

,

February 22, 1999

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FEB 24 1999

BUREAU OF AIR REGULATION

Mr. Al Linero, P.E. Bureau of Air Regulation Florida Department of Environmental Protection^{*} 2600 Blair Stone Road Tallahassee, FL 32399-2400

Dear Mr. Linero:

Re: Inlet Fogging Permit Application

0970014-002-AC

Enclosed are three originals of a construction permit application for installation of inlet fogging systems on Units 7 through 10 at Florida Power Corporation's (FPC) Intercession City plant. As you know, FPC wishes to install inlet fogging systems on its newer peaking units at the two facilities in order to obtain additional electric output during summer peak demand periods.

FPC requests that the inlet fogging be permitted for use at the Intercession City facilities for a total of 7,200 hrs/year. Permitting the use of inlet fogging will help FPC address a very real need for additional generating capacity during the summer of 1999 with a corresponding insignificant increase in emissions. Please contact Mike Kennedy at (727) 826-4334 if you have any questions.

Sincerely,

W. Jeffrey Pardue, C.E.P.

CC: File Central District

Director

ONE POWER PLAZA, 263 - 13th Avenue South, BB1A, St. Petersburg, FL 33701-5511 • P.O. Box 14042, BB1A • St. Petersburg • Florida 33733-4042 • (727) 866-5151

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Department of Environmental Protection

BUREAU OF AIR REGULATION

DIVISION OF AIR RESOURCES MANAGEMENT APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Identification of Facility Addressed in This Application

Facility Owner/Company Name : Florida Power Corporation		
2. Site Name : Intercession City Plant		
3. Facility Identification Number:	0970014	[] Unknown
4. Facility Location : Intercession City		
Street Address or Other Locator:	6525 Osceola Polk	Co. Line Rd.
City: Intercession City	County: Osceola	Zip Code: 33848
5. Relocatable Facility? [] Yes [X] No		6. Existing Permitted Facility? [X] Yes [] No

0970014-002-AC

Owner/Authorized Representative or Responsible Official

Date

I. Part 2 - 1

DEP Form No. 62-210.900(1) - Form

Effective: 3-21-96

Signature

^{*} Attach letter of authorization if not currently on file.

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type
002	Combustion Turbine (CT) Peaking Unit Nos. 7-10	

DEP Form No. 62-210.900(1) - Form Effective: 3-21-96

Purpose of Application and Category

	ategory I: All Air Operation Permit Applications Subject to Processing Under Chapter 62-213, A.C.
T	his Application for Air Permit is submitted to obtain:
[Initial air operation permit under Chapter 62-213, F.A.C., for an existing facility which is classified as a Title V source.
[Initial air operation permit under Chapter 62-213, F.A.C., for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.
	Current construction permit number :
[] Air operation permit renewal under Chapter 62-213, F.A.C., for a Title V source. Operation permit to be renewed:
[Air operation permit revision for a Title V source to address one or more newly constructed or modified emissions units addressed in this application. Current construction permit number :
	Operation permit to be revised :
[] Air operation permit revision or administrative correction for a Title V source to address one or more proposed new or modified emissions units and to be processed concurrently with the air

Operation permit to be revised/corrected:

I. Part 4 - 1

DEP Form No. 62-210.900(1) - Form

construction permit application.

[] Air operation permit revision for a Title V source for reasons other than construction or modification of an emissions unit.
Operation permit to be revised:
Reason for revision:
Category II: All Air Operation Permit Applications Subject to Processing Under Rule 2-210.300(2)(b), F.A.C.
This Application for Air Permit is submitted to obtain:
[] Initial air operation permit under Rule 62-210.300(2)(b), F.A.C., for an existing facility seeking classification as a synthetic non-Title V source.
Current operation/construction permit number(s):
[] Renewal air operation permit under Fule 62-210.300(2)(b), F.A.C., for a synthetic non-Title V source.
Operation permit to be renewed:
[] Air operation permit revision for a synthetic non-Title V source.
Operation permit to be revised:
Reason for revision:
Category III: All Air Construction Permit Applications for All Facilities and Emissions Units
This Application for Air Permit is submitted to obtain:
[X] Air construction permit to construct or modify one or more emissions units within a facility (including any facility classified as a Title V source).
I. Part 4 - 2 DEP Form No. 62-210.900(1) - Form Effective: 3-21-96

Current operation permit number(s), if any: 0970014-001-AV

[] Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.

Current operation permit number(s):

[] Air construction permit for one or more existing, but unpermitted, emissions units.

I. Part 4 - 3

DEP Form No. 62-210.900(1) - Form

Application Processing Fee

Check one:

[] Attached - Amount :

\$0.00

[X] Not Applicable.

Construction/Modification Information

1. Description of Proposed Project or Alterations:

Project to add inlet fogging to each of Units 7 through 10. Fogging consists of atomized water to cool the inlet air to the turbine, producing additional electric generation output.

2. Projected or Actual Date of Commencement of Construction:

01-May-1999

3. Projected Date of Completion of Construction:

30-Jun-1999

Professional Engineer Certification

1. Professional Engineer Name:

Jennifer L. Tillman

Registration Number:

0052125

2. Professional Engineer Mailing Address:

Organization/Firm: Florida Power Corporation

Street Address: P.O. Box 14042, MAC BB1A

City: St. Petersburg

State: FL Zip Code: 33733

3. Professional Engineer Telephone Numbers:

Telephone: (727)826-4132

Fax: (727)826-4216

DEP Form No. 62-210.900(1) - Form

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein*, that:

- (1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollutant 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
- (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.

If the purpose of this application is to obtain a Title V source air operation permit (check here [] 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 schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [] 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.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [] if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions 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.

Signature Date

Date

I. Part 6 - 1

DEP Form No. 62-210.900(1) - Form

* Attach any exception to certification statement.

I. Part 6 - 2

DEP Form No. 62-210.900(1) - Form

Application Contact

1. Name and Title of Application Contact:

Name: J. Michael Kennedy, Q.E.P. Title: Manager, Air Programs

2. Application Contact Mailing Address:

Organization/Firm:

Florida Power Corporation

Street Address:

P.O. Box 14042, MAC BB1A

City:

St. Petersburg

FL

State:

Zip Code: 33733

3. Application Contact Telephone Numbers:

Telephone:

(727)826-4334

Fax:

(727)826-4216

Application Comment

This application is for a permit to authorize the installation of inlet fogging on Intercession City Units 7 through 10.

I. Part 7 - 1

DEP Form No. 62-210.900(1) - Form

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility, Location, and Type

2

1. Facility UTM Coordinates: Zone: 17 East (km): 446.30 North (km): 3126.00 2. Facility Latitude/Longitude: Latitude (DD/MM/SS): Longitude (DD/MM/SS): 28 15 38 32 51 3. Governmental 4. Facility Status 5. Facility Major 6. Facility SIC(s):

Facility Code:

Code: Α

49

Group SIC Code:

7. Facility Comment:

Facility consists of 11 combustion turbine peaking units. Six CTs are fired with #2 distillate oil with a maximum sulfur content of 0.5%. Five CTs are fired with #2 distillate oil with a maximum sulfur content of 0.2% or natural gas. These 5 CTs are limited to average annual capacity factor of 33% based on weighted 12-month rolling average sulfur content of 0.2%, which may be increased up to 38.7% if average sulfur content is 0.16% or less.

Facility Contact

1. Name and Title of Facility Contact:

M. J. Drango

Asset Manager

2. Facility Contact Mailing Address:

Organization/Firm:

Florida Power Corporation

Street Address:

6525 Osceola Polk Co. Line Rd.

City:

Intercession City

State: FL Zip Code: 33848

3. Facility Contact Telephone Numbers:

Telephone:

(407)396-2111

Fax:

(407)678-4453

II. Part 1 - 1

DEP Form No. 62-210.900(1) - Form

Facility Regulatory Classifications

1.	Small Business Stationary Source?	N
2.	Title V Source?	Y
3.	Synthetic Non-Title V Source?	N
4.	Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?	Y
5.	Synthetic Minor Source of Pollutants Other than HAPs?	N
6.	Major Source of Hazardous Air Pollutants (HAPs)?	N
7.	Synthetic Minor Source of HAPs?	N
8.	One or More Emissions Units Subject to NSPS?	Y
9.	One or More Emission Units Subject to NESHAP?	N
10	Title V Source by EPA Designation?	N
11	. Facility Regulatory Classifications Comment :	
	Combustion Turbine Units 7 through 10, to which this application applies, are subject stationary gas turbines (40 CFR Part 60, Subpart GG).	to NSPS for

DEP Form No. 62-210.900(1) - Form

B. FACILITY REGULATIONS

<u>]</u>	Rule Applicability Analysis					
	Not Applicable					

II. Part 3a - 1

DEP Form No. 62-210.900(1) - Form

B. FACILITY REGULATIONS

List of Applicable Regulations

Refer to Attachment IC-FE-B

II. Part 3b - 1

DEP Form No. 62-210.900(1) - Form

C. FACILITY POLLUTANTS

Facility Pollutant Information

1. Pollutant Emitted	2. Pollutant Classification
PM10	A
NOX	A
РМ	A
СО	A
SO2	A
VOC	А
SAM	A

II. Part 4 - 1

DEP Form No. 62-210.900(1) - Form

Facility Pollutant Information	n Pollutant 1	
1. Pollutant Emitted :	PM10	
2. Requested Emissions Cap :	(lbs/hour)	(tons/year)
3. Basis for Emissions Cap Co	ode:	
4. Facility Pollutant Comment		

DEP Form No. 62-210.900(1) - Form

Facility Pollutant Information	Pollutant2_	
1. Pollutant Emitted: NOX		
2. Requested Emissions Cap:	(lbs/hour)	(tons/year)
3. Basis for Emissions Cap Code:		
4. Facility Pollutant Comment:		

II. Part 4b - 2

DEP Form No. 62-210.900(1) - Form

Facility Pollutant Information	Pollutant3	
1. Pollutant Emitted: PM		
2. Requested Emissions Cap:	(lbs/hour)	(tons/year)
3. Basis for Emissions Cap Code:		
4. Facility Pollutant Comment:		

II. Part 4b - 3

DEP Form No. 62-210.900(1) - Form

Facility Pollutant Information	Pollutant 4	
1. Pollutant Emitted: C	О	
2. Requested Emissions Cap :	(lbs/hour)	(tons/year)
3. Basis for Emissions Cap Code:		
4. Facility Pollutant Comment:		

II. Part 4b - 4

DEP Form No. 62-210.900(1) - Form Effective: 3-21-96

Facility Pollutant Information	Pollutant5	
1. Pollutant Emitted: SO2		
2. Requested Emissions Cap:	(lbs/hour)	(tons/year)
3. Basis for Emissions Cap Code:		
4. Facility Pollutant Comment:		

DEP Form No. 62-210.900(1) - Form Effective: 3-21-96

Facility Pollutant	Information	Pollutant <u>6</u>	
1. Pollutant Emit	ted: VOC		
2. Requested Em	issions Cap :	(lbs/hour)	(tons/year)
3. Basis for Emis	sions Cap Code :		
4. Facility Polluta	ant Comment :		

II. Part 4b - 6

DEP Form No. 62-210.900(1) - Form

Facility Pollutant Information	Pollutant7		
1. Pollutant Emitted : SAM		-	
2. Requested Emissions Cap :	(lbs/hour)	(tons/year)	
3. Basis for Emissions Cap Code:			
4. Facility Pollutant Comment:			

II. Part 4b - 7

DEP Form No. 62-210.900(1) - Form

D. FACILITY SUPPLEMENTAL INFORMATION

Supplemental Requirements for All Applications

1. Area Map Showing Facility Location :	IC-FE-1
2. Facility Plot Plan :	IC-FE-2
3. Process Flow Diagram(s):	IC-FE-3
4. Precautions to Prevent Emissions of Unconfined Particulate Matter:	NA
5. Fugitive Emissions Identification :	NA
6. Supplemental Information for Construction Permit Applica	IC-FE-4

Additional Supplemental Requirements for Category I Applications Only

7. List of Proposed Exempt
8. List of Equipment/Activities Regulated under
9. Alternative Methods of Operation :
10. Alternative Modes of Operation (Emissions
11. Identification of Additional Applicable
12. Compliance Assurance Monitoring
13. Risk Management Plan Verification :
14. Compliance Report and Plan :
15. Compliance Certification (Hard-copy Requir

II. Part 5 - 1

DEP Form No. 62-210.900(1) - Form

II. Part 5 - 2

DEP Form No. 62-210.900(1) - Form

ATTACHMENT IC-FE-B FACILITY REGULATIONS

ATTACHMENT IC-FE-B

FACILITY REGULATIONS

Applicable Requirements Listing - Power Plants

FACILITY: FPC Intercession City Plant

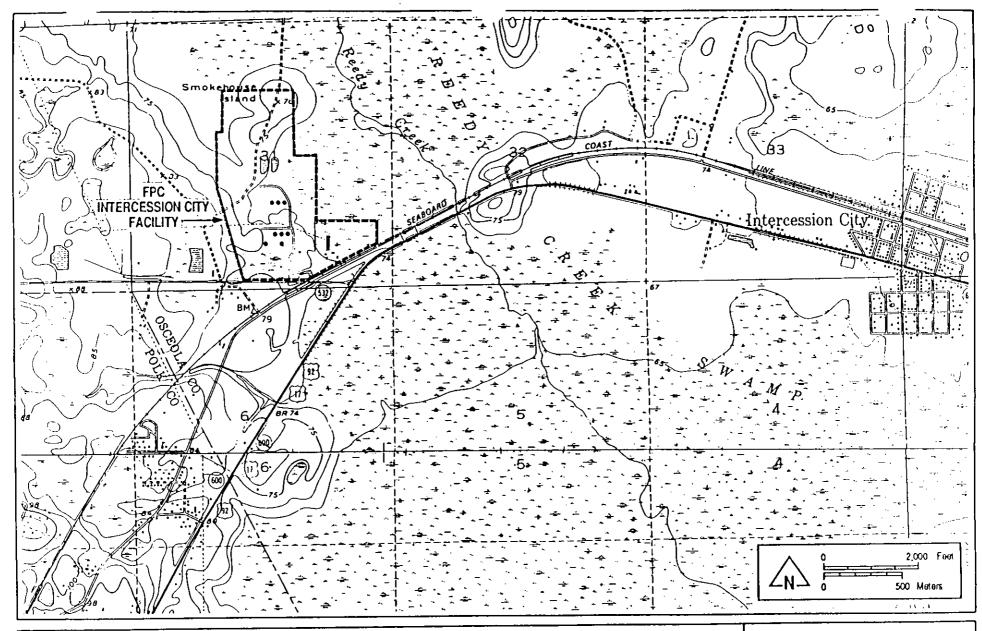
62-210.900(5)

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FDEP Rules:
General Permits:
62-4.030
62-4.040(1)(a)
                                - Exemptions from permitting
62-4.040(1)(b)
                                - Exemptions from permitting
62-4.100
62-4.130
Asbestos NESHAP:
62-204.800(8)(b)8.(State Only) - Asbestos Removal
62-204.800(8)(d) (State Only) - General Provisions (Asbestos)
62-204.800(19) (State Only)
                               - CFCs; Part 82
Stationary Sources-General:
62-210.300(2)
Exemptions - Plant Specific:
62-210.300(3)(a)4.
                                - comfort heating < 1 mmBtu/hr
62-210.300(3)(a)5.
                               - mobile sources
62-210.300(3)(a)7.
                               - non-industrial vacuum cleaning
62-210.300(3)(a)8.
                               - refrigeration equipment
62-210.300(3)(a)9.
                               - vacuum pumps for labs
                               - steam cleaning equipment
62-210.300(3)(a)10.
62-210.300(3)(a)11.
                               - sanders < 5 ft2
62-210.300(3)(a)12.
                               - space heating equip.; (non-boilers)
62-210.300(3)(a)14.
                               - bakery ovens
62-210.300(3)(a)15.
                               - lab equipment
62-210.300(3)(a)16.
                               - brazing, soldering or welding
62-210.300(3)(a)17.
                               - laundry dryers
                               - emergency generators < 32,000 gal/yr
62-210.300(3)(a)20.
62-210.300(3)(a)21.
                               - general purpose engines < 32,000 gal.vr
62-210.300(3)(a)22.
                               - fire and safety equipment
62-210.300(3)(a)23.
                               - surface coating >5% VOC; 6 gal/month
62-210.300(3)(a)24.
                               - surface coating < 5% VOC
62-210.300(3)(b)
                               - Temporary Exemptions
62-210.370(3)
                               - AORs
```

- AOR Form

Title V Permits:	
62-213.205(1)(a)	- Fees
62-213.205(1)(b)	1 003
62-213.205(1)(c)	
62-213.205(1)(e)	
62-213.205(1)(f)	
62-213.205(1)(t) 62-213.205(1)(g)	
62-213.205(1)(I)	
62-213.205(1)(j)	
62-213.400	Dec. to Dec. tota
62-213.410	- Permits/Revisions
	- Changes without permit revisions
62-213.420.(1)(b)2.	- Permits-allows continued operation
62-213.420.(1)(b)3.	- Permits-additional information
62-213.460	- Permit Shield
62-213.900(1)	- Fee Form
	,
Open Burning:	
62-256.300	- Prohibitions
62-256.700	- Open burning Allowed
Asbestos Removal:	
62-257.301	No. (Constant D
	- Notification and Fee
62-257.400	- Fee Schedule
62-257.900	- Form
Stationary Sources-Emission Sta	andarde:
62-296.320(2) (State Only)	
62-296.320(3)(b) (State Only)	
62-296.320(4)(b)	- General VE Standard
62-296.320(4)(c)	- Unconfined Emissions of Particulate Matter
02-230.320(4)(c)	- Uncommed Emissions of Particulate Matter
Stationary Sources-Emission Mo	nnitoring
62-297.310(7)(a)10.	- Exemption of annual VE for 210.300(3)(a) sources/Gen. Per.
02 23 2 10 (·) (u) 10 .	Exemption of animal VE for 210.300(3)(a) sources/Ocil. 1 cr.
Federal Regulations:	
Asbestos Removal:	
40 CFR 61.05	- Prohibited Activities
40 CFR 61.12(b)	- Compliance with work practice standard
40 CFR 61.14	- Monitoring Requirements (if required)
40 CFR 61.19	- Circumvention
40 CRF 61.145	- Demolition and Renovation
40 CFR 61.148	- Standard for Insulating Material
	Promote tot immining limoria
CFCs > 50 lb:	
40 CFR 82.166(k)	- Service Documentation
40 CFR 82.166(m)	- Recordkeeping

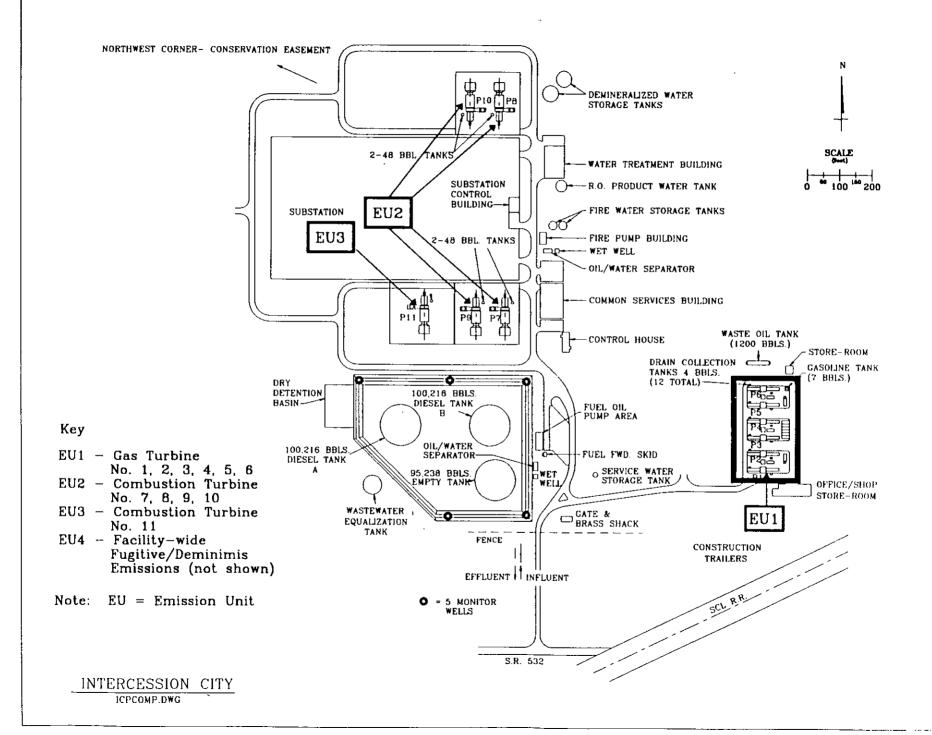
ATTACHMENT IC-FE-1 AREA MAP



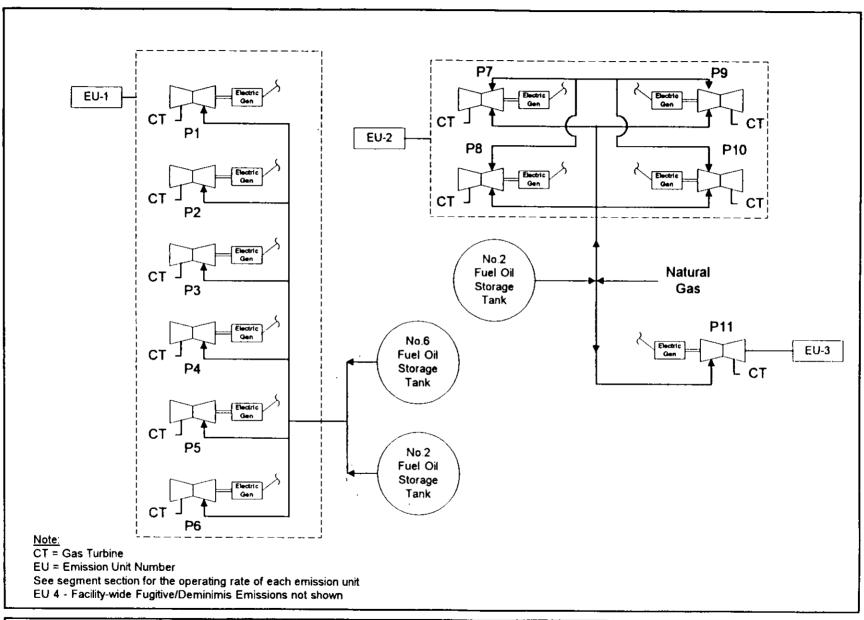
LOCATION OF THE FPC INTERCESSION CITY FACILITY



ATTACHMENT IC-FE-2 FACILITY PLOT PLAN



ATTACHMENT IC-FE-3 PROCESS FLOW DIAGRAM



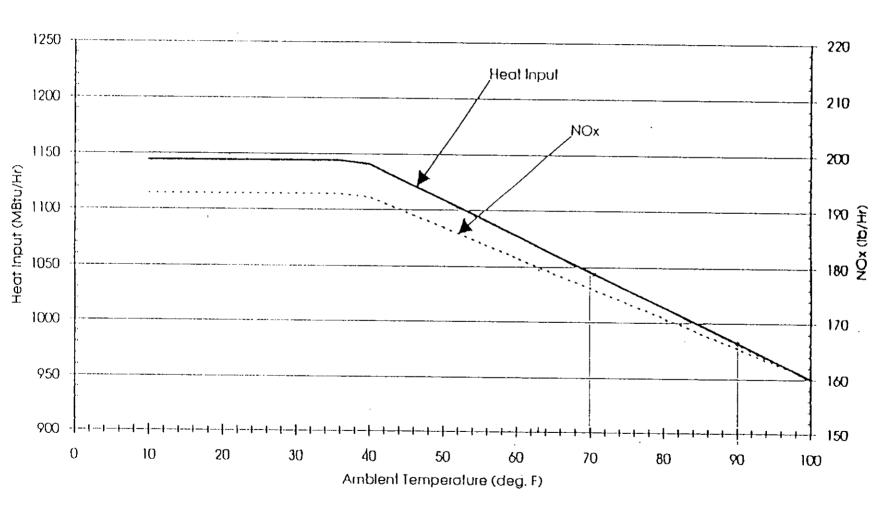
- 1	Florida Power Corporation		Emission Unit Significant Uni	ts	1	
L			Process Area Overall Plant		Engineering and Appli	
	Emission Units	Intercession City	Filename: FPCIC1.VSD			
			Latest Revision Date: 6/3/96	03:45 PM	Sciences, Inc.	Sciences, inc.
						

Attachment IC-FE-4

Supplemental Information

FlotIda Power Corporation

GE Frame 7EA Combustion Turbines



Florida Power Corporation
Intercession City Facility
Heat Input vs. Ambient Temperature Curve

Description of Project and Estimated Emissions Increase

The inlet fogging system is useful on hot summer days. A water mist is sprayed into the inlet of the combustion turbine. The mist cools the inlet air by evaporation, resulting in a 20 degrees F. reduction in temperature. The air is therefore denser, and the unit can achieve higher output (nominally, 4 to 6 MW of additional output will be obtained). This also results in slightly higher heat input and NOx emissions, although they are within the allowable limits for the inlet temperature achieved. In addition, the fogging system improves unit efficiency slightly. Efficiency is expected to increase by approximately 1% as a result of the fogging. This will have a nominal offsetting effect on the direct increase in emissions resulting from the use of inlet fogging.

The attached curves, which are a part of the current permit for the facility, show the relationship between inlet temperature and heat input and NOx emissions for the GE Frame 7EA combustion turbines at Intercession City. These curves do not take into account the improved efficiency achieved with inlet fogging, so they are conservative.

A typical scenario would occur when the ambient temperature is 90 degrees F. If fogging is used, the inlet air to the combustion turbine would be cooled to approximately 70 deg. NOx emissions could increase from 165 lbs/hr to 176 lbs/hr, which is an increase of 11 lbs/hr per unit. This is a worst-case estimate, because it is based on oil firing. The increase would be only 6 lbs/hr while operating on natural gas. At an increase of 11 lbs/hr, inlet fogging could be used for an aggregate of over 7,200 hrs/year and remain below the PSD significant emissions increase threshold of 40 tons/year. Given the long, hot summers in Florida, limiting the use of the fogging systems to an aggregate total of 7,200 hrs/year per facility should provide adequate operating time while ensuring that emissions do not increase significantly.

For other criteria pollutants, the emissions increase can be estimated by using the heat input increase associated with a 20 deg. F decrease in temperature. Using the heat input curve, a 20 deg. F temperature decrease results in an increase in heat input of 55 mmBtu/hour. This is then multiplied by the emissions rate in lb/mmBtu in order to obtain the increase in hourly emissions. The following table summarizes the results.

Pollutant	Emission Rate (lb/mmBtu)	Emission Increase (lb/hr)	Tons/Year @ 7,200 hr/yr	PSD Threshold
SO₂	0.19	10.5	37.8	40
PM	0.015	0.8	2.9	25
PM10	0.015	0.8	2.9	15
CO	0.05	2.8	10.1	100
VOC	0.004	0.2	11.0	40
SAM	0.016	0.9	2.9	7

All pollutant increases will remain less than the respective PSD thresholds at an aggregate fogging use limit of 7,200 hours per year for Units 7 through 10.

Unit Hours of Operation

Total annual hours of operation for Units 7 through 10 for 1997 and 1998 are as follows.

Unit	1997 Hours	1998 Hours
7	1,996	1,927
8	1,974	1,796
9	2,031	1,981
10	1,893	2,015

Units 7 through 10 will continue to be used as peaking units after the installation of inlet fogging.

III. EMISSIONS UNIT INFORMATION

A. TYPE OF EMISSIONS UNIT

(Regulated and Unregulated Emissions Units)

Emissio	ns Unit Information Section1
Combusti	on Turbine (CT) Peaking Unit Nos. 7-10
Type of	Emissions Unit Addressed in This Section
I. Regul	lated or Unregulated Emissions Unit? Check one:
	The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.
	The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.
2. Single	e Process, Group of Processes, or Fugitive Only? Check one:
	This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).
	This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.
	This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

III. Part 1 - 1

DEP Form No. 62-210.900(1) - Form

B. GENERAL EMISSIONS UNIT INFORMATION (Regulated and Unregulated Emissions Units)

Emissions Unit Description and Status

1. Description of Emissions	Unit Addressed in This Section :	
Combustion Turbine (CT) F	Peaking Unit Nos. 7-10	
Emissions Unit Identifica No Correspond		Unknown
3. Emissions Unit Status Code: A	4. Acid Rain Unit? [X] Yes [] No	5. Emissions Unit Major Group SIC Code: 49
6. Emissions Unit Comment		

DEP Form No. 62-210.900(1) - Form

Emissions Unit Information Section	<u> </u>
Combustion Turbine (CT) Peaking Unit Nos.	7-10
Emissions Unit Control Equipment	1_
Description: Water Injection	
2. Control Device or Method Code :	

III. Part 3 - 1

DEP Form No. 62-210.900(1) - Form

C. EMISSIONS UNIT DETAIL INFORMATION (Regulated Emissions Units Only)

Emissions Unit Details	
1. Initial Startup Date:	19-Aug-1993
2. Long-term Reserve Shutdown Date :	
3. Package Unit : Manufacturer : General Electric	Model Number: PG 7111EA
4. Generator Nameplate Rating: 93	MW
5. Incinerator Information : Dwell Temperature : Dwell Time : Incinerator Afterburner Temperature :	Degrees Fahrenheit Seconds Degrees Fahrenheit
Emissions Unit Operating Capacity	
1. Maximum Heat Input Rate: 1144	mmBtu/hr
2. Maximum Incinerator Rate :	lb/hr tons/day
3. Maximum Process or Throughput Rate:	
4. Maximum Production Rate:	
4. Maximum Production Rate :5. Operating Capacity Comment : See Attachment IC-EU2-C5	
5. Operating Capacity Comment :	

III. Part 4 - 1

DEP Form No. 62-210.900(1) - Form

D. EMISSIONS UNIT REGULATIONS (Regulated Emissions Units Only)

Combustion Turbine (CT) Peaking U	
Rule Applicability Analysis	
Not Applicable	

III. Part 6a - 1

DEP Form No. 62-210.900(1) - Form

Emissions Unit Information Section 1 Combustion Turbine (CT) Peaking Unit Nos. 7-10

List of Applicable Regulations

See Attachment IC-EU2-D

III. Part 6b - 1

DEP Form No. 62-210.900(1) - Form

E. EMISSION POINT (STACK/VENT) INFORMATION

Emissions Unit Information Section 1		
Combustion Turbine (CT) Peaking Unit Nos. 7-10		
Emission Point Description and Type :		
1. Identification of Point on Plot Plan or Flow Diagra	am : See Attach. I	C-FE-2
2. Emission Point Type Code:		
3. Descriptions of Emission Points Comprising this E (limit to 100 characters per point)	Emissions Unit for VE	Tracking:
4. ID Numbers or Descriptions of Emission Units wi	th this Emission Point	in Common :
Combustion turbine gases exhaust through a single sta	ack per turbine.	
5. Discharge Type Code :	V	
6. Stack Height:	50	feet
7. Exit Diameter :	13.8	feet
8. Exit Temperature :	1043	°F
9. Actual Volumetric Flow Rate:	155131 7	acfm
10. Percent Water Vapor :	0.00	%
11. Maximum Dry Standard Flow Rate:	0	dscfm
12. Nonstack Emission Point Height:	0	feet
13. Emission Point UTM Coordinates:		
Zone: 0 East (km): 0.000	North (kr	n): 0.000

III. Part 7a - 1

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14. Emission Point Comment:

Exit temperature and flow rate given for a single CT at an ambient temperature of 59 deg. F (oil firing).

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F. SEGMENT (PROCESS/FUEL) INFORMATION

Emissions Unit Information Section 1				
Combustion Turbine (CT) Peaking Unit Nos. 7-10				
Segment Description and Rate: Segment 1				
1. Segment Description (Process/Fuel Type and A	Associated Operating Method/Mode):			
Distillate fuel oil.				
2. Source Classification Code (SCC): 20100	101			
3. SCC Units: Thousand Gallons Burned (all liquid fuels)				
4. Maximum Hourly Rate: 8.70	5. Maximum Annual Rate: 26,523.00			
6. Estimated Annual Activity Factor :				
7. Maximum Percent Sulfur: 0.2	8. Maximum Percent Ash: 0.10			
9. Million Btu per SCC Unit: 132				
10. Segment Comment :				

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F. SEGMENT (PROCESS/FUEL) INFORMATION

Emissions Unit Information Section 1	_			
Combustion Turbine (CT) Peaking Unit Nos. 7-10				
Segment Description and Rate: Segment 2				
1. Segment Description (Process/Fuel Type and	Associated Operating Method/Mode):			
Natural gas				
2. Source Classification Code (SCC): 2010	0201			
3. SCC Units: Million Cubic Feet Burned (all g	ascous fuels)			
4. Maximum Hourly Rate: 1.05	5. Maximum Annual Rate: 3,553.00			
6. Estimated Annual Activity Factor:				
7. Maximum Percent Sulfur :	8. Maximum Percent Ash:			
9. Million Btu per SCC Unit: 1,000				
10. Segment Comment :				
Maximum % sulfur: 1 grain/100 cf. 1) Max. ho rate based on 3390 hours. However, permitted re	ourly and annual rates at 59 deg. F for one CT. Annual ate is actually an aggregate of all four units. 2)			

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G. EMISSIONS UNIT POLLUTANTS (Regulated and Unregulated Emissions Units)

Emissions Unit Information Section 1 Combustion Turbine (CT) Peaking Unit Nos. 7-10

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
1 - SO2			EL
2 - NOX	028		EL
3 - PM			EL
4 - PM10			EL
5 - CO			EL
6 - VOC			EL
7 - SAM			EL

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H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION

(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section 1 Combustion Turbine (CT) Peaking Unit Nos. 7-10		
Pollutant Potential/Estimated Emissions: Pollutant 1		
1. Pollutant Emitted: SO2		
2. Total Percent Efficiency of Control: %		
3. Potential Emissions : 222.0000000 lb/hour	321.0000000 tons/year	
4. Synthetically Limited? [] Yes [X] No		
5. Range of Estimated Fugitive/Other Emissions:	to tons/year	
6. Emissions Factor 0.2 Units % S Reference AC permit limit		
7. Emissions Method Code: 0		
 Calculations of Emissions : Oil-firing at 59 deg. F. AC permit limit. Equivalent TPY for single limit of 1,283 TPY. 	CT; four CTs have an aggregate	
 Pollutant Potential/Estimated Emissions Comment : Max. hourly emissions based on ambient temp. at 59 deg. F. Annua 33% capacity factor. 	l emissions based on 59 deg. and	

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H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION (Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section	_1
Combustion Turbine (CT) Peaking Unit Nos. 7-1	0

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H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION

(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

	mbustion Turbine (CT) Peaking Unit Nos. 7-10		
<u>Po</u>	llutant Potential/Estimated Emissions: Pollut	ant <u>2</u>	
1.	Pollutant Emitted: NOX		
2.	Total Percent Efficiency of Control: 80.00	%	
3.	Potential Emissions: 182.0000000 lb/hour	3	308.5000000 tons/year
4.	Synthetically Limited? [] Yes [X] No		
5.	Range of Estimated Fugitive/Other Emissions:	to	tons/year
6.	Emissions Factor 42 Reference Permit limit	Units ppmvd@15%	02
7.	Emissions Method Code: 0		
8.	Calculations of Emissions : Oil-firing at 59 deg. F. AC permit limit. Equivalent T 1,232 TPY.	PY for 1 CT; 4 CTs ha	ave aggregate limit of
9.	Pollutant Potential/Estimated Emissions Comment Max. hourly emissions based on ambient temp. at 59 d 38.7% capacity factor.		ns based on 59 deg. and

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H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION (Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section	1
Combustion Turbine (CT) Peaking Unit Nos. 7-1	10

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H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION

(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Co	missions Unit Information Section
	Pollutant Emitted: PM
2.	Total Percent Efficiency of Control: %
3.	Potential Emissions : 15.0000000 lb/hour 25.4000000 tons/year
4.	Synthetically Limited? [] Yes [X] No
5.	Range of Estimated Fugitive/Other Emissions: to tons/year
6.	Emissions Factor 15 Units lb/hr Reference AC permit limit
7.	Emissions Method Code: 0
8.	Calculations of Emissions: Oil-firing at 59 deg. F. AC permit limit. Equivalent TPY for 1 CT; 4CTs have aggregate limit of 102 TPY.
9.	Pollutant Potential/Estimated Emissions Comment: Max. hourly emissions based on ambient temp. at 59 deg. F. Annual emissions based on 59 deg. and 38.7% capacity factor.

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H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION (Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section1	
Combustion Turbine (CT) Peaking Unit Nos. 7-10	

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H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION

(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

	ombustion Turbine (CT) Peaking Unit Nos. 7-10	
<u>Po</u>	Ilutant Potential/Estimated Emissions: Pollutant 4	
1.	Pollutant Emitted: PM10	
2.	Total Percent Efficiency of Control: %	
3.	Potential Emissions : 15.0000000 lb/hour	25.4000000 tons/year
4.	Synthetically Limited? [] Yes [X] No	
5.	Range of Estimated Fugitive/Other Emissions:	tons/year
6.	Emissions Factor 15 Units lb/hr Reference AC permit limit	
7.	Emissions Method Code: 0	
8.	Calculations of Emissions: Oil-firing at 59 deg. F. AC permit limit. Equivalent TPY for single CT; 4 C of 102 TPY.	CTs have an aggregate limit
9.	Pollutant Potential/Estimated Emissions Comment :	
	Max. hourly emissions based on ambient temp. at 59 deg. F. Annual emissio 38.7% capacity factor.	ons based on 59 deg. F and

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H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION (Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section	1
Combustion Turbine (CT) Peaking Unit Nos. 7-10	

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H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION

(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Co	Emissions Unit Information Section 1 Combustion Turbine (CT) Peaking Unit Nos. 7-10 Pollutant Potential/Estimated Emissions: Pollutant 5		
1.	Pollutant Emitted : CO		
2.	Total Percent Efficiency of Control: %		
3.	Potential Emissions : 54.0000000 lb/hour 91.5000000 tons/year		
4.	Synthetically Limited? [] Yes [X] No		
5.	Range of Estimated Fugitive/Other Emissions: to tons/year		
6.	Emissions Factor 25 Units ppmvd Reference AC permit limit		
7.	Emissions Method Code: 0		
8.	Calculations of Emissions: Oil-firing @ 59 deg. F. AC permit limit. Equivalent TPY for 1 CT; 4 CTs limited to 366 TPY.		
9.	Pollutant Potential/Estimated Emissions Comment: Max. hourly emissions based on ambient temp. @ 59 deg. F. Annual emissions based on 59 deg. F. and 38.7% capacity factor.		

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H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION (Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section	
Combustion Turbine (CT) Peaking Unit Nos. 7-10	_ _ _

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H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION

(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section		
Combustion Turbine (CT) Peaking Unit Nos. 7-10		
Pollutant Potential/Estimated Emissions: Pollutant 6		
1. Pollutant Emitted: VOC	ı	
2. Total Percent Efficiency of Control: %		
3. Potential Emissions :		
5.0000000 lb/hour	8.5000000 tons/year	
4. Synthetically Limited?		
[] Yes [X] No		
5. Range of Estimated Fugitive/Other Emissions:		
	to tons/year	
6. Emissions Factor 5 Units ppmvd Reference AC permit limit		
7. Emissions Method Code: 0		
8. Calculations of Emissions :		
Oil-firing @ 59 deg. F. AC permit limit. Equivalent TPY for 1 CT; 4 34 TPY.	4 CTs limited to an aggregate of	
9. Pollutant Potential/Estimated Emissions Comment :		
Max. hourly emissions based on ambient temp. @ 59 deg. F. Annual earned 38.7% capacity factor.	emissions based on 59 deg. F	

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H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION (Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section	
Combustion Turbine (CT) Peaking Unit Nos. 7-10	

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H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION

(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section				
Combustion Turbine (CT) Peaking Unit Nos. 7-10				
Pollutant Potential/Estimated Emissions: Pollutant 7				
1. Pollutant Emitted: SAM				
2. Total Percent Efficiency of Control: %				
3. Potential Emissions : 18.0000000 lb/hour		26.5000000 tons/year		
4. Synthetically Limited? [] Yes [X] No				
5. Range of Estimated Fugitive/Other Emissions:	to	tons/year		
6. Emissions Factor 0.2 Units % S Reference Permit limit				
7. Emissions Method Code: 0				
8. Calculations of Emissions :				
Oil-firing at 59 deg. F. AC permit limit. Equivalent TPY for single TPY.	CT; four	CTs have limit of 106		
9. Pollutant Potential/Estimated Emissions Comment :				
Max. hourly emissions based on ambient temp. at 50 deg. F. Annua 33% capacity factor.	l emission	s based on 59 deg. and		

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Emissions Unit Information Section Combustion Turbine (CT) Peaking Unit Nos. 7-10 Pollutant Information Section I Allowable Emissions I 1. Basis for Allowable Emissions Code: OTHER 2. Future Effective Date of Allowable Emissions: 3. Requested Allowable Emissions and Units: 0.20 % S max. 4. Equivalent Allowable Emissions: 222.00 lb/hour 321.00 tons/year

6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode):

AC permit limit - oil firing at 59 deg. F. No applicable ann. emiss. limit for single CT; 4 CTs have aggregate limit of 1,283 TPY. 33% cap. fact. limit @ 0.2 %S, 38.7% @ 0.16 %S.

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5. Method of Compliance:

Fuel analysis

Emissions Unit Information Section Combustion Turbine (CT) Peaking Unit Nos. 7-10 **Pollutant Information Section** Allowable Emissions 1. Basis for Allowable Emissions Code: **OTHER** 2. Future Effective Date of Allowable Emissions: 3. Requested Allowable Emissions and Units: 1.00 grain S/100 CF 4. Equivalent Allowable Emissions: 2.99 lb/hour 5.06 tons/year 5. Method of Compliance: Fuel analysis 6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode):

AC permit limit - natural gas firing at 59 deg. F. No annual emissions limit applicable for 1 CT; 4 CTs

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have aggregate limit of 20.2 TPY.

Emissions Unit Information Section 1 Combustion Turbine (CT) Peaking Unit Nos. 7-10 Pollutant Information Section 2 Allowable Emissions 1 1. Basis for Allowable Emissions Code: OTHER 2. Future Effective Date of Allowable Emissions: 3. Requested Allowable Emissions and Units: 42.00 ppmvd@15% O2 4. Equivalent Allowable Emissions: 182.00 lb/hour 308.50 tons/year

6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode):

AC permit limit - oil firing. No applicable annual emission limit for 1 CT; 4 CTs have a limit of 1,232 TPY @ 38.7% capacity factor.

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5. Method of Compliance:

Annual compliance test, EPA Method 20

Emissions Unit Information Section 1 Combustion Turbine (CT) Peaking Unit Nos. 7-10						
Po	Pollutant Information Section2_					
Allowable Emissions 2						
1.	Basis for Allowable Emissions Code:	OTHER				
2.	Future Effective Date of Allowable Emissic	ons :				
3.	Requested Allowable Emissions and Units:	25.00	ррі	nvd@15% O 2		
4	Equivalent Allowable Emissions :					
7.	·					
	107.00	lb/hour	181.40	tons/year		
5.	Method of Compliance:					
	Annual compliance test, EPA Method 20					
6.	Pollutant Allowable Emissions Comment (I	Desc. of Related Op	perating Met	hod/Mode) :		
	AC permit limit- natural gas-firing at 59 deg. F have a limit of 725 TPY @ 38.7% capacity fac		nual emission	limit for 1 CT; 4 CTs		

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	Emissions Unit Information Section 1 Combustion Turbine (CT) Peaking Unit Nos. 7-10						
Po	Pollutant Information Section 3						
All	Allowable Emissions 1						
1.	Basis for Allowable Emissions Code :		OTHER				
2.	Future Effective Date of Allowable Emission	ons :					
3.	Requested Allowable Emissions and Units:	:	15.00	11	o/hr		
4.	Equivalent Allowable Emissions :						
	15.00	lb/hour		25.40	tons/year		
5.	Method of Compliance :						
	Annual compliance test, EPA Mthd 5 or VE <	10% at full	load				
6.	Pollutant Allowable Emissions Comment (E	Desc. of R	elated Op	erating M	ethod/Mode) :		
	AC permit limit - oil-firing at 59 deg. F. No ap have a limit of 102 TPY at a 38.7% capacity fa		nual emiss	ion limit fo	or a single CT; 4 C	Γs	

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	Emissions Unit Information Section 1 Combustion Turbine (CT) Peaking Unit Nos. 7-10						
Po	Pollutant Information Section 3						
<u>All</u>	Allowable Emissions 2						
1.	Basis for Allowable Emissions Code:	OTHER					
2.	Future Effective Date of Allowable Emission	ons :					
3.	Requested Allowable Emissions and Units	7.50	lb/hr	-			
4.	Equivalent Allowable Emissions:						
	7.50	lb/hour	12.71	tons/year			
5.	Method of Compliance :						
	VE, EPA Method 9						
6.	Pollutant Allowable Emissions Comment (I	Desc. of Related Op	perating Metho	od/Mode) :			
8	If VE < 10%, stack test not required. Permit li emissions limit for 1 CT; 4 CTs limited to 50.8			o applicable annual			

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	Emissions Unit Information Section 1 Combustion Turbine (CT) Peaking Unit Nos. 7-10						
Po	Pollutant Information Section 4						
Allowable Emissions 1							
1.	Basis for Allowable Emissions Code:	OTHER					
2.	Future Effective Date of Allowable Emission	ons :					
3.	Requested Allowable Emissions and Units	: 15.00	115	o/hr			
4.	Equivalent Allowable Emissions :		<u></u>				
	15.00	lb/hour	25.40	tons/year			
5.	Method of Compliance :						
	VE, EPA Method 9						
6.	Pollutant Allowable Emissions Comment (I If VE < 10%, stack test not required. AC perm emission limit for 1 CT: 4 CTs limited to 102	nit limit - oil-firing @		•			

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Emissions Unit Information Section 1 Combustion Turbine (CT) Peaking Unit Nos. 7-10

Pollutant Information Section 4							
<u>All</u>	Allowable Emissions 2						
1.	Basis for Allowable Emissions Code:	OTHER					
2.	Future Effective Date of Allowable Emissio	ns :					
3.	Requested Allowable Emissions and Units:	7.50	lb/h	r			
4.	Equivalent Allowable Emissions :						
	7.50	lb/hour	12.71	tons/year			
5.	Method of Compliance :						
	VE, EPA Method 9						
6.	Pollutant Allowable Emissions Comment (D	esc. of Related Op	perating Meth	nod/Mode) :			
	If VE < 10%, stack test not required. AC permit limit - natural gas-firing @ 59 deg. F. No applicable annual emissions limit for 1 CT; 4 CTs limited to 50.8 TPY.						

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Emissions Unit Information Section 1 Combustion Turbine (CT) Peaking Unit Nos. 7-10 Pollutant Information Section 5 Allowable Emissions 1 1. Basis for Allowable Emissions Code: OTHER 2. Future Effective Date of Allowable Emissions: 3. Requested Allowable Emissions and Units: 25.00 ppm 4. Equivalent Allowable Emissions: 54.00 lb/hour 91.50 tons/year

6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode):

AC permit limit - oil-firing @ 59 deg. F. No applicable annual emissions limit for 1 CT; 4 CTs limited to 366 TPY.

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5. Method of Compliance:

Annual compliance test, EPA Method 10

Emissions Unit Information Section Combustion Turbine (CT) Peaking Unit Nos. 7-10 **Pollutant Information Section Allowable Emissions** 1. Basis for Allowable Emissions Code: **OTHER** 2. Future Effective Date of Allowable Emissions: 3. Requested Allowable Emissions and Units: 10.00 ppmvd 4. Equivalent Allowable Emissions: 21.30 lb/hour 36.10 tons/year 5. Method of Compliance: Annual compliance test, EPA Method 10 6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode):

AC permit limit - natural gas-firing @ 59 deg. F. No applicable annual limit for 1 CT; 4 CTs limited to

144.4 TPY.

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	Emissions Unit Information Section 1 Combustion Turbine (CT) Peaking Unit Nos. 7-10						
Po	llutant Information Section	6					
<u>Al</u>	lowable Emissions 1						
1.	Basis for Allowable Emissions Co	ode :		OTHER	_		
2.	Future Effective Date of Allowab	ole Emission	 1S :				
3.	Requested Allowable Emissions a	and Units :		5.00		lb/hr	
4.	Equivalent Allowable Emissions	:					
	5.0	0	lb/hour		8.50		tons/year
5.	Method of Compliance :				<u> </u>		
	Annual test, EPA Method 25A. Tes	st not req'd if	CO met.				
6.	Pollutant Allowable Emissions Co AC permit limit - oil-firing @ 59 de aggregate of 34 TPY. VOC test not	g. F. No app	plicable a	nnual emis	_		

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	Emissions Unit Information Section Combustion Turbine (CT) Peaking Unit Nos. 7-10				
Po	llutant Information Section 6				
All	lowable Emissions 2				
1.	Basis for Allowable Emissions Code:	OTHER			
2.	Future Effective Date of Allowable Emiss	sions :			
3.	Requested Allowable Emissions and Units	s: 3.00	lb/hr		
4.	Equivalent Allowable Emissions:				
	3.00	lb/hour	5.08	tons/year	
5.	Method of Compliance :				
	Annual test, EPA Method 25A. Test not req'e	d if CO met.			
6.	Pollutant Allowable Emissions Comment	(Desc. of Related O	perating Metho	od/Mode) :	
	AC permit limit - natural gas-firing @ 59 deg. F. No applicable annual emission limit for 1 CT; 4 CTs limited to 20.3 TPY. VOC test not req'd if CO limit met.				

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	missions Unit Information Section ombustion Turbine (CT) Peaking Unit Nos.	1 7-10		
Po	dlutant Information Section 7			
Al	lowable Emissions 1			
1.	Basis for Allowable Emissions Code :	OTHER		
2.	Future Effective Date of Allowable Emissi	ions :		
3.	Requested Allowable Emissions and Units	0.20	% S	
4	Equivalent Allowable Emissions:			
	18.00	lb/hour	26.50	tons/year
5.	Method of Compliance :			
	Annual test (EPA Method 8) or fuel sulfur con	ntent		
6.	Pollutant Allowable Emissions Comment (Desc. of Related O	perating Metho	od/Mode) :
ĺ	AC permit limit - oil firing. No annual emiss. met, SAM test not req'd. 33% cap. fact., 38.7			06 TPY. If S content

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Co	ombustion Turbine (CT) Peaki	ing Unit Nos. 7	-10		
Po	llutant Information Section	7			
<u>Al</u>	lowable Emissions 2				
1.	Basis for Allowable Emissio	ns Code :	OTHER		
2.	Future Effective Date of Alle	owable Emissio	ns :		
3.	Requested Allowable Emissi	ons and Units :	0.44	lb/h	r
4.	Equivalent Allowable Emissi	ions :			
		0.44	lb/hour	0.75	tons/year
5.	Method of Compliance :				
	Annual test, EPA Method 8. T	est not req'd if S	content met.		
6.	Pollutant Allowable Emissio	ns Comment (Γ	Pesc. of Related O	perating Meth	od/Mode) :
:	AC permit limit - natural gas-f limited to 3.0 TPY. SAM test	iring @ 59 deg. I not req'd if sulfu	F. No applicable an roontent limit met.	nual emission l	imit for 1 CT; 4 CTs

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Emissions Unit Information Section

I. VISIBLE EMISSIONS INFORMATION (Regulated Emissions Units Only)

Combustion Turbine (CT) Peaking Unit Nos. 7-10			
Visible Emissions Limitation: Visible Emissions Li	mitation		
1. Visible Emissions Subtype: 10			
2. Basis for Allowable Opacity: OTHER			
3. Requested Allowable Opacity:			
Normal Conditions:	10	%	
Exceptional Conditions:	20	%	
Maximum Period of Excess Opacity Allowed:		min/hour	
4. Method of Compliance:			
Annual compliance test, EPA Method 9			
5. Visible Emissions Comment :			
AC permit limit. VE limit under normal conditions at fu other loads.	ıll load; exe	ceptional conditions are spe	ecified for

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I. VISIBLE EMISSIONS INFORMATION (Regulated Emissions Units Only)

Combustion Turbine (CT) Peaking Unit Nos. 7-10 Visible Emissions Limitation: Visible Emissions Limitation 2			
1. Visible Emissions Subtype :			
2. Basis for Allowable Opacity: RULE			
3. Requested Allowable Opacity:			
Normal Conditions:	%		
Exceptional Conditions: 100	%		
Maximum Period of Excess Opacity Allowed: 60	min/hour		
4. Method of Compliance :			
EPA Method 9			
5. Visible Emissions Comment :			
1. Rule 62-210.700. 2. Max. period of excess opacity allowed - 21	hours/24 hours.		

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J. CONTINUOUS MONITOR INFORMATION

(Regulated Emissions Units Only)

Emissions Unit Information Section 1 Combustion Turbine (CT) Peaking Unit Nos. 7-10			
Continuous Monitoring System Continuous Mo	onitor 1		
1. Parameter Code: EM	2. Pollutant(s): NOX		
3. CMS Requirement RULE			
4. Monitor Information			
Manufacturer: Model Number: Serial Number:			
5. Installation Date:	19-Aug-1993		
6. Performance Specification Test Date :	19-Aug-1993		
7. Continuous Monitor Comment: Water/fuel ratio monitored on continuous basis (40 CFR 60.334). Monitoring incorporated into CT control system and recorded on hourly basis.			
Continuous Monitoring System Continuous Mo	onitor 2		
1. Parameter Code: EM	2. Pollutant(s): NOX		

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J. CONTINUOUS MONITOR INFORMATION

(Regulated Emissions Units Only)

Emissions Unit Information Section ______

Combustion Tu	Combustion Turbine (CT) Peaking Unit Nos. 7-10			
3. CMS Requ	irement RULE			
Model N	acturer :			
5. Installation	Date :	19 -A ug-1993		
6. Performano	ce Specification Test Date :	19-Aug-1993		
	Monitor Comment : Appendix E.			

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K. PREVENTION OF SIGNIFICANT DETERIORATION (PSD) INCREMENT TRACKING INFORMATION

Eı	Emissions Unit Information Section1			
Co	omb	oustion Turbine (CT) Peaking Unit Nos. 7-10		
PS	SD	Increment Consumption Determination		
1.	In	crement Consuming for Particulate Matter or Sulfur Dioxide?		
[X	()	The emissions unit is undergoing PSD review as part of this application, or has undergone PSD review previously, for particulate matter or sulfur dioxide. If so, emissions unit consumes increment.		
]]	The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after January 6, 1975. If so, baseline emissions are zero, and emissions unit consumes increment.		
[]	The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after January 6, 1975, but before December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.		
[]	For any facility, the emissions unit began (or will begin) initial operation after December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.		
[]	None of the above apply. If so, the baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may		

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consume or expand increment.

2.	ln	crement Consuming for N	litrogen Dioxide?			
[X	ζ]		gone PSD review previ	indergoing PSD review as part of this iously, for nitrogen dioxide. If so, emissions		
[]] The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after February 8, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.				
]]] The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after February 8, 1988, but before March 28, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.				
[]] For any facility, the emissions unit began (or will begin) initial operation after March 28, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.				
]]	case, additional analysis,	beyond the scope of th	ons of the emissions unit are nonzero. In such a substitution, is needed to determine whether ur) after the baseline date that may consume or		
3.	Ir	ncrement Consuming/Exp	anding Code:			
		PM: C	SO2: C	NO2: C		
4.	В	aseline Emissions:				
		PM : SO2 : NO2 :	lb/hour lb/hour	tons/year tons/year tons/year		
5.	P	SD Comment :				

III. Part 12 - 2

DEP Form No. 62-210.900(1) - Form

L. EMISSIONS UNIT SUPPLEMENTAL INFORMATION

Emissions Unit Information Section1			
Combustion Turbine (CT) Peaking Unit Nos. 7-10			
IC-EU2-L1			
IC-EU2-L2			
IC-EU2-L3			
IC-EU2-L4			
3/5/98			
IC-EU2-L6			
NA			
Appendix A			
NA			
ons Only			

III. Part 13 - 1

DEP Form No. 62-210.900(1) - Form

2. Identification of Additional Applicable Requirements :			
13. Compliance Assurance Monitoring Plan:			
14. Acid Rain Application (Hard-copy Required):			
	Acid Rain Part - Phase II (Form No. 62-210.900(1)(a))		
	Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)		
	New Unit Exemption (Form No. 62-210.900(1)(a)2.)		
	Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)		

DEP Form No. 62-210.900(1) - Form

ATTACHMENT IC-EU2-C5 OPERATING CAPACITY COMMENT

The maximum heat input rate is based on the permit limit at 20°F for one combustion turbine (CT). The four turbines are permitted to operate up to the equivalent of 3,390 hours/year per CT at peak or other lesser loads and 38.7 percent capacity factor. The capacity factor shall be limited to 33 percent based on weighted 12-month rolling average sulfur content not to exceed 0.2 percent. If sulfur content is less than 0.2 percent, the capacity factor can be adjusted up to 38.7 percent. A single turbine can operate at more than 3,390 hours/year. Fuel usage not limited for a single turbine; usage up to 106,120,560 gallons/yr (59°F) is authorized by construction permit. There is no annual emission limit for a single CT.

ATTACHMENT IC-EU2-D EMISSIONS UNIT REGULATIONS

ATTACHMENT IC-EU2-D

EMISSIONS UNIT REGULATIONS

Applicable Requirements Listing - Power Plants

EMISSION UNIT: FPC Intercession City Plant - Combustion Turbines 7-10 (Also CT 11)

FDEP Rules:

62-297.310(7)(a)3.

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Air Pollution Control-General Provisions:
62-204.800(7)(b)37.(State Only) - NSPS Subpart GG
62-204.800(7)(d) (State Only) - NSPS General Provisions
62-204.800(12) (State Only)
                              - Acid Rain Program
62-204.800(13) (State Only)
                              - Allowances
62-204.800(14) (State Only)
                               - Acid Rain Program Monitoring
Stationary Sources-General:
62-210.700(1)
                               - Startup/shutdown/malfunction
62-210.700(4)
                               - Maintenance
62-210.700(6)
Acid Rain:
62-214.300
                               - Acid Rain Units (Applicability)
62-214.320
                               - Acid Rain Units (Application Shield)
                               - Compliance Options (if 62-214.430)
62-214.330
62-214.350(2),(3),(6)
                               - Acid Rain Units (Certification)
62-214.370
                               - Revisions; corrections; (potentially applicable)
62-214,430
                               - Acid Rain Units (Compliance Options)
Stationary Sources-Emission Monitoring (where stack test is required):
62-297.310(1)
                               - Test Runs-Mass Emission
62-297.310(2)(b)
                               - Operating Rate; other than CTs
62-297.310(3)
                               - Calculation of Emission
62-297.310(4)(a)
                               - Applicable Test Procedures; Sampling time
62-297.310(4)(b)
                               - Sample Volume
                               - Required Flow Rate Range-PM/H2SO4/F
62-297.310(4)(c)
62-297.310(4)(d)
                               - Calibration
62-297.310(4)(e)
                               - EPA Method 5-only
62-297.310(5)
                               - Determination of Process Variables
62-297.310(6)(a)
                               - Permanent Test Facilities-general
62-297.310(6)(c)
                               - Sampling Ports
                               - Work Platforms
62-297.310(6)(d)
62-297.310(6)(e)
                               - Access
62-297.310(6)(f)
                               - Electrical Power
62-297.310(6)(g)
                               - Equipment Support
62-297.310(7)(a)2.
                               - FFSG excess emissions
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- Permit Renewal Test Required

62-297.310(7)(a)4. 62-297.310(7)(a)5. 62-297.310(7)(a)6. 62-297.310(7)(a)9. 62-297.310(7)(c) 62-297.310(8) Federal Rules:	 PM exemption if < 400 hrs/yr PM exemption if < 200 hrs/6 month FDEP Notification - 15 days Waiver of Compliance Tests (fuel sampling) Test Reports
rederal Rules,	
NSPS General Requirements: 40 CFR 60.7(b) 40 CFR 60.7(f) 40 CFR 60.8(c) 40 CFR 60.8(e) 40 CFR 60.8(f) 40 CFR 60.11(a) 40 CFR 60.11(d) 40 CFR 60.12	 Notification/Recordkeeping (startup/shutdown/malfunction) Notification/Recordkeeping (maintain records-2 years) Performance Tests (representative conditions) Performance Tests (Provide stack sampling facilities) Test Runs Compliance (ref. S. 60.8) Compliance (maintain air pollution control equipment) Circumvention
NSPS Subpart GG:	
40 CFR 60.332(a)(1)	- NOx for Electric Utility Cts
40 CFR 60.333	- SO2 limits (0.8% sulfur)
40 CFR 60.334	- Monitoring of Operations (WTF ratio)
40 CFR 60.335	- Test Methods
Acid Rain-Permits:	
40 CFR 72.9(a)	- Permit Requirements
40 CFR 72.9(b)	- Monitoring Requirements
40 CFR 72.9(c)(1)	- SO2 Allowances-hold allowances
40 CFR 72.9(c)(2)	- SO2 Allowances-violation
40 CFR 72.9(c)(1)(iv)	
40 CFR 72.9(c)(4)	- SO2 Allowances-allowances held in ATS
40 CFR 72.9(c)(5) 40 CFR 72.9(e)	- SO2 Allowances-no deduction for 72.9(c)(1)(i)
40 CFR 72.9(f)	- Excess Emission Requirements
40 CFR 72.9(g)	- Recordkeeping and Reporting - Liability
40 CFR 72.20(a)	- Designated Representative; required
40 CFR 72.20(b)	- Designated Representative; legally binding
40 CFR 72.20(c)	- Designated Representative; certification requirements
40 CFR 72.21	- Submissions
40 CFR 72.22	- Alternate Designated Representative
40 CFR 72.23	- Changing representatives; owners
40 CFR 72.30(a)	- Requirements to Apply (operate)
40 CFR 72.30(c)	- Requirements to Apply (reapply before expiration)
40 CFR 72.30(d)	- Requirements to Apply (submittal requirements)
40 CFR 72.32	- Permit Application Shield
40 CFR 72.33(b)	- Dispatch System ID;unit/system ID
40 CFR 72.33(c)	- Dispatch System ID;ID requirements
40 CFR 72.33(d)	- Dispatch System ID;ID change
40 CFR 72.40(a)	- General; compliance plan
40 CFR 72.40(b)	- General; multi-unit compliance options
40 CFR 72.40(c)	- General; conditional approval

40 CFR 72.40(d)	- General; termination of compliance options
40 CFR 72.51	- Permit Shield
40 CFR 72.90	- Annual Compliance Certification
Manitoring Dart 75:	
Monitoring Part 75: 40 CFR 75.5	Dockilaisione
40 CFR 75.10(a)(2)	- Prohibitions
40 CFR 75.10(a)(2)	- Primary Measurement; NOx; except 75.12&.17; Subpart E
40 CFR 75.10(c)	- Primary Measurement; Performance Requirements
40 CFR 75.10(f)	 Primary Measurement; Heat Input; Appendix F Primary Measurement; Minimum Measurement
40 CFR 75.10(g)	- Primary Measurement; Minimum Recording
40 CFR 75.11(d)	- SO2 Monitoring; Gas- and Oil-fired units
40 CFR 75.11(e)	- SO2 Monitoring; Gaseous fuel firing
40 CFR 75.12(b)	- NOx Monitoring; Determination of NOx emission rate;
(0)	Appendix F
40 CFR 75.20(a)(5)	- Initial Certification Approval Process; Loss of Certification
40 CFR 75.20(b)	- Recertification Procedures
40 CFR 75.20(c)	- Certification Procedures
40 CFR 75.20(g)	- Exceptions to CEMS; oil/gas/diesel; Appendix D & E
40 CFR 75.21(a)	- QA/QC; CEMS;
40 CFR 75.21(b)	- QA/QC; Opacity;
40 CFR 75.21(c)	- QA/QC; Calibration Gases
40 CFR 75.21(d)	- QA/QC; Notification of RATA
40 CFR 75.21(e)	- QA/QC; Audits
40 CFR 75.21(f)	- QA/QC; CEMS
40 CFR 75.22	- Reference Methods
40 CFR 75.24	- Out-of-Control Periods; CEMS
40 CFR 75.30(a)(3)	- General Missing Data Procedures; NOx
40 CFR 75.32	- Monitoring Data Availability for Missing Data
40 CFR 75.33	- Standard Missing Data Procedures
40 CFR 75.36	- Missing Data Procedures for Heat Input
40 CFR 75.53	- Monitoring Plan (revisions)
40 CFR 75.54(a) 40 CFR 75.54(b)	- Recordkeeping-general
	- Recordkeeping-operating parameter
40 CFR 75.54(d) 40 CFR 75.55(c);(e)	- Recordkeeping-NOx
40 CFR 75.55(c);(e)	- Recordkeeping; Special Situations (gas & oil firing)
40 CFR 75.60	- Certification; QA/QC Provisions
40 CFR 75.61	Reporting Requirements-GeneralReporting Requirements-Notification cert/recertification
40 CFR 75.63	- Reporting Requirements-Notification/Recertification
40 CFR 75.64(a)	- Reporting Requirements-Quarterly reports; submission
40 CFR 75.64(b)	- Reporting Requirements-Quarterly reports; Submission
40 CFR 75.64(c)	- Rep. Req.; Quarterly reports; Compliance Certification
40 CFR 75.64(d)	- Rep. Req.; Quarterly reports; Electronic format
Appendix A-3.	- Performance Specifications
Appendix A-4.	- Data Handling and Acquisition Systems
Appendix A-5.	- Calibration Gases
Appendix A-6.	- Certification Tests and Procedures
Appendix B	- QA/QC Procedures
Appendix C-1.	- Missing Data; SO2/NOx for controlled sources
Appendix C-2.	- Missing Data; Load-Based Procedure; NOx & flow
Appendix F	- Conversion Procedures

Appendix G-2. Appendix H

- Determination of CO2; from combustion sources

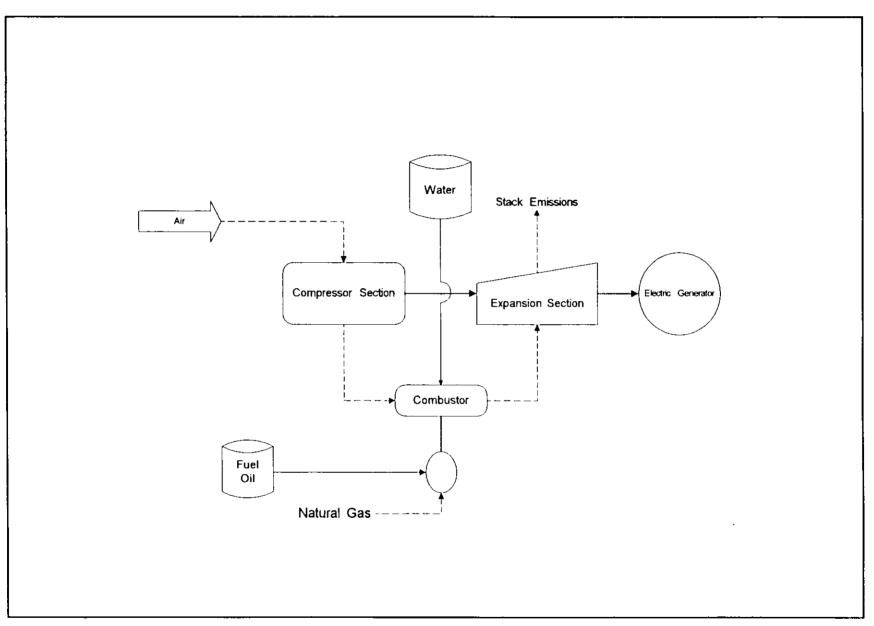
- Traceability Protocol

40 CFR Part 77.3 40 CFR Part 77.5(b) Offset Plans (future)Deductions of Allowances (future)

40 CFR Part 77.6

- Excess Emissions Penalties SO2 and NOx

ATTACHMENT IC-EU2-L1 PROCESS FLOW DIAGRAM



	Florida Power Corporation		Emission Unit: Combustion Turbines No. 7, 8, 9, 10, 11	
			Process Area: Overall Plant	Engineering and Applied
	Emission Units	Intercession City	Filename: FPCICB.VSD	Sciences, Inc.
	L	intercession City	Latest Revision Date 6/8/96 03:15 PM	- Colorioco, Irro.

ATTACHMENT IC-EU2-L2 FUEL ANALYSIS OR SPECIFICATION

Page 1 of 2

Attachment IC-EU2-L2

Fuel Analysis

No. 2 Fuel Oil

Parameter	Typical Value	Max Value
API gravity @ 60 F	30 ¹	-
Relative density	7.02 lb/gal ²	
Heat content	18,400 Btu / lb (LHV)	
% sulfur	0.2 2	0.2 3
% nitrogen	0.025 - 0.03	
% ash	negligible	0.01^{-1}

Note: The values listed are "typical" values based upon 1) information gathered by laboratory analysis, and 2) FPC's fuel purchasing specifications. However, analytical results from grab samples of fuel taken at any given point in time may vary from those listed.

¹ Data taken from the FPC fuel procurement specification

² Data from laboratory analysis

³ Data from current air permit.

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ATTACHMENT IC-EU2-L2

FUEL ANALYSIS NATURAL GAS ANALYSIS

ParameterTypical ValueMax ValueRelative density0.58 (compared to air)heat content950 - 1124 Btu/cu ft.% sulfur0.43 grains/CCF 11 grain/100 CF% nitrogen0.8% by volume% ashnegligible

Note: The values listed are "typical" values based upon information supplied to FPC by Florida Gas Transmission (FGT). However, analytical results from grab samples of fuel taken at any given point in time may vary from those listed.

¹ Data from laboratory analysis

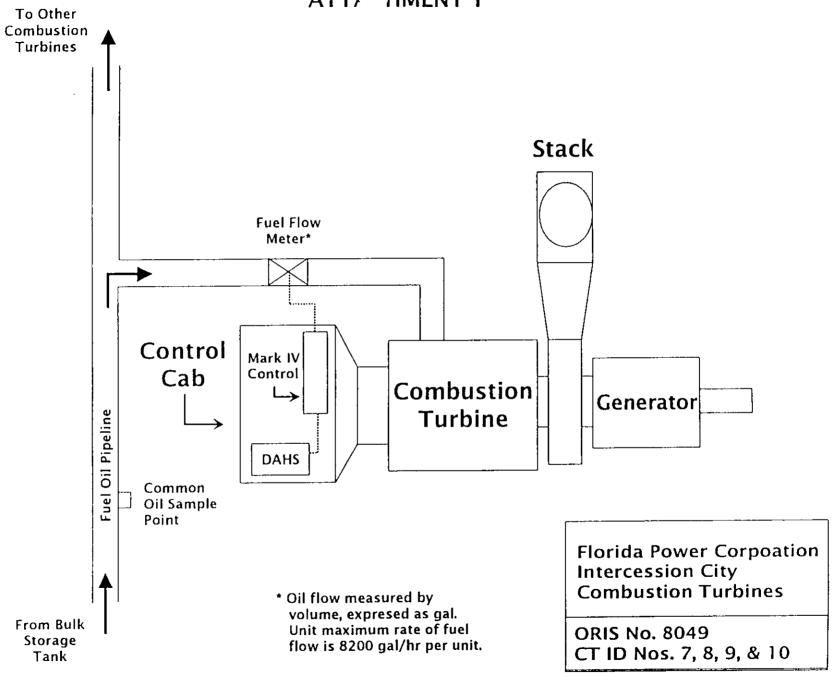
ATTACHMENT IC-EU2-L3 DETAILED DESCRIPTION OF CONTROL EQUIPMENT

GE Mark IV Nox Control Algorithm Description

The GE Mark IV Nox control algorithm utilizes data from digital temperature and humidity monitors located at each combustion turbine. The algorithm receives and processes the ambient temperature and humidity on a continuous basis. A temperature/humidity correction is used in determining the amount of water to inject for Nox control. This correction accounts for the ambient water entering the combustion chamber, and then it adds the correct amount of injection water in order to ensure compliance with the unit's required water to fuel ratio as determined from the water/fuel curve. This algorithm ensures compliance on a continuous basis regardless of the unit load and ambient weather conditions.

ATTACHMENT IC-EU2-L4 DESCRIPTION OF STACK SAMPLING FACILITIES

ATT/ HMENT 1



ATTACHMENT IC-EU2-L6 PROCEDURES FOR STARTUP AND SHUTDOWN

ATTACHMENT IC-EU2-L6 PROCEDURES FOR STARTUP/SHUTDOWN

Startup and shutdown for these units are fully automatic.

Startup for the combustion turbine begins with "lighting off" of the machines on distillate oil.

Corrective actions may include switching the unit from automatic (remote) to local control, or changing fuel. Best Operating Practices are adhered to and all efforts to minimize both the level and duration of excess emissions are undertaken.

Shutdown is performed by reducing the unit load (electrical production) to a minimum level, opening the breaker (which disconnects the unit from the system electrical grid), shutting off the fuel and coasting down to stop. The CT is then put "on turning gear" to prevent possible disfiguration of the turbine components.

ATTACHMENT IC-EU2-L10 ALTERNATIVE METHODS OF OPERATION

ATTACHMENT IC-EU2-L10 Alternative Methods of Operation

₹ 1.

The four combustion turbines making up Emission Unit 2 (P7, P8, P9, and P10) rated at 92.9 megawatts (MW) at 59 degrees Fahrenheit (°F) (GE PG7111EA) and one combustion turbine rated at 171 MW at 59°F (Siemens V84.3) were limited in the air construction permit to an average maximum capacity factor of 38.7 percent (3,390 hours per year operating time). The total hours of operation for the turbines were not to exceed 16,950 unit hours per year (5 units times 3,390 hours/yr/unit). In addition, the capacity factors for these turbines were limited to 33 percent based on a weighted 12 month rolling maximum sulfur content of 0.2 percent. However, if the weighted rolling average sulfur content of the fuel oil is less than 0.2 percent, the capacity factor may be adjusted using the following table:

Percent Average	Percent	
Sulfur Content	Capacity Factor	
0.2 - 0.195	33.0	
0.19 - 0.185	34.4	
0.18 - 0.175	35.8	
0.17 - 0.165	37.2	
0.16 - or less	38.7	

The four combustion turbines (GE Frame 7EA) were limited in fuel oil consumption on a per unit basis, per aggregate units, or prorated consumption based on the table as described above. The maximum No. 2 fuel oil consumption shall not exceed 7,826 gal/hr/unit or 106,120,560 gal/yr based on 59°F or prorated consumption based on the table as described above.

The other combustion turbine (Siemens V84.3) was limited in fuel oil consumption on a per unit basis, per aggregate units, or prorated consumption based on the table as described above. The maximum No. 2 fuel oil consumption shall not exceed 13,171 gal/hr/unit or 44,649,000 gal/yr based on 59°F or prorated consumption based on the table as described above.

Therefore, any combination of the five combustion turbines may operate for up to 8,760 hours per year provided that both the hourly and annual emission limitations, aggregate annual capacity factors, and aggregate fuel oil consumption limits are met.