X <i>[Signature]</i>			

Thank you for using Return Receipt Service.

PS Form 3811, December 1994

102595-97-8-0179

Domestic Return Receipt

P 263 585 292

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to
Mr. W. Jeffrey Pardue
 Street & Number
3201 34th Street South
 Post Office, State, & Zip Code
St. Petersburg, FL 33733

Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$

PS Form 3800, April 1995

Postmark or Date *3/22/99*
FPC - Suwannee River Plant
NSPS Amendment to ac permit
Custom Fuel Monitoring Schedule

Mr. W. Jeffrey Pardue
AC 61-11862, 61-11863, & 61-11864/PSD-FL-014(A)
Suwannee River Permit Amendment
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I. Specific Condition Number;

From

Condition 3(b). The applicant shall record weekly the sulfur content, nitrogen content, and lower heating value of fuel being fired in the gas turbine.

To

Condition 3(b). The permittee shall monitor sulfur content and nitrogen content of the new No. 2 distillate fuel oil and sulfur content of natural gas. These values may be provided by the vendor and the frequency of determinations of these values shall be as follows:

A. New No. 2 Distillate Fuel Oil

The values, sulfur and nitrogen content, shall be determined on each occasion that fuel is transferred to the storage tanks from any other source. Records of these values shall be kept by the facility for a five year period for regulatory agency inspection purposes.

B. Natural Gas

Pursuant to 40 CFR 60.334(b)(2), a custom fuel monitoring schedule for the determination of these values shall be followed for the natural gas fired at this facility and shall be as follows:

Custom Fuel Monitoring Schedule for Natural Gas (NG)

1. Monitoring of fuel nitrogen content shall not be required if NG is the only fuel being fired in the gas turbines.
2. Sulfur Monitoring
 - a. Analysis for fuel sulfur content of the natural gas shall be conducted using one of the approved ASTM reference methods for the measurement of sulfur in gaseous fuels, or an approved alternative method. The reference methods are ASTM D1072-80, ASTM D3031-81, ASTM D3246-81, and ASTM D4084-82 as referenced in 40 CFR 60.335(b)(2), or the latest edition(s).

- b. **This custom fuel monitoring schedule shall become effective on the date this permit amendment becomes valid. Effective the date of this custom schedule, sulfur monitoring shall be conducted twice monthly for six months. If this monitoring shows little variability in the fuel sulfur content, and indicates consistent compliance with 40 CFR 60.333 and the conditions of this permit, then sulfur monitoring shall be conducted once per quarter for six quarters. If monitoring data is provided by the applicant which demonstrates consistent compliance with the requirements herein the applicant may begin monitoring as per the requirements of 2.c.**
 - c. **If after the monitoring required in item 2.b. above, or herein, the sulfur content of the fuel shows little variability and, calculated as sulfur dioxide, represents consistent compliance with the sulfur dioxide emission limits specified under 40 CFR 60.333 and the conditions of this permit, sample analysis shall be conducted twice per annum. This monitoring shall be conducted during the first and third quarters of each calendar year.**
 - d. **Should any sulfur analysis as required in items 2.b. or 2.c. above indicate noncompliance with 40 CFR 60.333 and the conditions of this permit, the owner or operator shall notify the Department of such excess emissions and the custom schedule shall be re-examined by the Environmental Protection Agency. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.**
3. **If there is a change in fuel supply, the owner or operator must notify the Department of such change for re-examination of this custom schedule. A substantial change in fuel quality shall be considered as a change in fuel supply. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.**
4. **Records of sample analysis and fuel supply pertinent to this custom schedule shall be retained for a period of five years, and be available for inspection by personnel of federal, state, and local air pollution control agencies.**

II. Attachments to be Incorporated;

- FPC letter dated September 26, 1997
- EPA letter dated August 14, 1987
- EPA letter dated October 25, 1997
- Natural Gas Analysis Data received January 20, 1998

Mr. W. Jeffrey Pardue
AC 61-11862, 61-11863, & 61-11864/PSD-FL-014(A)
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A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, 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 at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions filed by the applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information:

- (a) The name, address and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action;
- (g) A statement of the relief sought by petitioner, stating precisely the action the petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the request/application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this amendment in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

