

*Scott*

THE STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of an  
Application for Permit by:

OGC CASE NO. \_\_\_\_\_

Florida Power Corporation,  
Intercession City Plant

DRAFT Permit No.: 0970014-001-AV  
Osceola County, Florida

\_\_\_\_\_ /

**NOTICE OF WITHDRAWAL OF REQUEST  
FOR EXTENSION OF TIME**

The Florida Power Corporation (FPC), by and through undersigned counsel, hereby withdraws its Request for Extension of Time to file a petition for formal administrative proceedings in accordance with Chapter 120, Florida Statutes. FPC filed its last Request for Extension of Time on October 3, 1997, in response to the "Intent to Issue Title V Air Operation Permit" (Permit No. 0970014-001-AV) for the Intercession City Plant located in Osceola County, Florida, to negotiate certain changes in the draft proposed Title V air operation permit with the Department of Environmental Protection (Department). Based on the FPC comment letter dated September 17, 1997, and subsequent discussions with Department representatives, FPC and the Department have come to an agreement on the issues involving the above-referenced draft Title V permit. The agreement between FPC and the Department is contained in the correspondence from the Department dated October 9, 1997, a copy of which is attached to this Notice. Therefore, FPC hereby withdraws its Request for Extension, conditioned upon the Department's issuance of the Proposed Permit in accordance with the Department's agreement with FPC.

**RECEIVED**  
OCT 13 1997  
BUREAU OF  
AIR REGULATION

Respectfully submitted this 10th day of October, 1997.

HOPPING GREEN SAMS & SMITH, P.A.

A handwritten signature in cursive script that reads "Robert A. Manning". The signature is written in dark ink and is positioned above a horizontal line.

Robert A. Manning, Fla. Bar No. 0035173

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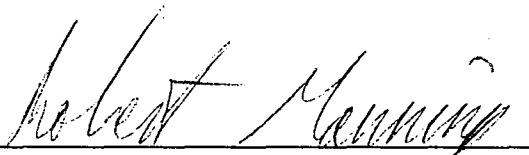
Attorney for Florida Power Corporation

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following  
by U.S. Mail on this 10th day of October, 1997:

Clair H. Fancy, P.E.  
Chief  
Bureau of Air Regulation  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2600

Jeffrey Brown  
Office of General Counsel  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2600

  
\_\_\_\_\_  
Attorney

## **PROPOSED PERMIT DETERMINATION**

PROPOSED Permit No.: 0970014-001-AV

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### **I. Public Notice.**

An "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" to Florida Power Corporation for the Intercession City Plant located at 6525 Osceola Polk County Line Road, Intercession City, Osceola County was clerked on June 25, 1997. The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was published in The Orlando Sentinel on September 3, 1997. The DRAFT Title V Air Operation Permit was available for public inspection at the Northeast District Branch Office in Gainesville and the permitting authority's office in Tallahassee. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was received on August 13, 1997.

### **II. Public Comment(s).**

Comments were received and the DRAFT Title V Operation Permit was changed. The comments were not considered significant enough to reissue the DRAFT Title V Permit and require another Public Notice. Comments were received from one respondent during the 30 (thirty) day public comment period. Listed below is each comment letter in the chronological order of receipt and a response to each comment in the order that the comment was received. The comment(s) will not be restated. Where duplicative comments exist, the original response is referenced.]

A. Letter from Mr. Scott H. Osbourn dated September 17, 1997, and received on September 22, 1997.

#### **General Comments:**

1. The permit will be updated to reflect the most recent version of Appendix TV-1.
2. FPC will be provided a copy of the Notice intended to be published and proof of publication.

#### **Section I. Facility Information, Subsection A:**

The correct date the Title V permit application was received is June 14, 1996.

#### **Section II. Facility-wide Conditions**

##### **1. Condition 2, Page 3 of 37:**

The word "not" will be deleted from the second line of this condition.

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**2. Condition 3, Page 3 of 37:**

Conditions 1 through 9 are general conditions worded to be used for all TV permits. The verbiage does not change the intent or content of this facilities permit, therefore, no change will be made.

**3. Condition 6, Page 3 of 37:**

As of this writing, the word exempt has not been changed to insignificant.

**4. Condition 7, Page 3 of 37:**

Refer to response 2. No change will be made.

**Section III. Subsection A.:**

**1. Facility Description, Page 6 of 37:**

The fourth line is changed to read as follows:

“These units are not subject to the following federal requirements, NSPS - 40 CFR 60, Subpart GG, Standards of Performance for Stationary Gas Turbines or Acid Rain.”

**2. Condition A.5, Page 7 of 37:**

Rule 62-296.320(4) provides the authority for this applicable condition. The condition will not be deleted.

**3. Condition A.12, Page 8 of 37:**

This condition will be changed to read as follows:

**A.12.** The fuel sulfur content, percent by weight, provided by the vendor for each delivery of liquid fuels shall be evaluated using either ASTM D2622-94, ASTM D4294-90(95), both ASTM D4057-88 and ASTM D129-91(95), or the latest edition(s).

**4. Condition A.14, Page 8 of 37:**

This condition, which was A.13, has been changed to be specific by referencing only EPA Method 9.

**5. Condition A.15, Page 9 of 37:**

This condition, which was A.14, has been changed by deleting the phrase “if there is an applicable standard” from (a)4.a.

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### **Section III. Subsection B:**

#### **1. Facility Description, Page 11 of 37:**

As requested, the 92.9 megawatts/CT is changed to 96.3 megawatts/CT. The 1994 is changed to 1996.

#### **2. Condition B.1, Page 11 of 37:**

The 92.9 megawatts/CT is changed to 96.3 megawatts/CT.

#### **3. Condition B.3, Page 11 of 37:**

The condition will be changed to read as follows:

**B.3. Methods of Operation - Fuels.** Only natural gas or new No. 2 fuel oil having a maximum sulfur content of 1 grain per 100 dscf and 0.2% or less, by weight, respectively, shall be fired in these turbines at all times. To comply with the SO<sub>2</sub> emission allowables of 222 lbs/hr/GE CT and 407 lbs/hr/Siemens CT, the fuel oil consumption is 106,120,560 gal./yr. (based on an average 7,826 gal/hr/GE CT and an average 13,171 gal/hr/Siemens CT, a capacity factor of 38.7%, 59° F, a 7.1 lbs/gal density, a maximum 0.2% S content by wt., and peak load).

[Rule 62-213.410, F.A.C.; and, AC 49-203114/PSD-FL-180(A); and, requested in initial Title V permit application received on June 14, 1996.]

#### **4. Condition B.4, Page 12 of 37:**

Your comment is appropriate and this condition will be changed as follows:

**B.4. Hours of Operation.** The cumulative hours of operation for any CT combination, while firing fuel oil with 0.2% S by weight, is 14,455 hours/ calendar year (based on an average 2,891 hours/year/CT, a capacity factor of 33%, 59° F, and at peak load). A maximum capacity factor of 38.7% is allowed if the weighted 12-month rolling average sulfur content, by weight, of the fuels burned are 0.16% or less. See specific condition No. B.5.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, AC 49-203114/PSD-FL-180(A)]

#### **5. Condition B.5, Page 12 of 37:**

The condition is changed to read as follows:

**B.5. Capacity Factors.** The permitted capacity factors for these emissions units are the ratio of average permitted hours of operation for each turbine to the total available hours of operation per year at peak load. The average capacity factor for these turbines shall be limited to 33% ( $\frac{2891 \text{ hrs}}{8760 \text{ hrs}}$ ) at peak load and based on a weighted 12-month rolling average maximum sulfur content of 0.2%, by weight. If the weighted 12-month rolling average sulfur content is less than 0.2%, by weight, the capacity factor and operating hours may be adjusted to a maximum average of 38.7% using the following table:

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Weighted 12-Month Rolling Sulfur Content (% by wt.)	% Capacity Factor	Cumulative Hours per Calendar Year (for any CT combination)
0.2 - 0.195	33.0	14,455 (based on an average 2891 hr/CT/yr)
0.19 - 0.185	34.4	15,070 (based on an average 3014 hr/CT/yr)
0.18 - 0.175	35.8	15,680 (based on an average 3136 hr/CT/yr)
0.17 - 0.165	37.2	16,295 (based on an average 3259 hr/CT/yr)
0.16 - or less	38.7	16,950 (based on an average 3390 hr/CT/yr)

[AC 49-303114/PSD-FL-180(A)]

**6. Condition B.7. & B.8, Page 12 & 13 of 37:**

Reference to "or any CT combination" will be inserted in the table description. The TPY/CT will be changed to TPY and the numerical value in this column will be changed to reflect allowable emissions from all four CT's.

**7. Condition B.7, Page 12 of 37:**

The standard for H<sub>2</sub>SO<sub>4</sub> while firing gas is the standard while firing fuel oil and will be changed accordingly in this condition and B.8. The TPY/CT in the table will be changed to TPY and the values will be increased by a factor of 4.

**8. Condition B.14, Page 15 of 37:**

The Title V permit will have to be amended at a latter date to include the NSPS Custom Fuel Monitoring Schedule.

**9. Condition B.16 through B.20, Page 16 of 37:**

Reference to Rule 62-296.320(4)(b)4.a., F.A.C. will only be deleted from conditions B.16, B.18, B.19, and B.20. Reference to AC 49-20311/PSD-FL-180(A) will be inserted in the citations of B.16 through B.20.

**10. Condition B.20 and B.29, Page 16 & 19 of 37:**

Condition B.20 is changed to reflect the amendment to VOC compliance testing and with this change I don't think any change is necessary to B.29. Also, the amend to compliance testing for H<sub>2</sub>SO<sub>4</sub> mist was inserted in B.16.

**11. Condition B.24, Page 17 of 37:**

The words "equation" and "as follows" will be deleted from the introduction to this condition. Part b.

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cannot be deleted since it references monitoring as per 40 CFI 60.334(a), but, verbiage was added as follows:

- b. **Testing to establish compliance with the NO<sub>x</sub> limit shall be done at capacity, as defined in condition B.28. If testing demonstrates NO<sub>x</sub> emissions in excess of the allowable, set forth in this permit when operating at capacity, the following shall apply:**
1. The monitoring device of 40 CFR 60.334(a) shall be used to determine the fuel consumption and the water-to-fuel ratio necessary to comply with 40 CFR 60.332 at 30, 50, 75, and 100 percent of peak load or at four points in the normal operating range of the gas turbine, including the minimum point in the range and peak load. All loads shall be corrected to ISO conditions using the appropriate equations supplied by the manufacture.

**12. Condition B.25, Page 17 of 37:**

The verbiage "or the latest edition(s)" will be placed inside the brackets at the end of the first sentence.

**13. Condition B.28, Page 18 of 37:**

Although reference is made to the heat input/ambient temperature curve the condition will be revised to as follows to include additional references to the curves:

**B.28.** Testing of emissions shall be conducted with the emissions unit operating at permitted capacity as defined below. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity, in which case subsequent emissions unit operations are limited to 105 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. The permitted capacity shall at no time be exceeded. Capacity is defined as 95 to 100 percent of the manufacturer's rated heat input achievable for the average ambient (or conditioned) air temperature during the test. If it is impracticable to test at capacity, an emissions unit may be tested at less than capacity. In such cases, the entire heat input vs. inlet temperature curve will be adjusted by the increment equal to the difference between the design heat input value and 105 percent of the value reached during the test. Data, average ambient temperature during the test, capacity vs. ambient temperature curves, and calculations necessary to demonstrate the heat input rate correction at both design and test conditions shall be submitted to the Department with the compliance test report. In no case shall the maximum permitted heat input exceed 1144 MMBtu/hr/CT at 20° F.

[Rule 62.297.310(2), F.A.C.; and, AC 49-203114/PSD-FL-180(A)]

**14. Condition B.29, Page 19 of 37:**

The verbiage "if there is an applicable standard" will be deleted from (a)4.a.



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**15. Condition B.30, Page 20 of 37:**

"When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method" will be deleted from (a)2.

**16. Condition B.38, Page 24 of 37:**

The reference to "40 CFR 60.332" in the first line of part a will be change to read "applicable requirements in". The 0.05 % in part b will be corrected to the correct value of 0.2 %.

**Section IV. Acid Rain Part.**

1. Provisions in the application are referenced so the date is correct. No changes will be made.
2. Condition 4 is moved to condition 12 in facility wide section. All numbering changed accordingly.

**Table 1-1, Air Pollutant Emission Allowables and Terms.**

1. The rule citation for SO<sub>2</sub> is deleted and replaced with "Rule 62-4.070, F.A.C".
2. The rule citation for VE is deleted and replaced with "Rule 62-296.320(4)(b)1. F.A.C.
3. The 0.2 % S is corrected to 0.5 % S.
4. The TPY/CT is only changed to TPY when there is more than one emission unit and the numerical values were increased by a factor equal to the number of turbines in the subject emission unit ( TPY in Table 1-1 was increased by a factor of 6).

**Tables 1-1 through 1-3, Air Pollutant Emission Allowables and Terms.**

1. The TPY/CT is only changed to TPY when there is more than one emission unit and the numerical values were increased by a factor equal to the number of turbines in the subject emission unit (Table 1-1 and Table 1-2 was increased by a factor of 6 and 4, respectively). Table 1-3, for instance, will not be changed since the is one unit. The specific conditions have addressed this issue and the statement at the beginning of each Emission Limitations and Standards section says these tables do not supersede any of the terms or conditions of this permit.

**Tables 2-1, Compliance Testing Requirements.**

1. The B.4. is changed to B.7.