



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

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# Interoffice Memorandum

TO: Charles M. Collins, Administrator  
Air Program—Central District Office

FROM: Mike Harley, Administrator *MH*  
Emissions Monitoring Section

DATE: May 19, 1993

SUBJECT: Florida Power Corporation Turbine Test  
Deviation From Specific Condition No.13 Of Construction Permit  
AC 64-191015

*Patly*

*File with FPC permits -*

*File Debarry*

Clair Fancy asked us to respond your April 12 memo about the above referenced test. On the basis of the information that you provided, we agree with your interpretation of the applicable requirements.

Both the permit and the applicable federal regulation require the emissions to be corrected to ISO standard day conditions. The formula for the ISO correction is specified in specific condition 13 of construction permit AC 64-191015 and 40 CFR 60.335(c)(1). Pursuant to 40 CFR 60.335(f)(1), the manufacturer is required to obtain federal approval of any alternate correction factors prior to the initial performance test. The federal regulation requires publication of the approval in the Federal Register. And, Rule 17-297.620, F.A.C., requires Florida Power Corporation to apply for approval of the alternate correction factor prior to the compliance test.

EPA Region IV agrees that alternate correction factors must be approved prior to the initial performance test. If you have any questions, please call Ramesh Menon or me at Suncom 278-1344.

MH/rm

cc: C. Fancy  
J. Brown  
P. Lewis