

**Florida  
Power**  
CORPORATION

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February 15, 1991

Mr. Clair H. Fancy, P.E.  
Central Air Permitting Section  
Florida Department of Environmental  
Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Dear Mr. Fancy:

Re: DeBary Construction Air Permit  
AC 64-191015, PSD - FL - 167

Florida Power Corporation received your letter of January 30, 1991, requesting additional information on the DeBary Construction Air Permit. This letter is in response to that request.

**Question 1:** Explain and demonstrate how the actual emissions of each pollutant listed in Table 500-2 of Rule 17-2.500 Florida Administrative Code (F.A.C.) were calculated in units of applicable emission limiting standard (lbs/hr and tons/yr) for each source at the DeBary Facility.

The emission calculations of all regulated and non-regulated pollutants were calculated using both manufacturer's data and EPA emission factors. The design information and emissions are presented in Tables A-1 through A-20 of Appendix A in the permit application. These tables were generated using a computerized spreadsheet (i.e., Lotus 1-2-3). Attached are Tables A-1 through A-5 which have been annotated to show the columns (i.e., A, B, C, and D) and rows (i.e., 1, 2, 3, ..... ) in the spreadsheet. Attachment A presents a printout of all the calculations made in the spreadsheet along with the basis for the calculation. The calculations, as well as text comments, are listed alpha-numerically in ascending order. For example, in Table A-1 column D row 12 is listed as A:D12 on the calculation page and the data input is 82740; as noted, this data was provided by General Electric (GE). Attachment B presents a copy of the relevant EPA emission factors.

**Question 2:** What is the anticipated schedule for using natural gas at the DeBary facility for the proposed new combustion turbines and other units?

The proposed new combustion turbines will burn No. 2 fuel oil as described in permit application AC 64-191015, PSD-FL-167.

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**Question 3: What is the intended use for the facility - baseload, cycling, peaking, etc?**

The immediate plan for the new facility is for peaking purposes. However, due to changes in system electric demand and systems supply capability, these units may be called upon to run more frequently than is typically characterized as peaker operation.

**Question 4: Why was combined cycle not used, particularly for such a large facility expansion?**

Simple cycle units were selected because they were the most appropriate generation technology for peaking purposes.

**Question 5: Please provide a map showing the facility location, county, municipalities, adjacent facilities, etc.**

Attached is a copy of drawing number SUR-0062-D which shows the existing facility property and its relationship to municipalities, the county name and the township range and sections where the DeBary Plant is located.

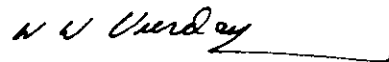
The attached Black and Veatch drawing number 17113-DS-0004 is a site arrangement which shows the new units P7 through P10 located south of the existing facility. Locations for two future peaking facilities are also shown.

**Question 6: Please provide a copy of the air quality dispersion modeling inputs and results in both paper and diskette formats.**

This information is enclosed in both paper and diskette formats. A list of filenames and corresponding descriptions is also attached for your convenience.

If you have any further questions, please contact me at (813) 866-4511.

Sincerely,



W. W. Vierday  
Environmental & Licensing

Enclosures

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cc: P. J. Linn  
B. Andrews  
C. Holladay  
C. Collins  
G. Harper, EPA