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JAN 18 2012

DIVISION OF AIR  
RESOURCE MANAGEMENT

January 16, 2012

Project No. 11389555

Mr. Jonathon Holtom, P.E.  
DEP/DARM  
Division of Air Resource Management  
2600 Blair Stone Road MS 5500  
Tallahassee, Florida 32399-2400

RE: INDIAN RIVER PLANT ID NO. 0090008  
AIR APPLICATION FOR REVISION TO TITLE V PERMIT NO. 0090008-005-AV

Project No. - 0090008-006-AV

Dear Mr. Holtom,

This application is to revise the Indian River Plant (IRP) Title V air permit (Permit No. 0090008-005-AV). The current Title V permit contains language with respect to the combustion turbines and associated COMS requirements. OUC believes that the COMS periodic monitoring condition is troublesome as worded. Pursuant to 40 CFR 75.14, gas-fired turbines units are NOT required to install COMS. Condition C.7 was originally meant to apply to the electric utility steam generating units onsite, which were once owned and operated by OUC and included in the Title V permit with the combustion turbines. The permit language is a legacy issue, as this language was inadvertently retained in OUC's permit even though the steam units were removed from the permit. Based on previous discussions, the Department is agreeable to deleting the condition entirely. Therefore, OUC is requesting deletion of Condition C.7 with this application for a Title V permit revision.

Enclosed are an original and three copies of the application package. OUC appreciates your timely processing of the application. Please don't hesitate to contact me at (813) 287-1717 if you have any questions.

Sincerely,

GOLDER ASSOCIATES INC.

Scott Osbourn, P.E.  
Associate and Tampa Operations Manager

cc: Caroline Shine, DEP Central District  
David Baez, OUC  
Garfield Blair, OUC

Enclosure: Air Application Package

h:\projects\2011proj\11389555 ouc air permitting support\irp permit revision\draft\irp revision cover letter.docx

Golder Associates Inc.

5100 W. Lemon Street, Suite 208  
Tampa, FL 33609 USA

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# Department of Environmental Protection

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## Division of Air Resource Management APPLICATION FOR AIR PERMIT - LONG FORM

DIVISION OF AIR  
RESOURCE MANAGEMENT

### I. APPLICATION INFORMATION

**Air Construction Permit** – Use this form to apply for an air construction permit:

- For any required purpose at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air operation permit;
- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment new source review, or maximum achievable control technology (MACT);
- To assume a restriction on the potential emissions of one or more pollutants to escape a requirement such as PSD review, nonattainment new source review, MACT, or Title V; or
- To establish, revise, or renew a plantwide applicability limit (PAL).

**Air Operation Permit** – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial, revised, or renewal Title V air operation permit.

**To ensure accuracy, please see form instructions.**

#### Identification of Facility

1. Facility Owner/Company Name: <b>Orlando Utilities Commission</b>	
2. Site Name: <b>Indian River Plant</b>	
3. Facility Identification Number: <b>0090008</b>	
4. Facility Location... Street Address or Other Locator: <b>US 1 &amp; Kings Hwy</b> City: <b>Titusville</b> County: <b>Brevard</b> Zip Code: <b>32780</b>	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

#### Application Contact

1. Application Contact Name: <b>David R. Baez</b>	
2. Application Contact Mailing Address... Organization/Firm: <b>Orlando Utilities Commission</b> Street Address: <b>5100 Alafaya Trail</b> City: <b>Orlando</b> State: <b>FL</b> Zip Code: <b>32831</b>	
3. Application Contact Telephone Numbers... Telephone: <b>(407) 434 - 3072</b> ext.                      Fax: <b>(407) 244 - 8794</b>	
4. Application Contact E-mail Address: <b>dbaez@ouc.com</b>	

#### Application Processing Information (DEP Use)

1. Date of Receipt of Application: <b>1/18/12</b>	3. PSD Number (if applicable):
2. Project Number(s): <b>0090008-006-AV</b>	4. Siting Number (if applicable):

## APPLICATION INFORMATION

### Purpose of Application

This application for air permit is being submitted to obtain: (Check one)

#### **Air Construction Permit**

- Air construction permit.
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

#### **Air Operation Permit**

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

#### **Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)**

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

**Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:**

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

### Application Comment

This application is to revise the Indian River Plant (IRP) Title V air permit (Permit No. 0090008-005-AV). The current Title V permit contains language with respect to the combustion turbines and associated COMS requirements. OUC believes that the COMS periodic monitoring condition is troublesome as worded. Pursuant to 40 CFR 75.14, gas-fired turbines units are NOT required to install COMS. Condition C.7 was originally meant to apply to the electric utility steam generating units onsite, which were once owned and operated by OUC and included in the Title V permit with the combustion turbines. The permit language is a legacy issue, as this language was inadvertently retained in OUC's permit even though the steam units were removed from the permit. Based on previous discussions, the Department is agreeable to deleting the condition entirely. Therefore, OUC is requesting deletion of Condition C.7 with this application for a Title V permit revision (public notice required).

**APPLICATION INFORMATION**

**Scope of Application**

<b>Emissions Unit ID Number</b>	<b>Description of Emissions Unit</b>	<b>Air Permit Type</b>	<b>Air Permit Processing Fee</b>
004	35 MW Simple Cycle Combustion Turbine A		
005	129 MW Simple Cycle Combustion Turbine C		
006	129 MW Simple Cycle Combustion Turbine D		
007	35 MW Simple Cycle Combustion Turbine B		

**Application Processing Fee**

Check one:  Attached - Amount: \$ \_\_\_\_\_  Not Applicable

## APPLICATION INFORMATION

### Owner/Authorized Representative Statement - NA

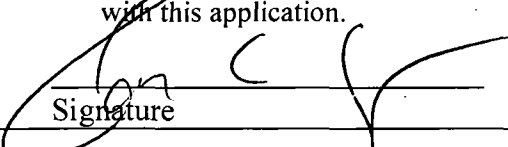
**Complete if applying for an air construction permit or an initial FESOP.**

1. Owner/Authorized Representative Name :
2. Owner/Authorized Representative Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Owner/Authorized Representative Telephone Numbers... Telephone: ( ) - ext. Fax: ( ) -
4. Owner/Authorized Representative E-mail Address:
5. Owner/Authorized Representative Statement:  <i>I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.</i>  _____ Signature  _____ Date

## APPLICATION INFORMATION

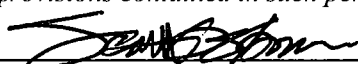
### Application Responsible Official Certification

Complete if applying for an initial, revised, or renewal Title V air operation permit or concurrent processing of an air construction permit and revised or renewal Title V air operation permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: <b>Jan C. Aspuru, Vice President of Power Resources</b>
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input checked="" type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source or CAIR source.
3. Application Responsible Official Mailing Address... Organization/Firm: <b>Orlando Utilities Commission</b> Street Address: <b>Reliable Plaza, 100 West Anderson Street</b> City: <b>Orlando</b> State: <b>FL</b> Zip Code: <b>32801</b>
4. Application Responsible Official Telephone Numbers... Telephone: <b>(407) 434 - 3135</b> ext. Fax: <b>(407) 275 - 4120</b>
5. Application Responsible Official E-mail Address: <b><u>jaspuru@ouc.com</u></b>
6. Application Responsible Official Certification: I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.   Signature _____ Date <u>1-9-12</u>

**APPLICATION INFORMATION**

**Professional Engineer Certification**

1. Professional Engineer Name: <b>Scott H. Osbourn, Senior Consultant</b> Registration Number: <b>57557</b>
2. Professional Engineer Mailing Address... Organization/Firm: <b>Golder Associates, Inc.</b> Street Address: <b>5100 West Lemon Street, Suite 114</b> City: <b>Tampa</b> State: <b>FL</b> Zip Code: <b>33609</b>
3. Professional Engineer Telephone Numbers... Telephone: <b>(813) 287-1717</b> ext. Fax: <b>(813) 287-1716</b>
4. Professional Engineer E-mail Address: <b>sosbourn@golder.com</b>
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input checked="" type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i>  Signature: <u></u> Date: <u>1/16/12</u>  (seal)

\* Attach any exception to certification statement.



## II. FACILITY INFORMATION

### A. GENERAL FACILITY INFORMATION

#### Facility Location and Type

1. Facility UTM Coordinates...		2. Facility Latitude/Longitude...	
Zone 17	East (km) <b>521.3</b>	Latitude (DD/MM/SS) <b>28°29'36"N</b>	Longitude (DD/MM/SS) <b>80°46'57"W</b>
	North (km) <b>3151.7</b>		
3. Governmental Facility Code:	4. Facility Status Code:	5. Facility Major Group SIC Code:	6. Facility SIC(s):
<b>4</b>	<b>A</b>	<b>49</b>	<b>4911</b>
7. Facility Comment : <b>Electric Power Plant</b>			

#### Facility Contact

1. Facility Contact Name: <b>David R. Baez, Project Engineer, Environmental Affairs</b>
2. Facility Contact Mailing Address... Organization/Firm: <b>Orlando Utilities Commission</b> Street Address: <b>5100 Alafaya Trail</b> City: <b>Orlando</b> State: <b>FL</b> Zip Code: <b>32831</b>
3. Facility Contact Telephone Numbers: Telephone: <b>(407) 434 - 3072</b> ext. Fax: <b>(407) 244 - 8794</b>
4. Facility Contact E-mail Address: <b>dbaez@ouc.com</b>

#### Facility Primary Responsible Official - NA

Complete if an "application responsible official" is identified in Section I that is not the facility "primary responsible official."

1. Facility Primary Responsible Official Name:
2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Facility Primary Responsible Official Telephone Numbers... Telephone: ( ) - ext. Fax: ( ) -
4. Facility Primary Responsible Official E-mail Address:



**FACILITY INFORMATION**

**Facility Regulatory Classifications**

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a “major source” and a “synthetic minor source.”

1. <input type="checkbox"/> Small Business Stationary Source	<input type="checkbox"/> Unknown
2. <input type="checkbox"/> Synthetic Non-Title V Source	
3. <input checked="" type="checkbox"/> Title V Source	
4. <input checked="" type="checkbox"/> Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. <input type="checkbox"/> Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. <input type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)	
7. <input type="checkbox"/> Synthetic Minor Source of HAPs	
8. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9. <input type="checkbox"/> One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10. <input type="checkbox"/> One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11. <input type="checkbox"/> Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment:	

**FACILITY INFORMATION**

**List of Pollutants Emitted by Facility**

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
NO <sub>x</sub>		
CO		
SO <sub>2</sub>		
PM		
PM <sub>10</sub>		
VOC		

**FACILITY INFORMATION**

**B. EMISSIONS CAPS**

**Facility-Wide or Multi-Unit Emissions Caps**

1. Pollutant Subject to Emissions Cap	2. Facility-Wide Cap [Y or N]? (all units)	3. Emissions Unit ID's Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap

7. Facility-Wide or Multi-Unit Emissions Cap Comment:

## FACILITY INFORMATION

### C. FACILITY ADDITIONAL INFORMATION

#### Additional Requirements for All Applications, Except as Otherwise Stated

1.	Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <b>May 20, 2009</b>
2.	Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <b>May 20, 2009</b>
3.	Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <b>May 20, 2009</b>

#### Additional Requirements for Air Construction Permit Applications - NA

1.	Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable (existing permitted facility)
2.	Description of Proposed Construction, Modification, or Plantwide Applicability Limit (PAL): <input type="checkbox"/> Attached, Document ID: _____
3.	Rule Applicability Analysis: <input type="checkbox"/> Attached, Document ID: _____
4.	List of Exempt Emissions Units: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable (no exempt units at facility)
5.	Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
6.	Air Quality Analysis (Rule 62-212.400(7), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
7.	Source Impact Analysis (Rule 62-212.400(5), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
8.	Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
9.	Additional Impact Analyses (Rules 62-212.400(8) and 62-212.500(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
10.	Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable

## FACILITY INFORMATION

### C. FACILITY ADDITIONAL INFORMATION (CONTINUED)

#### Additional Requirements for FESOP Applications - NA

1. List of Exempt Emissions Units:  
 Attached, Document ID: \_\_\_\_\_  Not Applicable (no exempt units at facility)

#### Additional Requirements for Title V Air Operation Permit Applications

1. List of Insignificant Activities: (Required for initial/renewal applications only)  
 Attached, Document ID: \_\_\_\_\_  Not Applicable (revision application)
2. Identification of Applicable Requirements: (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought)  
 Attached, Document ID: \_\_\_\_\_  
 Not Applicable (revision application with no change in applicable requirements)
3. Compliance Report and Plan: (Required for all initial/revision/renewal applications)  
 Attached, Document ID: NA  
Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.
4. List of Equipment/Activities Regulated under Title VI: (If applicable, required for initial/renewal applications only)  
 Attached, Document ID: \_\_\_\_\_  
 Equipment/Activities Onsite but Not Required to be Individually Listed  
 Not Applicable
5. Verification of Risk Management Plan Submission to EPA: (If applicable, required for initial/renewal applications only)  
 Attached, Document ID: \_\_\_\_\_  Not Applicable
6. Requested Changes to Current Title V Air Operation Permit:  
 Attached, Document ID: IRP-FI-C6  Not Applicable

**FACILITY INFORMATION**

**C. FACILITY ADDITIONAL INFORMATION (CONTINUED)**

**Additional Requirements for Facilities Subject to Acid Rain, CAIR, or Hg Budget Program**

1. Acid Rain Program Forms:

Acid Rain Part Application (DEP Form No. 62-210.900(1)(a)):

Attached, Document ID: \_\_\_\_\_  Previously Submitted, Date: May 20, 2009

Not Applicable (not an Acid Rain source)

Phase II NO<sub>x</sub> Averaging Plan (DEP Form No. 62-210.900(1)(a)1.):

Attached, Document ID: \_\_\_\_\_  Previously Submitted, Date: \_\_\_\_\_

Not Applicable

New Unit Exemption (DEP Form No. 62-210.900(1)(a)2.):

Attached, Document ID: \_\_\_\_\_  Previously Submitted, Date: \_\_\_\_\_

Not Applicable

2. CAIR Part (DEP Form No. 62-210.900(1)(b)):

Attached, Document ID: \_\_\_\_\_  Previously Submitted, Date: May 20, 2009

Not Applicable (not a CAIR source)

**Additional Requirements Comment**

**ATTACHMENT IRP-FI-C6**  
**Requested Changes to the TV Permit No. 0090008-005-AV**

**SECTION III. EMISSIONS UNITS' AND SPECIFIC CONDITIONS.**

**Subsection C. Common Conditions for Emissions Units 004, 005, 006 and 007**

**Subsection C. The specific conditions in this section apply to the following emissions units:**

<b>EU No.</b>	<b>Brief Description</b>
004	35 MW Simple Cycle Combustion Turbine A
005	129 MW Simple Cycle Combustion Turbine C
006	129 MW Simple Cycle Combustion Turbine D
007	35 MW Simple Cycle Combustion Turbine B

**Federal Regulations**

**C.1.** NSPS Subpart GG. These emissions units are subject to all applicable requirements of NSPS - 40 CFR 60, Subpart GG, Standards of Performance for Stationary Gas Turbines. [PSD-FL-130 and PSD-FL-173]

**Excess Emissions**

**C.2.** Excess Emissions Permitted. Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]

**C.3.** Excess Emissions Permitted. Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized. [Rule 62-210.700(2), F.A.C.]

**C.4.** Excess Emissions Prohibited. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]

**C.5.** Excess Emissions Defined. For the purpose of reports required under 40 CFR 60.7, periods of excess emissions that shall be reported are defined as follows:

- a. *Nitrogen oxides.* Any one-hour period during which the average water-to-fuel ratio, as measured by the continuous monitoring system, falls below the water-to-fuel ratio determined to demonstrate compliance with 40 CFR 60.332 by the performance test required in 40 CFR 60.8 or any period during which the fuel-bound nitrogen of the fuel is greater than the maximum nitrogen content allowed by the fuel-bound nitrogen allowance used during the performance test required in 40 CFR 60.8. Each report shall include the average water-to-fuel ratio, average fuel consumption, ambient conditions, gas turbine load, and nitrogen content of the fuel during the period of excess emissions, and the graphs or figures developed under 40 CFR 60.335(a).
- b. *Sulfur dioxide.* Any daily period during which the sulfur content of the fuel being fired in the gas turbine exceeds 0.3 percent.

[40 CFR 60.334; PSD-FL-130 and PSD-FL-173]

**Monitoring of Operations**

**C.6.** CAM Plan. These emissions units are subject to the Compliance Assurance Monitoring (CAM) requirements contained in the attached Appendix CAM. Failure to adhere to the monitoring requirements specified does not necessarily indicate an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297 .310(7)(b), F.A.C. [40 CFR 64; Rules 62-204.800 and 62-21 3.440(1)(b) 1.a., F.A.C.]

**Continuous Monitoring Requirements**

~~**C.7.** COMS for Periodic Monitoring. OUC shall have installed continuous opacity monitoring systems (COMS) pursuant to 40 CFR Part 75. OUC shall maintain and operate the COMS and shall make and maintain records of opacity measured by the COMS, for purposes of periodic monitoring. [Rule 62 213.440, F.A.C., and applicant request]~~