MEMORANDUM

TO:

Scott M. Sheplak, P.E.

FROM:

Tom Cascio

THROUGH: Bruce Mitchell

DATE:

October 16, 2000

Re:

Intent package for DRAFT Title V Air Operation Permit Revision

No.: 0110036-003-AV

Florida Power & Light Company

Port Everglades Plant

Permit Clock:

Today is ARMS Day 21

Default Date (Day 90):

December 25, 2000

This permit is for a Title V Air Operation Permit Revision for the subject facility that reflects a change to the testing frequency of the twelve simple cycle gas turbines.

I recommend that this Intent to Issue be sent out as attached.



Department of Environmental Protection

Jeb Bush Governor Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400

David B. Struhs Secretary

P.E. Certification Statement

Permittee:

Florida Power & Light Company Port Everglades Plant DRAFT Permit Revision No.: 0110036-003-AV

Facility ID No.: 0110036

Project type: Revised Title V Air Operation Permit

I HEREBY CERTIFY that the engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).

Scott M. Sheplak, P.E.

Registration Number: 48866

Permitting Authority:

Department of Environmental Protection Bureau of Air Regulation 111 South Magnolia Drive, Suite 4

Tallahassee, Florida 32301 Telephone: 850/921-9532

Fax: 850/922-6979

STATEMENT OF BASIS

Title V DRAFT Permit Revision No.: 0110036-003-AV
Florida Power and Light Company
Port Everglades Plant
Broward County

This Title V air operation permit revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit revision.

This facility consists of four fossil fuel steam generators and twelve simple cycle combustion turbines. Fossil Fuel Steam Generators, Units 1 and 2, each rated at 225 MW, 2400 mmBtu/hr for natural gas and 2300 mmBtu/hr for number 6 fuel oil, are capable of burning any combination of natural gas, number 6 fuel oil, number 2 fuel oil, propane and on-specification used oil from FPL operations. The emissions are exhausted through a 344 ft. stack for each unit. Fossil Fuel Steam Generators, Units 3 and 4, each rated at 402 MW, 4180 mmBtu/hr for natural gas and 4000 mmBtu/hr for number 6 fuel oil, are capable of burning any combination of natural gas, number 6 fuel oil, number 2 fuel oil, propane and on-specification used oil from FPL operations. The emissions are exhausted through a 344 ft. stack for each unit. The twelve simple cycle gas turbines, GT1 through GT12, with a total capacity rated at 42 MW, 8424 mmBtu/hr, are capable of burning any combination of, number 2 fuel oil and natural gas, with emissions exhausted through twelve 44 ft. stacks.

Emissions Unit 1, Unit 2, Unit 3 and Unit 4 are regulated under Acid Rain, Phase II; and Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators with More than 250 million Btu per Hour Heat Input. Fossil fuel fired steam generator Unit 1 began commercial operation in 1960 and fossil fuel fired steam generator Unit 2 began commercial operation in 1961. Fossil fuel fired steam generator Unit 3 began commercial operation in 1965 and fossil fuel fired steam generator Unit 4 began commercial operation in 1964. These emissions units may inject additives such as magnesium hydroxide and related compounds into each boiler.

Emissions Units GT1 through GT12 are regulated under Rule 62-210.300, F.A.C., Permits Required. These emissions units are not subject to 40 CFR 60, Subpart GG, Standards of Performance for New Stationary Gas Turbines. All turbines began commercial operation in 1971.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Based on the initial Title V permit application received June 12, 1996, this facility is a major source of hazardous air pollutants (HAPs).

This permit revision reflects a change to the testing frequency of the twelve simple cycle gas turbines. Specific Condition C.7. is changed as follows:

From:

C.7. <u>Nitrogen Oxides</u>. Nitrogen oxides emissions shall be determined by a stack test on one representative turbine. Testing shall be performed each federal fiscal year, no later than September 30th. [Rules 62-296.570(4)(a)3. and (4)(b)5., F.A.C.]

To:

C.7. <u>Nitrogen Oxides</u>. Provided operation is no more than 320 hours/year/turbine on oil, NOx emissions for the combustion turbines shall be tested every five (5) years by EPA Method 20 tests as described in 40 CFR 60, Appendix A (July 1, 1996) on any representative unit in the bank of the combustion turbines. Tests shall be conducted both while burning 100% natural gas and 100% light distillate oil. [Rule 62-296.570, F.A.C.; Requested by the applicant in letter dated September 19, 2000]

This change is allowed by the NOx RACT rule, 62-296.570. F.A.C., and makes the permit language consistent with that of the Florida Power & Light Lauderdale Plant Title V permit, that regulates banks of similar combustion turbines.



Department of Environmental Protection

Jeb Bush Governor Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400

David B. Struhs Secretary

October 23, 2000

Mr. Rudy Sanchez PGBU Broward-Plant General Manager Florida Power & Light Company Environmental Services Department P.O. Box 14000 Juno Beach, Florida 33408

Re:

DRAFT Title V Permit Revision No.: 0110036-003-AV

Port Everglades Plant

Dear Mr. Sanchez:

One copy of the DRAFT Title V Air Operation Permit Revision for the Port Everglades Plant, located at 8100 Eisenhower Boulevard, Fort Lauderdale, Broward County, is enclosed. The permitting authority's "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT REVISION" and the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT REVISION" are also included.

The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT REVISION" must be published as soon as possible upon receipt of this letter. Proof of publication, i.e., newspaper affidavit, must be provided to the permitting authority's office within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit revision.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to Scott M. Sheplak, P.E., at the above letterhead address. If you have any other questions, please contact Tom Cascio at 850/921-9526.

Sincerely,

fw-

C. H. Fancy, P.E.

Chief

Bureau of Air Regulation

CHF/tbc

Enclosures

cc: Mr. Gregg Worley, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)

Ms. Elizabeth Bartlett, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)

In the Matter of an Application for Permit Revision by:

Florida Power & Light Company Environmental Services Department P.O. Box 14000 Juno Beach, Florida 33408 DRAFT Permit Revision No.: 0110036-003-AV Port Everglades Plant Broward County

INTENT TO ISSUE TITLE V AIR OPERATION PERMIT REVISION

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit revision (copy of DRAFT Permit revision enclosed) for the Title V source detailed in the application specified above, for the reasons stated below.

The applicant, Florida Power & Light Company, applied on September 25, 2000, to the permitting authority for a Title V air operation permit revision for the Port Everglades Plant, located at 8100 Eisenhower Blvd., Fort Lauderdale, Broward County. The revision reflects a change to the testing frequency of the twelve simple cycle gas turbines. The permitting authority has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, 62-213, and 62-214, F.A.C. This source is not exempt from Title V permitting procedures. The permitting authority has determined that a Title V air operation permit revision is required to commence or continue operations at the described facility.

The permitting authority intends to issue this Title V air operation permit revision based on the belief that reasonable assurances have been provided to indicate that operation of the source will not adversely impact air quality, and the source will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

Pursuant to Sections 403.815 and 403.087, F.S., and Rules 62-110.106 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT REVISION." The notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit revision. If you are uncertain that a newspaper meets these requirements, please contact the permitting authority at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114; Fax: 850/922-6979).

Page 2 of 5

within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit revision pursuant to Rule 62-110.106, F.A.C.

The permitting authority will issue the Title V PROPOSED Permit Revision, and subsequent Title V FINAL Permit Revision, in accordance with the conditions of the attached Title V DRAFT Permit Revision unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed permit revision issuance action for a period of 30 (thirty) days from the date of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT REVISION." Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit Revision, the permitting authority shall issue another DRAFT Permit Revision and require, if applicable, another Public Notice.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the permitting authority's action is based must contain the following information:

- (a) The name and address of each agency affected and each agency's file or identification number, if known;
- (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;

DRAFT Permit Revision No.: 0110036-003-AV Page 3 of 5

- (c) A statement of how and when each petitioner received notice of the agency action or proposed action;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate:
- (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief;
 - (f) A demand for relief.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation will not be available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
 - (c) Each rule or portion of a rule from which a variance or waiver is requested;
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
 - (e) The type of action requested;
 - (f) The specific facts that would justify a variance or waiver for the petitioner;
- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and,
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as

Page 4 of 5

each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Chief

Bureau of Air Regulation

Page 5 of 5

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT REVISION (including the PUBLIC NOTICE and the DRAFT permit revision) and all copies were sent by certified mail before the close of business on 10 0 to the person(s) listed:

Mr. Rudy Sanchez, Florida Power & Light Company

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE TITLE V AIR OPERATION PERMIT REVISION (including the PUBLIC NOTICE and the DRAFT permit revision) were sent by U.S. mail on the same date to the person(s) listed:

Mr. Kevin Washington, Florida Power & Light Company

Ms. Daniela Banu, Broward County Department of Natural Resource Protection

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency Clerk, receipt of which is hereby

Clerk) Fiday 1064/2

 PS Form 38 i 1, July 1999 Domestic Return Receipt	7099 3400 0000 1449 3218	2 Article Number (Const. Inc.		Florida Power & Light Co.	Mr. Rudy Sanchez PGBU-Broward-Plant General Manager	Article Addressed to:	 Attach this card to the back of the mailpiece, or on the front if space permits. 	 Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse 	SENDER: COMPLETE THIS SECTION	
 urn Receipt 102595-99-M-1789		4. Restricted Delivery? (Extra Fee)	LixCertified Mail		EST PALLA CEIVEN AND COMMITTED TO THE PROPERTY OF THE PROPERTY	gress differentiam item 1?	X Agent	A. Received by (Pease Print Clearly) B. Date of Delivery	COMPLETE THIS SECTION ON DELIVERY	

P.9	U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)						
E E	Article Sent To:	_					
	Mr. Rudy	Sanchez					
1449	Postage	\$					
Ä	Certified Fee		Destruct.				
0000	Return Receipt Fee (Endorsement Required)		Postmark Here				
	Restricted Delivery Fee (Endorsement Required)						
4 00	Total Postage & Fees	\$					
ш	Name (Please Print Clearly) (to be completed by mailer)						
<u></u>	Mr. Rudy Sanchez Street. Agt. No., or PO Box No.						
709	P.O. Box 14000						
Γ-	City State, Zip-4 Juno Beach, Florida 33408						
PS Form 3800, July 1999 See Reverse for Instru							

PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT REVISION

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Title V DRAFT Permit Revision No.: 0110036-003-AV

Port Everglades Plant Broward County

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit revision for the Port Everglades Plant, located at 8100 Eisenhower Blvd., Fort Lauderdale, Broward County. The revision reflects a change to the testing frequency of the twelve simple cycle gas turbines. The applicant's name and address are: Mr. Rudy Sanchez, PGBU Broward-Plant General Manager, Environmental Services Department, Florida Power & Light Company, P.O. Box 14000, Juno Beach, Florida 33408.

The permitting authority will issue the Title V PROPOSED Permit Revision, and subsequent Title V FINAL Permit Revision, in accordance with the conditions of the Title V DRAFT Permit Revision unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions. The permitting authority will accept written comments concerning the proposed Title V DRAFT Permit Revision issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit Revision, the permitting authority shall issue another DRAFT Permit Revision and require, if applicable, another Public Notice.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 of the Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of the notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the applicable time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the permitting authority's action is based must contain the following information:

- (a) The name and address of each agency affected and each agency's file or identification number, if known;
- (b) The name, address and telephone number of the petitioner; name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how petitioner's substantial rights will be affected by the agency determination;

- (c) A statement of how and when the petitioner received notice of the agency action or proposed action;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so state;
- (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle petitioner to relief; and
 - (f) A demand for relief.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available for this proceeding.

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Permitting Authority:

Department of Environmental Protection Bureau of Air Regulation 111 South Magnolia Drive, Suite 4 Tallahassee, Florida 32301 Telephone: 850/488-0114

Fax: 850/922-6979

Affected Local Program:

Broward County Department of Natural Resource Protection Air Quality Division 218 Southwest First Avenue Fort Lauderdale, Florida 33301 Telephone: 954/519-1220

Fax: 954/519-1495

The complete project file includes the DRAFT Permit Revision, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Scott M. Sheplak, P.E., at the above address, or call 850/921-9532, for additional information.

Florida Power and Light Company Port Everglades Plant Facility ID No.: 0110036 Broward County

Title V Air Operation Permit Revision

DRAFT Permit Revision No.: 0110036-003-AV

Permitting Authority:

State of Florida
Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
Title V Section

Mail Station #5505 2600 Blair Stone Road Tallahassee, Florida 32399-2400

Telephone: 850/488-0114 Fax: 850/922-6979

Monitoring of Operations

C.6. <u>Visible Emissions Testing Required</u>. The owner or operator shall conduct testing for visible emissions, using EPA Method 9, while the combustion turbine is operating at 90-100 percent of its capacity, according to the following schedule.

The owner or operator shall conduct testing for visible emissions while firing fuel oil for each simple-cycle turbine unit upon that turbine's exceeding 400 hours of operation on fuel oil, and every 150 hours of operation on fuel oil thereafter, in any given federal fiscal year (October 1 through September 30). Such tests shall be performed within 15 days of exceeding such operating hours, to allow for prior notification of the tests.

[Rule 62-213.440, F.A.C., applicant agreement with EPA on March 3, 1998, and AO 06-230618]

C.7. <u>Nitrogen Oxides</u>. Provided operation is no more than 320 hours/year/turbine on oil, NOx emissions for the combustion turbines shall be tested every five (5) years by EPA Method 20 tests as described in 40 CFR 60, Appendix A (July 1, 1996) on any representative unit in the bank of the combustion turbines. Tests shall be conducted both while burning 100% natural gas and 100% light distillate oil.

[Rule 62-296,570, F.A.C.; Requested by the applicant in letter dated September 19, 2000]

Test Methods and Procedures

C.8. <u>Nitrogen Oxides</u>. The test method for nitrogen oxides emissions shall be EPA Method 20, incorporated by reference in Chapter 62-297, F.A.C. If the owner or operator obtains an alternate procedure under the provisions of Rule 62-297.620, F.A.C., the procedure shall automatically become a condition of this permit.

[Rules 62-213.440, 62-296.570(4)(a)3. and 62-297.401, F.A.C.]

Record Keeping and Reporting Requirements

C.9. Records of Fuel Consumption and Operating Time Required. The owner or operator shall make and maintain records of the hours of operation of each turbine and the total fuel oil consumption of all twelve turbines in sufficient detail to ensure compliance with specific condition C.6 of this permit.

[Rule 62-4.070(3), F.A.C.]

Other Conditions

C.10. These emissions units are also subject to conditions D.1 through D.19 contained in Subsection D. Common Conditions. Common condition D.20 is not applicable to these emission units.

Table 2-1, Continued

Emissions Unit	Brief Description
005	12 Simple Cycle Gas Turbines, GT1 through GT12.

Pollutant or Parameter	Fuel(s)	Compliance Method	Testing Frequency	Frequency Base Date ¹	Minimum Compliance Test Duration	CMS ²	See Permit Condition(s)
VE	Oil, Natural Gas	EPA Method 9	Annual, each turbine exceeding fuel limit	October 31	30 min.	No	C.6
NOx	Oil, Natural Gas	EPA Method 20	Every five years, one turbine only, provided operation is no more than 320 hours/year/ turbine on oil	September 30	3 hours	No	C.5

Notes:

¹ Frequency base date established for planning purposes only; see Rule 62-297.310, F.A.C. ² CMS = continuous monitoring system