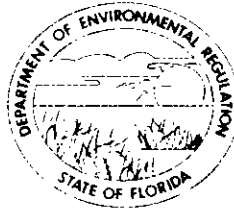


STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

October 5, 1982

Mr. P. A. Korelich, P.E.
Utilities Commission
City of New Smyrna Beach
P. O. Box 519
New Smyrna Beach, Florida 32069

Dear Mr. Korelich:

RE: Final Determination - City of New Smyrna Beach
Utilities Commission, Swoope Units 3 and 4,
Application for State and Federal PSD Permits
(AC 64-57578, AC 64-57580, PSD-FL-089)

Enclosed please find one copy of the referenced Final Determination. State Permit Numbers AC 64-57578 and AC 64-57580 are hereby issued as of September 30, 1982, pursuant to Section 403, Florida Statutes. Final approval of the Federal PSD permit, which is incorporated with the state permit, is contingent upon review and acceptance of the permit conditions by the Environmental Protection Agency Region IV office in Atlanta. Questions concerning final issuance of the Federal permit should be directed to Mr. James T. Wilburn of the EPA office.

Acceptance of the state permit constitutes notice and agreement that the Department will periodically review this permit for compliance, including site inspections where applicable, and may initiate enforcement actions for violation of the conditions and requirements thereof.

Sincerely,

C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management

CHF/pa

cc: James T. Wilburn, EPA Region IV
Charles Collins, DER St. Johns River District
David A. Buff, Environmental Science and Engineering

P16 7682429

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL
(See Reverse)

SENT TO	
P.A. Korelich, P.E.	
STREET AND NO.	
P. O. Box 519	
P.O., STATE AND ZIP CODE	
New Smyrna Beach, FL	
POSTAGE	\$
CERTIFIED FEE	\$
SPECIAL DELIVERY	\$
RESTRICTED DELIVERY	\$
CONSULT POSTMASTER FOR FEES	
OPTIONAL SERVICES	
MEMBER REVIEW SERVICE	
SHOW TO WHOM AND DATE DELIVERED	\$
SHOW TO WHOM DATE AND ADDRESS OF DELIVERY	\$
SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	\$
SHOW TO WHOM DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	\$
TOTAL POSTAGE AND FEES	\$
POSTMARK OR DATE	
10/6/82	

PS Form 3800, Apr. 1976

PS Form 3811, Jan. 1979

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
 Show to whom and date delivered..... \$
 Show to whom, date and address of delivery..... \$
 RESTRICTED DELIVERY
 Show to whom and date delivered..... \$
 RESTRICTED DELIVERY.
 Show to whom, date, and address of delivery \$

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
 Mr. P. A. Korelich, P.E.
 P. O. Box 519
 New Smyrna Beach, FL 32069

3. ARTICLE DESCRIPTION:
 REGISTERED NO. | CERTIFIED NO. | INSURED NO.
 | 7682429 |

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE Addressee Authorized agent
P.A. Korelich

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

NEW SMYRNA BEACH, FL
 OCT 07 1982
 USPO

☆GPO : 1979-300-459

Final Determination

Utilities Commission
City of New Smyrna Beach
Volusia County, Florida
Swoope Units 3 and 4, Gas Diesel

Permit Numbers

State: AC 64-57578
AC 64-57580

Federal: PSD-FL-089

Florida Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting

September 27, 1982

Response to Public Comment

Utilities Commission
City of New Smyrna Beach

The Utilities Commission's Construction Permit applications for installation of two gas diesel units at the existing Swoope Generation Station in New Smyrna Beach have been reviewed by FDER. Public Notice of the Department's Intent to Issue was published in the New Smyrna Beach News and Observer on August 27, 1982. Copies of the preliminary determination were available for public inspection at Brannon Memorial Library in the city, the FDER's St. Johns River District office and the Bureau of Air Quality Management.

There were no comments from the public as a result of the public notice period.

The final action of the Department will be to issue the permits as noticed in the public review process.



STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL REGULATION

CONSTRUCTION
PERMIT

NO. AC 64-57578

UTILITIES COMMISSION
CITY OF NEW SMYRNA BEACH
UNIT 3, GAS DIESEL

DATE OF ISSUANCE

September 30, 1982

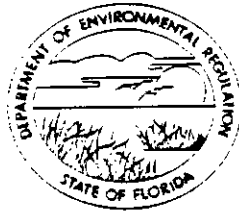
DATE OF EXPIRATION

JUNE 30, 1983

VICTORIA J. TSCHINKEL
SECRETARY

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

APPLICANT: Utilities Commission
City of New Smyrna Beach
P. O. Box 519
New Smyrna Beach, Florida 32069

PERMIT/CERTIFICATION
NO. AC 64-57578

COUNTY: Volusia

PROJECT: Swoope Unit #3
Gas Diesel

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2 and 17-4, Florida Administrative Code. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the approved drawing(s), plans, documents, and specifications attached hereto and made a part hereof and specifically described as follows:

For the installation of a 2050 kw diesel generating unit to be located at the existing Swoope plant site in the City of New Smyrna Beach, Volusia County, Florida. The UTM coordinates are 505.8 km East and 3214.8 km North.

The construction shall be in accordance with the attached permit application, plans and documents except as otherwise noted on page 3, Specific Conditions.

Attachments:

1. Application to Construct Air Pollution Source, DER Form 17-2.122(16), received on June 28, 1982.
2. Best Available Control Technology (BACT) Determination dated August 18, 1982.

PERMIT NO.: AC 64-57578
APPLICANT: Utilities Commission

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions; and as such are binding upon the permittee and enforceable pursuant to the authority of Section 403.161(1), Florida Statutes. Permittee is hereby placed on notice that the department will review this permit periodically and may initiate court action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
2. This permit is valid only for the specific processes and operations indicated in the attached drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit shall constitute grounds for revocation and enforcement action by the department.
3. 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 notify and provide the department with the following information: (a) a description of and cause of non-compliance; and (b) the period of non-compliance, including exact 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. 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 revocation of this permit.
4. As provided in subsection 403.087(6), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor 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.
5. This permit is required to be posted in a conspicuous location at the work site or source during the entire period of construction or operation.
6. 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 arising under the Florida Statutes or department rules, except where such use is proscribed by Section 403.111, F.S.
7. In the case of an operation permit, 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.
8. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant, or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, except where specifically authorized by an order from the department granting a variance or exception from department rules or state statutes.
9. This permit is not transferable. Upon sale or legal transfer of the property or facility covered by this permit, the permittee shall notify the department within thirty (30) days. The new owner must apply for a permit transfer within thirty (30) days. The permittee shall be liable for any non-compliance of the permitted source until the transferee applies for and receives a transfer of permit.
10. The permittee, by acceptance of this permit, specifically agrees to allow access to permitted source at reasonable times by department personnel presenting credentials for the purposes of inspection and testing to determine compliance with this permit and department rules.
11. This permit does not indicate a waiver of or approval of any other department permit that may be required for other aspects of the total project.
12. This permit conveys no title to land or water, nor constitutes state recognition or acknowledgement of title, and does not constitute authority for the reclamation 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.
13. This permit also constitutes:
 - Determination of Best Available Control Technology (BACT)
 - Determination of Prevention of Significant Deterioration (PSD)
 - Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)

PERMIT NO.: AC 64-57578
APPLICANT: Utilities Commission

SPECIFIC CONDITIONS:

1. The proposed unit shall be constructed in accordance with the capacities and specifications stated in the application and additional information supplied by the applicant.
2. Sulfur content of the fuel oil fired in the proposed gas diesel unit shall be limited to 0.3%.
3. Nitrogen oxides emissions from the Unit No. 3 shall be limited to 620 ppmv corrected to 15% oxygen on a dry basis. Compliance with the emission limits required by the attached BACT determination shall be determined by performance tests while the unit is at or close to full operating capacity.
4. The 70% capacity factor restriction of Swoope Unit No. 2 shall be eliminated. The new NO_x emission limit, which is regulated by the attached BACT determination, shall be 690 ppmv corrected to 15% oxygen on a dry basis.

PERMIT NO.: AC 64-57578
APPLICANT: Utilities Commission

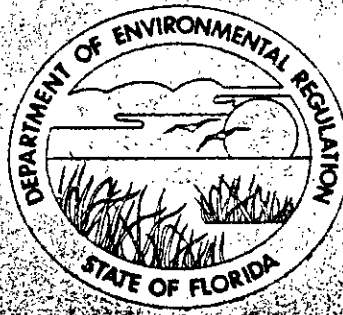
Expiration Date: June 30, 1983

Issued this 30 day of September, 1983.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

 Pages Attached.

Victoria J. Hill
Signature



**STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL REGULATION**

**CONSTRUCTION
PERMIT**

NO. AC 64-57580

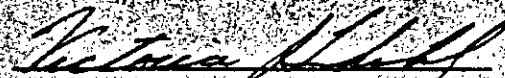
UTILITIES COMMISSION
CITY OF NEW SMYRNA BEACH
UNIT 4, GAS DIESEL

DATE OF ISSUANCE

September 30, 1982

DATE OF EXPIRATION

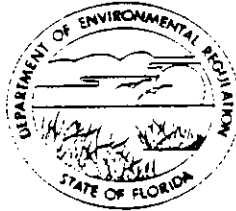
JUNE 30, 1983



VICTORIA J. TSCHINKEL
SECRETARY

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2800 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

APPLICANT: Utilities Commission
City of New Smyrna Beach
P. O. Box 519
New Smyrna Beach, Florida 32069

PERMIT/CERTIFICATION
NO. AC 64-57580

COUNTY: Volusia

PROJECT: Swoope Unit #4
Gas Diesel

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2 and 17-4, Florida Administrative Code. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the approved drawing(s), plans, documents, and specifications attached hereto and made a part hereof and specifically described as follows:

For the installation of a 2275 kw diesel generating unit to be located at the existing Swoope plant site in the City of New Smyrna Beach, Volusia County, Florida. The UTM coordinates are 505.8 km East and 3214.8 km North.

The construction shall be in accordance with the attached permit application, plans and documents except as otherwise noted on page 3, Specific Conditions.

Attachments:

1. Application to Construct Air Pollution Source, DER Form 17-1.122(16), received on June 28, 1982.
2. Best Available Control Technology (BACT) Determination dated August 18, 1982.

PERMIT NO.: AC 64-57580
APPLICANT: Utilities Commission

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions," and as such are binding upon the permittee and enforceable pursuant to the authority of Section 403.161(1), Florida Statutes. Permittee is hereby placed on notice that the department will review this permit periodically and may initiate court action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
2. This permit is valid only for the specific processes and operations indicated in the attached drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit shall constitute grounds for revocation and enforcement action by the department.
3. 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 notify and provide the department with the following information: (a) a description of and cause of non-compliance; and (b) the period of non-compliance, including exact 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. 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 revocation of this permit.
4. As provided in subsection 403.087(6), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor 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.
5. This permit is required to be posted in a conspicuous location at the work site or source during the entire period of construction or operation.
6. 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 arising under the Florida Statutes or department rules, except where such use is proscribed by Section 403.111, F.S.
7. In the case of an operation permit, 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.
8. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant, or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, except where specifically authorized by an order from the department granting a variance or exception from department rules or state statutes.
9. This permit is not transferable. Upon sale or legal transfer of the property or facility covered by this permit, the permittee shall notify the department within thirty (30) days. The new owner must apply for a permit transfer within thirty (30) days. The permittee shall be liable for any non-compliance of the permitted source until the transferee applies for and receives a transfer of permit.
10. The permittee, by acceptance of this permit, specifically agrees to allow access to permitted source at reasonable times by department personnel presenting credentials for the purposes of inspection and testing to determine compliance with this permit and department rules.
11. This permit does not indicate a waiver of or approval of any other department permit that may be required for other aspects of the total project.
12. This permit conveys no title to land or water, nor constitutes state recognition or acknowledgement of title, and does not constitute authority for the reclamation 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.
13. This permit also constitutes:
 - Determination of Best Available Control Technology (BACT)
 - Determination of Prevention of Significant Deterioration (PSD)
 - Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)

PERMIT NO.: AC 64-57580
APPLICANT: Utilities Commission

SPECIFIC CONDITIONS:

1. The proposed unit shall be constructed in accordance with the capacities and specifications stated in the application and additional information supplied by the applicant.
2. Sulfur content of the fuel oil fired in the proposed gas diesel unit shall be limited to 0.3%.
3. Nitrogen oxides emissions from the unit shall be limited to 625 ppmv corrected to 15% oxygen on a dry basis. Compliance with the emission limits required by the attached BACT determination shall be determined by performance tests while the unit is at or close to full operating capacity.

PERMIT NO.: AC 64-57580
APPLICANT: Utilities Commission

Expiration Date: June 30, 1983

 Pages Attached.

Issued this 30 day of September, 1982.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

Victoria J. Hall
Signature

Final Determination
(PSD-FL-089)

Utilities Commission
City of New Smyrna Beach

The preceding State Final Determinations are adopted by reference for the federal permit, PSD-FL-089.

Specific Conditions listed in the State permits, AC 64-57578 and AC 64-57580, are adopted as specific conditions for the federal permit, PSD-FL-089, for this source.

The attached General Conditions are also made a part of the federal permit PSD-FL-089 for this source.

Attachment: General Conditions (federal)

GENERAL CONDITIONS

1. The permittee shall notify the permitting authority in writing of the beginning of construction of the permitted source within 30 days of such action and the estimated date of start-up of operation.
2. The permittee shall notify the permitting authority in writing of the actual start-up of the permitted source within 30 days of such action and the estimated date of demonstration of compliance as required in the specific conditions.
3. Each emission point for which an emission test method is established in this permit shall be tested in order to determine compliance with the emission limitations contained herein within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source. The permittee shall notify the permitting authority of the scheduled date of compliance testing at least thirty (30) days in advance of such test. Compliance test results shall be submitted to the permitting authority within forty-five (45) days after the complete testing. The permittee shall provide (1) sampling ports adequate for test methods applicable to such facility, (2) safe sampling platforms, (3) safe access to sampling platforms, and (4) utilities for sampling and testing equipment.
4. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of two (2) years from the date of recording.
5. If, for any reason, the permittee does not comply with or will not be able to comply with the emission limitations specified in this permit, the permittee shall immediately notify the State District Manager by telephone and provide the District Office and the permitting authority with the following information in writing within four (4) days of such conditions:
 - (a) description for noncomplying emission(s),
 - (b) cause of noncompliance,
 - (c) anticipated time the noncompliance is expected to continue or, if corrected, the duration of the period of noncompliance,

(d) steps taken by the permittee to reduce and eliminate the noncomplying emission,

and

(e) steps taken by the permittee to prevent recurrence of the noncomplying emission.

Failure to provide the above information when appropriate shall constitute a violation of the terms and conditions of this permit. Submittal of this report does not constitute a waiver of the emission limitations contained within this permit.

6. Any change in the information submitted in the application regarding facility emissions or changes in the quantity or quality of materials processed that will result in new or increased emissions must be reported to the permitting authority. If appropriate, modifications to the permit may then be made by the permitting authority to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause violation of the emission limitations specified herein.
7. In the event of any change in control or ownership of the source described in the permit, the permittee shall notify the succeeding owner of the existence of this permit by letter and forward a copy of such letter to the permitting authority.
8. The permittee shall allow representatives of the State environmental control agency or representatives of the Environmental Protection Agency, upon the presentation of credentials:
 - (a) to enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of the permit;
 - (b) to have access to any copy at reasonable times any records required to be kept under the terms and conditions of this permit, or the Act;
 - (c) to inspect at reasonable times any monitoring equipment or monitoring method required in this permit;

(d) to sample at reasonable times any emission of pollutants;

and

(e) to perform at reasonable times an operation and maintenance inspection of the permitted source.

9. All correspondence required to be submitted to this permit to the permitting agency shall be mailed to:

Mr. James T. Wilburn
Chief, Air Management Branch
Air & Waste Management Division
U.S. EPA, Region IV
345 Courtland Street, NE
Atlanta, GA 30365

10. The conditions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

The emission of any pollutant more frequently or at a level in excess of that authorized by this permit shall constitute a violation of the terms and conditions of this permit.

BEST AVAILABLE CONTROL TECHNOLOGY (BACT) DETERMINATION
CITY OF NEW SMYRNA BEACH
VOLUSIA COUNTY

The City of New Smyrna Beach plans to increase electric power generation capacity an additional 4.33 megawatts. Two generators, each driven by a dual fuel twelve cylinder diesel engine, are to be installed at the Swoope generating station. The engines will use natural gas and No. 2 distillate oil as fuel.

The new installations identified as Swoope No. 3 and Swoope No. 4 will have a maximum engine heat input of 19.2 and 21.2 million Btu per hour, respectively. Both units are scheduled to operate 8760 hours per year.

Swoope No. 2, a similar existing 910 kilowatt unit is limited by permit conditions to operate at 70 percent of full load (AC 64-43484). The applicant has requested this permit condition be changed to allow unrestricted operation.

Air Contaminants Summary: (tons per year)

<u>Source</u>	<u>PM</u>	<u>SO₂</u>	<u>CO</u>	<u>NO_x</u>	<u>HC</u>
No. 3 Unit	<1	2	39	250	11
No. 4 Unit	<1	2	43	245	15
Total	2	4	82	495	26
No. 2 Unit ⁽¹⁾	<1	<1	5	40	16
Rate ⁽²⁾	25	40	100	40	-

(1) Emissions due to increase from 70 to 100 percent operation.

(2) Significant Emission Rate, 17-2.500, FAC, Table 500-2.

The amount of NO_x emitted from the proposed sources exceed the significant emission rate and requires a BACT determination per 17-2.500(5)(c), FAC. A BACT determination is also required for Swoope No. 2 due to the relaxation of a permit limitation.

BACT Determination Requested by the Applicant:

Pollutant	Emission Limit
NO _x	Natural gas firing with the ignition timing set as recommended by the manufacturer

Date of Receipt of a BACT Application:

June 28, 1982

Date of Publication in the Florida Administrative Weekly:

July 9, 1982

Review Group Members:

Comments were obtained from the New Source Review Section, the Air Modeling Section in the Bureau of Air Quality Management, and DER St. Johns River District.

BACT Determined by DER:

*NO_x Pollutant Emission Limits

Unit 2 - 690 ppmv corrected to 15% oxygen on a dry basis

Unit 3 - 620 ppmv corrected to 15% oxygen on a dry basis

Unit 4 - 625 ppmv corrected to 15% oxygen on a dry basis

*Based on manufacturer's rated brake-specific fuel consumption at peak load. Applicant has option of using brake-specific fuel consumption as determined in the field. Test methods and operations monitoring as per the proposed NSPS 40 CFR 60.320, Subpart FF, Subsections 60.324 and 60.323.

DER Determination Rationale:

There is a proposed NSPS for stationary internal combustion engines, 40 CFR 60.320, Subpart FF. The NSPS is in administrative review and promulgation is expected in the last quarter of 1982. The consensus was that a more stringent NO_x emission limitation than the NSPS was not justified. The department has determined BACT for NO_x emissions to be based on the NSPS formula in Subpart FF, Subsection 60.322(a)(3)(ii).

$$\text{STD} = 600 \frac{10.2}{Y}$$

STD = Allowable NO_x emissions, ppmv corrected to 15% oxygen on a dry basis.

Y = Manufacturer's rated brake-specific fuel consumption at peak load (Kj/w-hr) or applicants brake-specific fuel consumption at peak load as determined in the field.

The NO_x emission limits determined as BACT are based on the manufacturer's brake-specific fuel consumption at peak load. The applicant has the option of using a brake-specific fuel consumption as determined in the field.

The NSPS was proposed July 23, 1979 (44 FR 43152) to apply to sources that commence construction after January 1982. The manufacturers of engines subject to the regulations should have had adequate time to develop a NO_x emission reduction control technique for their engines in anticipation of the NSPS being promulgated.

The applicant, therefore, should have no great difficulty in meeting the NO_x emission limits determined as BACT for Units 3 and 4. However, Unit 2 was permitted in July 1981 and that engine may require major modifications to meet the NO_x emission limit. In this case, the applicant may submit to the department actual field data indicating the inability to meet the NO_x emission limit. The department will then review the BACT determination for Unit 2 on basis of the new data presented.

The dual-fired engines serve the same application as diesel engines. In the event that natural gas should become limited the dual-fuel engines would likely operate as diesel engines. The NO_x emission limit determined as BACT also applies to diesel engines, therefore, simplifying compliance by the applicant in the event the engines are converted totally to diesel.

Fuel injection retard is an effective NO_x control technique but results in approximately a 3% increase in fuel usage. This will increase total fuel usage by 1107 cubic feet per hour of natural gas and 0.519 gallon per hour of No. 2 oil. The increased monthly cost to a consumer using 1000 kw of electricity would be approximately one dollar. The additional fuel cost is not considered excessive.

Details of the Analysis May Be Obtained by Contacting:

Edward Palagyi, BACT Coordinator
Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

Recommended By:

for *Stamand George*
Steve Smallwood, Chief BAQM

Date: *August 18, 1982*

Approved:

Terry Cole
Victoria V. Tschinkel, Secretary

Date: *8/18/82*

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional []	Reply Required []	Info. Only []
Date Due: _____	Date Due: _____	

RECEIVED

SEP 28 1982

Office of the Secretary

TO: Victoria J. Tschinkel
FROM: Clair Fancy *J. George / HICF*
DATE: September 28, 1982
SUBJ: Approval and Signature of Air Construction Permits

Attached please find two Air Construction Permits for which the applicant is New Smyrna Beach Utilities Commission. The proposed construction is the installation of two gas diesel units at the existing Swoope Generation Station in New Smyrna Beach.

Day 90, after which the permit would be issued by default, is October 17, 1982.

The Bureau recommends your approval and signature.

CF/pa

Attachments