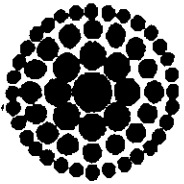


Patty



**Florida
Power
CORPORATION**

3201 Thirty-Fourth Street South • P. O. Box 14042 • St. Petersburg, Florida 33733

ENVIRONMENTAL SERVICES DEPARTMENT

TELECOPIER NUMBER (813) 866-4926

TO: *PRESTON LEWIS*

FROM: *Kent Hedrick*

DATE: *10/7/93*

TELECOPIER NUMBER: ~~813~~ ~~866~~ *(904)* 922-6979

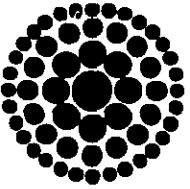
CONFIRMATION NUMBER: *(813)* ~~866~~ 866-5825

NUMBER OF PAGES TO FOLLOW: *5*

PLEASE NOTIFY (813) 866-4940 FOR ANY PROBLEMS CONCERNING THE RECEIPT OF THIS FAX.

REMARKS:

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OCT 7 1993
Division of Air
Resources Management



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OCT 12 1993

Division of Air
Resources Management

*Patty
Copy for all
including CL
GSD-
10/12*

October 7, 1993

Mr. Chuck M. Collins
Florida Department of Environmental Protection
Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Dear Mr. Collins:

Re: DeBary Operating Permit AO64-233544

Per your request, enclosed is a summary of the interpretive issues Florida Power Corporation (FPC) has identified with the above referenced permit. FPC is requesting the Central District to consider amending the permit to incorporate necessary language to address these issues.

FPC requests a meeting with Central District to discuss these issues and I will contact you to establish a date for this meeting.

Please call me at (813)866-4281 with any questions or comments. I look forward to meeting with you to reach resolution regarding these issues.

Sincerely,

Kent D. Hedrick, P.E.
Supervisor, Air Programs

cc: Preston Lewis, FDEP, Tallahassee/by fax

C. Foggan

Department of Environmental Regulation
Routing and Transmittal Slip

To: (Name, Office, Location)

1. *Steve*
2. *John B.*
3. *John P.*
4. *Mike H.*

Remarks:

FYI

Please return to me for file -

Preston: Please take a look at this to determine whether CFD is included by the AC conditions. IF so are the AC conditions defensible? JLS

ASK PATTY

From

Patty

Date

10-13-93

Phone

Florida Power Corporation
DeBary Permit AO64-233544
Interpretive Issues

Specific Condition:

- 1) How is the heat input limitation of 944 mmBtu/Hr at base load and 87 °F applied to actual turbine operation? Specifically, what is the implication of the temperature reference? Can the turbines be operated at other heat inputs based on the ambient temperature as indicated by the curve of ambient temperature versus heat input that was part of the application for the permit to operate?

Florida Power Corporation (FPC) requests this condition be changed to reflect a maximum permitted capacity of 1144 mmBtu/Hr at 20 °F (based on FDEP approved PSD application) and contain language addressing heat input limitations based on compliance tests as provided in a guidance memo from Howard L. Rhodes, dated August 30, 1993 (copy attached). In addition, the heat input vs. ambient temperature curve supplied by FPC in the application for a permit to operate needs to be made a part of the operating permit.

- 4) FPC requests clarification from FDEP Central District that the hours of operation limitation contained in this condition applies to any load, not just peak load. FPC believes this interpretation to be correct since the capacity factor of 38.7% stated in this condition is equivalent to 3390 hour per year.
- 5) FPC requests that this condition be reworded to require agency approval for changes in equipment and/or method of operation which results in increased pollutant emissions above permitted allowable limits.
- 6) FPC requests FDEP Central District to identify the specific operating parameters that were established during compliance testing that are a part of this operating permit. FPC cannot assure compliance with this condition without the knowledge of these specific operating parameters.
- 7) FPC requests this condition be changed to allow this notification be done at the time FPC makes the 15 day notification for formal compliance testing that is required in Specific Condition 9. In addition, this condition should be combined with Specific Condition 14 for clarification. FPC believes these two conditions are a restatement of the same requirement.

FPC also requests clarification on an apparent conflict with Specific Condition 12. This condition states that the compliance year is October 1 to September 30 while Specific Condition 12 requires compliance testing be conducted 60 days prior to

July 15 of each year. For clarity and notification purposes, FPC requests the compliance year be defined as August 1 to July 31. This time frame corresponds with the time requirement for compliance testing.

- 8) FPC cannot reproduce the tons/yr. values supplied in this table. FPC requests the method of calculation for these values to allow review and concurrence with the values.

The reference to 15% O₂ should be changed to apply only to pollutant concentrations (i.e. 42 ppm NO_x) and not mass rate (i.e. lb/hr) emissions. If this is not the case, FPC requests guidance on the method to correct mass rate emissions to 15% O₂.

Footnote (a) needs to be changed to state the sulfur content shall not exceed 0.30% based upon a weighted 12 month rolling average as stated in Specific Condition 2, not an annual average.

- 10) This condition should be reworded according to the August 30, 1993 memo from Howard Rhodes providing Agency guidance on proper language addressing heat input limitations based on compliance testing.

The language in the second paragraph should be amended to state that the particulate test requirement is optional as per Specific Condition 14.

- 13) The requirement to perform VE tests needs to be amended to provide the requirements for this test if it is used in lieu of a particulate test. In addition, FPC is unaware of any regulatory requirement to perform a VE during each particulate run. Typically, only one VE is required during particulate testing. FPC request this condition be changed to require one VE during each particulate test or provide the regulatory cite that requires a VE to be performed during each particulate test run.

For clarification, the method of determination for fuel heat content (Btu/lb) contained in the second table should be changed to state ASTM D-240, which is the actual test method used.

The second table should also be changed to add CO₂ in addition to O₂ as parameters to be determined by Method 3A. Method 20 allows the use of either O₂ or CO₂ in determining emission rate calculations.

- 14) This condition should be combined with Specific Condition 7 for clarification.
- 15) The continuous monitoring system required by this condition is the GE Mark IV Control System. This system is comprised of many component parts and, therefore, does not have a single unique serial number or model number. FPC

requests guidance on how to properly identify this system to FDEP Central District in light of this fact.

- 17) This condition needs to be changed to disallow the use of the GE NO_x ISO correction algorithm contained in the GE Mark IV Control System until approval from the EPA Administrator is obtained. FPC will be unable to operate the combustion turbines without the GE Mark IV Control System. FPC does not believe FDEP Central District's intent is to prevent the operation of the combustion turbines, therefore, this change is needed.
- 18) This condition should be changed to state higher heating value of the fuel is required as well as lower to be consistent with the requirements of the second table in Specific Condition 13.
- 19) These units are not required to have a continuous opacity monitoring strip chart, therefore, this requirement should be deleted. A requirement to submit FDEP approved VE forms should be added.
- 20) FPC disagrees with the statement that compliance is based upon daily averages. As stated in Specific Condition 2, the weighted 12 month rolling average and maximum fuel sulfur content is the basis of determining compliance. It is also unclear what daily averages are being referenced. Daily records of lb/hr and lb/mmBtu of SO₂ will be impossible to record since fuel analysis is not done on a daily basis (see Specific Condition 2). FPC can provide these values on a monthly basis, which can be submitted quarterly to the Department.