ORLANDO UTILITIES COMMISSION

Indian River Plant

Title V Operating Permit Application
June 15, 1996

Control No. 3

Certified Mail No. Z-120-759-620
Return Receipt Requested

ORLANDO UTILITIES COMMISSION
500 SOUTH ORANGE AVENUE • P. O. BOX 3193 • ORLANDO, FLORIDA 32802 • 407/423-9100

November 13, 1996

Mr. John C. Brown, Jr., P. E.
Administrator Title V Section
Florida Department of
Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Responsible Official - Title V

Dear Mr. Brown:

Enclosed for updating of your files is a copy of the ratified Orlando Utilities Commission's "Designated Representative Agreement for Indian River Plant and Stanton Energy Center By and Between Orlando Utilities Commission Frederick f. Haddad, Jr., and Gregory A. DeMuth" and a copy of the Certificate of Representation for both the Stanton Energy Center and the Indian River Plant.

I trust these documents will demonstrate that I have been appropriately delegated the authority to act in all matters relating to Title V permits and submittals.

Thank you for your consideration. Should you have any questions or require additional information, please call me at 407/423-9100.

Sincerely,

Gregory A. DeMuth, Director
Environmental Division/
Alternate Designated Representative

GAD:rc
Enclosures

xc: F. F. Haddad
T. B. Tart
R. F. Hicks

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I N T E R O F F I C E M E M O R A N D U M

Date: 31-Dec-1996 08:34am EST
From: Leonard Kozlov ORL
KOZLOV_L@A1@ORL1
Dept: Central District Office
Tel No: 407/894-7555

TO: Steve Welsh TAL (WELSH_S@A1@DER)

CC: 5 addressees

Subject: Re: Indian River Plant

Steve:
We will access our files per your request and send any information we have to you. Please note that I had a phone conversation with Bruce Mitchell last week and informed him we have an outstanding consent order (turbines C&D) with OUC at their Brevard plant (Indian River) and they presently have new outstanding violations on all their units at same facility. On Dec.17,1996 we had a preliminary enforcement meeting with OUC without issuing a warning letter though one is ready for signing and issuance. A copy of the consent order should be in the possession of Jim Pennington. If you have any further questions, let me know.
P.S. you may have to put some kind of compliance schedule into the Title V permit.

Len

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

File: Orlando Utilities Commission
Brevard County - AP

Meeting Documentation

Location : Orlando Date: December 17, 1996 Time: 3:00 p.m.

Subject: Summary of Noncompliances found at the Indian River Facility

Meeting Requested by: Vivian Garfein and Bob Haven

Notes:

V. Garfein opened the meeting with introduction. Greg Demuth requested to L. Kozlov to allow him to discuss the items as he felt that OUC has complied. C. Shine circulated a list of findings, and Demuth circulated his responses. The discussion was as follows:

- Unit 1 Heat input rates were not submitted in the report.
  The report was submitted 7 days late.

Greg stated that the company submitted the heat input in a letter. C. Shine stated that the company submitted an average of the entire test, rather than a distinct heat input per distinct run as required by the rule. Distinct values are applicable for all other process variables as well, such as water to fuel ratio and other. Bob Haven stated that OUC wants to comply. OUC will submit this information in its proper form. OUC wants to get with Garry Kuberski to come up with a format for its contractors.

- Unit 2 Heat input rates were not submitted in the report.
  The report was submitted 5 days late.

  (this situation is the same as above. Also, the company did not test within the 90-100% capacity range, and as such, would be derated. A. Sobolevskiy advised that this has happened before, and even though this in itself is not a violation, the company should be aware to prevent further noncompliances.

- Unit 3 Heat input rates were not submitted in the report.
  The report was submitted 6 days late.

  (this situation is the same as #1)

- CT-A-B July 26, 1996 testing information for CT-A, showing noncompliance of NOx emissions, was omitted for CT-A.

Greg Demuth stated that there has been problems in the calibration of the sensor. A. Sobolovskiy discussed that the sensor problems indicate that the source was out of compliance, and is an indicator of improper maintenance. He requested the calibration records. Also, the water-to-fuel has fallen below the curve because of the underreporting of the sensor. Shine stated that the testing and related information has not been submitted to the Department, not reported in excess emission reports.

(This portion is the same as #1 concerns)
Heat input rates were not submitted in the report.
Water- to-fuel ratio information was not submitted.
Test report was 26 days late.

- CT-C Heat input rates were not submitted in the report.
  GAS Water- to-fuel ratio information was not submitted.
  Test report was 25 days late.
  (This portion is the same as #1 concerns)

  VE was not performed at low loads.

There was much discussion about the wording of the permit. The permit has two standards. Recommendation was made to OUC to try to change the permit condition if this was not acceptable, but follow current permit in the meantime.

- CT-C Heat input rates were not submitted.
  OIL Water- to-fuel ratio information was not submitted.
  Test report was 26 days late.
  (This portion is the same as #1 concerns)

  N0x values were not ISO corrected for initial performance test.
  One hour VE were not performed for each load.

Greg stated that H. Rhodes memo allowed them not to ISO correct. Shine pointed out that the ISO correction was a rule requirement for initial testing. The Consent Order clearly stated that OUC would conduct initial testing and H. Rhodes memo stated that ISO correction would be done on initial performance testing. Initial performance testing also requires 3 one hour VE. Sobolevskiy stated that this is not a long effort for the company to recalculate the numbers.

- CT-D Heat input rates were not submitted.
  GAS Test report was submitted 24 days late.
  Water- to-fuel ratio information was not submitted.
  One hour VE was not performed at the low load.

  CT-D Heat input rates were not submitted.
  OIL Test report submitted 23 days late.

Water- to-fuel ratio information was not calculated and submitted
N0x values were not ISO corrected for initial performance test.
One hour VE were not performed for each load.

(Same issues as above)

- Quarterly emission reports for the 2nd quarter 1996 were submitted 22 days late. Quarterly emission reports for the 3rd quarter 1996 were submitted 19 days late.
- CT-A The 1st Quarterly Emission Report indicated that 11 hours, 34 minutes of water-to-fuel data was omitted, because of missing data logs.
- CT-C The 1st Quarterly Emission Report indicated that 1 hour, 17 minutes of water-to-fuel data was omitted, because of missing data logs.
- CT-D The 1st Quarterly Emission Report indicated that 2 hours, 2 minutes of water-to-fuel data was omitted, because of missing data logs.
- CT-C The 2nd Quarter Emission Report indicated that 1059 minutes of water-to-fuel data was omitted, because of missing data logs.
- CT-D The 2nd Quarter Emission Report indicated that 1134 minutes of water-to-fuel data was omitted, because of missing data logs.
- CT-A The 3rd Quarter Emission Report indicated that 325 minutes of water-to-fuel data was omitted, because of missing data logs.
- CT-B The 3rd Quarter Emission Report indicated that 197 minutes of water-to-fuel data was omitted, because of missing data logs.

Demuth stated that these problems were related to computer upgrading, and now that the system is upgraded the problem would no longer exist. Sobolovskiy advised that the Stanton reports are 50 days late.

Sobolevskiy discussed the Stanton Unit 1 problems, advising that the particulate emissions from the improper installation of the mist eliminator is a maintenance problem and a violation, and needs the installation date of the eliminator. Also information regarding the corrective actions from the prior SO2 excess emission has not been submitted. This facility also is delinquent in reporting some information to EPA.

Vivian Garfein stated that this plant needs to be brought under control.

Agreements/Conclusion Reached:

OUC agreed to submit all information requested from this meeting by the middle of the week of December 23, 1996. (15 days would be appropriate)

Follow-up Action Dates:

December 31, 1996

Prepared by_____

Reviewed by_____

Memorandum

Florida Department of
Environmental Protection

TO: Len Kozlov, CD

FROM: Bruce Mitchell

DATE: December 17, 1996

SUBJECT: Completeness Review of an Application Package for a Title V Operation Permit
Orlando Utilities Commission, Indian River Plant: 0090008-001-AV

The Title V operating permit application package for the referenced facility is being processed in Tallahassee. The application was previously forwarded to your office for your files and future reference. Please have someone review the package for completeness and respond in writing by January 20, 1997, if you have any comments. Otherwise, no response is required. If there are any questions, please call the project engineer, Steve Welsh, at 904/488-1344 or SC:278-1344. It is very important to verify the compliance statement regarding the facility. Since we do not have a readily effective means of determining compliance at the time the application was submitted, please advise if you know of any emissions unit(s) that were not in compliance at that time and provide supporting information. Also, do not write on the documents.

If there are any questions regarding this request, please call me or Scott Sheplak at the above number(s).

RBM/bm

cc: Alan Zahm

Table 1-1. Air Pollutant Standards and Terms

Facility ID: 300RL050008
Permittee: irp

DRAFT Permit No.:

			Allowable Emissions	Equivalent Allowable Emissions	
E.U. ID#	**Description**	**Pollutant Name**	**Standard(s)**	**lbs/hour**	**tons/year**
004	Combustion Turbine A	NOX			328.90
					518.20
		SO2			1.50
					625.00
005	Combustion Turbine B	NOX			328.90
					518.20
		SO2			1.50
					625.00
006	Combustion Turbine C	NOX			295.75
					253.00
		SO2			476.50
					1.05
		CO			79.50
					156.50
007	Combustion Turbine D	NOX			253.00
					295.75
		SO2			1.05

Table 2-1. Compliance Requirements

Facility ID: 300RL050008 **DRAFT Permit No.:**
Permittee: irp

E.U. ID#	Description		Name/Type	Compliance Method
001	Boiler 1	Poll. Information:	VOC	
			PM	
			PM10	
			SO2	
			NOX	
			CO	
			H095	
			H015	
			H021	
			H027	
			H046	
			H047	
			H110	
			H113	
			H133	
			H162	
			T035	
			H114	
		VE Information:		DEP Method 9
002	Boiler 2	Poll. Information:	PM	
			PM10	
			SO2	
			NOX	
			CO	
			VOC	
			H095	
			H015	

Facility ID: 300RL050008
Permittee: irp

DRAFT Permit No.:

E.U. ID#	Description		Name/Type	Compliance Method
002	Boiler 2	Poll. Information:	H021	
			H027	
			H046	
			H047	
			H110	
			H113	
			H114	
			H133	
			H162	
			T035	
		VE Information:		EPA method 9
				EPA Method 9
003	Boiler 3	Poll. Information:	PM	
			PM10	
			SO2	
			NOX	
			CO	
			VOC	
			H095	
			H015	
			H021	
			H027	
			H046	
			H047	
			H110	
			H113	
			H114	
			H133	

Facility ID: 300RL050008 **DRAFT Permit No.:**
Permittee: irp

E.U. ID#	Description		Name/Type	Compliance Method
003	Boiler 3	Poll. Information:	H162	
			T035	
		VE Information:		DEP Method 9.
				EPA Method 9
				DEP Method 9.
004	Combustion Turbine A	Poll. Information:	NOX	Annual compliance test (Method 20 or Method E).
				Compliance test required for initial startup and any year thereafter where distillate is fired more than 170 hours.
			SO2	Fuel analysis.
				Fuel analysis to ensure sulfur content of distillate < 0.3%,
			CO	
			PM	
			PM10	
			VOC	
			SAM	
			H021	
			H095	
			H015	
			H027	
			H046	
			H047	
			H110	
			H113	
			H114	
			H133	
			H148	
			H162	
		VE Information:		

Facility ID: 300RL050008
Permittee: irp

DRAFT Permit No.:

E.U. ID#	Description		Name/Type	Compliance Method
005	Combustion Turbine B	Poll. Information:	NOX	Annual compliance test (Method 20 or Method 7E).
				Compliance Test required for initial startup and any other year when distillate firing more than 170 hours per year.
			SO2	Fuel analysis.
				Fuel analysis to ensure sulfur content < 0.3%.
			CO	
			PM	
			PM10	
			VOC	
			SAM	
			H021	
			H095	
			H015	
			H027	
			H046	
			H047	
			H110	
			H113	
			H114	
			H133	
			H148	
			H162	
		VE Information:		
006	Combustion Turbine C	Poll. Information:	NOX	Annual compliance test (Method 7E).
				Initial startup compliance test and every year thereafter when distillate is fired for more than 170 hours (Method 20).
			SO2	Initial startup compliance test, and every year thereafter when the unit fires more than 170 hours on distillate (Method 7E).
				Fuel analysis.

Facility ID: 300RL050008
Permittee: irp

DRAFT Permit No.:

E.U. ID#	Description		Name/Type	Compliance Method
006	Combustion Turbine C	Poll. Information:	PM	
			PM10	
			CO	Initial performance test and annual compliance test during every year distillate is fired for more than 170 hours (Method 10).
				Annual compliance test (Method10).
			VOC	Assumed to be in compliance if CO is within compliance.
			SAM	
			H021	
			H014	
			H110	
			H095	
			H015	
			H027	
			H046	
			H047	
			H113	
			H133	
			H148	
			H162	
		VE Information:		
007	Combustion Turbine D	Poll. Information:	NOX	Initial compliance test, and annual compliance test every additional year the unit fires on distillate more than 170 hours.
				Annual compliance test (Method 7E).
			SO2	
			PM	
			PM10	
			CO	
			VOC	
			SAM	

Facility ID: 300RL050008 **DRAFT Permit No.:**
Permittee: irp

E.U. ID#	Description		Name/Type	Compliance Method
007	Combustion Turbine D	Poll. Information:	H021	
			H014	
			H110	
			H095	
			H015	
			H027	
			H046	
			H047	
			H113	
			H133	
			H148	
			H162	
		VE Information:		
08	Lime Storage Silo	Poll. Information:	PM	
			PM10	
		VE Information:		DEP Method 9
No	Non-regulated Emissions - Exempt and Insignifcant	Poll. Information:	VOC	
No Id	Non-regulated Emissions - Significant		PM	
			PM10	

Departme
Environmental

Lawton Chiles
Governor

Central Distri
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Virginia B. Wetherell
Secretary

Post-it™ brand fax transmittal memo 7671 | # of pages ▸ 1

To Steve Welsh	From Caroline Shine
Co. FDEP	Co.
Dept. Permitting	Phone #
Fax #	Fax #

January 13, 1997

Certified Letter
P 248 041 969

OCD-AP-97-11

Gregory DeMuth, Director
Environmental Division
Orlando Utilities Commission
Post Office Box 3193
Orlando, Florida 32803-3193

Dear Mr. DeMuth:

After reviewing the data submitted in response to our December 17, 1996 request, we find that some of the information has been omitted or not addressed properly. This missing information is listed below:

Indian River Plant

1. The heat input rates for Unit 1, 2, and 3, were not separated and averaged for the sootblowing test and the steady state test. Example: Unit 1 has two tests, one for sootblowing and one for steady state. Each test should have three independent runs and an average of the three runs. (See Attachment 1)

2. The Combustion Turbine A information regarding the noncompliance issues of the humidity sensor was not submitted. At the meeting, we requested copies of the calibrations and procedures. Information was submitted on the cleaning frequency.

3. The emissions reported did not have appropriate units. The emissions should be given in ppmdv rather than ppm.

4. Data Logs for water-to-fuel ratio were not found. See below:

Source	Quarter	Missing Data
CTA	1st 96	11 hr 34 min.
CTC	1st 96	1 hr 17 min.
CTD	1st 96	2 hr 2 min.
CTC	2nd 96	17 hr 39 min.
CTD	2nd 96	18 hr 54 min.
CTA	3rd 96	5 hr 24 min.
CTB	3rd 96	3 hr 17 min.

Indian River Plant

* Additional Note: The permitted water-to-fuel ratios in the permit needs to be changed to reflect the ratio established during the tests.

Stanton Energy Center -Unit 1

1. The quarterly excess emission report is 73 days late for the third quarter of 1996, and the fourth quarter is due January 97.

2. The data was not submitted for the installation date of the mist eliminator.

3. The corrective action performed to resolve the previous sulfur dioxide emission violation has not been submitted.

4. There was a twelve hour visible emission violation, caused by problems of the electrostatic precipator. Please explain why corrective action was not taken sooner allowing the visible emission violation to continue for twelve hours.

Please submit the information within ten (10) days receipt of this letter. Thank you for your cooperation.

Sincerely,

L. T. Kozlov, P.E.
Program Administrator
Air Resources Management

LTK/cs

cc: Bob Haven
Fred Haddad

Attachment 1

Unit 3	Total Oil Flow (lb/run)	Heat Input (mmbtu/run)	Heat Input (mmbtu/hr)	% of Permitted Heat Input (%)
RUN 1	188156.3	3439.9	2866.6	94
RUN 2	210865.8	3855.0	2855.6	94
RUN 3	197553.9	3611.7	2851.3	94
RUN 4	203044.2	3712.1	2855.4	94
RUN 5	190147.6	3476.3	2857.2	94
RUN 6	172327.8	3150.5	2739.6	90
		Avg.	2837.6	93

Unit 2	Total Oil Flow (lb/run)	Heat Input (mmbtu/run)	Heat Input (mmbtu/hr)	% of Permitted Heat Input (%)
RUN 1	126079.0	2331.6	1748.7	87
RUN 2	107533.0	1957.5	1753.0	87
RUN 3	109211.0	1988.1	1704.1	85
RUN 4	124097.1	2259.1	1737.7	86
RUN 5	124156.4	2260.1	1784.3	88
RUN 6	121534.8	2212.4	1793.9	89
		Avg.	1753.6	87

Unit 1	Total Oil Flow (lb/run)	Heat Input (mmbtu/run)	Heat Input (mmbtu/hr)	% of Permitted Heat Input (%)
RUN 1	61311.2	1118.9	818.7	98
RUN 2	53509.0	976.5	791.8	95
RUN 3	53360.5	973.8	789.6	95
RUN 4	60460.2	1103.4	788.1	95
RUN 5	55961.4	1021.3	785.6	94
RUN 6	44412.6	810.5	784.4	94
		Avg.	793.0	95

c:\123r4\rptst96

Copy to: Bruce, Cindy, Steve ✓

SMS 9/2

I N T E R O F F I C E M E M O R A N D U M

Date: 02-Sep-1997 09:31am EST
From: Garry Kuberski ORL
KUBERSKI_G@A1@ORL1
Dept: Central District Office
Tel No: 407/894-7555

TO: Syed Arif TAL (ARIF_S@A1@DER)

CC: 5 addressees

Subject: Compliance issues for Orlando Utilities Commission

Orlando Utilities Commission has two facilities, the Indian River Plant which is in Brevard County and the Stanton Energy Center which is located in Orange Count

The Indian River Plant has enforcement being taken by the EPA for failure to sub monitoring plan. Mike Harley may provide more information on the current status enforcement than we have available in this office.

The Stanton Energy Center has two compliance issues as follows:

1. Excess SO2 emissions for two three hour periods.
   Modifications are being made to a valve system to prevent reoccurrence.

2. Failure to submit quarterly ambient monitoring reports.

If you have trouble obtaining information on baghouses for the coal and limeston systems please let me know. The baghouses are not presently listed in ARMS, how believe they should be.

IV. Acid Rain Part

Indian River Plant **Facility ID No.: 0090008**
Operated by: Orlando Utilities Commission
ORIS code: 683

The emissions units listed below are regulated under Acid Rain Part, Phase II.

E.U. ID No.	Description
-001	87 MW Unit No. 1 Boiler (EPA ID # 1)
-002	188 MW Unit No. 2 Boiler (EPA ID # 2)
-003	328 MW Unit No. 3 Boiler (EPA ID # 3)
-005	129 MW Simple Cycle Combustion Turbine C (EPA ID # C)
-006	129 MW Simple Cycle Combustion Turbine D (EPA ID # D)

1. The Acid Rain Part application submitted for this facility, as approved by the Department, is a part of this permit. The owners and operators of these acid rain units must comply with the standard requirements and special provisions set forth in the application listed below:

a. DEP Form No. 62-210.900(1)(a), version 07/01/95, received June 17, 1996.

[Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

2. Sulfur dioxide (SO_2) allowance allocations for each Acid Rain unit:

E.U. ID No.	EPA ID #	Year	2000	2001	2002
-001	1	SO2 allowances, under Table 2 of 40 CFR 73	1180*	1180*	1180*
-002	2	SO2 allowances, under Table 2 of 40 CFR 73	1555*	1555*	1555*
-003	3	SO2 allowances, under Table 2 of 40 CFR 73	3612*	3612*	3612*
-005	C	SO2 allowances, under Table 2 of 40 CFR 73	0*	0*	0*
-006	D	SO2 allowances, under Table 3 of 40 CFR 73	634*	634*	634*

*The number of allowances held by an Acid Rain source in a unit account may differ from the number allocated by the USEPA under Table 2 or 3 of 40 CFR 73.

3. Comments, notes, and justifications: Phase II Permit Application received 1/2/96.

4. Emission Allowances. Emissions from sources subject to the Federal Acid Rain Program (Title IV) shall not exceed any allowances that the source lawfully holds under the Federal Acid Rain Program. Allowances shall not be used to demonstrate compliance with a non-Title IV applicable requirement of the Act.
a. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the Federal Acid Rain Program, provided that such increases do not require a permit revision pursuant to Rule 62-213.400(3), F.A.C.
b. No limit shall be placed on the number of allowances held by the source under the Federal Acid Rain Program.
c. Allowances shall be accounted for under the Federal Acid Rain Program.
[Rule 62-213.440(1)(c)1., 2. & 3., F.A.C.]

5. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3), F.A.C., shall be submitted within 60 (sixty) days after the end of the calendar year.
{See condition No. 51., Appendix TV-1, Title V Conditions.}
[Rule 62-214.420(11), F.A.C.]

Table 1-1. Air Pollutant Standards and Terms

Facility ID: 300RL050008 **DRAFT Permit No.:**

Permittee: irp

			Allowable Emissions	Equivalent Allowable Emissions	
E.U. ID#	**Description**	**Pollutant Name**	**Standard(s)**	**lbs/hour**	**tons/year**
004	Combustion Turbine A	NOX			328.90
					518.20
		SO2			1.50
					625.00
005	Combustion Turbine B	NOX			328.90
					518.20
		SO2			1.50
					625.00
006	Combustion Turbine C	NOX			295.75
					253.00
		SO2			476.50
					1.05
		CO			79.50
					156.50
007	Combustion Turbine D	NOX			253.00
					295.75
		SO2			1.05

Table 2-1. Compliance Requirements

Facility ID: 300RL050008 **DRAFT Permit No.:**

Permittee: irp

E.U. ID#	Description		Name/Type	Compliance Method
001	Boiler 1	Poll. Information:	VOC	
			PM	
			PM10	
			SO2	
			NOX	
			CO	
			H095	
			H015	
			H021	
			H027	
			H046	
			H047	
			H110	
			H113	
			H133	
			H162	
			T035	
			H114	
		VE Information:		DEP Method 9
002	Boiler 2	Poll. Information:	PM	
			PM10	
			SO2	
			NOX	
			CO	
			VOC	
			H095	
			H015	

Facility ID: 300RL050008 **DRAFT Permit No.:**

Permittee: irp

E.U. ID#	Description		Name/Type	Compliance Method
002	Boiler 2	Poll. Information:	H021	
			H027	
			H046	
			H047	
			H110	
			H113	
			H114	
			H133	
			H162	
			T035	
		VE Information:		EPA method 9
				EPA Method 9
003	Boiler 3	Poll. Information:	PM	
			PM10	
			SO2	
			NOX	
			CO	
			VOC	
			H095	
			H015	
			H021	
			H027	
			H046	
			H047	
			H110	
			H113	
			H114	
			H133	

Facility ID: 300RL050008 **DRAFT Permit No.:**

Permittee: irp

E.U. ID#	Description		Name/Type	Compliance Method
003	Boiler 3	Poll. Information:	H162	
			T035	
		VE Information:		DEP Method 9.
				EPA Method 9
				DEP Method 9.
004	Combustion Turbine A	Poll. Information:	NOX	Annual compliance test (Method 20 or Method E).
				Compliance test required for initial startup and any year thereafter where distillate is fired more than 170 hours.
			SO2	Fuel analysis.
				Fuel analysis to ensure sulfur content of distillate < 0.3%,
			CO	
			PM	
			PM10	
			VOC	
			SAM	
			H021	
			H095	
			H015	
			H027	
			H046	
			H047	
			H110	
			H113	
			H114	
			H133	
			H148	
			H162	
		VE Information:		

Facility ID: 300RL050008 **DRAFT Permit No.:**

Permittee: irp

E.U. ID#	Description		Name/Type	Compliance Method
005	Combustion Turbine B	Poll. Information:	NOX	Annual compliance test (Method 20 or Method 7E).
				Compliance Test required for initial startup and any other year when distillate firing more than 170 hours per year.
			SO2	Fuel analysis.
				Fuel analysis to ensure sulfur content < 0.3%.
			CO	
			PM	
			PM10	
			VOC	
			SAM	
			H021	
			H095	
			H015	
			H027	
			H046	
			H047	
			H110	
			H113	
			H114	
			H133	
			H148	
			H162	
		VE Information:		
006	Combustion Turbine C	Poll. Information:	NOX	Annual compliance test (Method 7E).
				Initial startup compliance test and every year thereafter when distillate is fired for more than 170 hours (Method 20).
			SO2	Initial startup compliance test, and every year thereafter when the unit fires more than 170 hours on distillate (Method 7E).
				Fuel analysis.

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E.U. ID#	Description		Name/Type	Compliance Method
006	Combustion Turbine C	Poll. Information:	PM	
			PM10	
			CO	Initial performance test and annual compliance test during every year distillate is fired for more than 170 hours (Method 10).
				Annual compliance test (Method10).
			VOC	Assumed to be in compliance if CO is within compliance.
			SAM	
			H021	
			H014	
			H110	
			H095	
			H015	
			H027	
			H046	
			H047	
			H113	
			H133	
			H148	
			H162	
		VE Information:		
007	Combustion Turbine D	Poll. Information:	NOX	Initial compliance test, and annual compliance test every additional year the unit fires on distillate more than 170 hours.
				Annual compliance test (Method 7E).
			SO2	
			PM	
			PM10	
			CO	
			VOC	
			SAM	

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E.U. ID#	Description		Name/Type	Compliance Method
007	Combustion Turbine D	Poll. Information:	H021	
			H014	
			H110	
			H095	
			H015	
			H027	
			H046	
			H047	
			H113	
			H133	
			H148	
			H162	
		VE Information:		
08	Lime Storage Silo	Poll. Information:	PM	
			PM10	
		VE Information:		DEP Method 9
No	Non-regulated Emissions - Exempt and Insignifcant	Poll. Information:	VOC	
No Id	Non-regulated Emissions - Significant		PM	
			PM10	