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## ORLANDO UTILITIES COMMISSION

500 SOUTH ORANGE AVENUE • P. O. BOX 3193. • ORLANDO, FLORIDA 32802 • 305/423-9100 CERTIFIED RETURN RECEIPT REQUESTED

August 17, 1988

Florida Department of
Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400
ATTN: Mr. Bill Thomas

RECEIVED

AUG 22 1988

**DER-BAQM** 

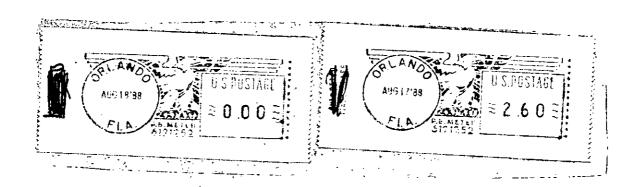
Dear Mr. Thomas:

We appreciate your continuing efforts in the processing of our PSD permit application for the four unit combustion turbine project at the Indian River Plant, Brevard County, Florida.

We would like to present the following comments on four of the specific conditions contained in the proposed permit attached to your letter of July 18.

Specific Condition 3 incorrectly specifies the maximum heat input. Each turbine is baseload rated at 445 Million BTU/hr (not 112) on oil at sea level and 590 F as specified in Section III E of the application. As you are aware, the ambient temperature affects the capacity of combustion turbines with lower temperatures serving to increase their maximum heat input firing rate. The amount of water required for  $NO_X$  control also affects turbine performance. enclosed two figures of heat input vs. temperature provide the range of heat input values expected for the GE frame 6 turbine for oil and natural gas. The center line on each figure is the rated baseload curve with maximum water injection. The top line represents the peak load values which could be sustained for only short periods of This line has also been time without extensive maintenance. adjusted to represent the higher heating value of the fuel (HHV). The bottom line represents the baseload condition with no water injection and is adjusted to represent the lower heating value of the fuel (LHV). Thus the figures provide the "normal" maximum capability vs. temperature and the range around that value. Based on the preceding discussion, Condition 3 should read, "The maximum heat input to each turbine shall not exceed the maximum values in the attached Figures of Heat Input vs. Temperature for the OUC Indian River Combustion Turbines." OUC is also providing copies of various GE correction charts and letter of expected performance which were used to develop the two Figures.

Specific condition 12 is currently incorrect as written since the proposed Unit 3 commence construction date is within 18 months of





the permit issuance date. We are hereby notifying you our intent to change the proposed commence construction date of Unit 4 from November 1990 to November 1989 so that it too will fall within 18 months of the permit issuance date. Our proposed new specific condition 12 would read "If construction does not commence on any of the four units within 18 months of the date of this permit issuance, then the permittee shall obtain from the Department a review and, if necessary, a modification of the control technology and allowable emission limits for any such unit. The proposed schedule indicates construction commencement dates of October 1988 for Units 1 & 2, and November 1989 for Units 3 & 4."

We are concerned that Specific Condition 2 could be read to imply a limitation with regard to the combustion of oil. This would be inconsistent with the permit application and the Department's BACT analysis. We have been assured by DER staff that this is not the Department's intent. Rather, the intent was to include in the permit the Department's preference that natural gas be burned if available. We are suggesting that the second sentence in Specific Condition 2 be moved to the second paragraph of the permit on page one following the second sentence in the paragraph to read "Natural gas is the expected primary fuel with distillate oil to be used if the units are needed during periods of curtailed or uneconomical natural gas supply."

Specific Condition B specifies the initial and annual compliance tests to be conducted. We would like to see the requirement to test annually on oil be limited to any unit burning fuel oil more than 170 hours in the preceding 12 month period. It would require 170 hours/year of operation on oil to create 40 tons of  $NO_X$  from oil combustion. This would allow OUC to avoid firing the units on oil to do testing when the units have been used only slightly on oil. For item (a), under Specific Condition 12, we agree with the use of EPA test method 20 for  $NO_X$ . For  $SO_2$ , we propose testing all oil shipments using ASTM D2880-71 for sulfur content less than 0.30 percent as a demonstration of compliance rather than stack testing. We propose that no  $SO_2$  testing be conducted for natural gas because of the very low emission rates. For item (c) we propose testing for particulate matter on oil only since particulate emissions from the combustion of natural gas are also minimal.

We appreciate your attention to these matters.

Sincerely

J.s. Crall

Director

Environmental Division

JSC:sp Enclosure

xc: W.H. Herrington

F.F. Haddad

K.P. Ksionek

T.D. Slepow

S.M. Day, B&V

Pradeep A. Raval, DER

copied: Chuck Callins CF Dist Barry andrews may Linn stagne Aronson, EPA miguel alones, N B CHF/BT Orlando, FL



file copy

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We appreciate your attention to these matters.

J.S. Crall

Director

Environmental Division copied: mai finn Chuck Collins CF Dest Chuck Collins CF Dest

Hayne aronson, EPA CHF/8T

JSC:sp Enclosure

W.H. Herrington

F.F. Haddad

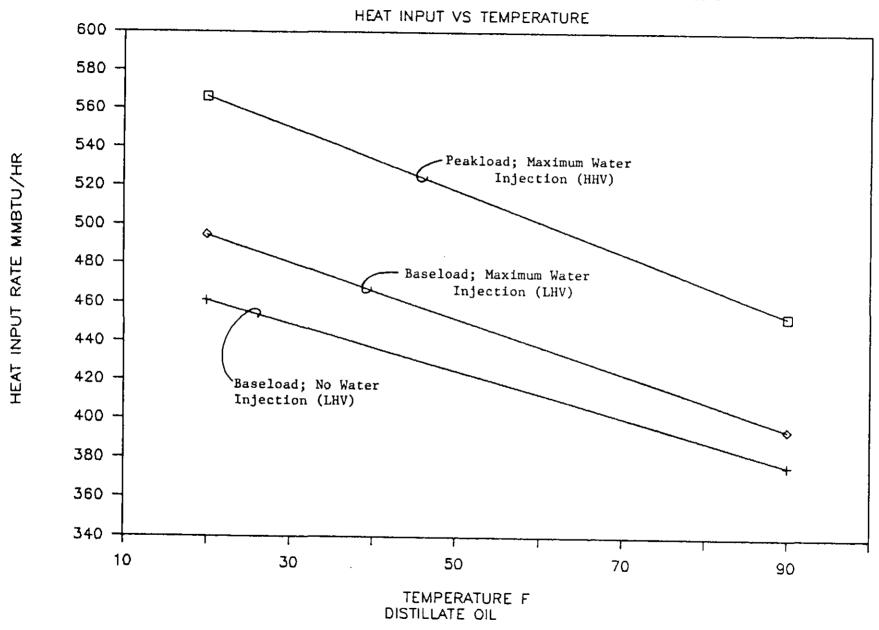
K.P. Ksionek

T.D. Slepow

S.M. Day, B&V

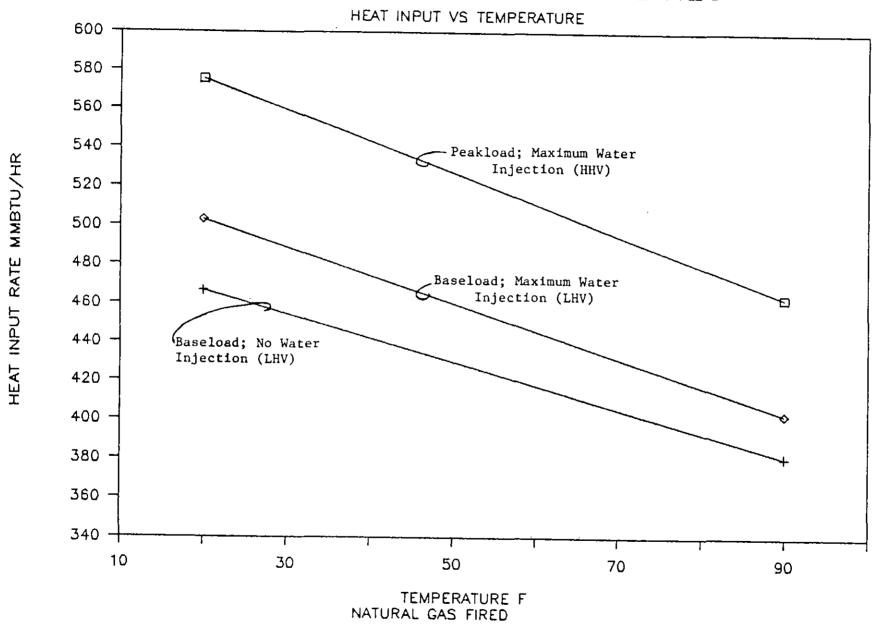
Pradeep A. Raval, DER

# OUC IRP COMBUSTION TURBINES



# OUC IRP COMBUSTION TURBINES

45.5



معتدو والمراسا

TURBINE TECHNOLOGY DEPARTMENT • TURBINE BUSINESS OPERATIONS
GENERAL ELECTRIC COMPANY • ONE RIVER ROAD • SCHENECTADY, NEW YORK 12345 • (518) 385-4523

February 4, 1988

Black & Veatch Engineers - Architects 1500 Meadow Lake Parkway Kansas City, Missouri 64114

Attention: Mr. D. D. Schultz

Subject: Orlando Utilities Commission

Indian River CT Project Combustion Turbine Project B&V File 14137.62.1001.02

Message No: GES/OUC/TJS/L-004

Dear Mr. Schultz

Attached you will find performance data for 20°F, 30°F, and 90°F (60% RH) recalculated at 24 feet elevation. This data replaces the data provided at the January 27 & 28 Coordination Meeting.

I have also included data for 90°F, 90% RH, and 24 feet per your request of February 4, 1988.

Please call me if you need additional information.

Regards,

Leny

T. J. Schoenholz

cc: 0. D. Schultz, B&V

K. P. Ksionek, OUC

T. D. Slepow, OUC

W. G. Gibbons. GE

B. W. Goche, GE

Attach.

TJS:jfc

3850w

## ESTIMATED PERFORMANCE - PG6541(B)

	BASE	PEAK	BASE	PEAK	
FUEL TYPE FUEL LHV - Btu/lb COMPRESSOR INLET TEMP Deg F. OUTPUT - kW , HEAT RATE (LHV) - Btu/kWh HEAT CONS. (LHV) X10-6 - Btu/h EXHAUST FLOW X10-3 - 1b/h EXHAUST TEMP - Deg F. EXHAUST HEAT X10-6 - Btu/h WATER FLOW - 1b/h	90 35460. 11500. 407.8 1035.0 1018. 255.6	21515 90 38730. 11420. 442.3 1038.0 1080. 275.0	11590. 398.9 1036.0 1019. 253.0	18550 90 37620. 11490. 432.3 1039.0 1082. 272.0	
NOX — ppmvd @ 15% O2 NOX AS NO2 — 15/h		42. 75.			,

## SITE CONDITIONS

ELEVATION - ft. 24
INLET LOSS - in. Water 4
EXHAUST LOSS - in. Water 2.5
RELATIVE HUMIDITY - % 60
APPLICATION - AIR COOLED GENERATOR

\* AS REPORTED USING GE MEASUREMENT TECHNIQUES 90F 60%RH AT 24FT PERFORMANCE.

TBO-P.GARRISON 2/4/88

## ESTIMATED PERFORMANCE - PG6541(B)

		BASE	PEAK	BASE	PEAK
FUEL TYPE			NAT GAS		
FUEL LHV	- Btu∕lb	21515	21515	18550	18550
COMPRESSOR INLET TE	MP Deg F.	90	90	90	90
TURTUC					
HEAT RATE (LHV)			11400.		
HEAT CONS. (LHV) XI		_ 403.4	437.0	395.3	427.9
EXHAUST FLOW X1	.0-3 - 1b/h	1027.0	1030.0	1028.0	1031.0
EXHAUST TEMP	- Deg F.	1020.	1082.	1021.	1034.
EXHAUST HEAT X1	.0−6 <del>-</del> Btu/h	255.6	274.4	253.1	271.7
NATER FLOW	- 1b∕h	12130.	14690.	10220.	12310.
	•				
40X - ppm4	od @ 15% 02	42.	42.	65.	65.
NOX AS NO2 1b/h	n	63.	. 24 • -	109.	118.

SITE CONDITIONS

ELEVATION - ft. 24
INLET LOSS - in. Water 4
EXHAUST LOSS - in. Water 2.5
RELATIVE HUMIDITY - % 90

AFPLICATION - AIR COOLED GENERATOR

\* AS REPORTED USING GE MEASUREMENT TECHNIQUES

50F 90%RH AT 24FT PERFORMANCE

TEO-P.GARRISON 2/4/88

## ESTIMATED PERFORMANCE - PG6541(B)

FUEL TYPE FUEL LHV - Etu/1b COMPRESSOR INLET TEMP Deg F. OUTPUT - kW HEAT RATE (LHV) - Btu/kWh HEAT CONS. (LHV) X10-6 - Btu/h EXHAUST FLOW \$10-3 - 1b/h EXHAUST TEMP - Deg F. EXHAUST HEAT X10-6 - Etu/h WATER FLOW - 1b/h	1200.0 979. 298.3	21515 30 48140. 10990. 529.1 1205.0 1040.	45U	PEAK DIST 18550 30 47030. 11060. 520.2 1206.0 1042. 317.3 22900.
NOX — ppmvd @ 15% 02	42.	42.	65.	65.
NOX AS NO2 — 1b/h	83.	90.	132.	

# SITE CONDITIONS

ELEVATION - ft. 24

INLET LOSS - in. Water 4

EXHAUST LOSS - in. Water 2.5

RELATIVE HUMIDITY - % 90

APPLICATION - AIR COOLED GENERATOR

\* AS REPORTED USING GE MEASUREMENT TECHNIQUES 30F AT 24FT PERFORMANCE.

TBO-P. GARRISON 2/4/88

## ESTIMATED PERFORMANCE - PG6541(B)

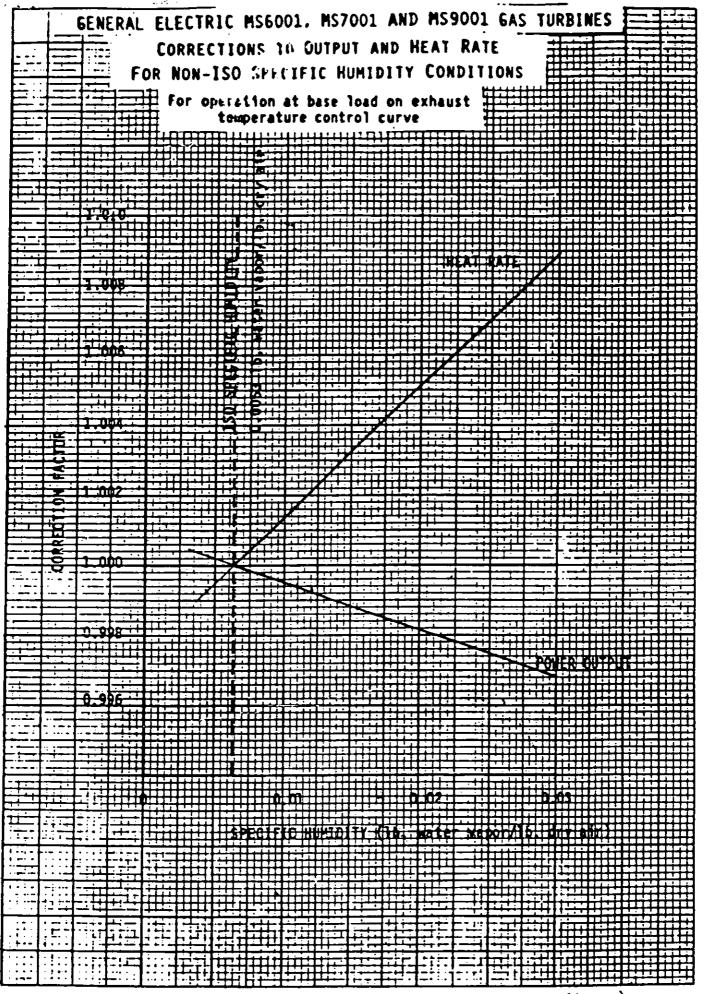
	•	BASE	PEAK	BASE	PEAK
FUEL TYPE		NAT GAS	NAT GAS	DIST	DIST
FUEL LHV	Btu/1b	21515		18550	18550
COMPRESSOR INLET TEMP.	- Deg F.	20	20	20	20 "
OUTPUT	- kM_,	46050.	49610,	44980.	48510,
HEAT RATE (LHV)	- Btu/kWh	10930.	10940.	11010.	11010.
HEAT CONS. (LHV) X10-6	- Btu/h *	503.3	542.7]	495.2	534.1
EXHAUST FLOW X10-3	- lb/h				
EXHAUST TEMP	- Deg F.	973.	1034.	974.	1035.
EXHAUST HEAT X10-6	- Btu/h	305.4	327.6	302.6	324.9
WATER FLOW	- 1b/h	21960.	25780.	20560.	23800.
NOX – ppmvd @	15% 02	42.	42.	65.	65.
NOX AS NO2 - 16/h					

SITE CONDITIONS

ELEVATION - ft. 24
INLET LOSS - in. Water 4
EXHAUST LOSS - in. Water 2.5
RELATIVE HUMIDITY - % 90
APPLICATION - AIR COOLED GENERATOR

\* AS REPORTED USING GE MEASUREMENT TECHNIQUES 20F AT 24 FT PERFORMANCE.

T50-P.GARRISON 2/4/88



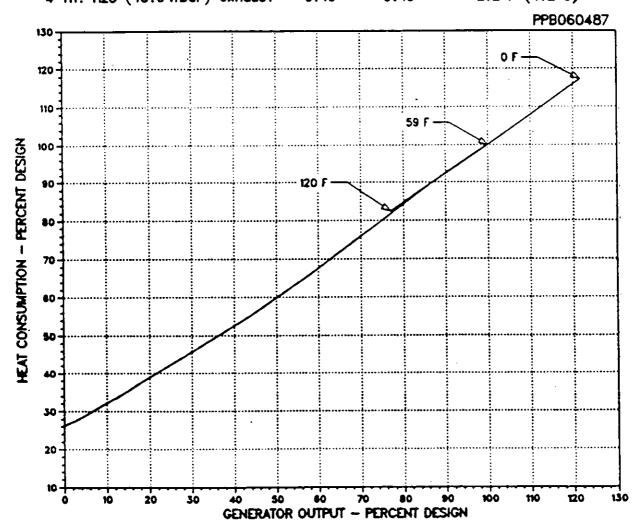
# GENERAL ELECTRIC MODEL PG6541(B) GAS TURBINE ESTIMATED PERFORMANCE — CONFIGURATION: NAT. GAS & DIST. Compressor Inlet Conditions 59 F (15.0 C), 60% Rel. Humidity Atmospheric Pressure 14.7 psia (1.013 bar)

FUEL	144	NATURAL GAS 38340	\$	DISTILLATE 37520	
DESIGN OUTPUT DESIGN HEAT RATE (LHV)	kW Btu (kJ)/kWh	10860 (	(11460)	10970	(11570)
DESIGN HEAT CONS (LHV) X10-6	Btu (kJ)/h		439.4		(434.1)
DESIGN EXHAUST FLOW X10-3 MODE: BASE LOAD	lb (kg)/h	1103. (	(500.5)	1106.	(501.4)

#### NOTES:

- 1. Attitude correction on curve 416HA662
- 2. Ambient temperature correction on curve 499HA543
- 3. Effects of modulated inlet guide vanes on curve 499HA555
- 4. Steam injection effects on curve 499HA531 & 499HA532
- 5. Humidity correction on curve 498HA697 all performance calculated with specific humidity of .0064 or less so as not to exceed 100% relative humidity.
- 6. Plant performance is measured at the generator terminals and includes allowances for excitation power, shaft driven auxiliaries, and 4.0 in. H2O (10.0 mbar) inlet and 2.5 in. H2O (6.2 mbar) exhaust pressure drops.
- 7. Additional pressure drop effects:

1	Æffect on		Effect on
4 in. H2O (10.0 mbar) inlet	Output -1.40	Heat Rate 0.40	Exhaust Temp. 2.2 F (1.2 C) 2.2 F (1.2 C)
A in H2O (10.0 mbor) exhaust	-0.40	0.40	2.2 F (1.2 C)



DATE: 9/9/87

499HA542

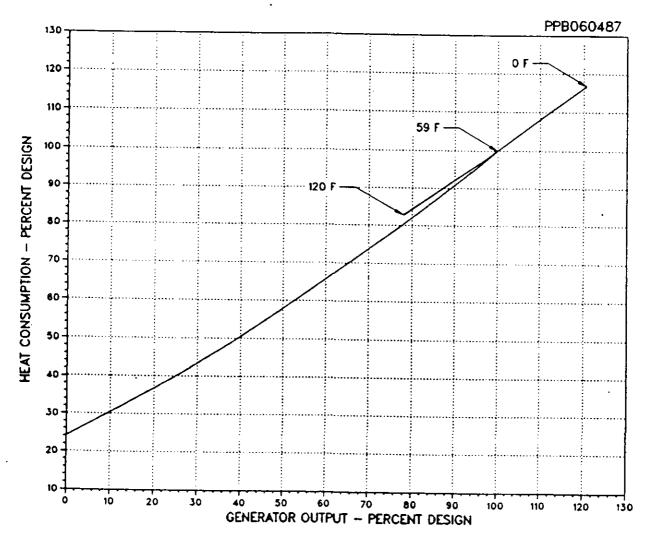
## GENERAL ELECTRIC MODEL PG6541(B) GAS TURBINE ESTIMATED PERFORMANCE - CONFIGURATION: NAT. GAS & DIST. Compressor Inlet Conditions 59 F (15.0 C), 60% Rel. Humidity Atmospheric Pressure 14.7 psia (1.013 bar)

FUEL DESIGN OUTPUT DESIGN HEAT RATE (LHV) DESIGN HEAT CONS (LHV) X10-6 DESIGN EXHAUST FLOW X10-3 MODE: PEAK LOAD		NATURAL GAS 41400 10780 (11370) 446.3 (470.7) 1104 (500.8)	DISTILLATE 40600 10880 (11480) 441.7 (466.1) 1107 (502.2)
--	--	--	---

#### NOTES:

- 1. Altitude correction on curve 416HA662
- 2. Ambient temperature correction on curve 499HA559
- 3. Humidity correction on curve 498HA697 all performance calculated with specific humidity of .0064 or less so as not to exceed 100% relative humidity.
- 4. Plant performance is measured at the generator terminals and includes allowances for excitation power, shaft driven auxiliaries, and 4.0 in. H20 (10.0 mbar) inlet and 2.5 in. H20 (6.2 mbar) exhaust pressure drops.
- 5. Additional pressure drop effects:

	%Effe	ct on	Effect on
4 in. H2O (10.0 mbar) inlet 4 in. H2O (10.0 mbar) exhaust	-1.45	Heat Rate 0.45 '0.45	Exhoust Temp. 2.2 F (1.2 C) 2.2 F (1.2 C)



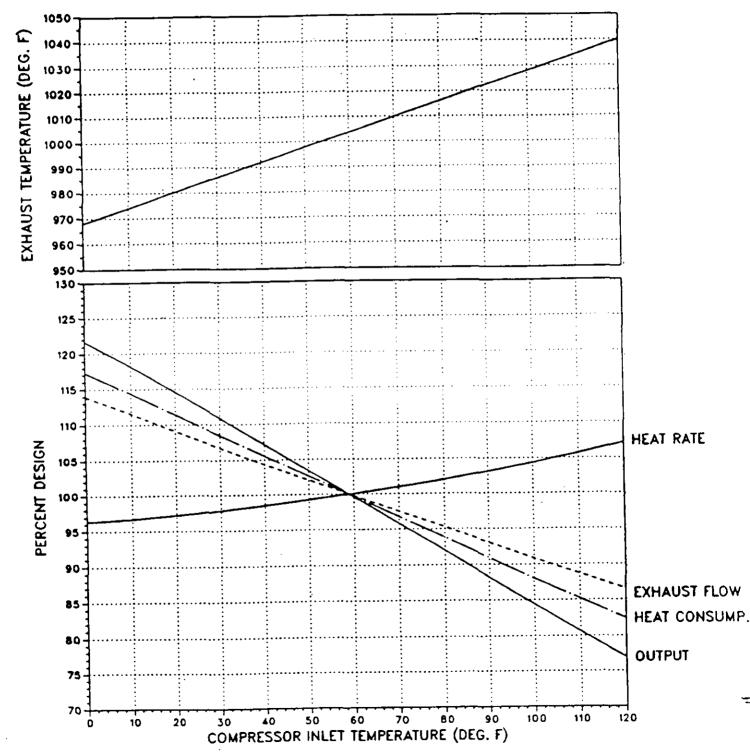
DATE: 11/30/87 KH Conway

# GENERAL ELECTRIC MODEL PG6541(B) GAS TURBINE ESTIMATED PERFORMANCE

OUTPUT, HEAT RATE, HEAT CONSUMPTION EXHAUST FLOW AND EXHAUST TEMPERATURE AT 100% SPEED

FUELS: NATURAL GAS AND DISTILLATE

MODE: BASE LOAD



DATE 9/11/87

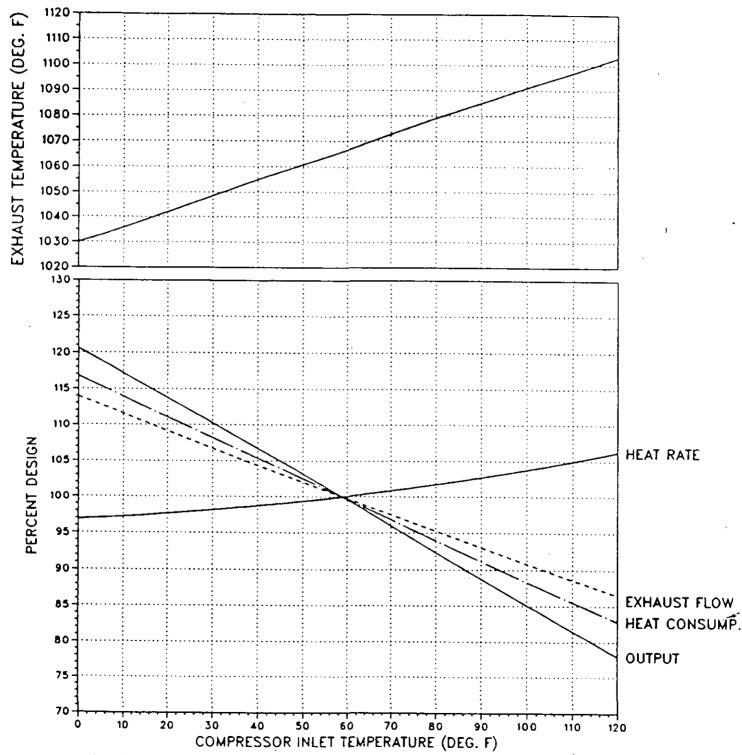
499HA543

# GENERAL ELECTRIC MODEL PG6541(B) GAS TURBINE ESTIMATED PERFORMANCE

EFFECT OF COMPRESSOR INLET TEMPERATURE ON OUTPUT, HEAT RATE, HEAT CONSUMPTION EXHAUST FLOW AND EXHAUST TEMPERATURE AT 100% SPEED

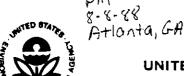
FUEL: NATURAL GAS AND DISTILLATE

MODE: PEAK LOAD



DATE 11/30/87 KH Conway

499HA559



#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

#### REGION IV

4APT-APB

#### 345 COURTLAND STREET ATLANTA, GEORGIA 30365

RECEIVED

AUG 8 1988

AUG 10 1988

C. H. Fancy, P.E., Deputy Chief Bureau of Air Quality Management Florida Department of Environmental Regulation Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400

DER - BAOM

Re: Orlando Utilities Commission (PSD-FL-130)

Dear Mr. Fancy:

This is to acknowledge our receipt of your July 18, 1988, preliminary determination and draft permit for Orlando Utilities to construct a four unit combustion turbine project at the Indian River Plant. We have reviewed and concurred with your determination. This permit will not be reviewed under the Region IV Overview of State Programs policy.

Please submit copies of the final determination and permit when they are issued. If you have any additional information or comments, please contact me or Gary Ng of my staff at (404) 347-2864.

Sincerely yours,

Succe of Willer

Bruce P. Miller, Chief

Air Programs Branch

Air, Pesticides, and Toxics

Management Division

Copied: Pradeix Raval

Barry andrews

man 4 inn

Chuck Collins, CF Dist.

LHF/BT

file copy

Fed. Ex. 7-27-94, Orlando FL Aufill # 431878972



## ORLANDO UTILITIES COMMISSION

500 SOUTH ORANGE AVENUE . P. O. BOX 3193 . ORLANDO, FLORIDA 32802 . 305/423-9100

July 27, 1988

## RECEIVED

C.H. Fancy, Deputy Chief Bureau of Air Quality Management Twin Towers Office Building 2600 Blair Stone Road Tallahassee, FL 32399-2400

JUL 28 1988

DER - BAQM

RE: Permit Numbers: AC 05-144482

05-146749

05-146750

05-146751

Dear Mr. Fancy:

Enclosed please find the proof of publication for OUC's Combustion Turbine Project at the Indian River Plant.

Please feel free to call me at (407)423-9141 if you have questions or comments regarding this permit.

J.S. Crall Director

Environmental Division

Thick for

JSC:sp

**Enclosures** 

xc: W.H. Herrington

T.L. Smith

S.M. Day, B&V

Copied: Pradup Roval

Farri Andrews Con Jacusto, CF Sitt. Hay it Grancon, EPA Miguel Blance, NPS



USE THIS AIRBILL FOR DOMESTIC SHIPMENTS AND FOR SHIPMENTS FROM PUERTO RICO TO THE U.S.A.
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SENDER'S FEDERAL EXPRESS ACCOUNT NUMBER

7 DATE 07-27-88

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## CAPE PUBLICATIONS, INC.

## The Times

Published Weekly on Wednesday

## THE TRIBUNE

Published Weekly on Wednesday



Published Daily

### STATE OF FLORIDA COUNTY OF BREVARD

Before the undersigned authority personally appeared Linda L. Spicer who on
oath says that he/she is Legal Advertising Clerk
of theFLORIDA TODAY, a newspaper published in Brevard County,
Florida; that the attached copy of advertising being a
Legal Notice of Intent
in the matter of
State of Florida Dept. of Environmental Regulation
in theCourt
was published in the FLORIDA TODAY NEWSPAPER
in the issues of July 21, 1988
Affiant further says that the said FLORIDA TODAY NEWSPAPER
is a newspaper published in said Breward County, Florida and that the said newspaper has
heretofore been continuously published in said Brevard County, Florida regularly as stated above,
and has been entered as second class mail matter at the post office inCOCOA,
said Brevard County, Florida for a period of one year next preceeding the first publication of the
attached copy of advertisement; and affiant further says that he has neither paid nor promised
any person, firm or corporation any discount, rebate, commission or refund for the purpose of
securing this advertisement for publication in said newspaper.

21st	day of July	A.D., 19 88
12.46	11	(11

Notary Public State of Florida at Large My Commission Expires March 29, 1992

## STAR-ADVOCATE

Published Weekly on Wednesday

Department of Environmental Regulation
The Department of Environmental Regulation
The Department of Environmental Regulation
The Department of Environmental Regulation hereby gives notice of its intent to issue permits to Orlando Utilities Commission to construct four new simple cycle combustion turbines, each with an electrical generation capacity of about 35 MW, at the existing Indian River Plant, Breward County, Florida. The Department is issuing this intent to issue for the reasons stated in the Technical Evaluation; and Preliminary Determination, and Preliminary Determination, and Preliminary Determination and Evaluation and Preliminary Determination, and the state of the Persons whose substantial interests are affected by the Department's proposed bermitting decision may petition for an administrative defermination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-57, Florida Administrative Code, and must, be filed (received) in the Department's Office of General Counsel, 2600 3iair Stone Road, Twin Towers Office Building, Tallahassee, Florida 23239-2400, Awithin fourteen (14) days of publication of this notice. Failure to file a petition of this notice. Failure to file a petition in situes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative Code, at least five (5) days before the final hearing and be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 23391, if no hearing officer has been assigned in processing and the Division of Administrative Department of Administrative Code, at least five (5) days before the final hearing and be filed wi

Tallahassee, Florida 32399-2400
Dept, of Environmental
Regulation
Central Florida District
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803-3767
Any person may send written
comments on the proposed action
to Mr. Bill Thomas at the department's Tallahassee address. All
comments mailed within 30 days
of the publication of this notice
will be considered in the department's finel determination.
T094439—117—7721;1988.
Thursday