



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

JUN 1 1987

4APT/APB-ljf

Mr. Clair Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

DER

JUN 4 1987

BAQM

Re: Kissimmee Utilities (Osceola County)

Dear Mr. Fancy:

This is in regard to your letter of April 10, 1987, forwarding the above company's request to increase the allowable nitrogen oxides emissions from their 49.9 MW combined cycle gas turbine. They have requested to increase their allowable emissions concentration limit from 79 ppm to 130 ppm using the fuel bound nitrogen credit as provided for in the New Source Performance Standards, Subpart GG.

We have reviewed the company's request to use the nitrogen content of their natural gas supply in calculating the emissions rate from equations contained in Subpart GG, New Source Performance Standards. During our review, we contacted the Office of Air Quality Planning and Standards regarding the definition of fuel bound nitrogen and data regarding measured concentrations of fuel bound nitrogen in natural gas. Their response was that natural gas does not contain measurable amounts of fuel bound nitrogen and that the nitrogen content reported by the supplier is probably atmospheric nitrogen which is not credible as fuel bound nitrogen. Therefore, the company's analysis supporting their request to increase their nitrogen oxides emissions rate is not valid.

In summary, the company's request to increase nitrogen oxides emissions when burning natural gas should be denied on the basis that the reported nitrogen content of the natural gas is not fuel bound nitrogen. Unless the supplier is able to provide an analysis of their natural gas which determines fuel bound nitrogen only, with supporting documentation of test methods and procedures, credit cannot be given in the calculation of allowable nitrogen oxide emissions as provided under the New Source Performance Standards, Subpart GG.

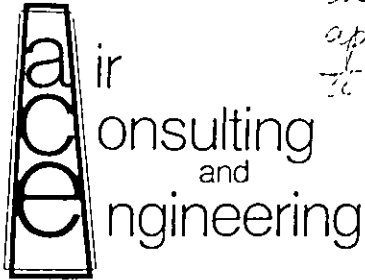
If you have any questions regarding this determination, you may contact Michael Brandon of my staff at (404) 347-2864.

Sincerely,

Bruce P. Miller

Bruce P. Miller, Chief
Air Programs Branch
Air, Pesticides and Toxics
Management Division

Thomas Nelson
1304 Thomas



John, CAPS may need this information to change the NO_x emission limit. I don't think it is appropriate for us to do that pending an opinion to CAPS determination. Tom.

April 27, 1987
151 87 01

Mr. John Turner
Florida Department of
Environmental Regulation
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803



RE: Kissimmee Utilities Gas Turbine (AO 49-093754)

Dear John:

In response to your "Completeness" inquiry of March 27, 1987, please accept the following responses:

Item 1: Estimate of actual NO_x emissions at 130 and 79 ppm.

$$\begin{aligned} \text{High Load Volumetric Flow} &= (30.9 \text{ MW}) \left(\frac{1000 \text{ KW}}{\text{MW}} \right) \left(\frac{14735 \text{ BTU}}{\text{KW}} \right) \left(\frac{9180 \text{ SCF}}{10^6 \text{ BTU}} \right) \left(\frac{20.9}{20.9-15.0} \right) \\ &= 14,806,000 \text{ SCFH} = 246,770 \text{ SCFMD} \end{aligned}$$

$$\begin{aligned} \text{NO}_x \text{ lb/Hr} &= \text{ppm} (1.194 \times 10^{-7}) (14806000 \text{ SCFH}) = \\ &= 229.8 \text{ lb/Hr @ 130 ppm} \\ &= 139.7 \text{ lb/Hr @ 79 ppm} \end{aligned}$$

Note: These values are conservative as the 130 and 79 ppm values are corrected to ISO ambient conditions. Actual emissions will be as much as 20% less depending on atmospheric conditions (for example, they were 7.14% less during 2/25/87 compliance test).

Item 4: CO emissions at NO_x concentrations of 130 and 79 ppm.

The CO concentrations were about 23 ppm at high load with water injection to control NO_x ≤ 79 ppm.

$$\text{CO lb/Hr} = 23(7.266 \times 10^{-8})(14806000 \text{ SCFH}) = 24.74$$

DER

APR 30 1987

BAQM

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)

Bill Thomas

2. Bureau of Air Quality Manag

3.

Barney A. DER

Initial

Date

Initial

Date

Initial

Date

Initial

Date

REMARKS:

Response to our previously forwarded incompleteness letter being handled by CAPS!

APR 30 1987

BAOM

INFORMATION

Review & Return

Review & File

Initial & Forward

DISPOSITION

Review & Respond

Prepare Response

For My Signature

For Your Signature

Let's Discuss

Set Up Meeting

Investigate & Report

Initial & Forward

Distribute

Concurrence

For Processing

Initial & Return

FROM:

Tedda 5/11/87
John Turner

DATE

4/29/87

PHONE

SC 325-1403

Mr. John Turner
April 27, 1987
Page 2

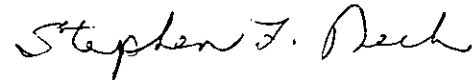
More importantly, however, CO emissions at low loads were 76.75 lb/Hr because it still took a degree of water injection to keep NO_x below 79 ppm at that load. It is expected that reduction of water injection rates to a level necessary to keep NO_x ≤130 ppm would reduce CO emissions to near zero at all loads.

Items 3 and 4: Are addressed by KUC (attached).

Please contact me if I can be further assistance.

Respectfully,

AIR CONSULTING AND ENGINEERING



Stephen L. Neck, P.E.

SLN:ctg

cc: Mr. Jeff Ling, KUA

Mr. John Turner
April 27, 1987
Page 2

More importantly, however, CO emissions at low loads were 70.73 lb/hr because it still took a degree of water injection to keep NO_x below 7 ppm that load. It is expected that reduction of water injection rates to a level necessary to keep NO_x at 130 ppm would reduce CO emissions to near zero at all loads.

Items 3 and 4: Are addressed by KBC (attached).

Please contact me if I can be further assistance.

Respectfully

AIR CONSULTING AND ENGINEERING

Stephen L. Yeck, P.E.

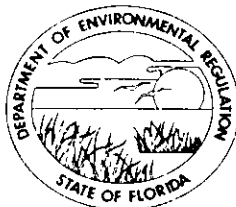
SLN:ctg

cc: Mr. Jeff King, KBA

File 697

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

April 10, 1987

Mr. Bruce Miller
Chief, Air Facilities Branch
Air & Waste Management Division
USEPA - Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Dear Mr. Miller:

Re: PSD-FL-087
Kissimmee Utilities (Osceola County)

Attached, for your information, is a copy of Kissimmee Utilities' request to increase NOx emission concentrations from their 49.9 MW-Combined Cycle Gas Turbine.

The construction permits for this unit, PSD-FL-087 and AC 49-46521, were originally issued on February 19, 1982, and November 25, 1981, respectively.

In 1983, the Company failed to apply for an operating permit within the time allowed by the construction permit. Therefore, we requested a submission of a new application. The application was reviewed and a new state permit was issued on March 30, 1984.

On April 1, 1984, we received the above mentioned request. Currently, we are in the process of modifying the BACT determination and specific conditions for state permits AC 49-74856 and AO 49-093754.

If you have any questions, please call Teresa Heron (Review Engineer) or Barry Andrews (BACT Coordinator) at (904)488-1344.

Sincerely,

Clair Fancy
Clair Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/TH/s
Attachments: sent 4/13/87 *ASF*
-cc: John Turner, DER Orlando



April 6, 1987

Mr. Stephen L. Neck, P.E.
Air Consulting & Engineering
2106 N. W. 67th Place, Suite 4
Gainesville, FL 32606-1608

RE: NO_x Emission Change Order

Dear Steve:

The following information is in reference to our recent telephone conversations in connection with the application for a change of NO_x emission limit.

- ITEM 2 - Asks for the source of the figure of 14,735 BTU/kWh. Please see attached worksheet from our last heat rate test for an output of 30 MW from the G.T.
- ITEM 3 - The effect water injection has on efficiency and maintenance with an airflow of 353 lb/sec at full load, each 1% of water injection will result in an increase of the heat rate by 1.3% (efficiency decrease).

Water injection increases the occurrences of cracking in the combustor baskets due to localised cooling, particularly in the dome area around the burner nozzle. This results in shorter basket life as well as increased maintenance and down time costs.

Up to the present time, we have had costs of approximately \$16,000 for basket repairs and \$36,000 for a standby set of burner nozzles.

Mr. Stephen L. Neck, P.E.
RE: NO_x Emission Change Order
April 6, 1987

Downtime has cost us anywhere up to \$5,000 per day, according to the situation on system external to KUA. Up to the present time no work has been carried out on the turbine section of our machine, other than visual inspection.

This has however, revealed deposits building up on the blades and vanes, in excess of what would normally be expected with the hours that the machine has run.

It is felt that the majority of the deposit buildup is due to the use of water injection at the rate required to comply with the present emission rates. We therefore expect that we will have to decrease the period between major turbine inspections, to take into account the increased fouling rate found in the turbine.

As both Westinghouse and KUA have only a short operating experience using water injection, it is not possible to draw on any further data than that noted above.

Regards,

KISSIMMEE UTILITY AUTHORITY

Jeff Ling
Power Plant Superintendent

JL/rk

cc - Max Alderman

Table 1 CO, NO_x Emission Summary
 Kissimmee Utilities Authority
 February 25, 1987

Load Average MW	NO _x ppm dry	O ₂ %	NO _x ppm dry 15% O ₂	DB °C	Relative Humidity %	Specific Humidity	Barometric Pressure "Hg	Temperature Correction Factor	Humidity Correction Factor	Pressure Correction Factor	NO _x * ppm	CO ppm
18	41	17.0	62	24.7	68	0.0134	30.08	0.950	1.144	0.997	67	64
23	42	16.4	55	20.4	83	0.0127	30.08	0.972	1.129	0.997	60	--
28	52	15.6	58	21.9	73	0.0122	30.08	0.964	1.118	0.997	62	--
32	63	15.2	65	24.6	68	0.0134	30.08	0.951	1.144	0.997	70	--

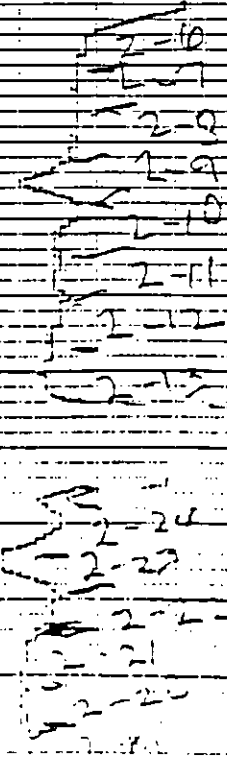
*Permitted Rate = 79 ppm

CO Emission Rate = (64)(2.595 x 10⁻⁶)(28)(275080)(60) = 76.75 lb/Hr

1200
1100
1000
900
800
700
600
500
400
300
200
100
0

1609 TIME

HT 1609
2-10
2-11
2-12
2-13
2-14
2-15
2-16
2-17
2-18
2-19
2-20
2-21
2-22
2-23
2-24



110 53019

- 3) Provide data and further information supporting the statements that the water injection rates used to maintain emissions of NO_x at or below 79 ppm results in decreased efficiency, and considerable combustor and turbine damage, and provide an economic analysis concerning the increased operating and maintenance costs.
- 4) Provide estimates of the CO emissions for NO_x concentrations of 130 ppm and 79 ppm.
- 5) Please provide a copy of your February 25, 1987 letter which bears your P.E. seal.

Pursuant to Section 120.60(2) Florida Statutes, the department may deny an application if the applicant, after receiving timely notice fails to correct errors, omissions or supply additional information within a reasonable period of time.

Your request has been forwarded to Central Air Permitting for further processing. Please direct future correspondence on this matter to Mr. Bill Thomas, and send a copy to our Central Florida District Office.

Sincerely,



A. T. Sawicki, P.E., Supervisor
Air Engineering

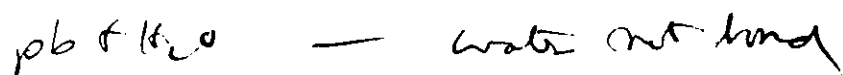
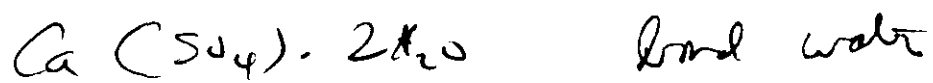
ATS/jte

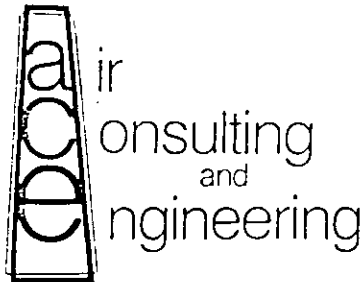
cc: James D. Welsh, Utilities Director
Bill Thomas, BAQM

Natural Gas : A combustible, gaseous mixture of low-molecular-weight paraffin hydrocarbons, generated below the surface of the earth; contains mostly methane and ethane with small amounts of propane, butane, and higher hydrocarbons, and sometimes nitrogen, carbon dioxide, hydrogen sulfide, and helium



Bound Water : Water that is portion of a system such as tissues or soil and does not form ice crystals until the material's temperature is lowered to about $-20^{\circ}C$





February 25, 1987
151 87 01

*copy of permit
to review for Tom
signature*
Check
E

Mr. A.T. Sawicki
Florida Department of
Environmental Regulation
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803

DER
APR 1 1987
BAQM

RE: Kissimmee Utilities Commission Gas Turbine Allowable NO_x
Emissions As Specified In Permit Number A0-49-093754

Dear Mr. Sawicki:

On behalf of Kissimmee Utilities Commission (KUC), Air Consulting and Engineering (ACE) has investigated the current maximum allowable emissions specified in the referenced operating permit. It would appear from the information and calculations included in this submittal, that KUC should be allowed a maximum NO_x emission of 130 ppm corrected to standard conditions versus the current limit of 79 ppm. This adjustment is necessary in accordance with Subpart GG NSPS standards which allows credit for fuel bound nitrogen. It is my belief that the fuel bound nitrogen content of natural gas was either never investigated during the original permitting effort or that the fuel analysis has changed since that time period.

Please review the enclosed data. If you agree with my assessment, I wish to ask for a permit change to reflect the higher allowable emission. I would also like to point out that the high water injection rates that are now necessary to ensure a maximum emission of 79 ppm results in greater fuel usage (decreased efficiency) and considerable combustor and turbine damage (increased maintenance cost). The high water rates also result in higher than necessary carbon monoxide emissions at all loads.

Please contact Mr. Jeff Ling of KUC or me if you have any questions regarding this request.

Respectfully,

AIR CONSULTING AND ENGINEERING

Stephen L. Neck, P.E.

SLN:ctg

attachments

cc: Mr. Jeff Ling (KUC)

TABLE 1
ALLOWABLE EMISSION LIMITS
49.9 MW Combined Cycle Combustion Turbine

Pollutant	Standard	Gas Turbine(a)	Boiler	Basis
NO _x (a)	0.0075 $\frac{(14.4)}{Y}$ + F	79 PPM (gas) and 129 (oil) at 15 percent oxygen on a dry basis		NSPS, BACT
SO ₂	0.8 percent S by weight 0.015 percent by volume at 15 percent oxygen on a dry basis	0.5 percent S by weight and 255 lb/hr	0.5 percent S by weight	NSPS, BACT
PM (b)	20% opacity	20% opacity or 22 lb/hr	20% opacity	BACT
VOC	-	19 lb/hr		BACT
CO	-	80 lb/hr		BACT
Mercury (Hg)	-	0.0004 lb/hr		Estimated by Applicant
Beryllium (Be)	-	0.00004 lb/hr		EPA 600/57-81-003b

(a) The allowable NO_x emission rate for the gas turbine was determined by the following formula:

$$STD = 0.0075 \frac{(14.4)}{Y} + F \text{ where:}$$

STD = allowable NO_x emissions (percent by volume at 15 percent oxygen and on a dry basis).
 Y = manufacturer's rated heat rate at manufacturer's rated load (kilojoules per watt hour) or, actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt hour. The efficiency factor must be based on the gas turbine efficiency itself, not the overall efficiency of the gas turbine combined with other equipment.

NO_x = 79 PPM when burning natural gas
 NO_x = 129 PPM when burning fuel oil No. 2

(b) Visible emissions: Not to exceed 20% opacity; 40% opacity is permitted for not more than two-minutes in any one hour.

F = NO_x emission allowance for fuel-bound nitrogen as follows:
 Fuel-bound nitrogen (Percent by weight) (NO_x percent by volume)

$$\frac{\begin{matrix} < 0.015 \\ 0.015 < N < 0.1 \\ 0.1 < N < 0.25 \\ N > 0.25 \end{matrix}}{\begin{matrix} 0 \\ 0.04(N) \\ 0.04 + 0.0067(N - 0.1) \\ 0.005 \end{matrix}}$$

where: N = the nitrogen content of the fuel (percent by weight)
 > 0.25 is proposed by the applicant

ATTACHMENT

1.0 Amount of H₂O in combustion gases

Basis: N atoms of H produce n/2 moles of H₂O.

Methane (CH ₄)	4 atoms of H produces 2 moles H ₂ O
Ethane (C ₂ H ₆)	6 atoms of H produces 3 moles H ₂ O
Propane (C ₃ H ₈)	8 atoms of H produces 4 moles H ₂ O
Butane (C ₄ H ₁₀)	10 atoms of H produces 5 moles H ₂ O
Pentane (C ₅ H ₁₂)	12 atoms of H produces 6 moles H ₂ O
Hexane (C ₆ H ₁₄)	14 atoms of H produces 7 moles H ₂ O

Therefore, moles of H₂O produced per mole of gas is equal to:

$$0.96222(2) + 0.02214(3) + 0.0022(4) + (0.00006 + 0.00005)(5) + (0.00004 + 0.00002)(6) + 0.00022(7) = 2.00187$$

2.0 Molecular Weight Of Gas

Nitrogen (as N)	(MW=14)	14 (.00432) +	
Carbon Dioxide	(MW=44)	44 (.00873) +	
Methane	(MW=16)	16 (.96222) +	
Ethane	(MW=30)	30 (.02214) +	
Propane	(MW=44)	44 (.0022) +	
Butane	(MW=58)	58 (.00011) +	
Pentane	(MW=72)	72 (.00006) +	
Hexane	(MW=86)	86 (.00022)	= 16.631

3.0 Weight Of Water Per Dry Ft³ At 60°F And 14.7 PSIA

$$2.00187 \frac{\text{moles H}_2\text{O}}{\text{mole gas}} \times \frac{18 \text{ lb gas}}{1 \text{ mole H}_2\text{O}} \times \frac{1 \text{ mole gas}}{16.631 \text{ lb gas}} \times \frac{0.0765 \times .5779 \text{ lb gas}}{\text{Ft}^3 \text{ gas}}$$

$$= 0.096 \frac{\text{lb H}_2\text{O}}{\text{Ft}^3 \text{ gas}}$$

4.0 Lower Heating Value Of Gas

$$\text{LHV} = \text{HHV} - \frac{\text{lb H}_2\text{O}}{\text{Ft}^3 \text{ gas}} \times \frac{1023 \text{ Btu}}{\text{lb H}_2\text{O}}$$

$$= 1005 - [(0.096)(1023)] = 907.0 \frac{\text{Btu}}{\text{Ft}^3}$$

5.0 Percent Nitrogen In Fuel

$$\left(0.00432 \frac{\text{moles N}}{\text{mole gas}}\right) \left(\frac{14 \text{ lb N}}{\text{lb mole}}\right) \left(\frac{1 \text{ mole gas}}{16.631 \text{ lb gas}}\right) = 0.00364$$

OR 0.364% N

6.0 Calculation Of Y Using Lower Heating Value

$$Y = \left(\frac{907}{1045}\right) \left(14,735 \frac{\text{Btu}}{\text{KwH}}\right) = 12,789 \frac{\text{Btu}}{\text{KwH}}$$

Convert To KJ/WH,

$$\left(12,789 \frac{\text{Btu}}{\text{KwH}}\right) \left(3600 \frac{\text{KJ}}{\text{Btu}}\right) \left(\frac{1 \text{ Kw}}{1000 \text{ W}}\right) = 13.49 \frac{\text{KJ}}{\text{WH}}$$

KUC ALLOWABLE EMISSION RATE:

$$\text{STD} = 0.0075 \left(\frac{14.4}{Y}\right) + .005$$

Where: F = NO_x percent by volume
Y = heat rate (Kj/WH)

$$\text{STD}_{\text{KUC}} = 0.0075 \left(\frac{14.4}{13.5}\right) + .005$$

$$= .0080 + .0050 = 0.013\% \text{ by volume}$$

$$= 130 \text{ ppm}_v \text{ corrected to } 15\% \text{ O}_2 \text{ ISO ambient conditions}$$



February 16, 1987

Mr. Stephen L. Neck, P.E.
Air Consulting and Engineering
2106 N. W. 67th Place, Suite 4
Gainesville, FL 32606

Dear Steve:

Enclosed is a copy of the gas analysis supplied to me by Florida Gas Transmission. I trust that this is to your requirements.

Sincerely,

KISSIMMEE UTILITY AUTHORITY

A handwritten signature in black ink, appearing to read 'Jeff Ling', is written over the typed name.

Jeff Ling
Power Plant Superintendent

JL/rk

Enclosure

12/05/86

FLORIDA GAS TRANSMISSION CO.
 TECHNICAL OPERATIONS DEPT.
 P. O. BOX 44
 WINTER PARK FL 32790-0044

FGT - MARKET SERVICES
 MR. JIM DOWDEN
 P. O. BOX 44
 WINTER PARK FL 32790

GAS ANALYSIS ID NUMBER 86 0780 MEAS. DIST. 07
 METER STATION NAME FLA HYDROCARBON - OUTLET STATION NO.
 FIELD DATA TAKEN BY B S DATE TAKEN 11-
 PRESSURE 534 TEMPERATURE 0 SPEC GRAV 0.5800
 STU\ 1016 WATER 0.0000 H2S 0.7 /
 DATA ANALYZED BY M P. C. DATE ANAL. 12-03-86

COMPONENT	MOLE %	B.T.U.	GPM	SPEC GRAV
OXYGEN	0.0000	0.0000	0.0000	0.0000
NITROGEN	0.4320	0.0000	0.0000	0.0042
CARBON DIOXIDE	0.8730	0.0000	0.0000	0.0133
METHANE	96.2220	956.9300	0.0000	0.5331
ETHANE	2.2140	38.5700	0.0000	0.0230
PROPANE	0.2200	5.4500	0.0606	0.0533
I BUTANE	0.0050	0.1600	0.0016	0.0001
N BUTANE	0.0060	0.1900	0.0019	0.0001
I PENTANE	0.0040	0.1600	0.0015	0.0001
N PENTANE	0.0020	0.0800	0.0007	0.0000
HEXANE PLUS	0.0220	1.1300	0.0097	0.0007
TOTALS	100.0000	1002.6700	0.0760	0.5779

BTU/CU FT AT 14.73 PSIA 60 DEG F CORRECTED FOR Z
 CALCULATED SATURATED 1005 DRY 1023 0.0000 LB/MCF 1023
 CALORIMETER SATURATED 1003 DRY 1021
 SPECIFIC GRAVITY - AIR = 1.0000 CALC 0.5779 RANAREX 0.5780

COMPRESSIBILITY FACTOR - Z = 0.9979
 SUPERCOMPRESSIBILITY FACTOR CALC AT 0.5780 SP GR 600 PSIG 90 DEG
 BY TEST WITH BURNETT APPARATUS 1.0340
 CALC AGA-NX-19 NO DILUENTS 1.0366
 CALC AGA-NX-19 ADJUSTED FOR DILUENTS 1.0353

NOTES PHYSICAL CONSTANTS FROM AGA 3
 GPM FROM NGPA PUE NO 2145-84
 HEXANE PLUS DERIVED FROM PHILLIPS REF STANDARD

REMARKS 3000
 P

B A
 AGA-NX-19
 (0.126)