STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF FINAL PERMIT MODIFICATION

In the Matter of an
Application for Permit Modification

Mr. W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Dept.
Florida Power Corp.
3201 34th Street South
St. Petersburg, FL 33711

DEP File No. 1270028-002-AC
PSD-FL-167(B) I
DeBary Power Plant
Volusia County

Enclosed is Permit Modification Number PSD-FL-167(B) to add natural gas firing capability to four existing oil-fired peaking units at the DeBary Power Plant. This permit modification is issued pursuant to Section 403, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

C.H. Fancy, P.E., Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT MODIFICATION (including the FINAL permit Modification) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 5-6-97 to the person(s) listed:

Mr. W. Jeffrey Pardue, FPC *
Mr. Ken Kosky, P.E.
Mr. Brian Beals, EPA
Mr. John Bunyak, NPS
Mr. Len Koslov, CD

Clerk Stamp

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

Kym Iber 5-6-97
(Clerk) (Date)

FINAL DETERMINATION

Florida Power Corporation

Permit No. PSD-FL-167(B), File No. 1270028-002-AC
DeBary Facility, Peaking Units P7, P8, P9, and P10

An Intent to Issue a permit modification for Florida Power Corporation (FPC), DeBary Facility, Peaking Units P7, P8, P9, and P10 was distributed on February 14, 1997. The facility is located on West Highbanks Road, Volusia County. The Public Notice of Intent to Issue was published in the Volusia County News-Journal on March 25, 1997. No comments were received in response to the public notice or from agencies reviewing the proposed action.

The final action of the Department will be to issue the permit as proposed.

P 265 659 207

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail *(See reverse)*

Sent to	Jeffrey Pardue
Street & Number	FPC
Post Office, State, & ZIP Code	St. Pete, Fl
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date	5-6-97

PS Form **3800**, April 1995

1270028-002-AC
PSD-FI-167B

Fold at line over top of envelope to the right of the return address

SENDER
- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write *"Return Receipt Requested"* on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):
1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Jeffrey Pardue, CEP
Director, Env. Serv. Dept.
Florida Power Corp
3201 34th St. South
St. Petersburg, Fl 33711

4a. Article Number
P 265 659 207

4b. Service Type
☐ Registered ☒ Certified
☐ Express Mail ☐ Insured
☐ Return Receipt for Merchandise ☐ COD

7. Date of Delivery
5/8/97

5. Received By: *(Print Name)*

8. Addressee's Address *(Only if requested and fee is paid)*

6. Signature: *(Addressee or Agent)*
X Frankie Chapman

PS Form **3811**, December 1994 Domestic Return Receipt

Is your RETURN ADDRESS completed on the reverse side?

Thank you for using Return Receipt Service.

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

PERMITTEE:

Florida Power Corporation
3201 34th Street South
St. Petersburg, Florida 33711

Permit No.	AC64-191015(B)
PSD No.	PSD-FL-167(B)
File No.	1270028-002-AC
Expires:	December 31, 1997
Facility	DeBary

Authorized Representative:
Mr. W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department

LOCATED AT:

UTM: Zone 17, 467.5 km East and 3197.2 km North

Directions: ***West Highbanks Road, DeBary, Volusia County***

STATEMENT OF BASIS:

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and the Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297. The above named permittee is authorized to construct or modify the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department) and made a part hereof and specifically described as follows:

For four 92.9 MW simple cycle combustion turbines (CT's - P7, P8, P9, and P10) with maximum heat input of 1,144 (oil) and 1,159 (gas) MMBtu/hr/unit at 20°F to be located at the DeBary Facility in DeBary, Volusia County. The turbines are GE PG7111EA equipped with wet injection capability. The source shall be constructed in accordance with the permit application, plans, documents, amendments, and drawings, except as otherwise noted in the General and Specific Conditions.

Attached appendices made a part of this permit:

Appendix GC	Construction Permit General Conditions
Appendix SC	Specific Conditions

Howard L. Rhodes, Director
Division of Air Resources Management

APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

G.2 This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

(a) Have access to and copy and records that must be kept under the conditions of the permit;
(b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
(c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

(a) A description of and cause of non-compliance; and
(b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extend it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.

G.13 This permit also constitutes:

(a) Determination of Best Available Control Technology *(X)*
(b) Determination of Prevention of Significant Deterioration *(X)*; and
(c) Compliance with New Source Performance Standards *(X)*.

G.14 The permittee shall comply with the following:

(a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

(b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

(c) Records of monitoring information shall include:

1. The date, exact place, and time of sampling or measurements;
2. The person responsible for performing the sampling or measurements;
3. The dates analyses were performed;
4. The person responsible for performing the analyses;
5. The analytical techniques or methods used; and
6. The results of such analyses.

G.15 When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

APPENDIX SC
SPECIFIC CONDITIONS

1. This permit supersedes permit AC64-191015 (PSD-FL-167), dated October 18, 1991, and its revisions dated:

   June 30, 1993 - Change Method 3 to Method 3A
   August 11, 1993 - Replace trace element limits with use of low sulfur oil
   August 30, 1993 - Correct PM basis and SAM limit
   September 21, 1994 - Incorporate heat input curves

   The provisions of the air construction permit AC64-191015 (PSD-FL-167), dated October 18, 1991 and the revisions to that permit, attached and listed above, are incorporated into this air construction permit except for the changes that follow in Specific Conditions 2. through 6, below.

2. Table 1 from Previous Specific Condition 1 is changed per the previous modifications listed above and the present modification to read as shown in revised Table 1, attached.

3. Previous Specific Condition 3 is changed as follows:

   FROM

   These sources are allowed to use only No. 2 fuel oil with a 0.30% average and 0.5% sulfur content maximum, by weight. The sulfur content is based upon a weighted 12 month rolling average of fuel oil analysis from delivery receipts.

   TO:

   These units are allowed to use No. 2 fuel oil with a 0.30% average and 0.5% maximum sulfur content, by weight, as well as natural gas. The sulfur content is based upon a weighted 12-month rolling average of fuel oil analysis from delivery receipts.

4. Previous Specific Condition 4 is changed as follows:

   FROM

   The permitted materials and utilization rates for the combined cycle gas turbines shall not exceed: (a) the maximum heat input of 1,144 MMBtu/hr/unit at 20° F. (b) maximum No. 2 fuel oil consumption shall not exceed 7,826 (at 59° F) gal/hr/unit or 159,200,000 gal/yr for 6 CT's. (c) SO2 emissions for the six combustion turbines not exceed 2,888 tons/year. (d) the maximum capacity factor shall be limited to 38.7%.

TO

The permitted materials and utilization rates for the combined cycle gas turbines shall not exceed: (a) the maximum heat input of 1,144 (oil) and 1,159 (gas) MMBtu/hr/unit at 20° F. (b) maximum No. 2 fuel oil consumption shall not exceed 106,133,333 gal/yr for 4 CT's. (c) SO2 emissions for the four combustion turbines not exceed 1925 tons/year. (d) the maximum capacity factor shall be limited to 38.7% (equivalent to 3,390 hours per year).

5. The first paragraph of Previous Specific Condition 8 is changed as follows:

FROM

Compliance with the NOx, SO_2, CO, PM, PM_{10} and VOC standards shall be determined (on each unit within 10% maximum heat rate input) within 180 days of initial operation and annually thereafter, by the following reference methods as described in 40CFR60, Appendix A (July, 1990 version) and adopted by reference in F.A.C. Rule 17-2.700.

TO

Testing of emissions of NOx, SO_2, CO, PM, PM_{10} and VOC shall be conducted with the source operating at capacity. Capacity is defined as 95-100 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, then sources 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, 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.

6. Previous Specific Condition 14 is changed as follows:

FROM

Test results will be the average of 3 valid runs. The Central District office will be notified at least 15 days in writing in advance of the compliance test(s). The sources shall operate between 90% and 100% of permitted capacity during the compliance test(s) as adjusted for ambient temperature. Compliance test results shall be submitted to the Central District office no later than 45 days after completion.

TO

Test results will be the average of 3 valid runs. The Central District office shall be notified at least 15 days in writing in advance of the compliance test(s). Compliance test results shall be submitted to the Central District office no later than 45 days after completion.

TABLE 1 (Revised)
ALLOWABLE EMISSION LIMITS
Simple Cycle Combustion Turbine

Pollutant	Standard Oil Firing	Each Unit lb/hr [a]	Total 4 Units	Basis
NO_x	42 ppm at 15% oxygen dry basis	182	1,234[b]	BACT
NO_x	25 ppm at 15% oxygen dry basis (gas firing)	107	726[b]	FPC
SO_2	No. 2 fuel oil with 0.3% avg. and 0.5% max. sulfur	555	1,925[c]	BACT
PM/PM_{10}	0.015 lb/MMBtu	15	102[b]	BACT
VOC	-	5	34[b]	BACT
CO	-	54	365[b]	BACT
Sulfuric Acid Mist	No. 2 fuel oil with 0.3% avg. and 0.5% max,. sulfur	69	469[b]	BACT

[a] Emission rates based on 59°F and 15% O_2.

[b] Equivalent to 3390 hours per year at peak load and 38.7% capacity factor.

[c] Total TPY CAP for SO2 assumes 33% capacity factor and fuel sulfur content of 0.30%.

Memorandum

Florida Department of
Environmental Protection

TO: Howard Rhodes

THRU: Clair Fancy CHF by aaj

FROM: Al Linero Al Linero 5/5

DATE: May 5, 1997

SUBJECT: FPC DeBary - Natural Gas Use for Peaking Units P7-P10

Attached is a reissued and modified PSD construction permit for the four oil-fired peaking units at DeBary which are slated for addition of natural gas firing capability.

The revision deletes from the permit two authorized units which were never constructed, while allowing firing of natural gas which is available to FPC on an interruptible basis.

The key issue is that they have not operated long enough to establish representative past actual emissions for peaking units. At the same time, hourly emissions are greatly reduced when firing natural gas. Therefore it is reasonable to assume that past allowable emissions can be substituted for past actual emissions as allowed by rule. This results in no significant emissions increases and therefore the project is not subject to PSD or BACT.

FPC has agreed to accept a lower NOx limit (25 ppm) when firing natural gas by use of the presently installed water injection capability. It is doubtful that subjecting the these units to a new BACT determination would result in additional control requirements because of the intermittent and low usage of these units resulting in high costs per ton of pollutant removed.

No comments were received pursuant to the public notice. I recommend your approval and signature.

AAL/aal/l

Attachments:

Florida Power
CORPORATION

Original

April 11, 1997

Ms. Kim Tober
Florida Department of Environmental Protection
2600 Blair Stone Rd.
Tallahassee, Florida 32399-2400

Dear Ms. Tober:

Re: FPC DeBary Site
Public Notice of Intent to Issue Air Construction Permit Modification

As you requested during our telephone conversation of April 10, 1997, enclosed please find the original public notice and notarized proof of publication. The legal notice ran in the March 25, 1997 edition of the Volusia County News-Journal. It is my understanding that all future submittals of this type to the Department must be originals and not copies.

If you should have any questions or require additional information, please do not hesitate to contact me at (813) 866-5158.

Sincerely,

Scott H. Osbourn
Senior Environmental Engineer

Attachment

cc: Len Kozlov, DEP Central District
Ken Kosky, Golder Associates

The News-Journal

Published Daily and Sunday
Daytona Beach, Volusia County, Florida

State of Florida,
County of Volusia:

Before the undersigned authority personally appeared

Bryan P. Stephens

who, on oath says that he is

Classified Advertising Manager

of The News-Journal, a daily and Sunday newspaper, published at Daytona Beach in Volusia County, Florida; that the attached copy of advertisement, being a

Public Notice of Intent to Issue

Air Construction Permit Modification

in the matter of From The Department of Environmental

Protection to DeBary Facility/Volusia County

in the Court, was published

in said newspaper in the issues

March 25, 1997

Affiant further says that The News-Journal is a newspaper published at Daytona Beach, in said Volusia County, Florida, and that the said newspaper has heretofore been continuously published in said Volusia County, Florida, each day and Sunday and has been entered as second-class mail matter at the post office in Daytona Beach, in said Volusia County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before me

this 25th day of March

A.D. 1997

CAROL A. TAYLOR
Notary Public, State of Florida
My Comm. Exp. Apr. 13, 1998
Comm. No. CC 452734

49

LEGAL ADVERTISEMENT

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION
STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DRAFT Permit Modification No.: AC64-191015(B), PSD-FL-167(B)
File No. 1270028-002
DeBary Facility/Volusia County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit modification to Florida Power Corporation (FPC), for Combustion Turbines (Peaking Units) P7, P8, P9, and P10 at its DeBary Facility located at West Highbanks Road, Volusia County. A Best Available Control Technology (BACT) determination was not required pursuant to Rule 62-212.400, F.A.C. and 40 CFR 52.21, Prevention of Significant Deterioration (PSD). The applicant's name and address are: Florida Power Corporation, 3201 34th Street South, St. Petersburg, FL 33711.

The modification is to reissue the expired construction permit for six 92.9 megawatt, oil-fired simple cycle combustion turbines; revise the number of units to the four already constructed; and allow installation of natural gas firing capability.

The four peaking units were each permitted to operate up to 3,390 hours per year. Since their startup in late 1992, usage has been less than 800 hours each. In the near future, increased service to 900-1700 hours of operation per year is expected. FPC plans to burn available natural gas, an inherently clean fuel which is available to FPC on an interruptible basis, in lieu of some fuel oil to meet the anticipated demand.

Because of the great variability of usage from year-to-year inherent in peaking units and the relatively short period of operation for the four units, the Department does not believe that representative part B emissions have yet been established. Also, hourly emissions will be very substantially reduced when natural gas is fired in lieu of fuel. Per Rule 62-210.200(1)(b), F.A.C., the Department may pressure that unit-specific allowable emissions for an emissions unit are equivalent to the actual emissions of the emissions unit. Therefore, there will be no significant increase in PSD pollutants and the project is exempt from PSD and BACT. Burning natural gas will minimize emissions of particulate matter, sulfur dioxide, and nitrogen oxides (NOx). NOx will be further controlled to 25 parts per million by the installed water injection equipment.

The Department will issue the FINAL Permit Modification, in accordance with the conditions of the DRAFT Permit Modification unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed DRAFT Permit Modification issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit Modification, the Department shall issue a Revised DRAFT Permit Modification and require, if applicable, another Public Notice.

The Department will issue FINAL Permit Modification with the conditions of the DRAFT Permit Modification unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S. or a party requests mediation as an alternative remedy under Section 120.573 before the deadline for filing a petition. Choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement. The procedures for petitioning for a hearing are set forth below, followed by the procedures for requesting mediation.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, telephone: 904/488-9370, fax: 904/487-4938. Petitions must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition (or a request for mediation, as discussd below) within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207 of the Florida Administrative Code.

A petition must contain the following information: (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by petitioner, if any; (e) A statement of the facts that the petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take with respect to the Department's action or proposed action addressed in this notice of intent.

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

A person whose substantial interests are affected by the Department's proposed permitting decision, may elect to pursue mediation by asking all parties to the proceeding to agree to such mediation and by filing with the Department a request for mediation and the written agreement of all such parties to mediate the dispute. The request and agreement must be filed in (received by) the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, by the same deadline as set forth above for the filing of a petition.

A request for mediation must contain the following information: (a) The name, address, and telephone number of the person requesting mediation and that person's representative, if any; (b) A statement of the preliminary agency action; (c) A statement of the relief sought; and (d) Either an explanation of how the requester's substantial interests will be affected by the action or proposed action addressed in this notice of intent or a statement clearly identifying the petition for hearing that the requester has already filed, and incorporating it by reference.

The agreement to mediate must include the following: (a) The names, addresses, and telephone numbers of any persons who may attend the mediation; (b) The name, address, and telephone number of the mediator selected by the parties, or a provision for selecting a mediator within a specified time; (c) The agreed allocation of the costs and fees associated with the mediation; (d) The agreement of the parties on the confidentiality of discussions and documents introduced during mediation; (e) The date, time, and place of the first mediation session, or a deadline for holding the first session, if no mediator has yet been chosen; (f) The name of each party's representative who shall have authority to settle or recommend settlement; and (g) The signatures of all parties or their authorized representatives.

As provided in Section 120.573 F.S., the timely agreement of all parties to mediate will toll the time limitations imposed by Sections 120.569 and 120.57 F.S. for requesting and holding an administrative hearing. Unless otherwise agreed by the parties, the mediation must be concluded within sixty days of the execution of the agreement. If mediation results in settlement of the administrative dispute, the Department must enter a final order incorporating the agreement of the parties. Persons whose substantial interests will be affected by such modified final decision of the Department have a right to petition for a hearing only in accordance with the requirements for such petitions set forth above. If mediation terminates without settlement of the dispute, the Department shall notify all parties in writing that the administrative hearing processes under Sections 120.569 and 120.57 F.S. remain available for disposition of the dispute, and the notice will specify the deadlines that then will apply for challenging the agency action and electing remedies under those two statutes.

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

Department of
Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 904/488-1344
Fax: 904/922-6979

Department of
Environmental Protection
Central District Office
3319 Maguire Boulevard, Suite 232
Orlando, FL 32803-3767
Telephone: 407/893-3333
Fax: 407/897-5963

The complete project file includes the Draft Permit Modification, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 904/488-1344, for additional information.

Legal L27803. March 25, 1997 1t.

Florida Power
CORPORATION

April 7, 1997

Mr. Clair Fancy, P.E.
Chief, Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Rd.
Tallahassee, Florida 32399-2400

Dear Mr. Fancy:

Re: DeBary Peaking Units P7, P8, P9, and P10 -- Addition of Natural Gas Capability
Draft Permit Modification No. AC64-191015(B); PSD-FL-167(~~B~~) I

This letter serves to notify the Department that Florida Power Corporation published a Notice of Intent to Issue Air Construction Permit Modification for the above-referenced project. The legal notice ran in the March 25, 1997 edition of the Volusia County News-Journal. A copy of the notice and the notarized proof of publication are attached.

If you should have any questions concerning the above, please do not hesitate to contact me at (813) 866-5158.

Sincerely,

Scott H. Osbourn
Senior Environmental Engineer

Attachment

cc: Len Kozlov, DEP Central District
Ken Kosky, P.E., Golder Associates

EPA
NPS
A. Linero, BAR

RECEIVED
APR 10 1997
BUREAU OF
AIR REGULATION

The News-Journal

Published Daily and Sunday
Daytona Beach, Volusia County, Florida

State of Florida,
County of Volusia:

Before the undersigned authority personally appeared

Bryan P. Stephens

who, on oath says that he is.....

Classified Advertising Manager

of The News-Journal, a daily and Sunday newspaper, published at Daytona Beach in Volusia County, Florida; that the attached copy of advertisement, being a.....

Public Notice of Intent to Issue

Air Construction Permit Modification

in the matter of From The Department of Environmental

Protection to DeBary Facility/Volusia County 27803

in the .....Court, was published

in said newspaper in the issues.....

March 25, 1997

Affiant further says that The News-Journal is a newspaper published at Daytona Beach, in said Volusia County, Florida, and that the said newspaper has heretofore been continuously published in said Volusia County, Florida, each day and Sunday and has been entered as second-class mail matter at the post office in Daytona Beach, in said Volusia County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

.....

Sworn to and subscribed before me

this 25th day of March

A.D. 19 97

.....

CAROL A. TAYLOR
Notary Public, State of Florida
My Comm. Exp. Apr. 13, 1999
Comm. No. CC 452734

49

LEGAL ADVERTISEMENT

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION
STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DRAFT Permit Modification No.: AC64-191015(B), PSD-FL-167(B)
File No. 1270028-002
DeBary Facility/Volusia County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit modification to Florida Power Corporation (FPC), for Combustion Turbines (Peaking Units) P7, P8, P9, and P10 at its DeBary Facility located at West Highbanks Road, Volusia County. A Best Available Control Technology (BACT) determination was not required pursuant to Rule 62-212.400, F.A.C. and 40 CFR 52.21, Prevention of Significant Deterioration (PSD). The applicant's name and address are: Florida Power Corporation, 3201 34th Street South, St. Petersburg, FL 33711.

The modification is to reissue the expired construction permit for six 92.9 megawatt, oil-fired simple cycle combustion turbines; revise the number of units to the four already constructed; and allow installation of natural gas firing capability.

The four peaking units were each permitted to operate up to 3,390 hours per year. Since their startup in late 1992, usage has been less than 800 hours each. In the near future, increased service to 900-1700 hours of operation per year is expected. FPC plans to burn available natural gas, an inherently clean fuel which is available to FPC on an interruptible basis, in lieu of some fuel oil to meet the anticipated demand.

Because of the great variability of usage from year-to-year inherent in peaking units and the relatively short period of operation for the four units, the Department does not believe that representative past actual emissions have yet been established. Also, hourly emissions will be very substantially reduced when natural gas is fired in lieu of fuel. Per Rule 62-210.200(1)(b), F.A.C. the Department may pressure that unit-specific allowable emissions for an emissions unit are equivalent to the actual emissions of the emissions unit. Therefore, there will be no significant increase in PSD pollutants and the project is exempt from PSD and BACT. Burning natural gas will minimize emissions of particulate matter, sulfur dioxide, and nitrogen oxides (NOx). NOx will be further controlled to 25 parts per million by the installed water injection equipment.

The Department will issue the FINAL Permit Modification, in accordance with the conditions of the DRAFT Permit Modification unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed DRAFT Permit Modification issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahasee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit Modification, the Department shall issue a Revised DRAFT Permit Modification and require, if applicable, another Public Notice.

The Department will issue FINAL Permit Modification with the conditions of the DRAFT Permit Modification unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S. or a party requests mediation as an alternative remedy under Section 120.573 before the deadline for filing a petition. Choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement. The procedures for petitioning for a hearing are set forth below, followed by the procedures for requesting mediation.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, telephone: 904/488-9370, fax: 904/487-4938. Petitions must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition (or a request for mediation, as discussd below) within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207 of the Florida Administrative Code.

A petition must contain the following information: (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by petitioner, if any; (e) A statement of the facts that the petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take with respect to the Department's action or proposed action addressed in this notice of intent.

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

A person whose substantial interests are affected by the Department's proposed permitting decision, may elect to pursue mediation by asking all parties to the proceeding to agree to such mediation and by filing with the Department a request for mediation and the written agreement of all such parties to mediate the dispute. The request and agreement must be filed in (received by) the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, by the same deadline as set forth above for the filing of a petition.

A request for mediation must contain the following information: (a) The name, address, and telephone number of the person requesting mediation and that person's representative, if any; (b) A statement of the preliminary agency action; (c) A statement of the relief sought; and (d) Either an explanation of how the requester's substantial interests will be affected by the action or proposed action addressed in this notice of intent or a statement clearly identifying the petition for hearing that the requester has already filed, and incorporating it by reference.

The agreement to mediate must include the following: (a) The names, addresses, and telephone numbers of any persons who may attend the mediation; (b) The name, address, and telephone number of the mediator selected by the parties, or a provision for selecting a mediator within a specified time; (c) The agreed allocation of the costs and fees associated with the mediation; (d) The agreement of the parties on the confidentiality of discussions and documents introduced during mediation (e) The date, time, and place of the first mediation session, or a deadline for holding the first session, if no mediator has yet been chosen; (f) The name of each party's representative who shall have authority to settle or recommend settlement; and (g) The signatures of all parties or their authorized representatives.

As provided in Section 120.573 F.S., the timely agreement of all parties to mediate will toll the time limitations imposed by Sections 120.569 and 120.57 F.S. for requesting and holding an administrative hearing. Unless otherwise agreed by the parties, the mediation must be concluded within sixty days of the execution of the agreement. If mediation results in settlement of the administrative dispute, the Department must enter a final order incorporating the agreement of the parties. Persons whose substantial interests will be affected by such modified final decision of the Department have a right to petition for a hearing only in accordance with the requirements for such petitions set forth above. If mediation terminates without settlement of the dispute, the Department shall notify all parties in writing that the administrative hearing processes under Sections 120.569 and 120.57 F.S. remain available for disposition of the dispute, and the notice will specify the deadlines that then will apply for challenging the agency action and electing remedies under those two statutes.

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

Department of
Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 904/488-1344
Fax: 904/922-6979

Department of
Environmental Protection
Central District Office
3319 Maguire Boulevard, Suite 232
Orlando, FL 32803-3767
Telephone: 407/893-3333
Fax: 407/897-5963

The complete project file includes the Draft Permit Modification, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 904/488-1344, for additional information.

Legal L27803. March 25, 1997 1t.

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

February 14, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Jeffrey Pardue, C.E.P.
Director, Environmental Service Dept.
Florida Power Corp.
3201 34th Street South
St. Petersburg, Florida 33711

Re: DRAFT Air Construction Permit Modification: PSD-FL-167(B) → I, AC64-191015(B) → I
DeBary Facility/Peaking Units P7-P10 - Addition of Natural Gas Capability

Dear Mr. Pardue:

Enclosed is one copy of the Draft Air Construction Permit Modification for Combustion Turbines (Peaking Units) P7-P10 located at the DeBary Facility, West Highbanks Road, DeBary, Volusia County. The Department's Intent to Issue Air Construction Permit Modification and the "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION" are also included.

The "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION" must be published within 30 (thirty) days of receipt of this letter. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit modification.

Please submit any written comments you wish to have considered concerning the Department's proposed action to A. A. Linero, P.E., Administrator, New Source Review Section at the above letterhead address. If you have any other questions, please contact Mr. Linero at 904/488-1344.

Sincerely,

C. H. Fancy, P.E., Chief,
Bureau of Air Regulation

CHF/aal/hh

Enclosures

P 265 659 171

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail *(See reverse)*

Sent to	Jeffrey Pardue
Street & Number	FPC
Post Office, State, & ZIP Code	St. Pete, Fl
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date	PSD-Fl-1673 2-17-97 Peaking Units P7-P10

PS Form **3800**, April 1995

Is your **RETURN ADDRESS** completed on the reverse side?

SENDER:
- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write *"Return Receipt Requested"* on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):
1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Jeffrey Pardue, Director
Fla. Power Corp.
3201 34th St. South
St. Petersburg, Fl
33711

4a. Article Number
P 265 659 171

4b. Service Type
☐ Registered ☒ Certified
☐ Express Mail ☐ Insured
☐ Return Receipt for Merchandise ☐ COD

7. Date of Delivery
2/20/97

5. Received By: *(Print Name)*
Kathy DeLong

8. Addressee's Address *(Only if requested and fee is paid)*

6. Signature: *(Addressee or Agent)*
X Kathy DeLong

PS Form **3811**, December 1994 Domestic Return Receipt

Thank you for using Return Receipt Service.

In the Matter of an
Application for Permit Modification by:

Mr. W. Jeffrey Pardue, C.E.P., Director
Environmental Services Department
Florida Power Corporation
3201 34th Street South
St. Petersburg, Florida 33711 /

DRAFT Permit Nos. AC64-191015(B), PSD-FL-167(B)
File No. 1270028-002-AC
DeBary Facility/Volusia County

INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit modification (copy of DRAFT permit modification attached) for the proposed project, as detailed in the application specified above, for the reasons stated below.

The applicant, Florida Power Corporation (FPC) applied on November 8, 1996, to the Department for an air construction permit modification for Combustion Turbines (Peaking Units) P7, P8, P9, and P10 at its DeBary Facility located on West Highbanks Road, DeBary, Volusia County. The request is for a modification to Permits AC64-191015 and PSD-FL-167 to allow installation of natural gas firing capability for the mentioned units.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-212. The above actions are not exempt from permitting procedures. The Department has determined that an air construction permit modification, including re-issuance of the expired permit, is required to commence the additional construction at the described facility.

The Department intends to issue this air construction permit modification based on the belief that reasonable assurances have been provided to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION". The notice shall be published one time only within 30 (thirty) days in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 904/488-1344; Fax 904/ 922-6979) within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit modification pursuant to Rule 62-103.150 (6), F.A.C.

The Department will issue the FINAL Permit Modification, in accordance with the conditions of the enclosed DRAFT Permit Modification unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed DRAFT Permit Modification issuance action for a period of 30 (thirty) days from the date of publication of "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION." Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit Modification, the Department shall issue a Revised DRAFT Permit Modification and require, if applicable, another Public Notice.

The Department will issue the permit modification with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S., or a party requests mediation as an alternative remedy under Section 120.573 F.S. before the deadline for filing a petition. Choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement. The procedures for petitioning for a hearing are set forth below, followed by the procedures for requesting mediation.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, telephone: 904/488-9730, fax: 904/487-4938. Petitions must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition (or a request for mediation, as discussed below) within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207 of the Florida Administrative Code.

A petition must contain the following information: (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by petitioner, if any; (e) A statement of the facts that the petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take with respect to the action or proposed action addressed in this notice of intent.

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

A person whose substantial interests are affected by the Department's proposed permitting decision, may elect to pursue mediation by asking all parties to the proceeding to agree to such mediation and by filing with the Department a request for mediation and the written agreement of all such parties to mediate the dispute. The request and agreement must be filed in (received by) the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, by the same deadline as set forth above for the filing of a petition.

A request for mediation must contain the following information: (a) The name, address, and telephone number of the person requesting mediation and that person's representative, if any; (b) A statement of the preliminary agency action; (c) A statement of the relief sought; and (d) Either an explanation of how the requester's substantial interests will be affected by the action or proposed action addressed in this notice of intent or a statement clearly identifying the petition for hearing that the requester has already filed, and incorporating it by reference.

The agreement to mediate must include the following: (a) The names, addresses, and telephone numbers of any persons who may attend the mediation; (b) The name, address, and telephone number of the mediator selected by the parties, or a provision for selecting a mediator within a specified time; (c) The agreed allocation of the costs

and fees associated with the mediation; (d) The agreement of the parties on the confidentiality of discussions and documents introduced during mediation; (e) The date, time, and place of the first mediation session, or a deadline for holding the first session, if no mediator has yet been chosen; (f) The name of each party's representative who shall have authority to settle or recommend settlement; and (g) The signatures of all parties or their authorized representatives.

As provided in Section 120.573 F.S., the timely agreement of all parties to mediate will toll the time limitations imposed by Sections 120.569 and 120.57 F.S. for requesting and holding an administrative hearing. Unless otherwise agreed by the parties, the mediation must be concluded within sixty days of the execution of the agreement. If mediation results in settlement of the administrative dispute, the Department must enter a final order incorporating the agreement of the parties. Persons whose substantial interests will be affected by such modified final decision of the Department have a right to petition for a hearing only in accordance with the requirements for such petitions set forth above. If mediation terminates without settlement of the dispute, the Department shall notify all parties in writing that the administrative hearing processes under Sections 120.569 and 120.57 F.S. remain available for disposition of the dispute, and the notice will specify the deadlines that then will apply for challenging the agency action and electing remedies under those two statutes.

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

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2) F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

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

Executed in Tallahassee, Florida.

C. H. Fancy, P.E., Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION (including the PUBLIC NOTICE, and DRAFT permit modification) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 2-17-97 to the person(s) listed:

Mr. W. Jeffrey Pardue, FPC *
Mr. Ken Kosky, P.E.
Mr. Brian Beals, EPA
Mr. John Bunyak, NPS
Mr. Len Koslov, CD

Clerk Stamp

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

Kuri Gibes 2-17-97
(Clerk) (Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DRAFT Permit Modification No.: AC64-191015(B), PSD-FL-167(B)
File No. 1270028-002
DeBary Facility/Volusia County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit modification to Florida Power Corporation (FPC), for Combustion Turbines (Peaking Units) P7, P8, P9, and P10 at its DeBary Facility located at West Highbanks Road, Volusia County. A Best Available Control Technology (BACT) determination was not required pursuant to Rule 62-212.400, F.A.C. and 40 CFR 52.21, Prevention of Significant Deterioration (PSD). The applicant's name and address are: Florida Power Corporation, 3201 34th Street South, St. Petersburg, FL 33711.

The modification is to reissue the expired construction permit for six 92.9 megawatt, oil-fired simple cycle combustion turbines; revise the number of units to the four already constructed; and allow installation of natural gas firing capability.

The four peaking units were each permitted to operate up to 3,390 hours per year. Since their startup in late 1992, usage has been less than 800 hours each. In the near future, increased service to 900-1700 hours of operation per year is expected. FPC plans to burn available natural gas, an inherently clean fuel which is available to FPC on an interruptible basis, in lieu of some fuel oil to meet the anticipated demand.

Because of the great variability of usage from year-to-year inherent in peaking units and the relatively short period of operation for the four units, the Department does not believe that representative past actual emissions have yet been established. Also, hourly emissions will be very substantially reduced when natural gas is fired in lieu of fuel. Per Rule 62-210.200(1)(b), F.A.C. the Department may presume that unit-specific allowable emissions for an emissions unit are equivalent to the actual emissions of the emissions unit. Therefore, there will be no significant increase in PSD pollutants and the project is exempt from PSD and BACT. Burning natural gas will minimize emissions of particulate matter, sulfur dioxide, and nitrogen oxides (NOx). NOx will be further controlled to 25 parts per million by the installed water injection equipment.

The Department will issue the FINAL Permit Modification, in accordance with the conditions of the DRAFT Permit Modification unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed DRAFT Permit Modification issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit Modification, the Department shall issue a Revised DRAFT Permit Modification and require, if applicable, another Public Notice.

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A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, telephone: 904/488-9370, fax: 904/487-4938. Petitions must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition (or a request for mediation, as discussed below) within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207 of the Florida Administrative Code.

A petition must contain the following information: (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by petitioner, if any; (e) A statement of the facts that the petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take with respect to the Department's action or proposed action addressed in this notice of intent.

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

A person whose substantial interests are affected by the Department's proposed permitting decision, may elect to pursue mediation by asking all parties to the proceeding to agree to such mediation and by filing with the Department a request for mediation and the written agreement of all such parties to mediate the dispute. The request and agreement must be filed in (received by) the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, by the same deadline as set forth above for the filing of a petition.

A request for mediation must contain the following information: (a) The name, address, and telephone number of the person requesting mediation and that person's representative, if any; (b) A statement of the preliminary agency action; (c) A statement of the relief sought; and (d) Either an explanation of how the requester's substantial interests will be affected by the action or proposed action addressed in this notice of intent or a statement clearly identifying the petition for hearing that the requester has already filed, and incorporating it by reference.

The agreement to mediate must include the following: (a) The names, addresses, and telephone numbers of any persons who may attend the mediation; (b) The name, address, and telephone number of the mediator selected by the parties, or a provision for selecting a mediator within a specified time; (c) The agreed allocation of the costs and fees associated with the mediation; (d) The agreement of the parties on the confidentiality of discussions and documents introduced during mediation; (e) The date, time, and place of the first mediation session, or a deadline for holding the first session, if no mediator has yet been chosen; (f) The name of each party's representative who shall have authority to settle or recommend settlement; and (g) The signatures of all parties or their authorized representatives.

As provided in Section 120.573 F.S., the timely agreement of all parties to mediate will toll the time limitations imposed by Sections 120.569 and 120.57 F.S. for requesting and holding an administrative hearing. Unless otherwise agreed by the parties, the mediation must be concluded within sixty days of the execution of the agreement. If mediation results in settlement of the administrative dispute, the Department must enter a final order incorporating the agreement of the parties. Persons whose substantial interests will be affected by such modified final decision of the Department have a right to petition for a hearing only in accordance with the requirements for such petitions set forth above. If mediation terminates without settlement of the dispute, the Department shall notify all parties in writing that the administrative hearing processes under Sections 120.569 and 120.57 F.S. remain available for disposition of the dispute, and the notice will specify the deadlines that then will apply for challenging the agency action and electing remedies under those two statutes.

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

Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida, 32301
Telephone: 904/488-1344
Fax: 904/922-6979

Department of Environmental Protection
Central District Office
3319 Maguire Boulevard, Suite 232
Orlando, FL 32803-3767
Telephone: 407/893-3333
Fax: 407/897-5963

The complete project file includes the Draft Permit Modification, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 904/488-1344, for additional information.

DIVISION OF AIR RESOURCES MANAGEMENT
BUREAU OF AIR REGULATION
NEW SOURCE REVIEW SECTION
Telephone (904) 488-1344
Fax (904) 922-6979

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

DeBary Facility/Peaking Units P7-P10

Florida Power Corporation

Facility ID No. 1270028
DeBary
Volusia, County

Air Construction Permit Modification No. AC64-191015(B)
PSD-FL-167(B)
File No. 1270028-002-AC

February 14, 1997

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

1. Applicant

Florida Power Corporation
3201 34th Street South
St. Petersburg, Florida 33711

2. Source Name and Location

DeBary Power Plant
Units P7, P8, P9, P10
DeBary, Florida

3. Source Description

The Florida Power Corporation (FPC) DeBary Power Plant consists of six combustion turbines peaking units that are fired by No. 2 or No. 6 fuel oil and four combustion turbines that are fired by No. 2 fuel oil.

The latter four combustion turbines (P7, P8, P9, P10) are each 96 megawatt simple cycle units manufactured by General Electric (Model PG7111EA). The units are fired with No. 2 fuel oil containing 0.3 percent (%) or less sulfur. Annual hours of operation are limited to 3,390 or less based on a sliding scale related to the fuel sulfur content. Control measures and equipment consists of firing relatively clean fuel, good combustion practices, and water injection.

Since their startup in late 1992, these units have each been utilized less than 800 hours per year. This characteristic of relatively low levels of operation is typical of peaking units. Among the reasons are the inherent thermal inefficiency that results in the turbine use being primarily limited to extreme meteorological conditions, and unavailability of baseload plants. Although the use is usually low, these units can, during extreme years, be called upon to provide service at much higher rates within their permitted limits.

FPC projects substantially increased use during 1997 to approximately 850 to 1200 hours per unit while fired exclusively with fuel oil. This is largely due to unavailability of the baseloaded Crystal River Unit 3.

4. Current Permit and Major Regulatory Program Status

Construction of P7-P10 was authorized by the Department's Prevention of Significant Deterioration (PSD) Permit No. PSD-FL-167 and Air Construction Permit AC64-191015 issued in October 1991. Two other identical units were also authorized but were never constructed. The four units are operated under Air Operation Permit AO64-233544 issued in October, 1993.

The initial construction of P7-P10 was authorized pursuant to the Department's Preconstruction Review PSD and Permitting requirements in Rules 62-210 and 62-212, F.A.C. The units were also reviewed in accordance with the New Source Performance Standard (NSPS) Subpart GG - Standards of Performance for Stationary Gas Turbines, adopted by reference as Rule 62-204.800(7)37.

As a major source, any modification of P7-P10 resulting in emissions increases must be evaluated for significance per Table 62-212.400-2, F.A.C. to determine if further PSD review is required along with a Best Available Control Technology (BACT) Determination.

5. Permit Modification Request

On November 8, 1996 the Department received a request from FPC for modification of its permits to install natural gas firing capability for units P7-P10. Limited quantities of gas will be available to FPC on an "interruptible basis." No increase in hours of operation was requested and FPC proposed to reduce allowable nitrogen oxides (NO_x) emissions from 42 parts per million (ppm) permitted while firing fuel oil to 25 ppm when firing gas.

Following an initial review of the submitted material, the Department requested additional information in a letter to FPC dated December 2, 1996. A response was received by the Department on January 9, 1997. Additional details were received by the Department on January 28.

6. Potentially Applicable Major Rules

Major rules that could potentially apply to this permit modification request include the following:

- Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration of Air Quality
- 40 CFR 60 - Standards of Performance for New Stationary Sources, Subpart GG - Standards for Stationary Gas Turbines (adopted by reference in Chapter 62-204, F.A.C.) and
- Chapter 62-297, F.A.C., related to emissions monitoring at stationary sources.

The primary regulatory issue pertinent to FPC's permit modification is that of PSD permitting applicability. Modifications which result in a *significant net emission rate increase* are classified as major modifications and therefore subject to PSD review. The procedures for determining whether a significant net emission rate increase will occur were changed for steam units only by EPA in July 1992 as a result of the Wisconsin Electric Power Company (WEPCO) litigation.

In the absence of applicability of the WEPCO decision (as reflected in revisions of Rule 62-210 and 62-212, F.A.C.), the calculation of a net emission increase for sources other than steam units is based on comparing actual annual emissions for the two year period prior to the change (before case) with potential emissions following the change (after case). Another two year period (within a five year period prior to the change) can be used if it is demonstrated to be more representative of normal source operation. Potential emissions are calculated assuming operation at rated capacity for the number of hours allowed by the enforceable permit conditions. This procedure is referred to as the *actual-to-potential* method.

Operation on gas and fuel oil will result in approximately 500 hours extra hours of usage in 1997 (to 1400-1700 hours) compared to operation on fuel oil alone for each peaking unit at DeBary and a decrease at some peaking units elsewhere in the FPC system. This will also result in PSD-significant emissions increases under the *actual-to-potential* test. However while operating on gas, these units will emit considerably less emissions than while firing fuel oil. Following is an estimate of emissions for the four units at full capacity for gas compared with oil:

COMPARISON OF EMISSIONS FROM FUEL OIL AND GAS AT DEBARY

	No. 2 Fuel Oil		Natural Gas	
Pollutant	lb/hr	tons/yr	lb/hr	tons/yr
NO_x	182	1,234	107	726
PM/PM_{10}	17	116	7.5	51
CO	54	365	21	144
VOC's	5	34	3	20
SO_2	555	1925	3	20
SAM	69	469	0.4	3

The decreases in hourly emissions while operating under gas are dramatic. However because of the fact that the units can still fire fuel oil, their potential to emit will remain unchanged even though true actual emissions may well be reduced based on a WEPCO-type evaluation.

7. **Evaluation of PSD Applicability**

The main issue regarding FPC's permit modification is that of PSD review applicability. The Department's detailed assessment of this regulatory issue follows.

A brief description of the PSD review procedures was provided above. As mentioned, EPA and the Department have not revised their rules to implement the WEPCO PSD review procedures for sources other than steam units. The Department's definitions of "actual" and "potential" emissions (per Chapter 62-210 (12) and (225), F.A.C.) for units other than steam units follow:

(12) "Actual Emissions" - The actual rate of emission of a pollutant from an emissions unit as determined in accordance with the following provisions:

(12)(a) In general, actual emissions as of a particular date shall equal the average rate, in tons per year, at which the emissions unit actually emitted the pollutant during a two year period which precedes the particular date and which is representative of the normal operation of the emissions unit.

The Department may allow the use of a different time period upon a determination that it is more representative of the normal operation of the emissions unit. Actual emissions shall be calculated using the emissions unit's actual operating hours, production rates and types of materials processed, stored, or combusted during the selected time period.

(12)(b) The Department may presume that unit-specific allowable emissions for an emissions unit are equivalent to the actual emissions of the emissions unit provided that, for any regulated air pollutant, such unit-specific allowable emissions limits are federally enforceable.

(12)(c) For any emissions unit (other than an electric utility steam generating unit specified in subparagraph (d) of this definition) which has not begun normal operations on a particular date, actual emissions shall equal the potential emissions of the emissions unit on that date.

(225) "Potential Emissions" or "Potential to Emit" - The maximum capacity of an emission unit or facility to emit a pollutant under its physical and operational design. Any enforceable physical or operational limitation on the capacity of the emission unit or facility to emit a pollutant, including any air pollution control equipment and any restrictions on hours of operation or on the type or amount of material combusted, stored, or processed shall be treated as part of its design provided that, for any regulated air pollutant, such physical or operational limitation is federally enforceable.

Because of the great variability of usage from year-to-year inherent in peaking units and the relatively short period of operation for the four units, the Department does not believe that representative past actual emissions have yet been established. This is further validated by the very substantial increase in hours of operation expected in 1997 even without addition of natural gas capability. Therefore in accordance with Rule 62-210(12)(b), the Department will presume that allowable emissions would better reflect the "before" case for comparison with the "after" case following the proposed change.

Based on the above analysis, the Department concludes that the addition of gas firing capability, as described in FPC's permit application, will not result in a significant net increase in any PSD regulated pollutant and therefore the permit modification regarding the use of gas Units P7-P10 is not subject to PSD review.

Even if PSD were applied, natural gas combustion would suffice as BACT for most pollutants. In the case of NO_x, the proposed limit of 25 ppm would likely meet BACT requirements. Any additional NO_x control measures for a peaking unit firing natural gas, on an interruptible basis, would probably not prove to be cost-effective.

There is at least one precedent for exempting addition of gas capability for oil fired combustion turbines. The specific case is described in an EPA letter dated June 24, 1981 (attached). Although the Department does not necessarily agree with the rationale given in the analysis by EPA, it appears that the situation and the decision were similar to those in the present review.

8. Proposed Addition of New Conditions of Approval to Permit PSD-FL-167

The proposed new conditions applicable to gas firing in Units P7-P10 are shown in the draft re-issued and modified permit. The changes to be incorporated include:

- Limiting NO_x emissions to 25 ppm (corrected) while firing natural gas
- Revising the number of units from six to four
- Revising emission limits downward to reflect less units
- Incorporation of previous permit modifications

9. Conclusions

The changes in operation authorized by these permit amendments will not cause net significant increase in potential emissions of any PSD regulated air pollutant. The Department expects the change to result in lower actual emissions of all pollutants although great variability will continue to characterize annual emissions from year-to-year. The changes will not cause or contribute to a violation of any ambient air quality standard or PSD increment.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

4.17

JUN 24 1981

OFFICE OF ENFORCEMENT

Mr. Amasjit S. Gill
General Electric - Gas Turbine Division
One River Road
Schenectady, New York 12345

Dear Mr. Gill:

This is to respond to your letter of May 19, 1981, requesting a determination of the applicability of NSPS and PSD to stationary gas turbines converting from middle distillates to natural gas.

The information presented in your letter indicated that NO_x and SO_2 emissions will decrease after the conversion to natural gas and hydrocarbons, CO and particulate emissions will either remain the same or decrease. As you correctly pointed out in your letter, the NSPS would only apply if there is an increase in emissions of a pollutant to which the standard applies. The NSPS for gas turbines applies only to NO_x and SO_2 emissions. Since the conversion from middle distillate fuel to natural gas for the turbines in question will cause a decrease in NO_x and SO_2 emissions, it is not considered a modification as defined in 40 CFR 60.14(a). The turbines however, could be subject to the NSPS if the conversion falls under the definition of reconstruction (See 40 CFR 60.15).

PSD review would apply to a proposed modification at an existing major stationary source if it would cause a significant net increase in actual emissions of any regulated pollutant. In the case of the gas turbine conversions outlined in your letter, PSD applicability is determined by evaluating any change in emissions rates caused by the conversions. The data contained in your letter indicate that the emission rates after the conversion will either remain constant or decrease. Actual emissions could increase only if there is an increase in the production rate or hours of operation, both of which are specifically exempt from PSD review. (See 40 CFR 5221(b)(2)(iii)(f)). Therefore, since there will not be any increase in emission rates or any creditable increases in actual emissions, the conversion of the gas turbines will not be subject to PSD review.

If you have any questions concerning this determination please contact Janet Farella of my staff at 202-755-2564.

Sincerely yours,

Edward E. Reich, Director
Division of Stationary
Source Enforcement

cc: Peter Wyckoff
Mike Trutna

DRAFT

PERMITTEE:

Florida Power Corporation
3201 34th Street South
St. Petersburg, Florida 33711

Permit No.	AC64-191015(B)
PSD No.	PSD-FL-167(B)
File No.	1270028-002-AC
Expires:	December 31, 1997
Facility	DeBary

Authorized Representative:
Mr. W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department

LOCATED AT:

UTM: Zone 17, 467.5 km East and 3197.2 km North

Directions: ***West Highbanks Road, DeBary, Volusia County***

STATEMENT OF BASIS:

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and the Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297. The above named permittee is authorized to construct or modify the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department) and made a part hereof and specifically described as follows:

For four 92.9 MW simple cycle combustion turbines (CT's - P7, P8, P9, and P10) with maximum heat input of 1,144 (oil) and 1,159 (gas) MMBtu/hr/unit at 20°F to be located at the DeBary Facility in DeBary, Volusia County. The turbines are GE PG7111EA equipped with wet injection capability. The source shall be constructed in accordance with the permit application, plans, documents, amendments, and drawings, except as otherwise noted in the General and Specific Conditions.

Attached appendices made a part of this permit:

Appendix GC	Construction Permit General Conditions
Appendix SC	Specific Conditions

EFFECTIVE DATE:

_____
Howard L. Rhodes, Director
Division of Air Resources
Management

G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

G.2 This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

(a) Have access to and copy and records that must be kept under the conditions of the permit;
(b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
(c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

(a) A description of and cause of non-compliance; and
(b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extend it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.

G.13 This permit also constitutes:

(a) Determination of Best Available Control Technology *(X)*
(b) Determination of Prevention of Significant Deterioration *(X)*; and
(c) Compliance with New Source Performance Standards *(X)*.

G.14 The permittee shall comply with the following:

(a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

(b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

(c) Records of monitoring information shall include:

1. The date, exact place, and time of sampling or measurements;
2. The person responsible for performing the sampling or measurements;
3. The dates analyses were performed;
4. The person responsible for performing the analyses;
5. The analytical techniques or methods used; and
6. The results of such analyses.

G.15 When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

APPENDIX SC
SPECIFIC CONDITIONS

1. This permit supersedes permit AC64-191015 (PSD-FL-167), dated October 18, 1991, and its revisions dated:

   June 30, 1993 - Change Method 3 to Method 3A
   August 11, 1993 - Replace trace element limits with use of low sulfur oil
   August 30, 1993 - Correct PM basis and SAM limit
   September 21, 1994 - Incorporate heat input curves

   The provisions of the air construction permit AC64-191015 (PSD-FL-167), dated October 18, 1991 and the revisions to that permit, attached and listed above, are incorporated into this air construction permit except for the changes that follow in Specific Conditions 2. through 6, below.

2. Table 1 from Previous Specific Condition 1 is changed per the previous modifications listed above and the present modification to read as shown in revised Table 1, attached.

3. Previous Specific Condition 3 is changed as follows:

   FROM

   These sources are allowed to use only No. 2 fuel oil with a 0.30% average and 0.5% sulfur content maximum, by weight. The sulfur content is based upon a weighted 12 month rolling average of fuel oil analysis from delivery receipts.

   TO:

   These units are allowed to use No. 2 fuel oil with a 0.30% average and 0.5% maximum sulfur content, by weight, as well as natural gas. The sulfur content is based upon a weighted 12-month rolling average of fuel oil analysis from delivery receipts.

4. Previous Specific Condition 4 is changed as follows:

   FROM

   The permitted materials and utilization rates for the combined cycle gas turbines shall not exceed: (a) the maximum heat input of 1,144 MMBtu/hr/unit at 20° F. (b) maximum No. 2 fuel oil consumption shall not exceed 7,826 (at 59° F) gal/hr/unit or 159,200,000 gal/yr for 6 CT's. (c) SO2 emissions for the six combustion turbines not exceed 2,888 tons/year. (d) the maximum capacity factor shall be limited to 38.7%.

TO

The permitted materials and utilization rates for the combined cycle gas turbines shall not exceed: (a) the maximum heat input of 1,144 (oil) and 1,159 (gas) MMBtu/hr/unit at 20°F. (b) maximum No. 2 fuel oil consumption shall not exceed 106,133,333 gal/yr for 4 CT's. (c) SO2 emissions for the four combustion turbines not exceed 1925 tons/year. (d) the maximum capacity factor shall be limited to 38.7% (equivalent to 3,390 hours per year).

5. The first paragraph of Previous Specific Condition 8 is changed as follows:

FROM

Compliance with the NOx, SO_2, CO, PM, PM_{10} and VOC standards shall be determined (on each unit within 10% maximum heat rate input) within 180 days of initial operation and annually thereafter, by the following reference methods as described in 40CFR60, Appendix A (July, 1990 version) and adopted by reference in F.A.C. Rule 17-2.700.

TO

Testing of emissions of NOx, SO_2, CO, PM, PM_{10} and VOC shall be conducted with the source operating at capacity. Capacity is defined as 95-100 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, then sources 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, 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.

6. Previous Specific Condition 14 is changed as follows:

FROM

Test results will be the average of 3 valid runs. The Central District office will be notified at least 15 days in writing in advance of the compliance test(s). The sources shall operate between 90% and 100% of permitted capacity during the compliance test(s) as adjusted for ambient temperature. Compliance test results shall be submitted to the Central District office no later than 45 days after completion.

TO

Test results will be the average of 3 valid runs. The Central District office shall be notified at least 15 days in writing in advance of the compliance test(s). Compliance test results shall be submitted to the Central District office no later than 45 days after completion.

TABLE 1 (Revised)
ALLOWABLE EMISSION LIMITS
Simple Cycle Combustion Turbine

Pollutant	Standard Oil Firing	Each Unit lb/hr [a]	Total 4 Units	Basis
NO_x	42 ppm at 15% oxygen dry basis	182	1,234[b]	BACT
NO_x	25 ppm at 15% oxygen dry basis (gas firing)	107	726[b]	FPC
SO_2	No. 2 fuel oil with 0.3% avg. and 0.5% max. sulfur	555	1,925[c]	BACT
PM/PM_{10}	0.015 lb/MMBtu	15	102[b]	BACT
VOC	-	5	34[b]	BACT
CO	-	54	365[b]	BACT
Sulfuric Acid Mist	No. 2 fuel oil with 0.3% avg. and 0.5% max,. sulfur	69	469[b]	BACT

[a] Emission rates based on 59°F and 15% O_2.

[b] Equivalent to 3390 hours per year at peak load and 38.7% capacity factor.

[c] Total TPY CAP for SO2 assumes 33% capacity factor and fuel sulfur content of 0.30%.

Memorandum

Florida Department of
Environmental Protection

TO: Clair Fancy

FROM Al Linero AAL 2/14

DATE: February 14, 1997

SUBJECT: FPC DeBary - Natural Gas Use for Peaking Units P7-P10

Attached is a reissued and modified PSD construction permit for the four oil-fired peaking units at DeBary which are slated for addition of natural gas firing capability.

The revision deletes from the permit two authorized units which were never constructed, while allowing firing of natural gas which is available to FPC on an interruptible basis.

The key issue is that they have not operated long enough to establish representative past actual emissions for peaking units. At the same time, hourly emissions are greatly reduced when firing natural gas. Therefore it is reasonable to assume that past allowable emissions can be substituted for past actual emissions as allowed by rule. This results in no significant emissions increases and therefore the project is not subject to PSD or BACT.

FPC has agreed to accept a lower NOx limit (25 ppm) when firing natural gas by use of the presently installed water injection capability. It is doubtful that subjecting the these units to a new BACT determination would result in additional control requirements because of the intermittent and low usage of these units resulting in high costs per ton of pollutant removed.

I have attached a Guidance Memo from EPA for a similar case involving addition of gas capability at peaking units. Although I do not agree with the rationale, both the facts and conclusions (with which I agree) are similar to what we are proposing here.

I recommend your approval and signature.

AAL/aal/l

Attachments:

To: Martin Costello
921-8986

922-6979

Schedule A-4 Monthly Report
FLORIDA POWER CORPORATION
- January 1994 through October 1996 -

01/15/1997

Generating Unit / Fuel / Year / Month	(1) NET CAPABILITY (MW)	(2) NET GENERATION (MWH)	(3) CAP FACTOR (%)	(4) EQUIV AVAIL FACTOR (%)	(5) NET OUTPUT FACTOR (%)	(6) AVG. NET HEAT RATE (BTU/KWH)	(7) FUEL BURNED (UNITS)	(8) FUEL HEAT VALUE (BTU/UNIT)	(9) FUEL BURNED (MMBTU)	(10) AS BURNED FUEL COST ($)	(11) FUEL COST PER KWH (¢/KWH)	(12) FUEL COST PER UNIT ($/UNIT)
BAYB PEAKER 1-4												
Total												
1995												
February	184	2,713.20	2	0	0	12,984	0	0	35,229	135,757	5.004	0.000
March	184	1,278.50	1	0	0	13,796	0	0	17,638	68,297	5.342	0.000
April	184	1,610.10	1	0	0	14,103	0	0	22,708	87,510	5.435	0.000
May	184	10,861.30	8	0	0	13,428	0	0	145,843	564,401	5.381	0.000
June	184	7,057.90	5	0	0	13,615	0	0	96,094	389,070	5.513	0.000
July	184	10,366.40	8	0	0	13,442	0	0	139,349	550,327	5.309	0.000
August	184	11,411.90	8	0	0	13,296	0	0	151,731	602,182	5.277	0.000
September	184	6,730.40	5	0	0	13,465	0	0	90,628	361,140	5.366	0.000
October	184	12,661.60	9	0	0	13,254	0	0	167,815	672,216	5.309	0.000
November	184	3,214.90	2	0	0	12,732	0	0	40,932	165,407	5.145	0.000
December	187	2,658.70	2	0	0	12,726	0	0	33,835	135,927	5.113	0.000
1996												
January	186	7,369.40	5	0	0	12,771	0	0	94,111	416,830	5.656	0.000
February	206	9,578.30	7	0	0	12,562	0	0	120,320	529,589	5.529	0.000
March	184	7,243.70	5	0	0	12,931	0	0	93,670	412,471	5.694	0.000
April	184	2,180.70	2	0	0	13,368	0	0	29,152	128,417	5.889	0.000
May	184	7,653.40	6	0	0	13,559	0	0	103,769	466,604	6.097	0.000
June	184	4,334.00	3	0	0	13,455	0	0	58,315	257,831	5.949	0.000
July	184	21,788.10	16	0	0	13,391	0	0	291,757	1,325,911	6.086	0.000
August	184	11,289.20	8	0	0	13,395	0	0	151,222	706,475	6.258	0.000
September	184	5,763.90	4	0	0	13,773	0	0	79,387	371,209	6.440	0.000
October	184	1,117.70	1	0	0	13,867	0	0	15,499	83,888	7.505	0.000
CBRY PEAKER 1-10												
Light Oil												
1994												
January	586	5,443.00	1	0	0	14,511	13,505	5,848,636	78,984	319,028	5.861	23.623
February	586	3,965.60	1	0	0	13,717	9,303	5,846,179	54,388	219,179	5.528	23.560
March	586	6,702.00	2	0	0	13,976	16,029	5,843,697	93,669	375,670	5.605	23.437
April	586	21,828.00	5	0	0	13,691	51,150	5,842,359	298,839	1,192,548	5.463	23.315
May	586	30,972.00	7	0	0	13,881	73,595	5,841,689	429,920	1,693,777	5.469	23.015
June	586	16,576.00	4	0	0	13,962	39,573	5,848,226	231,430	922,155	5.563	23.303
July	586	17,451.00	4	0	0	13,962	41,669	5,847,392	243,656	972,175	5.571	23.331
August	586	2,356.00	1	0	0	15,333	6,178	5,847,392	36,125	147,475	6.260	23.871
September	586	840.00	0	0	0	17,276	2,461	5,896,903	14,512	69,852	8.316	28.384
October	586	20.00	0	0	0	55,500	189	5,869,437	1,110	4,803	24.015	25.413
November	586	721.00	0	0	0	13,843	1,700	5,870,904	9,981	40,874	5.669	24.044
December	617	2,641.00	1	0	0	13,733	6,222	5,829,172	36,268	148,964	5.640	23.941

~13,900

Notes :

§ Symbol indicates unresolved or potential problems.
Source: 'AS FILED' data reported from S:\PSC\EAG\RATE\SCHA_SYS\A4FPCSAV.DBF
Unit quantity by fueltype: Coal-TON, Light Oil-BBL, Heavy Oil-BBL, Natural Gas-CF, Nuclear-MBTU

Schedule A-4 Monthly Report
FLORIDA POWER CORPORATION
- January 1994 through October 1996 -

Generating Unit / Fuel / Year / Month	(1) NET CAPABILITY (MW)	(2) NET GENERATION (MWH)	(3) CAP FACTOR (%)	(4) EQUIV AVAIL FACTOR (%)	(5) NET OUTPUT FACTOR (%)	(6) AVG. NET HEAT RATE (BTU/KWH)	(7) FUEL BURNED (UNITS)	(8) FUEL HEAT VALUE (BTU/UNIT)	(9) FUEL BURNED (MMBTU)	(10) AS BURNED FUEL COST ($)	(11) FUEL COST PER KWH (¢/KWH)	(12) FUEL COST PER UNIT ($/UNIT)
DERY PEAKER 1-10												
Light Oil												
1995												
January	614	1,570.00	0	0	0	15,200	4,088	5,837,285	23,864	97,705	6.223	23.900
February	614	10,640.00	3	0	0	13,329	24,289	5,839,009	141,823	586,659	5.514	24.153
March	614	444.00	0	0	0	16,912	1,285	5,843,909	7,509	30,935	6.967	24.074
April	586	2,088.00	0	0	0	13,616	4,837	5,877,677	28,430	118,886	5.694	24.578
May	586	13,746.00	3	0	0	13,901	32,808	5,824,409	191,086	786,695	5.723	23.979
June	614	2,984.00	1	0	0	14,689	7,512	5,834,830	43,833	175,637	5.886	23.381
July	614	3,743.00	1	0	0	54,285	34,940	5,815,398	203,190	838,644	22.406	24.002
August	614	47,299.00	10	0	0	10,752	87,268	5,827,347	508,540	2,110,713	4.462	24.187
September	614	6,347.00	1	0	0	12,204	13,295	5,826,159	77,460	330,747	5.211	24.878
October	614	7,704.00	2	0	0	13,505	17,803	5,844,012	104,042	399,895	5.191	22.462
November	614	3,855.00	1	0	0	13,348	8,821	5,833,290	51,455	216,149	5.607	24.504
December	614	5,632.00	1	0	0	13,986	13,486	5,840,900	78,771	332,749	5.908	24.674
1996												
January	614	10,556.00	2	0	0	13,662	24,691	5,840,900	144,216	631,821	5.985	25.589
February	614	11,603.00	3	0	0	12,728	25,284	5,840,900	147,682	645,807	5.566	25.542
March	614	20,422.00	4	0	0	12,844	47,746	5,493,724	262,304	1,222,723	5.987	25.609
April	614	17,929.00	4	0	0	13,741	42,154	5,844,235	246,356	1,100,604	6.139	26.109
May	614	30,950.00	7	0	0	13,652	72,259	5,847,298	422,520	1,937,201	6.259	26.809
June	614	11,943.00	3	0	0	13,655	28,021	5,820,149	163,086	733,587	6.142	26.180
July	614	15,548.00	3	0	0	13,969	37,287	5,824,358	217,197	968,590	6.230	25.977
August	614	3,060.00	1	0	0	15,137	7,925	5,844,598	46,319	208,286	6.807	26.282
September	614	24,366.00	6	0	0	13,568	56,937	5,806,525	330,606	1,488,274	6.108	26.139
October	614	11,386.00	2	0	0	13,604	26,586	5,826,270	154,898	702,206	6.167	26.413
Total												
1994												
January	586	5,443.00	1	0	0	14,511	0	0	78,984	319,028	5.861	0.000
February	586	3,965.00	1	0	0	13,717	0	0	54,388	219,179	5.528	0.000
March	586	6,702.00	2	0	0	13,976	0	0	93,669	375,670	5.605	0.000
April	586	21,828.00	5	0	0	13,691	0	0	298,839	1,192,548	5.463	0.000
May	586	30,972.00	7	0	0	13,881	0	0	429,920	1,693,777	5.469	0.000
June	586	16,576.00	4	0	0	13,962	0	0	231,430	922,155	5.563	0.000
July	586	17,451.00	4	0	0	13,962	0	0	243,656	972,175	5.571	0.000
August	586	2,356.00	1	0	0	15,333	0	0	36,125	147,475	6.260	0.000
September	586	840.00	0	0	0	17,276	0	0	14,512	69,852	8.316	0.000
October	586	20.00	0	0	0	55,500	0	0	1,110	4,803	24.015	0.000
November	586	721.00	0	0	0	13,843	0	0	9,981	40,874	5.669	0.000
December	617	2,641.00	1	0	0	13,733	0	0	36,268	148,964	5.640	0.000
1995												
January	614	1,570.00	0	0	0	15,200	0	0	23,864	97,705	6.223	0.000

Notes :

$ Symbol indicates unresolved or potential problems.
Source: 'AS FILED' data reported from S:\PSC\EAG\RATE\SCHA_SYS\A4FPCSAV.DBF
Unit Quantity by fueltype : Coal-TON, Light Oil-BBL, Heavy Oil-BBL, Natural Gas-CF, Nuclear-MBTU.

Schedule A-4 Monthly Report
FLORIDA POWER CORPORATION
- January 1994 through October 1996 -

Generating Unit / Fuel / Year / Month	(1) NET CAPABILITY (MW)	(2) NET GENERATION (MWH)	(3) CAP FACTOR (%)	(4) EQUIV AVAIL FACTOR (%)	(5) NET OUTPUT FACTOR (%)	(6) AVG. NET HEAT RATE (BTU/KWH)	(7) FUEL BURNED (UNITS)	(8) FUEL HEAT VALUE (BTU/UNIT)	(9) FUEL BURNED (MMBTU)	(10) AS BURNED FUEL COST ($)	(11) FUEL COST PER KWH (¢/KWH)	(12) FUEL COST PER UNIT ($/UNIT)
DBRY PEAKER 1-10												
Total												
1995												
February	614	10,640.00	3	0	0	13,329	0	0	141,823	586,659	5.514	0.000
March	614	444.00	0	0	0	16,912	0	0	7,509	30,935	6.967	0.000
April	586	2,088.00	0	0	0	13,616	0	0	28,430	118,886	5.694	0.000
May	586	13,746.00	3	0	0	13,901	0	0	191,086	786,695	5.723	0.000
June	614	2,984.00	1	0	0	14,689	0	0	43,833	175,637	5.886	0.000
July	614	3,743.00	1	0	0	54,285	0	0	203,150	838,644	22.406	0.000
August	614	47,299.00	10	0	0	10,752	0	0	508,540	2,110,713	4.463	0.000
September	614	6,347.00	1	0	0	12,204	0	0	77,460	330,747	5.211	0.000
October	614	7,704.00	2	0	0	13,505	0	0	104,042	399,895	5.191	0.000
November	614	3,856.00	1	0	0	13,348	0	0	51,455	216,149	5.607	0.000
December	614	5,632.00	1	0	0	13,986	0	0	78,771	332,749	5.908	0.000
1996												
January	614	10,556.00	2	0	0	13,662	0	0	144,216	631,821	5.985	0.000
February	614	11,603.00	3	0	0	12,728	0	0	147,682	645,807	5.566	0.000
March	614	20,422.00	4	0	0	12,844	0	0	262,304	1,222,723	5.987	0.000
April	614	17,929.00	4	0	0	13,741	0	0	246,356	1,100,604	6.139	0.000
May	614	30,950.00	7	0	0	13,652	0	0	422,520	1,937,201	6.259	0.000
June	614	11,943.00	3	0	0	13,655	0	0	163,086	733,587	6.142	0.000
July	614	15,548.00	3	0	0	13,969	0	0	217,197	968,590	6.230	0.000
August	614	3,060.00	1	0	0	15,137	0	0	46,319	208,286	6.807	0.000
September	614	24,366.00	6	0	0	13,568	0	0	330,606	1,488,274	6.108	0.000
October	614	11,386.00	2	0	0	13,604	0	0	154,898	702,206	6.167	0.000
HGG PEAKER 1-4												
Light Oil												
1994												
January	110	94.53	0	0	0	18,217	291	5,916,109	1,722	7,277	7.698	25.007
February	110	0.00	0	0	0	0	0	0	0	0	0.000	0.000
March	121	90.60	1	0	0	17,561	269	5,916,109	1,591	7,082	7.817	26.327
April	110	15.80	0	0	0	31,835	85	5,908,526	503	2,238	14.165	26.329
May	110	905.08	3	0	0	35,792	2,419	5,908,526	14,293	63,687	7.037	26.328
June	110	971.95	3	0	0	16,163	2,659	5,908,526	15,710	70,006	7.203	26.328
July	110	3.30	4	0	0	17,890	10	5,908,526	59	401	12.159	40.100
August	110	16.36	1	0	0	21,333	59	5,908,526	349	1,517	9.273	25.712
September	110	320.44	1	0	0	16,096	873	5,908,526	5,158	22,443	7.004	25.708
October	113	749.36	1	0	0	15,305	1,941	5,908,526	11,469	49,900	6.659	25.708
November	110	7.64	0	0	0	24,093	31	5,908,526	184	797	10.436	25.710
December	110	16.90	0	0	0	20,651	59	5,908,526	349	1,461	8.645	24.763

Notes :

§ Symbol indicates unresolved or potential problems.
Source: 'AS FILED' data reported from S:\PSC\EAG\RATE\SCHA_SYS\A4FPC9AV.DBF
Unit quantity by fueltype : Coal-TON; Light Oil-BBL; Heavy Oil-BBL; Natural Gas-CF; Nuclear-MBTU

Schedule A-4 Monthly Report
FLORIDA POWER CORPORATION
- January 1994 through October 1996 -

Generating Unit Fuel Year Month	(1) NET CAPABILITY (MW)	(2) NET GENERATION (MWH)	(3) CAP FACTOR (%)	(4) EQUIV AVAIL FACTOR (%)	(5) NET OUTPUT FACTOR (%)	(6) AVG. NET HEAT RATE (BTU/KWH)	(7) FUEL BURNED (UNITS)	(8) FUEL HEAT VALUE (BTU/UNIT)	(9) FUEL BURNED (MMBTU)	(10) AS BURNED FUEL COST ($)	(11) FUEL COST PER KWH (¢/KWH)	(12) FUEL COST PER UNIT ($/UNIT)
HISG PEAKER 1-4												
Light Oil												
1995												
January	110	60.28	0	0	0	41,277	422	5,893,924	2,488	10,387	17.233	24.614
February	128	1,029.52	2	0	0	13,854	2,420	5,893,924	14,263	59,438	5.773	24.561
May	110	481.48	6	0	0	15,975	1,305	5,893,924	7,691	32,052	6.657	24.561
June	110	354.36	5	0	0	13,054	342	5,893,924	2,015	8,400	5.442	24.561
July	110	32.33	10	0	0	13,704	75	5,893,924	443	1,842	5.698	24.560
August	110	880.47	12	0	0	16,045	2,397	5,893,924	14,127	58,873	6.687	24.561
December	110	0.00	0	0	0	0	0	0	0	0	0.000	0.000
1996												
January	110	235.41	1	0	0	14,970	602	5,855,855	3,524	14,546	6.179	24.163
February	128	1,284.83	2	0	0	14,684	3,222	5,855,855	18,867	77,989	6.070	24.205
March	125	352.87	0	0	0	14,918	899	5,855,855	5,264	21,910	6.209	24.372
July	110	115.92	0	0	0	21,587	796	5,855,855	4,661	20,462	9.477	25.706
August	110	45.55	0	0	0	15,413	120	5,855,855	702	3,085	6.773	25.708
October	110	147.41	2	0	0	18,432	464	5,855,855	2,717	11,928	8.092	25.707
Natural Gas												
1994												
January	0	0.18	0	0	0	17,143	3	1,047	3	-181	-103.429	-60.333
March	0	742.40	0	0	0	18,731	13,281	1,047	13,906	16,096	4.862	2.718
May	0	1,651.32	0	0	0	16,199	25,819	1,036	26,749	55,323	3.350	2.143
June	0	1,092.65	0	0	0	17,078	18,098	1,031	18,660	43,601	3.990	2.409
July	0	2,871.50	0	0	0	18,757	51,690	1,042	53,861	109,361	3.808	2.116
August	0	1,119.44	0	0	0	23,071	24,905	1,037	25,827	52,910	4.726	2.124
September	0	255.06	0	0	0	16,479	4,065	1,034	4,203	12,662	4.964	3.115
October	0	21.84	0	0	0	16,025	339	1,031	350	418	1.914	1.233
November	0	56.06	0	0	0	14,626	798	1,028	820	1,578	2.815	1.977
1995												
January	0	84.23	0	0	0	42,434	3,464	1,032	3,574	6,621	7.861	1.911
February	0	707.78	0	0	0	14,242	9,768	1,032	10,080	17,447	2.465	1.786
March	110	886.99	1	0	0	13,527	11,625	1,032	11,997	21,886	2.468	1.883
April	110	1,566.40	2	0	0	16,401	24,845	1,034	25,690	45,863	2.928	1.846
May	0	4,286.36	0	0	0	17,064	70,602	1,036	73,143	148,716	3.470	2.106
June	0	4,085.94	0	0	0	14,083	55,598	1,035	57,544	134,276	3.286	2.415
July	0	8,347.07	0	0	0	14,464	116,648	1,035	120,731	224,555	2.690	1.925
August	0	8,737.23	0	0	0	17,216	145,473	1,034	150,419	296,607	3.395	2.039
September	110	475.70	1	0	0	25,550	11,743	1,035	12,154	-14,528	-3.054	-1.237
October	110	4,184.20	5	0	0	15,700	62,805	1,046	65,694	130,330	3.115	2.075
November	110	28.90	0	0	0	13,495	373	1,046	390	-162	-0.561	-0.434
December	110	0.00	0	0	0	0	0	0	0	71,142	0.000	0.000

1/2 to 1/3 Fuel Cost on Gas

Notes :

1 Symbol indicates unresolved or potential problems.
Source: 'AS FILED' data reported from S:\PSC\RAG\RATE\SCHA_SYS\A4FPCSAV.DBF
Unit quantity by fueltype : Coal-TON, Light Oil-BBL, Heavy Oil-BBL, Natural Gas-CF, Nuclear-MBTU

Schedule A-4 Monthly Report
FLORIDA POWER CORPORATION
- January 1994 through October 1996 -

Generating Unit / Fuel / Year / Month	(1) NET CAPABILITY (MW)	(2) NET GENERATION (MWH)	(3) CAP FACTOR (%)	(4) EQUIV AVAIL FACTOR (%)	(5) NET OUTPUT FACTOR (%)	(6) AVG. NET HEAT RATE (BTU/KWH)	(7) FUEL BURNED (UNITS)	(8) FUEL HEAT VALUE (BTU/UNIT)	(9) FUEL BURNED (MMBTU)	(10) AS BURNED FUEL COST ($)	(11) FUEL COST PER KWH (¢/KWH)	(12) FUEL COST PER UNIT ($/UNIT)
HIGG PEAKER 1-4												
Natural Gas												
1996												
January	0	560.59	0	0	0	16,244	8,648	1,053	9,106	38,385	6.847	4.439
February	0	182.97	0	0	0	15,609	2,723	1,049	2,856	10,467	5.721	3.844
March	0	9.33	0	0	0	15,859	141	1,047	148	-191	-2.047	-1.355
April	110	604.40	1	0	0	16,037	9,240	1,049	9,693	38,890	6.434	4.209
May	110	5,833.90	7	0	0	16,277	90,525	1,049	94,960	205,731	3.526	2.273
June	110	3,145.90	4	0	0	15,565	47,310	1,035	48,966	170,706	5.426	3.608
July	0	6,418.98	0	0	0	17,395	106,445	1,049	111,661	274,743	4.280	2.581
August	0	6,078.55	0	0	0	15,919	92,246	1,049	96,767	268,510	4.417	2.911
September	110	711.00	1	0	0	16,513	11,225	1,046	11,741	76,269	10.727	6.795
October	0	1,760.79	0	0	0	16,094	27,092	1,046	28,338	68,411	3.885	2.525
Total												
1994												
January	110	94.71	0	0	0	18,213	0	0	1,725	7,096	7.492	0.000
February	110	0.00	0	0	0	0	0	0	0	0	0.000	0.000
March	121	833.00	1	0	0	18,604	0	0	15,497	43,178	5.183	0.000
April	110	15.80	0	0	0	31,835	0	0	503	2,238	14.165	0.000
May	110	2,556.40	3	0	0	16,055	0	0	41,042	119,010	4.655	0.000
June	110	2,064.60	3	0	0	16,647	0	0	34,370	113,607	5.503	0.000
July	110	2,874.80	4	0	0	18,756	0	0	53,920	109,762	3.818	0.000
August	110	1,135.80	1	0	0	23,046	0	0	26,176	54,427	4.792	0.000
September	110	575.50	1	0	0	16,266	0	0	9,361	35,105	6.100	0.000
October	113	771.20	1	0	0	15,325	0	0	11,819	50,318	6.525	0.000
November	110	63.70	0	0	0	15,761	0	0	1,004	2,375	3.728	0.000
December	110	16.90	0	0	0	20,651	0	0	349	1,461	8.645	0.000
1995												
January	110	144.51	0	0	0	41,949	0	0	6,062	17,008	11.769	0.000
February	128	1,737.30	2	0	0	14,012	0	0	24,343	76,885	4.426	0.000
March	110	886.90	1	0	0	13,527	0	0	11,997	21,886	2.468	0.000
April	110	1,566.40	2	0	0	16,401	0	0	25,690	45,863	2.928	0.000
May	110	4,767.80	6	0	0	16,954	0	0	80,834	180,758	3.791	0.000
June	110	4,240.30	5	0	0	14,046	0	0	59,559	142,676	3.365	0.000
July	110	8,379.40	10	0	0	14,461	0	0	121,174	226,397	2.702	0.000
August	110	9,617.70	12	0	0	17,109	0	0	164,546	355,480	3.696	0.000
September	110	475.70	1	0	0	25,550	0	0	12,154	-14,528	-3.054	0.000
October	110	4,184.20	5	0	0	15,700	0	0	65,694	130,330	3.115	0.000
November	110	28.90	0	0	0	13,495	0	0	390	-162	-0.561	0.000
December	220	0.00	0	0	0	0	0	0	0	71,142	0.000	0.000
1996												
January	110	796.00	1	0	0	15,867	0	0	12,630	52,931	6.650	0.000

Notes :

$ Symbol indicates unresolved or potential problems.
Source: 'AS FILED' data reported from S:\PSC\EAG\RATE\SCHA_SYS\A4FPCSAV.DBF
Unit quantity by fueltype : Coal-TON, Light Oil-BBL, Heavy Oil-BBL, Natural Gas-CF, Nuclear-MBTU

Schedule A-4 Monthly Report
FLORIDA POWER CORPORATION
- January 1994 through October 1996 -

Generating Unit / Fuel / Year / Month	(1) NET CAPABILITY (MW)	(2) NET GENERATION (MWH)	(3) CAP FACTOR (%)	(4) EQUIV AVAIL FACTOR (%)	(5) NET OUTPUT FACTOR (%)	(6) AVG. NET HEAT RATE (BTU/KWH)	(7) FUEL BURNED (UNITS)	(8) FUEL HEAT VALUE (BTU/UNIT)	(9) FUEL BURNED (MMBTU)	(10) AS BURNED FUEL COST ($)	(11) FUEL COST PER KWH (¢/KWH)	(12) FUEL COST PER UNIT ($/UNIT)	
HIGG PEAKER 1-4													
Total													
1996													
February	128	1,467.80	2	0	0	14,800	0	0	21,723	84,456	6.826	0.000	
March	125	362.20	0	0	0	14,342	0	0	5,412	21,719	5.996	0.000	
April	110	604.40	1	0	0	16,037	0	0	9,693	38,890	6.435	0.000	
May	110	5,833.90	7	0	0	16,277	0	0	94,960	205,731	3.527	0.000	
June	110	3,145.90	4	0	0	15,565	0	0	48,966	170,706	5.426	0.000	
July	110	6,744.90	8	0	0	17,246	0	0	116,322	295,205	4.377	0.000	
August	110	6,124.10	7	0	0	15,916	0	0	97,469	271,595	4.436	0.000	
September	110	711.00	1	0	0	16,513	0	0	11,741	75,269	10.727	0.000	
October	110	1,908.20	2	0	0	16,274	0	0	31,055	80,339	4.210	0.000	
IKTC PEAKER 1-10													
Light Oil													
1995													
August	608	25,338.65	8	0	0	13,306	64,211	5,250,719	337,156	1,581,506	6.241	24.630	
September	608	7,998.23	4	0	0	16,979	23,031	5,830,037	134,271	572,305	7.237	24.849	
October	768	8,697.30	3	0	0	13,684	31,729	3,712,863	117,780	762,845	8.863	24.043	§
November	608	2,872.22	2	0	0	14,684	-15,344	4,325,393	-66,369	-159,964	8.169	24.063	
December	768	2,714.09	1	0	0	12,815	5,960	5,835,920	34,781	367,233	5.542	25.235	§
1996													
January	775	8,831.15	2	0	0	13,124	19,916	5,819,457	115,900	486,896	5.513	24.447	
February	809	17,335.09	3	0	0	12,058	38,208	5,470,959	209,034	940,319	5.424	24.611	
March	770	17,000.99	4	0	0	11,826	36,820	5,460,673	201,062	913,191	5.371	24.801	
April	768	3,538.25	1	0	0	12,560	8,092	5,491,922	44,440	202,971	5.736	25.083	
May	769	7,664.35	3	0	0	12,347	17,256	5,484,080	94,635	445,685	5.815	25.828	
June	768	10,464.92	6	0	0	11,132	19,918	5,849,012	116,499	509,694	4.871	25.590	
July	768	21,327.54	11	0	0	12,263	44,679	5,853,704	261,539	1,146,347	5.375	25.657	
August	768	3,880.42	4	0	0	12,653	8,374	5,863,203	49,098	216,086	5.569	25.804	
September	608	7,255.56	12	0	0	11,615	14,449	5,832,316	84,270	378,809	5.221	26.217	
October	768	1,855.35	5	0	0	13,582	4,068	5,860,802	23,841	106,559	5.071	26.194	
Natural Gas													
1995													
August	0	10,408.75	0	0	0	12,566	126,498	1,034	130,799	305,554	2.936	2.415	
September	0	9,203.47	0	0	0	12,604	112,081	1,035	116,004	212,865	2.313	1.899	
October	0	9,809.00	0	0	0	16,547	152,008	1,046	159,001	328,758	3.421	2.163	
November	0	4,633.58	0	0	0	15,441	68,402	1,046	71,548	157,796	3.405	2.307	
December	0	1,629.92	0	0	0	11,922	18,454	1,053	19,432	99,716	6.118	5.403	
1996													
January	0	4,394.95	0	0	0	12,946	54,035	1,053	56,899	278,210	6.330	5.149	

Notes :

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Unit quantity by fueltype : Coal-TON, Light Oil-BBL, Heavy Oil-BBL, Natural Gas-CF, Nuclear-MBTU

Schedule A-4 Monthly Report
FLORIDA POWER CORPORATION
- January 1994 through October 1996 -

Generating Unit / Fuel / Year / Month	(1) NET CAPABILITY (MW)	(2) NET GENERATION (MWH)	(3) CAP FACTOR (%)	(4) EQUIV AVAIL FACTOR (%)	(5) NET OUTPUT FACTOR (%)	(6) AVG. NET HEAT RATE (BTU/KWH)	(7) FUEL BURNED (UNITS)	(8) FUEL HEAT VALUE (BTU/UNIT)	(9) FUEL BURNED (MMBTU)	(10) AS BURNED FUEL COST ($)	(11) FUEL COST PER KWH (¢/KWH)	(12) FUEL COST PER UNIT ($/UNIT)
INTC PEAKER 1-10												
Natural Gas												
1996												
February	0	295.11	0	0	0	12,999	3,456	1,049	3,836	9,606	3.255	2.627
March	0	5,593.21	0	0	0	13,011	69,507	1,047	72,773	346,000	6.186	4.978
April	0	302.76	0	0	0	25,321	7,308	1,049	7,666	-8,759	-2.893	-1.199
May	0	9,455.85	0	0	0	14,030	126,472	1,049	132,669	349,089	3.692	2.760
June	0	21,694.29	0	0	0	13,968	293,906	1,031	303,018	879,532	4.054	2.993
July	0	44,259.66	0	0	0	12,950	546,386	1,049	573,158	1,442,932	3.260	2.641
August	0	19,168.88	0	0	0	12,855	234,913	1,049	246,423	680,052	3.548	2.895
September	0	45,966.54	0	0	0	13,603	597,767	1,046	625,264	1,543,605	3.358	2.582
October	0	29,194.95	0	0	0	13,251	369,838	1,046	386,851	959,081	3.285	2.593
Total												
1995												
August	608	35,747.40	8	0	0	13,091	0	0	467,955	1,887,060	5.279	0.000
September	608	17,111.70	4	0	0	14,626	0	0	250,275	785,170	4.589	0.000
October	768	18,216.30	3	0	0	15,194	0	0	276,781	1,091,603	5.993	0.000
November	608	7,505.80	2	0	0	690	0	0	5,179	-2,168	-0.029	0.000
December	768	4,344.01	1	0	0	12,480	0	0	54,213	466,949	10.749	0.000 $
1996												
January	775	13,226.10	2	0	0	13,065	0	0	172,799	765,106	5.785	0.000
February	809	17,630.20	3	0	0	12,074	0	0	212,870	949,925	5.388	0.000
March	770	22,594.20	4	0	0	12,120	0	0	273,835	1,259,191	5.573	0.000
April	768	3,841.01	1	0	0	13,566	0	0	52,106	194,212	5.056	0.000
May	769	17,120.20	3	0	0	13,277	0	0	227,304	794,774	4.642	0.000
June	768	32,159.21	6	0	0	13,045	0	0	419,517	1,389,226	4.320	0.000
July	768	65,587.20	11	0	0	12,727	0	0	834,697	2,589,279	3.948	0.000
August	768	23,049.30	4	0	0	12,821	0	0	295,521	896,138	3.888	0.000
September	608	53,222.10	12	0	0	13,332	0	0	709,534	1,922,414	3.612	0.000
October	768	31,050.30	5	0	0	13,227	0	0	410,692	1,065,640	3.432	0.000
INTC PEAKER 1-6												
Light Oil												
1994												
January	580	16,689.90	4	0	0	12,569	35,719	5,872,891	209,774	845,137	5.064	23.661
February	580	1,750.90	0	0	0	12,425	3,719	5,847,411	21,744	90,092	5.148	24.225
March	580	4,543.80	1	0	0	13,957	10,810	5,866,466	63,416	267,382	5.885	24.735
April	580	28,677.40	7	0	0	13,302	65,298	5,841,902	381,665	1,566,977	5.464	23.997
May	580	33,362.40	8	0	0	13,560	77,113	5,866,799	452,407	1,763,333	5.285	22.867
June	580	22,447.70	5	0	0	13,893	53,567	5,822,123	311,874	1,241,971	5.533	23.185
July	585	22,006.70	5	0	0	14,040	52,947	5,835,489	308,972	1,250,618	5.683	23.620

Notes :

§ Symbol indicates unresolved or potential problems.
Source: 'AS FILED' data reported from S:\PSC\EAG\RATE\SCHA_SYS\A4FPCSAV.DBF
Unit quantity by fueltype : Coal-TON, Light Oil-BBL, Heavy Oil-BBL, Natural Gas-CF, Nuclear-MBTU

Schedule A-4 Monthly Report
FLORIDA POWER CORPORATION
- January 1994 through October 1996 -

Generating Unit / Fuel / Year / Month	(1) NET CAPABILITY (MW)	(2) NET GENERATION (MWH)	(3) CAP FACTOR (%)	(4) EQUIV AVAIL FACTOR (%)	(5) NET OUTPUT FACTOR (%)	(6) AVG. NET HEAT RATE (BTU/KWH)	(7) FUEL BURNED (UNITS)	(8) FUEL HEAT VALUE (BTU/UNIT)	(9) FUEL BURNED (MMBTU)	(10) AS BURNED FUEL COST ($)	(11) FUEL COST PER KWH (¢/KWH)	(12) FUEL COST PER UNIT ($/UNIT)
INTC PEAKER 1-6												
Light Oil												
1994												
August	580	7,090.30	2	0	0	14,750	17,923	5,834,991	104,580	435,362	6.140	24.291
September	580	3,686.50	1	0	0	14,285	8,971	5,849,995	52,661	213,913	5.803	23.845
October	580	3,929.50	1	0	0	13,847	9,295	5,853,838	54,412	225,256	5.732	24.234
November	580	1,312.20	0	0	0	13,904	3,118	5,851,589	18,245	76,138	5.802	24.419
December	580	4,391.60	1	0	0	13,876	10,425	5,845,499	60,940	256,289	5.836	24.584
1995												
January	608	6,961.20	2	0	0	13,886	16,536	5,845,499	96,664	409,932	5.889	24.790
February	587	12,177.50	3	0	0	13,462	28,093	5,835,507	163,937	703,196	5.775	25.031
March	608	530.80	0	0	0	15,437	1,404	5,835,507	8,194	34,670	6.532	24.694
April	580	4,539.40	1	0	0	13,363	10,330	5,872,533	60,662	258,250	5.689	25.000
May	580	22,441.50	5	0	0	13,392	51,503	5,835,507	300,545	1,229,438	5.478	23.871
June	608	5,980.70	1	0	0	13,825	14,227	5,811,602	82,681	354,823	5.933	24.940
July	608	5,002.10	1	0	0	13,972	11,886	5,880,010	69,889	296,926	5.936	24.981
Natural Gas												
1995												
July	0	0.00	0	0	0	0	0	0	0	7,322	0.000	0.000
Total												
1994												
January	580	16,689.90	4	0	0	12,569	0	0	209,774	845,137	5.064	0.000
February	580	1,750.00	0	0	0	12,425	0	0	21,744	90,092	5.148	0.000
March	580	4,543.80	1	0	0	13,957	0	0	63,416	267,382	5.885	0.000
April	580	28,677.40	7	0	0	13,302	0	0	381,465	1,566,977	5.464	0.000
May	580	33,362.40	8	0	0	13,560	0	0	452,407	1,763,333	5.285	0.000
June	580	22,447.70	5	0	0	13,893	0	0	311,874	1,241,971	5.533	0.000
July	585	22,006.70	5	0	0	14,040	0	0	308,972	1,250,618	5.683	0.000
August	580	7,090.30	2	0	0	14,750	0	0	104,580	435,362	6.140	0.000
September	580	3,686.50	1	0	0	14,285	0	0	52,661	213,913	5.803	0.000
October	580	3,929.50	1	0	0	13,847	0	0	54,412	225,256	5.732	0.000
November	580	1,312.20	0	0	0	13,904	0	0	18,245	76,138	5.802	0.000
December	580	4,391.60	1	0	0	13,876	0	0	60,940	256,289	5.836	0.000
1995												
January	608	6,961.20	2	0	0	13,886	0	0	96,664	409,932	5.889	0.000
February	587	12,177.50	3	0	0	13,462	0	0	163,937	703,196	5.775	0.000
March	608	530.80	0	0	0	15,437	0	0	8,194	34,670	6.532	0.000
April	580	4,539.40	1	0	0	13,363	0	0	60,662	258,250	5.689	0.000
May	580	22,441.50	5	0	0	13,392	0	0	300,545	1,229,438	5.478	0.000
June	608	5,980.70	1	0	0	13,825	0	0	82,681	354,823	5.933	0.000
July	608	5,002.10	1	0	0	13,972	0	0	69,889	304,248	6.082	0.000

Notes :

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Unit quantity by fueltype : Coal-TON, Light Oil-BBL, Heavy Oil-BBL, Natural Gas-CF, Nuclear-MBTU

Schedule A-4 Monthly Report
FLORIDA POWER CORPORATION
- January 1994 through October 1996 -

Generating Unit / Fuel / Year / Month	(1) NET CAPABILITY (MW)	(2) NET GENERATION (MWH)	(3) CAP FACTOR (%)	(4) EQUIV AVAIL FACTOR (%)	(5) NET OUTPUT FACTOR (%)	(6) AVG. NET HEAT RATE (BTU/KWH)	(7) FUEL BURNED (UNITS)	(8) FUEL HEAT VALUE (BTU/UNIT)	(9) FUEL BURNED (MMBTU)	(10) AS BURNED FUEL COST ($)	(11) FUEL COST PER KWH (¢/KWH)	(12) FUEL COST PER UNIT ($/UNIT)
PTSJ PEAKER 1												
Light Oil												
1994												
January	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
February	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
March	14	65.00	1	0	0	17,954	201	5,803,794	1,167	5,689	8.752	28.303
April	17	16.00	0	0	0	21,375	59	5,803,794	342	1,670	10.438	28.305
May	14	70.00	1	0	0	16,900	202	5,855,609	1,183	5,717	8.167	28.302
June	14	28.00	0	0	0	19,857	95	5,855,609	556	2,689	9.604	28.305
August	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
September	14	0.00	0	0	0	0	3	5,855,609	18	85	0.000	28.333
October	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
November	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
December	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
1995												
January	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
February	18	102.00	1	0	0	16,569	291	5,806,583	1,690	7,993	7.836	27.467
March	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
April	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
May	14	28.00	0	0	0	22,821	110	5,809,380	639	2,906	10.379	26.418
June	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
August	14	310.50	3	0	0	17,269	923	5,809,380	5,362	23,518	7.574	25.480
September	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
October	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
November	14	0.00	0	0	0	0	20	5,819,571	116	510	0.000	25.500
December	14	5.60	0	0	0	231,786	223	5,819,571	1,298	5,682	101.464	25.480
1996												
January	17	163.50	1	0	0	8,190	230	5,819,571	1,339	5,974	3.654	25.974
February	14	179.00	2	0	0	17,134	527	5,819,571	3,067	13,688	7.647	25.973
March	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
April	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
May	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
July	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
August	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
September	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
October	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
Natural Gas												
1995												
July	14	13.60	0	0	0	19,044	44	5,880,292	259	1,097	8.066	24.932
Total												
1994												
January	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000

Notes :

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Unit quantity by fueltype : Coal-TON, Light Oil-BBL, Heavy Oil-BBL, Natural Gas-CF, Nuclear-MBTU

Schedule A-4 Monthly Report
FLORIDA POWER CORPORATION
- January 1994 through October 1996 -

01/15/1997

Generating Unit / Fuel / Year / Month	(1) NET CAPABILITY (MW)	(2) NET GENERATION (MWH)	(3) CAP FACTOR (%)	(4) EQUIV AVAIL FACTOR (%)	(5) NET OUTPUT FACTOR (%)	(6) AVG. NET HEAT RATE (BTU/KWH)	(7) FUEL BURNED (UNITS)	(8) FUEL HEAT VALUE (BTU/UNIT)	(9) FUEL BURNED (MMBTU)	(10) AS BURNED FUEL COST ($)	(11) FUEL COST PER KWH (¢/KWH)	(12) FUEL COST PER UNIT ($/UNIT)
PTSJ PEAKER 1												
Total												
1994												
February	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
March	14	65.00	1	0	0	17,954	0	0	1,167	5,689	8.752	0.000
April	17	16.00	0	0	0	21,375	0	0	342	1,670	10.438	0.000
May	14	70.00	1	0	0	16,900	0	0	1,183	5,717	8.167	0.000
June	14	28.00	0	0	0	19,857	0	0	556	2,689	9.604	0.000
August	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
September	14	0.00	0	0	0	0	0	0	18	85	0.000	0.000
October	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
November	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
December	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
1995												
January	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
February	18	102.00	1	0	0	16,569	0	0	1,690	7,993	7.836	0.000
March	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
April	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
May	14	28.00	0	0	0	22,821	0	0	639	2,906	10.379	0.000
June	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
July	14	13.60	0	0	0	19,044	0	0	259	1,097	8.066	0.000
August	14	310.50	3	0	0	17,269	0	0	5,362	23,518	7.574	0.000
September	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
October	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
November	14	0.00	0	0	0	0	0	0	116	510	0.000	0.000
December	14	5.60	0	0	0	231,786	0	0	1,298	5,682	101.464	0.000
1996												
January	17	163.50	1	0	0	8,190	0	0	1,339	5,974	3.654	0.000
February	14	179.00	2	0	0	17,134	0	0	3,067	13,688	7.647	0.000
March	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
April	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
May	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
July	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
August	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
September	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
October	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
RIOP PEAKER 1												
Light Oil												
1994												
January	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000

Notes :

§ Symbol indicates unresolved or potential problems.
Source: 'AS FILED' data reported from S:\PSC\RAS\RATE\SCHA_SYS\A4FPCSAV.DBF
Unit quantity by fueltype : Coal-TON, Light Oil-BBL, Heavy Oil-BBL, Natural Gas-CF, Nuclear-MBTU

Schedule A-4 Monthly Report
FLORIDA POWER CORPORATION
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Generating Unit / Fuel / Year / Month	(1) NET CAPABILITY (MW)	(2) NET GENERATION (MWH)	(3) CAP FACTOR (%)	(4) EQUIV AVAIL FACTOR (%)	(5) NET OUTPUT FACTOR (%)	(6) AVG. NET HEAT RATE (BTU/KWH)	(7) FUEL BURNED (UNITS)	(8) FUEL HEAT VALUE (BTU/UNIT)	(9) FUEL BURNED (MMBTU)	(10) AS BURNED FUEL COST ($)	(11) FUEL COST PER KWH (¢/KWH)	(12) FUEL COST PER UNIT ($/UNIT)
RIOP PEAKER 1												
Light Oil												
1994												
February	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
March	14	64.00	1	0	0	17,563	192	5,855,609	1,124	5,477	8.558	28.526
April	14	0.00	0	0	0	0	0	0	0	-297	0.000	0.000
May	14	57.00	1	0	0	16,386	161	5,803,794	934	4,344	7.621	26.981
June	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
July	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
August	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
September	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
October	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
November	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
December	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
1995												
January	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
February	18	101.60	1	0	0	15,512	268	5,880,292	1,576	7,231	7.117	26.981
March	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
April	14	273.00	3	0	0	17,619	818	5,880,292	4,810	19,369	7.095	23.678
May	14	291.00	3	0	0	17,966	889	5,880,292	5,228	22,138	7.608	24.902
June	14	3.00	0	0	0	80,333	41	5,880,292	241	1,022	34.067	24.927
July	14	13.60	0	0	0	19,044	44	5,880,292	259	1,097	8.066	24.932
August	14	298.00	3	0	0	17,188	871	5,880,292	5,122	21,243	7.129	24.389
September	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
October	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
November	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
1996												
January	17	144.40	1	0	0	16,150	401	5,816,024	2,332	9,976	6.909	24.878
February	17	127.50	1	0	0	14,643	321	5,816,024	1,867	7,986	6.264	24.879
March	18	50.60	0	0	0	16,443	143	5,816,024	832	3,558	7.032	24.881
April	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
May	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
June	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
July	14	0.00	0	0	0	0	37	5,816,024	215	922	0.000	24.919
August	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
September	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
October	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
Total												
1994												
January	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
February	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000

Notes :

§ Symbol indicates unresolved or potential problems.
Source: 'AS FILED' data reported from S:\PSC\RAG\RATE\SCHA_SYS\A4FPCSAV.DBF
Unit quantity by fueltype : Coal-TON, Light Oil-BBL, Heavy Oil-BBL, Natural Gas-CF, Nuclear-MBTU

Schedule A-4 Monthly Report
FLORIDA POWER CORPORATION
- January 1994 through October 1996 -

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Generating Unit / Fuel / Year / Month	(1) NET CAPABILITY (MW)	(2) NET GENERATION (MWH)	(3) CAP FACTOR (%)	(4) EQUIV AVAIL FACTOR (%)	(5) NET OUTPUT FACTOR (%)	(6) AVG. NET HEAT RATE (BTU/KWH)	(7) FUEL BURNED (UNITS)	(8) FUEL HEAT VALUE (BTU/UNIT)	(9) FUEL BURNED (MMBTU)	(10) AS BURNED FUEL COST ($)	(11) FUEL COST PER KWH (¢/KWH)	(12) FUEL COST PER UNIT ($/UNIT)
RIO9 PEAKER 1												
Total												
1994												
March	14	64.00	1	0	0	17,563	0	0	1,124	5,477	8.558	0.000
April	14	0.00	0	0	0	0	0	0	0	-297	0.000	0.000
May	14	57.00	1	0	0	16,386	0	0	934	4,384	7.621	0.000
June	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
July	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
August	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
September	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
October	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
November	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
December	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
1995												
January	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
February	18	101.60	1	0	0	15,512	0	0	1,576	7,231	7.117	0.000
March	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
April	14	273.00	3	0	0	17,619	0	0	4,810	19,369	7.095	0.000
May	14	291.00	3	0	0	17,966	0	0	5,228	22,198	7.628	0.000
June	14	3.00	0	0	0	80,333	0	0	241	1,022	34.067	0.000
July	14	13.60	0	0	0	19,044	0	0	259	1,097	8.066	0.000
August	14	298.00	3	0	0	17,188	0	0	5,122	21,243	7.129	0.000
September	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
October	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
November	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
1996												
January	17	144.40	1	0	0	16,150	0	0	2,332	9,976	6.909	0.000
February	17	127.50	1	0	0	14,643	0	0	1,867	7,986	6.264	0.000
March	18	50.60	0	0	0	16,443	0	0	832	3,558	7.032	0.000
April	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
May	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
June	14	0.00	0	0	0	0	0	0	215	922	0.000	0.000
July	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
August	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
September	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
October	14	0.00	0	0	0	0	0	0	0	0	0.000	0.000
SUWA PEAKER 1-3												
Light Oil												
1994												
January	159	1,800.70	2	0	0	13,029	4,046	5,798,624	23,462	94,068	5.224	23.250

Notes :

* Symbol indicates unresolved or potential problems.
Source: 'AS FILED' data reported from S:\PSC\RAC\RATE\SCHA_STS\A4FPCSAV.DBF
Unit quantity by fueltype : Coal-TON, Light Oil-BBL, Heavy Oil-BBL, Natural Gas-CF, Nuclear-MBTU

Schedule A-4 Monthly Report 01/15/1997
FLORIDA POWER CORPORATION
- January 1994 through October 1996 -

Generating Unit / Fuel / Year / Month	(1) NET CAPABILITY (MW)	(2) NET GENERATION (MWH)	(3) CAP FACTOR (%)	(4) EQUIV AVAIL FACTOR (%)	(5) NET OUTPUT FACTOR (%)	(6) AVG. NET HEAT RATE (BTU/KWH)	(7) FUEL BURNED (UNITS)	(8) FUEL HEAT VALUE (BTU/UNIT)	(9) FUEL BURNED (MMBTU)	(10) AS BURNED FUEL COST ($)	(11) FUEL COST PER KWH (¢/KWH)	(12) FUEL COST PER UNIT ($/UNIT)
SUWA PEAKER 1-3												
Light Oil												
1994												
February	159	388.60	0	0	0	14,231	954	5,796,638	5,530	22,102	5.688	23.168
March	159	971.50	1	0	0	13,675	2,292	5,796,555	13,285	53,101	5.466	23.168
April	159	663.80	1	0	0	13,884	1,590	5,796,555	9,216	36,837	5.549	23.164
May	159	2,358.60	2	0	0	13,337	5,427	5,796,131	31,456	125,418	5.317	23.110
June	159	706.50	1	0	0	14,071	1,715	5,796,131	9,941	40,134	5.681	23.402
July	159	1,320.70	1	0	0	13,335	3,040	5,793,159	17,611	70,771	5.359	23.280
August	159	77.70	0	0	0	13,642	183	5,790,734	1,060	4,268	5.493	23.279
September	159	378.20	0	0	0	14,656	957	5,791,195	5,543	22,279	5.891	23.280
October	159	1,028.10	1	0	0	14,443	2,564	5,791,195	14,849	59,690	5.806	23.280
November	159	704.50	1	0	0	13,465	1,638	5,790,780	9,486	38,646	5.486	23.593
December	159	322.80	0	0	0	13,603	756	5,791,978	4,391	17,884	5.540	23.594
1995												
January	159	223.20	0	0	0	15,385	593	5,792,928	3,434	13,669	6.124	23.051
February	159	1,165.20	1	0	0	12,578	2,530	5,792,714	14,656	58,317	5.091	23.445
March	159	198.30	0	0	0	15,951	546	5,792,714	3,163	12,801	6.455	23.445
April	159	1,765.20	2	0	0	13,189	4,019	5,792,714	23,281	94,227	5.338	23.445
May	159	1,929.40	2	0	0	13,733	4,573	5,793,995	26,496	108,281	5.612	23.678
June	159	200.20	0	0	0	15,929	550	5,796,685	3,189	13,023	6.505	23.678
July	159	790.60	1	0	0	13,567	1,860	5,797,787	10,726	43,805	5.541	23.678
August	159	5,066.50	4	0	0	13,359	11,670	5,799,864	67,684	279,031	5.507	23.510
September	159	95.50	0	0	0	14,868	243	5,835,439	1,418	5,960	6.241	24.537
October	159	325.00	0	0	0	13,197	736	5,835,843	4,289	17,574	5.407	23.910
November	159	270.00	0	0	0	14,252	659	5,838,344	3,846	15,757	5.836	23.910
December	159	336.00	0	0	0	11,108	635	5,841,743	3,710	16,483	4.636	24.383
1996												
January	159	1,292.90	1	0	0	13,259	2,932	5,846,478	17,142	71,792	5.553	24.486
February	178	4,033.00	3	0	0	12,541	8,649	5,847,746	50,577	210,884	5.229	24.382
March	159	1,530.90	1	0	0	13,133	3,446	5,814,249	20,105	86,807	5.670	25.191
April	159	82.70	0	0	0	13,640	193	5,848,600	1,128	5,253	6.231	26.699
May	159	1,863.41	2	0	0	13,576	4,323	5,851,723	25,298	111,970	6.009	25.901
June	159	3,296.00	3	0	0	13,416	7,556	5,852,163	44,219	195,198	5.922	25.834
July	159	690.40	1	0	0	14,389	1,697	5,854,153	9,934	43,769	6.340	25.792
August	159	140.20	0	0	0	16,769	400	5,875,797	2,351	10,422	7.434	26.055
September	159	5,024.00	4	0	0	13,518	11,535	5,887,504	67,912	315,854	6.287	27.382
October	159	1,796.70	2	0	0	12,816	3,910	5,889,099	23,027	111,996	6.233	28.643
Natural Gas												
1994												
July	8	0.00	0	0	0	0	0	0	0	0	0.000	0.000

Notes :

§ Symbol indicates unresolved or potential problems.
Source: 'AS FILED' data reported from S:\RSC\EAB\RATE\SCHA_SYS\A4FPCSAV.DBF
Unit quantity by fueltype : Coal-TON, Light Oil-BBL, Heavy Oil-BBL, Natural Gas-CF, Nuclear-MBTU

Schedule A-4 Monthly Report
FLORIDA POWER CORPORATION
- January 1994 through October 1996 -

01/15/1997

Generating Unit / Fuel / Year / Month	(1) NET CAPABILITY (MW)	(2) NET GENERATION (MWH)	(3) CAP FACTOR (%)	(4) EQUIV AVAIL FACTOR (%)	(5) NET OUTPUT FACTOR (%)	(6) AVG. NET HEAT RATE (BTU/KWH)	(7) FUEL BURNED (UNITS)	(8) FUEL HEAT VALUE (BTU/UNIT)	(9) FUEL BURNED (MMBTU)	(10) AS BURNED FUEL COST ($)	(11) FUEL COST PER KWH (¢/KWH)	(12) FUEL COST PER UNIT ($/UNIT)
SUWA PEAKER 1-3												
Total												
1994												
January	159	1,800.70	2	0	0	13,029	0	0	23,462	94,068	5.224	0.000
February	159	388.60	0	0	0	14,231	0	0	5,530	22,102	5.688	0.000
March	159	971.50	1	0	0	13,675	0	0	13,285	53,101	5.466	0.000
April	159	663.80	1	0	0	13,884	0	0	9,216	36,837	5.549	0.000
May	159	2,358.60	2	0	0	13,337	0	0	31,456	125,418	5.318	0.000
June	159	706.50	1	0	0	14,071	0	0	9,941	40,134	5.681	0.000
July	167	1,320.70	1	0	0	13,335	0	0	17,611	70,771	5.359	0.000
August	159	77.70	0	0	0	13,642	0	0	1,060	4,260	5.483	0.000
September	159	378.20	0	0	0	14,656	0	0	5,543	22,279	5.891	0.000
October	159	1,028.10	1	0	0	14,443	0	0	14,849	59,690	5.806	0.000
November	159	704.50	1	0	0	13,465	0	0	9,486	38,646	5.486	0.000
December	159	322.80	0	0	0	13,603	0	0	4,391	17,884	5.540	0.000
1995												
January	159	223.20	0	0	0	15,385	0	0	3,434	13,669	6.124	0.000
February	169	1,165.20	1	0	0	12,578	0	0	14,656	59,317	5.091	0.000
March	159	198.30	0	0	0	15,951	0	0	3,163	12,801	6.455	0.000
April	159	1,765.20	2	0	0	13,189	0	0	23,281	94,227	5.338	0.000
May	159	1,929.40	2	0	0	13,733	0	0	26,496	108,281	5.612	0.000
June	159	200.20	0	0	0	15,929	0	0	3,189	13,023	6.505	0.000
July	159	790.60	1	0	0	13,569	0	0	10,726	43,805	5.541	0.000
August	159	5,066.50	4	0	0	13,359	0	0	67,684	279,031	5.507	0.000
September	159	95.50	0	0	0	14,848	0	0	1,418	5,960	6.241	0.000
October	159	325.00	0	0	0	13,197	0	0	4,289	17,574	5.407	0.000
November	159	270.00	0	0	0	14,252	0	0	3,848	15,757	5.836	0.000
December	159	334.00	0	0	0	11,108	0	0	3,710	15,483	4.636	0.000
1996												
January	159	1,292.90	1	0	0	13,259	0	0	17,142	71,792	5.553	0.000
February	178	4,033.00	3	0	0	12,541	0	0	50,577	210,884	5.229	0.000
March	159	1,530.90	1	0	0	13,133	0	0	20,105	86,807	5.670	0.000
April	159	82.70	0	0	0	13,640	0	0	1,128	5,153	6.231	0.000
May	159	1,863.41	2	0	0	13,576	0	0	25,298	111,970	6.009	0.000
June	159	3,296.00	3	0	0	13,416	0	0	44,219	195,198	5.922	0.000
July	159	690.40	1	0	0	14,389	0	0	9,934	43,769	6.340	0.000
August	159	140.20	0	0	0	16,769	0	0	2,351	10,422	7.434	0.000
September	159	5,024.00	4	0	0	13,518	0	0	67,912	315,854	6.287	0.000
October	159	1,796.70	2	0	0	12,816	0	0	23,027	111,996	6.233	0.000
TURN PEAKER 1-4												
Light Oil												
1994												
January	158	338.70	0	0	0	13,930	810	5,825,621	4,718	19,825	5.853	24.475

Notes :

§ Symbol indicates unresolved or potential problems.
Source: 'AS FILED' data reported from S:\PSC\EAG\RATE\SCHA_SYS\A4FPCSAV.DBF
Unit quantity by fueltype : Coal-TON, Light Oil-BBL, Heavy Oil-BBL, Natural Gas-CF, Nuclear-MBTU

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FLORIDA POWER CORPORATION
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Generating Unit / Fuel / Year / Month	(1) NET CAPABILITY (MW)	(2) NET GENERATION (MWH)	(3) CAP FACTOR (%)	(4) EQUIV AVAIL FACTOR (%)	(5) NET OUTPUT FACTOR (%)	(6) AVG. NET HEAT RATE (BTU/KWH)	(7) FUEL BURNED (UNITS)	(8) FUEL HEAT VALUE (BTU/UNIT)	(9) FUEL BURNED (MMBTU)	(10) AS BURNED FUEL COST ($)	(11) FUEL COST PER KWH (¢/KWH)	(12) FUEL COST PER UNIT ($/UNIT)
TURN PEAKER 1-4												
Light Oil												
1994												
February	158	160.00	0	0	0	9,031	248	5,825,621	1,445	5,601	3.501	22.585
March	176	1,529.00	1	0	0	13,777	3,621	5,817,545	21,065	81,779	5.349	22.585
April	158	2,413.70	2	0	0	14,603	6,059	5,817,545	35,248	136,841	5.669	22.585
May	158	8,304.40	7	0	0	14,561	20,786	5,817,545	120,924	469,445	5.653	22.585
June	158	1,305.00	1	0	0	15,289	3,167	5,817,080	18,423	74,618	6.192	23.561
July	158	1,575.90	1	0	0	13,938	3,776	5,817,080	21,965	89,548	5.682	23.715
August	158	901.10	1	0	0	13,104	2,028	5,822,488	11,808	47,530	5.275	23.437
September	158	321.00	0	0	0	18,355	1,012	5,822,888	5,892	23,637	7.364	23.357
October	158	257.20	0	0	0	16,388	724	5,822,088	4,215	16,910	6.575	23.356
November	158	0.00	0	0	0	0	238	5,822,088	1,385	7,155	0.000	30.063
December	158	0.00	0	0	0	0	0	0	0	0	0.000	0.000
1995												
January	158	0.00	0	0	0	0	0	0	0	0	0.000	0.000
February	181	736.30	1	0	0	15,445	1,943	5,853,307	11,372	45,978	6.244	23.663
March	158	234.00	0	0	0	19,137	765	5,853,307	4,478	18,102	7.736	23.663
April	158	78.10	0	0	0	74,571	995	5,853,307	5,824	23,525	30.122	23.643
May	158	3,431.50	3	0	0	15,232	8,930	5,853,307	52,270	211,134	6.153	23.643
June	158	2,701.00	2	0	0	16,110	7,434	5,853,307	43,513	177,206	6.561	23.837
July	158	2,601.60	2	0	0	15,406	6,321	5,853,307	36,999	149,202	6.213	23.604
August	158	5,689.90	5	0	0	15,595	15,360	5,853,307	88,735	353,195	6.207	23.298
September	158	1,185.00	1	0	0	14,186	2,872	5,853,307	16,811	66,752	5.633	23.242
October	158	717.40	1	0	0	15,453	1,894	5,853,307	11,086	43,922	6.122	23.190
November	158	106.70	0	0	0	18,875	344	5,853,307	2,014	7,973	7.472	23.177
December	158	268.00	0	0	0	20,052	918	5,853,307	5,374	21,277	7.939	23.178
1996												
January	206	4,642.70	3	0	0	13,906	11,030	5,853,307	64,563	281,788	6.069	25.547
February	165	5,129.00	4	0	0	13,871	12,154	5,853,307	71,142	308,771	6.020	25.405
March	160	2,198.70	2	0	0	13,849	5,202	5,853,307	30,449	132,450	6.024	25.461
April	158	389.60	0	0	0	16,437	1,094	5,853,307	6,404	27,855	7.150	25.462
May	158	3,909.80	3	0	0	15,290	10,213	5,853,307	59,780	269,681	6.898	26.406
June	158	0.00	0	0	0	0	0	0	0	1,351	0.000	0.000
July	158	1,407.00	1	0	0	15,293	3,676	5,853,307	21,517	94,370	6.707	25.672
August	158	287.00	0	0	0	19,049	934	5,853,307	5,467	23,977	8.354	25.671
September	158	753.00	1	0	0	15,027	1,933	5,853,307	11,315	49,624	6.590	25.672
October	158	0.00	0	0	0	0	54	5,853,307	316	1,383	0.000	25.611
Total												
1994												
January	158	338.70	0	0	0	13,930	0	0	4,718	19,825	5.853	0.000

Notes :

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Unit quantity by fueltype : Coal-TON, Light Oil-BBL, Heavy Oil-BBL, Natural Gas-CF, Nuclear-MBTU

Martin Costello

Schedule A-4 Monthly Report
FLORIDA POWER CORPORATION
- January 1994 through October 1996 -

01/15/1997

Generating Unit / Fuel / Year / Month	(1) NET CAPABILITY (MW)	(2) NET GENERATION (MWH)	(3) CAP FACTOR (%)	(4) EQUIV AVAIL FACTOR (%)	(5) NET OUTPUT FACTOR (%)	(6) AVG. NET HEAT RATE (BTU/KWH)	(7) FUEL BURNED (UNITS)	(8) FUEL HEAT VALUE (BTU/UNIT)	(9) FUEL BURNED (MMBTU)	(10) AS BURNED FUEL COST ($)	(11) FUEL COST PER KWH (¢/KWH)	(12) FUEL COST PER UNIT ($/UNIT)
TURN PRAKER 1-4												
Total												
1994												
February	158	160.00	0	0	0	9,031	0	0	1,445	5,601	3.501	0.000
March	176	1,529.00	1	0	0	13,777	0	0	21,065	81,779	5.349	0.000
April	158	2,413.70	2	0	0	14,603	0	0	35,248	136,841	5.669	0.000
May	158	8,304.40	7	0	0	14,561	0	0	120,924	469,445	5.653	0.000
June	158	1,205.00	1	0	0	15,289	0	0	18,423	74,618	6.192	0.000
July	158	1,575.90	1	0	0	13,938	0	0	21,965	89,548	5.682	0.000
August	158	901.10	1	0	0	13,104	0	0	11,808	47,530	5.275	0.000
September	158	321.00	0	0	0	18,355	0	0	5,892	23,637	7.364	0.000
October	158	257.20	0	0	0	16,388	0	0	4,215	16,910	6.575	0.000
November	158	0.00	0	0	0	0	0	0	1,385	7,155	0.000	0.000
December	158	0.00	0	0	0	0	0	0	0	0	0.000	0.000
1995												
January	158	0.00	0	0	0	0	0	0	0	0	0.000	0.000
February	181	736.30	1	0	0	15,445	0	0	11,372	45,978	6.245	0.000
March	158	234.00	0	0	0	19,137	0	0	4,478	18,102	7.736	0.000
April	158	78.10	0	0	0	74,571	0	0	5,824	23,525	30.122	0.000
May	158	3,431.50	3	0	0	15,232	0	0	52,270	211,134	6.153	0.000
June	158	2,701.00	2	0	0	16,110	0	0	43,513	177,206	6.561	0.000
July	158	2,401.60	2	0	0	15,406	0	0	36,999	149,202	6.213	0.000
August	158	5,689.90	5	0	0	15,595	0	0	88,735	353,195	6.207	0.000
September	158	1,185.00	1	0	0	14,186	0	0	16,811	66,752	5.633	0.000
October	158	717.40	1	0	0	15,453	0	0	11,086	43,922	6.122	0.000
November	158	106.70	0	0	0	18,875	0	0	2,014	7,973	7.472	0.000
December	158	268.00	0	0	0	20,052	0	0	5,374	21,277	7.939	0.000
1996												
January	206	4,642.70	3	0	0	13,906	0	0	64,563	281,788	6.070	0.000
February	165	5,129.00	4	0	0	13,871	0	0	71,142	308,771	6.020	0.000
March	160	2,198.70	2	0	0	13,849	0	0	30,449	132,450	6.024	0.000
April	158	389.60	0	0	0	16,437	0	0	6,404	27,855	7.150	0.000
May	158	3,909.80	3	0	0	15,290	0	0	59,780	269,681	6.898	0.000
June	158	0.00	0	0	0	0	0	0	0	1,351	0.000	0.000
July	158	1,407.00	1	0	0	15,293	0	0	21,517	94,370	6.707	0.000
August	158	287.00	0	0	0	19,049	0	0	5,467	23,977	8.354	0.000
September	158	753.00	1	0	0	15,027	0	0	11,315	49,624	6.590	0.000
October	158	0.00	0	0	0	0	0	0	316	1,383	0.000	0.000
U-OF-FLA UNIT 1												
Light Oil												
1994												
February	0	0.00	0	0	0	0	127	5,716,530	726	3,195	0.000	25.157

Notes :

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Unit quantity by fueltype : Coal-TON, Light Oil-BBL, Heavy Oil-BBL, Natural Gas-CF, Nuclear-MBTU

Schedule A-4 Monthly Report
FLORIDA POWER CORPORATION
- January 1994 through October 1996 -

Generating Unit / Fuel / Year / Month	(1) NET CAPABILITY (MW)	(2) NET GENERATION (MWH)	(3) CAP FACTOR (%)	(4) EQUIV AVAIL FACTOR (%)	(5) NET OUTPUT FACTOR (%)	(6) AVG. NET HEAT RATE (BTU/KWH)	(7) FUEL BURNED (UNITS)	(8) FUEL HEAT VALUE (BTU/UNIT)	(9) FUEL BURNED (MMBTU)	(10) AS BURNED FUEL COST ($)	(11) FUEL COST PER KWH (¢/KWH)	(12) FUEL COST PER UNIT ($/UNIT)
U-OF-FLA UNIT 1												
Light Oil												
1994												
March	0	0.00	0	0	0	0	110	5,725,499	630	2,927	0.000	26.609
April	0	0.00	0	0	0	0	155	5,738,681	890	3,758	0.000	24.245
July	39	0.00	51	0	0	0	1	0	0	24	0.000	24.000
October	39	0.00	58	0	0	0	164	5,740,115	942	3,940	0.000	24.024
December	39	0.00	57	0	0	0	582	5,740,115	3,340	15,785	0.000	27.122
1995												
January	0	0.00	0	0	0	0	126	5,740,115	724	3,423	0.000	27.167
February	36	0.00	81	0	0	0	455	5,740,115	2,612	11,530	0.000	25.341
March	39	0.00	66	0	0	0	148	5,749,327	850	4,721	0.000	31.859
April	39	0.00	75	0	0	0	3	5,862,877	18	73	0.000	24.333
May	39	0.00	67	0	0	0	693	5,862,877	4,063	18,020	0.000	26.003
June	39	0.00	80	0	0	0	689	5,862,877	4,040	17,943	0.000	26.042
August	39	0.00	81	0	0	0	3	5,862,877	18	78	0.000	26.000
September	39	0.00	87	0	0	0	2	5,862,877	12	52	0.000	26.000
October	39	0.00	80	0	0	0	1	5,862,877	6	26	0.000	26.000
1996												
February	0	0.00	0	0	0	0	102	5,862,877	598	2,656	0.000	26.039
April	0	0.00	0	0	0	0	3	5,854,255	18	79	0.000	26.333
July	42	0.00	82	0	0	0	81	5,854,255	474	2,141	0.000	26.432
September	42	0.00	81	0	0	0	2	5,854,255	12	53	0.000	26.500
Heavy Oil												
1994												
May	39	0.00	44	0	51	574,031	5	293	1,236	0	0.000	24.235
Natural Gas												
1994												
January	36	72.50	0	0	0	101,959	7,060	1,047	7,392	144,421	199.201	20.456
February	39	12,150.00	46	0	0	15,626	182,558	1,040	189,860	540,046	4.445	2.958
March	39	22,654.80	78	0	0	11,197	242,279	1,047	253,666	663,776	2.930	2.740
April	39	18,233.00	65	0	0	11,720	205,273	1,041	213,689	473,468	2.597	2.307
May	0	12,772.20	0	0	0	14,120	174,077	1,036	180,344	390,346	3.056	2.242
June	39	13,120.40	47	0	0	14,717	187,288	1,031	193,093	476,906	3.635	2.546
July	0	14,881.00	0	0	0	12,943	184,844	1,042	192,608	353,493	2.375	1.912
August	39	5,684.00	20	0	0	23,545	129,055	1,037	133,830	237,735	4.183	1.842
September	38	4,367.00	16	0	0	49,160	207,621	1,034	214,680	500,281	11.456	2.410
October	0	16,751.20	0	0	0	12,708	206,474	1,031	212,874	340,509	2.033	1.649
November	39	18,831.30	67	0	0	12,217	223,790	1,028	230,057	444,842	2.362	1.988
December	0	16,677.30	0	0	0	13,752	206,478	1,030	212,673	418,301	2.508	2.026
1995												
January	39	20,630.50	71	0	0	12,125	242,392	1,032	250,148	446,925	2.166	1.844

Notes :

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Unit quantity by fueltype : Coal-TON, Light Oil-BBL, Heavy Oil-BBL, Natural Gas-CF, Nuclear-MBTU

Schedule A-4 Monthly Report
FLORIDA POWER CORPORATION
- January 1994 through October 1996 -

01/15/1997

Generating Unit / Fuel / Year / Month	(1) NET CAPABILITY (MW)	(2) NET GENERATION (MWH)	(3) CAP FACTOR (%)	(4) EQUIV AVAIL FACTOR (%)	(5) NET OUTPUT FACTOR (%)	(6) AVG. NET HEAT RATE (BTU/KWH)	(7) FUEL BURNED (UNITS)	(8) FUEL HEAT VALUE (BTU/UNIT)	(9) FUEL BURNED (MMBTU)	(10) AS BURNED FUEL COST ($)	(11) FUEL COST PER KWH (¢/KWH)	(12) FUEL COST PER UNIT ($/UNIT)
U-OF-FLA UNIT 1												
Natural Gas												
1995												
February	0	19,614.10	0	0	0	11,520	218,946	1,032	225,952	397,801	2.028	1.817
March	0	19,272.00	0	0	0	12,388	231,340	1,032	238,742	377,201	1.957	1.631
April	0	20,958.40	0	0	0	11,231	227,552	1,034	235,392	430,879	2.056	1.893
May	0	19,489.10	0	0	0	11,159	209,923	1,036	217,481	443,675	2.277	2.114
June	0	22,345.50	0	0	0	11,621	250,897	1,035	259,678	521,831	2.335	2.080
July	36	22,548.80	84	0	0	11,065	241,073	1,035	249,510	564,548	2.503	2.350
August	0	23,529.60	0	0	0	10,825	246,330	1,034	254,704	416,142	1.769	1.689
September	0	24,515.80	0	0	0	10,510	248,946	1,035	257,658	729,195	2.974	2.929
October	0	24,059.90	0	0	0	10,301	239,470	1,035	247,852	390,348	1.622	1.630
November	36	23,225.40	90	0	0	10,597	237,338	1,037	246,120	439,025	1.890	1.850
December	39	26,602.30	92	0	0	10,653	270,153	1,049	283,391	-168,285	-0.633	-0.623
1996												
January	36	26,696.40	100	0	0	10,940	278,423	1,049	292,065	831,369	3.114	2.986
February	39	24,920.20	92	0	0	10,747	255,803	1,047	267,825	626,559	2.514	2.449
March	42	28,128.40	90	0	0	10,286	276,863	1,045	289,321	753,333	2.678	2.721
April	42	24,480.40	81	0	0	10,887	255,523	1,043	266,510	710,960	2.904	2.782
May	42	20,185.10	65	0	0	11,279	218,274	1,043	227,661	827,243	4.098	3.790
June	42	26,522.90	88	0	0	9,932	253,289	1,040	263,421	544,901	2.054	2.151
July	0	25,577.00	0	0	0	10,577	259,379	1,043	270,533	713,722	2.790	2.752
August	42	26,132.90	84	0	0	10,128	253,767	1,043	264,679	625,777	2.395	2.466
September	0	24,371.80	0	0	0	10,282	241,657	1,037	250,598	440,687	1.808	1.824
October	42	25,717.40	82	0	0	10,874	269,662	1,037	279,639	530,279	2.062	1.966
Total												
1994												
January	36	72.50	0	0	0	101,959	0	0	7,392	144,421	199.201	0.000
February	39	12,150.00	46	0	0	15,686	0	0	190,586	543,241	4.471	0.000
March	39	22,654.80	78	0	0	11,225	0	0	254,296	666,703	2.943	0.000
April	39	18,233.00	65	0	0	11,769	0	0	214,579	477,226	2.617	0.000
May	39	12,772.20	44	0	51	14,217	0	0	181,580	390,346	3.056	0.000
June	39	13,120.40	47	0	0	14,717	0	0	193,093	476,906	3.635	0.000
July	39	14,881.00	51	0	0	12,943	0	0	192,608	353,517	2.376	0.000
August	39	5,684.00	20	0	0	23,545	0	0	133,830	237,735	4.183	0.000
September	38	4,367.00	16	0	0	49,160	0	0	214,680	500,281	11.456	0.000
October	39	16,751.20	58	0	0	12,764	0	0	213,816	344,449	2.056	0.000
November	39	18,831.30	67	0	0	12,217	0	0	230,057	444,842	2.362	0.000
December	39	16,677.30	57	0	0	12,953	0	0	216,013	434,086	2.603	0.000
1995												
January	39	20,630.50	71	0	0	12,169	0	0	250,872	450,348	2.183	0.000

Notes :

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Unit quantity by fueltype : Coal-TON, Light Oil-BBL, Heavy Oil-BBL, Natural Gas-CF, Nuclear-MBTU

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FLORIDA POWER CORPORATION
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Generating Unit / Fuel / Year / Month	(1) NET CAPABILITY (MW)	(2) NET GENERATION (MWH)	(3) CAP FACTOR (%)	(4) EQUIV AVAIL FACTOR (%)	(5) NET OUTPUT FACTOR (%)	(6) AVG. NET HEAT RATE (BTU/KWH)	(7) FUEL BURNED (UNITS)	(8) FUEL HEAT VALUE (BTU/UNIT)	(9) FUEL BURNED (MMBTU)	(10) AS BURNED FUEL COST ($)	(11) FUEL COST PER KWH (¢/KWH)	(12) FUEL COST PER UNIT ($/UNIT)
U-OF-FLA UNIT 1												
Total												
1995												
February	36	19,614.10	81	0	0	11,653	0	0	228,564	409,331	2.087	0.000
March	39	19,272.00	66	0	0	12,432	0	0	239,592	381,922	1.982	0.000
April	39	20,958.40	75	0	0	11,232	0	0	235,410	430,952	2.056	0.000
May	39	19,489.10	67	0	0	11,368	0	0	221,544	461,695	2.369	0.000
June	39	22,345.50	80	0	0	11,802	0	0	263,718	539,774	2.416	0.000
July	36	22,548.80	84	0	0	11,065	0	0	249,510	566,548	2.513	0.000
August	39	23,529.60	81	0	0	10,826	0	0	254,722	416,220	1.769	0.000
September	39	24,515.80	87	0	0	10,510	0	0	257,670	729,247	2.975	0.000
October	39	24,059.90	83	0	0	10,302	0	0	247,858	390,174	1.623	0.000
November	36	23,225.40	90	0	0	10,597	0	0	246,120	439,925	1.890	0.000
December	39	26,602.30	92	0	0	10,653	0	0	283,391	-168,185	-0.633	0.000
1996												
January	36	26,696.40	100	0	0	10,940	0	0	292,065	831,369	3.114	0.000
February	39	24,920.20	92	0	0	10,771	0	0	268,423	629,215	2.525	0.000
March	42	28,128.40	90	0	0	10,286	0	0	289,321	753,333	2.678	0.000
April	42	24,480.40	81	0	0	10,887	0	0	266,528	711,039	2.905	0.000
May	42	20,185.10	65	0	0	11,279	0	0	227,661	827,243	4.098	0.000
June	42	26,522.90	88	0	0	9,932	0	0	263,421	544,901	2.055	0.000
July	42	25,577.00	82	0	0	10,596	0	0	271,007	715,863	2.799	0.000
August	42	26,132.90	84	0	0	10,128	0	0	264,679	625,777	2.395	0.000
September	42	24,371.80	81	0	0	10,283	0	0	250,610	440,740	1.808	0.000
October	42	25,717.40	82	0	0	10,874	0	0	279,639	530,279	2.062	0.000
ANCLOTE 1												
Light Oil												
1994												
January	0	0.00	0	0	0	0	2,989	5,928,040	17,719	66,259	0.000	22.168
February	0	0.00	0	0	0	0	1,227	5,928,040	7,274	28,483	0.000	23.214
March	0	0.00	0	0	0	0	2,674	5,928,040	15,852	60,512	0.000	22.630
April	0	0.00	0	0	0	0	2,804	5,928,040	16,622	62,193	0.000	22.180
May	0	0.00	0	0	0	0	3,021	5,928,040	17,909	66,876	0.000	22.137
June	0	0.00	0	0	0	0	2,991	5,928,040	17,731	67,417	0.000	22.540
July	0	0.00	0	0	0	0	3,132	5,928,040	18,567	71,486	0.000	22.824
August	0	0.00	0	0	0	0	2,970	5,928,040	17,606	68,808	0.000	23.168
September	0	0.00	0	0	0	0	2,802	5,864,625	16,433	64,005	0.000	22.843
December	0	0.00	0	0	0	0	3,366	5,877,695	19,784	76,499	0.000	22.727
1995												
January	0	0.00	0	0	0	0	2,492	5,864,625	14,615	56,622	0.000	22.722

Notes :

$ Symbol indicates unresolved or potential problems.
Source: 'AS FILED' data reported from S:\PSC\EAG\RATE\SCHA_SYS\A4FPCSAV.DBF
Unit quantity by fueltype : Coal-TON, Light Oil-BBL, Heavy Oil-BBL, Natural Gas-CF, Nuclear-MBTU

Florida Power
CORPORATION

January 27, 1997

Mr. Al Linero, P.E.
Administrator, New Source Review Section
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Linero:

Re: Request to Burn Natural Gas in FPC Combustion Turbines
DeBary DEP Permit No. AO49-203114
Suwannee DEP Permit No. AO61-189579

Florida Power Corporation (FPC) has the opportunity to use, on an interruptible basis, natural gas as a supplemental fuel in peaking units at DeBary (P7-P10) and Suwannee (P1-P3). Accordingly, on November 7, 1996, FPC submitted an application for an air construction permit to install natural gas-firing capability at the DeBary site. (An application for the Suwannee site followed on December 16, 1996.) Additional information was requested by Department letter (dated December 2, 1996) regarding: whether FPC had intended to fire gas in these units when they were originally constructed, what modifications were necessary to burn gas, fuel costs, the description of any restrictions or limitations in our natural gas contract, the feasibility and economics of installing dry low NO_x combustors in these units, and an emissions comparison of the before and after case to determine PSD applicability. FPC responded to these issues in a letter to the Department dated January 6, 1997. In follow-up conversations with the Department, FPC was requested to supply additional information regarding the PSD applicability issue. Although the Department has only formally requested this additional information for DeBary, the issue is the same for the proposed Suwannee conversion. Therefore, this letter serves to transmit the additional information it is believed that the Department requires for both the DeBary and Suwannee plant sites.

The salient issue in the permitting of the DeBary and Suwannee peaker conversions to natural gas is the Department's position regarding PSD applicability. Such a determination is based on comparing past emissions to emissions after the proposed modification. The Department may use several different approaches to conduct this determination: past actual-to-future actual, past actual-to-future potential, or past potential-to-future potential.

A comparison of past actual-to-future potential emissions will nearly always result in a determination of PSD applicability, as the past actual operating history of a unit rarely comes close to the allowable operating limit. This is particularly true for peaking units, whose operating capacities are dependent on the operability of other base load units within the FPC generating mix. FPC believes that it is inappropriate to use a past actual-to-future potential emissions test for these peaker conversions as, by definition, the nature of a peaker's operation is highly variable.

To demonstrate this point, FPC's System Planning Department has conducted several computer runs of the estimated operating hours of all the peaking units within our system for four scenarios. These scenarios are based on the fact that FPC's Crystal River nuclear facility will be inoperable until the fourth quarter of 1997. These scenarios are meant to illustrate how dependent each peaker's operating schedule is on other factors within FPC's system, rather than just what happens at a particular peaker site, such as a natural gas conversion. The four scenarios are: 1) assuming the nuclear unit remains in operation for 1997 (baseline), and the proposed gas conversions do not take place; 2) assuming the nuclear unit remains in operation for 1997 and the proposed gas conversions occur; 3) assuming the nuclear unit will not be in operation until October 1, 1997 and the gas conversions do not occur; and 4) assuming the nuclear unit will not be in operation until October 1, 1997 and the proposed gas conversions occur.

The attached Table 1 was constructed from the System Planning data discussed above, as well as Annual Operating Reports for the years 1993 through 1996. Table 1 provides a view of annual operating hours for a five year period (including estimated hours for 1997, under four different scenarios), for the peakers at Suwannee (P1-P3), DeBary (P7-P10), and the peakers converted to natural gas at Intercession City (P7-P10). It's interesting to note that the nuclear unit being down has the effect of almost doubling FPC's systemwide peaker operating hours (i.e., Cases S1 and S2 of approximately 21,000 hours vs. cases S3 and S4 of approximately 37,000 hours). Cases S3 and S4 show that, with the nuclear unit down and the proposed gas conversion, the systemwide peaker hours actually decrease slightly. It's interesting to note that if the nuclear unit had not gone down and the proposed gas conversions were to take place Case S2), *in no instance would any of these peakers of interest have operated more than they are projected to operate this year on oil with the nuclear unit down* (Case S3). All background data used in compiling this table is included in an appendix to this letter.

EPA's discussion of current law in the WEPCo rule preamble makes clear that, by limiting the revised rule regarding the so-called "demand growth exclusion" to electric utility steam generating units, the Agency did <u>not</u> intend to foreclose application of the similar exclusion that is currently available to all other sources. In the preamble, EPA expressly recognizes that the "NSR regulatory provisions require that the physical or operational change *result in* an increase in actual emissions in order to consider that change to be a modification." According to EPA the "new provision does not diminish the scope of coverage of the NSR regulations."57 Fed. Reg. at 32,327. In other words, EPA expressly recognizes that, under current law applicable to <u>all</u> sources, the "result in" language of the NSR regulations demands that emissions attributable to factors independent of a physical or operational change (e.g., demand growth, other external factors, etc.) be excluded from calculating an emission increase following that physical or operational change. EPA continues, where "projected increased operations are in response to an independent factor such as demand growth, <u>which could have occurred and</u>

affected the unit's operations during the representative baseline period even in the absense of the physical or operational change," such increased operations "cannot be said to result from the change and therefore may be excluded from the projection of the unit's future actual emissions." Id. (emphasis added). Again, as stated above, a comparison of Cases S2 and S3 illustrate that the increase in operating hours of the subject peakers would have occurred even in the absence of the proposed modifications.

Under the State of Florida's definition of actual emissions (62-210.200(12)(b)), the Department may presume that unit-specific allowable emissions for an emission unit are equivalent to the actual emissions (i.e., past actuals may be considered to be equivalent to allowable emissions) provided that, for any regulated air pollutant, such unit-specific allowable emission limits are federally enforceable. It is important to note that comparing potential-to-potential emissions for the switch from No. 2 fuel oil to natural gas results in significant decreases of all criteria pollutants, except for the case of CO and VOC emissions at Suwannee, where slight increases are predicted. The potential comparisons in the following tables are based on maximum allowable operation at each site (i.e., 1,500 hr/yr at Suwannee and 3,390 hr/yr at DeBary).

DeBary Conversion- Emissions Comparison

Pollutant	No. 2 Fuel Oil		Natural Gas	
	lb/hr	tons/yr	lb/hr	tons/yr
NO_x	182	1,234	107	726
PM/PM_{10}	17	116	7.5	51
CO	54	365	21	144
VOCs	5	34	3	20
SO_2	555	1,925	3	20
SAM	69	469	0.4	3

Suwannee Conversion- Emissions Comparison

Pollutant	No. 2 Fuel Oil		Natural Gas	
	lb/hr	tons/yr	lb/hr	tons/yr
NO_x	210	473	144	323
PM/PM_{10}	38	86	31	70
CO	179	402	193	435
VOCs	23	51	25	56
SO_2	379	853	2	5
SAM	12	26	0.4	1

FPC hopes that the information given satisfactorily addresses your questions. FPC wishes to use the limited amount of natural gas which has become available to it. The already-installed water injection control technology will limit NO_x emissions, reducing emissions when compared to those from burning fuel oil, and resulting in a benefit to the environment.

Please feel free to contact me at (813) 866-5158 if you should have any questions.

Sincerely,

Scott H. Osbourn
Senior Environmental Engineer

Attachments

cc: Martin Costello, DEP DARM
Chris Kirts, DEP NE District
Len Kozlov, DEP Central District
Ken Kosky, KBN/Golder

TABLE 1. FPC PEAKER OPERATING HISTORY AND PROJECTIONS

UNIT		OPERATING HOURS							
		1993	1994	1995	1996	S1	S2	S3	S4
Suwannee									
	P1	329	92	98	196	355	440	979	1223
	P2	308	100	94	215	155	236	565	952
	P3	174	61	86	192	245	285	763	1070
DeBary									
	P7	17	499	438	663	523	1053	1157	1653
	P8	679	492	371	711	467	999	1125	1612
	P9	573	426	439	753	392	914	1016	1488
	P10	728	382	379	630	288	854	870	1426
Int. City									
	P7	193	873	649	1125	1299	1025	2139	1851
	P8	222	724	562	1269	1193	909	1992	1698
	P9	68	697	715	1177	1090	801	1854	1557
	P10	155	579	512	1186	992	697	1732	1411
Total Systemwide Peaker Hours						21,427	21,013	37,316	36,731

S1 -- nuclear unit operating, no gas conversions
S2 -- nuclear unit operating, with gas conversions
S3 -- nuclear unit down until 10/1/97, no gas conversions
S4 -- nuclear unit down until 10/1/97, with gas conversions

S1--- NUCLEAR UNIT OPERATING, NO GAS CONVERSIONS

PM-960543
01/22/97

FORECAST OF UNIT SERVICE HOURS FOR 1997

UNIT		JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	ANNUAL
DEBARY	1	15	9	4	0	11	51	79	82	55	3	1	9	319
DEBARY	2	19	12	14	5	34	107	167	161	119	10	9	14	671
DEBARY	3	14	9	5	0	5	34	54	61	38	1	1	7	230
DEBARY	4	11	6	1	0	1	15	24	32	16	0	0	6	113
DEBARY	5	12	6	2	0	1	15	23	31	16	0	0	6	111
DEBARY	6	16	10	10	2	27	90	138	135	98	7	6	12	552
DEBARY	7	17	10	7	1	19	89	134	132	96	5	2	12	523
DEBARY	8	16	10	8	1	24	78	114	113	82	7	3	11	467
DEBARY	9	15	9	6	0	14	67	98	98	70	4	2	10	392
DEBARY	10	14	9	9	2	7	43	69	73	48	2	5	8	288
INT CITY	1	7	4	6	0	0	4	7	10	4	0	1	2	45
INT CITY	2	2	1	0	0	0	1	3	5	2	0	0	0	14
INT CITY	3	4	2	6	0	0	8	12	17	8	0	1	1	60
INT CITY	4	2	1	1	0	0	2	4	6	2	0	0	1	20
INT CITY	5	8	5	10	2	0	9	14	19	9	0	6	3	85
INT CITY	6	3	2	6	0	0	5	9	13	6	0	1	1	46
INT CITY	7	30	18	33	45	153	177	262	240	213	64	37	25	1,299
INT CITY	8	28	18	28	36	131	166	250	229	199	54	31	24	1,193
INT CITY	9	27	17	25	29	109	153	236	218	183	44	27	22	1,090
INT CITY	10	25	16	19	22	91	140	223	207	169	36	23	21	992
INT CITY	11	20	13	15	8	48	0	0	0	0	14	11	15	143
P SWAN	1	11	6	14	3	9	58	88	90	62	2	8	5	355
P SWAN	2	5	3	1	0	2	25	40	49	28	1	0	2	155
P SWAN	3	9	5	14	4	4	36	58	64	41	1	8	3	245

S2--- NUCLEAR UNIT OPERATING, WITH GAS CONVERSIONS

PM-960541
01/22/97

FORECAST OF UNIT SERVICE HOURS FOR 1997

UNIT		JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	ANNUAL
DEBARY	1	15	9	4	0	6	21	34	44	23	1	0	6	163
DEBARY	2	19	12	14	5	21	28	45	53	31	1	1	6	236
DEBARY	3	14	9	5	0	3	18	29	38	19	0	0	5	142
DEBARY	4	11	6	1	0	1	10	16	21	11	0	0	3	79
DEBARY	5	12	6	2	0	1	9	15	20	10	0	0	2	78
DEBARY	6	16	10	10	2	16	22	35	44	24	1	1	5	186
DEBARY	7	17	10	7	1	10	177	262	240	213	65	27	25	1,053
DEBARY	8	16	10	8	1	14	166	250	229	199	54	32	23	999
DEBARY	9	15	9	6	0	8	153	236	218	183	44	20	21	914
DEBARY	10	14	9	9	2	4	140	223	207	169	36	38	20	870
INT CITY	1	7	4	6	0	0	3	5	7	3	0	1	2	37
INT CITY	2	2	1	0	0	0	1	3	5	2	0	0	0	14
INT CITY	3	4	2	6	0	0	5	8	12	5	0	1	1	44
INT CITY	4	2	1	1	0	0	2	3	5	2	0	0	1	17
INT CITY	5	8	5	10	2	0	6	9	13	6	0	1	2	62
INT CITY	6	3	2	6	0	0	3	5	9	4	0	0	1	33
INT CITY	7	30	18	33	45	153	129	207	190	155	29	16	18	1,025
INT CITY	8	28	18	28	36	131	118	186	175	138	19	14	17	909
INT CITY	9	27	17	25	29	109	106	166	160	119	16	12	16	801
INT CITY	10	25	16	19	22	91	95	144	143	104	13	10	16	697
INT CITY	11	20	13	15	8	30	0	0	0	0	1	2	7	95
P SWAN	1	11	6	14	3	79	79	69	75	83	8	3	11	440
P SWAN	2	5	3	1	0	37	31	53	60	35	2	2	7	236
P SWAN	3	9	5	14	4	41	34	59	65	38	2	8	7	285

PM-960543
01/22/97

FORECAST OF UNIT SERVICE HOURS FOR 1997

UNIT		JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	ANNUAL
PAVON PK	1	20	12	15	11	54	109	171	164	124	16	13	15	724
PAVON PK	2	1	1	0	0	0	1	2	3	1	0	0	0	9
PBARTOW	1	6	3	1	0	0	2	3	5	2	0	0	2	25
PBARTOW	2	10	5	3	0	0	5	8	11	5	0	0	4	52
PBARTOW	3	10	5	1	0	0	3	5	9	4	0	0	4	41
PBARTOW	4	11	6	6	1	2	22	35	44	24	1	4	5	160
PBAYBORO	1	2	1	1	0	0	6	11	15	7	0	0	1	44
PBAYBORO	2	2	1	0	0	0	3	5	7	3	0	0	1	22
PBAYBORO	3	5	3	2	0	1	19	31	40	21	0	0	2	125
PBAYBORO	4	3	2	1	0	0	11	17	22	11	0	0	1	69
PHIGGINS	1	20	13	15	10	53	109	171	164	124	16	13	16	724
PHIGGINS	2	1	1	0	0	0	1	2	3	1	0	0	0	10
PHIGGINS	3	21	13	16	13	64	119	189	176	140	29	14	16	811
PHIGGINS	4	20	13	15	12	58	112	176	167	130	21	14	16	753
PINAR	1	1	1	0	0	0	1	1	3	1	0	0	0	9
PTURNER	1	1	1	0	0	0	1	1	3	1	0	0	0	8
PTURNER	2	1	1	0	0	0	1	1	3	1	0	0	0	8
PTURNER	3	13	8	3	0	3	30	47	55	33	1	0	7	201
PTURNER	4	11	6	2	0	0	10	16	22	11	0	0	6	84
ST JOE	1	1	1	0	0	0	1	1	3	1	0	0	0	8
UNIVERS	1	714	645	714	691	438	691	714	714	691	714	691	714	8,133
TOTAL		1,203	940	1,038	898	1,365	2,630	3,712	3,721	2,900	1,057	932	1,031	21,427

PM-960541
01/22/97

FORECAST OF UNIT SERVICE HOURS FOR 1997

UNIT		JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	ANNUAL
PAVON PK	1	20	12	15	11	47	39	65	70	43	3	3	8	335
PAVON PK	2	1	1	0	0	0	1	2	3	1	0	0	0	9
PBARTOW	1	6	3	1	0	0	60	96	96	63	5	6	13	349
PBARTOW	2	10	5	3	0	0	73	114	113	76	7	8	14	422
PBARTOW	3	10	5	1	0	0	66	105	105	69	6	7	13	388
PBARTOW	4	11	6	6	1	2	86	126	125	91	10	9	15	488
PBAYBORO	1	2	1	1	0	0	4	7	10	4	0	0	1	30
PBAYBORO	2	2	1	0	0	0	2	4	6	2	0	0	1	19
PBAYBORO	3	5	3	2	0	1	13	20	27	14	0	0	2	87
PBAYBORO	4	3	2	1	0	0	6	11	15	7	0	0	1	47
PHIGGINS	1	20	13	15	10	46	38	64	70	43	2	3	8	334
PHIGGINS	2	1	1	0	0	0	1	2	3	1	0	0	0	10
PHIGGINS	3	21	13	16	13	56	44	74	77	49	3	4	11	382
PHIGGINS	4	20	13	15	12	51	41	68	72	45	3	4	8	351
PINAR	1	1	1	0	0	0	1	1	3	1	0	0	0	9
PTURNER	1	1	1	0	0	0	1	1	3	1	0	0	0	8
PTURNER	2	1	1	0	0	0	1	1	3	1	0	0	0	8
PTURNER	3	13	8	3	0	2	15	24	32	16	0	0	4	120
PTURNER	4	11	6	2	0	0	7	11	15	7	0	0	3	61
ST JOE	1	1	1	0	0	0	1	1	3	1	0	0	0	8
UNIVERS	1	714	645	714	691	438	691	714	714	691	714	691	714	8,133
TOTAL		1,203	940	1,038	898	1,400	2,548	3,574	3,597	2,806	1,045	923	1,040	21,013

S3--- NUCLEAR UNIT DOWN TILL 10/1/97, NO GAS CONVERSIONS

PM-960542
01/22/97

FORECAST OF UNIT SERVICE HOURS FOR 1997

UNIT		JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	ANNUAL
DEBARY	1	20	13	7	0	88	150	237	219	182	3	1	9	929
DEBARY	2	26	15	19	23	181	220	315	285	260	10	9	14	1,377
DEBARY	3	18	12	7	1	52	120	193	181	142	1	1	7	736
DEBARY	4	15	9	3	0	15	67	103	102	73	0	0	6	393
DEBARY	5	16	10	5	0	14	65	99	99	71	0	0	6	385
DEBARY	6	23	13	15	12	151	189	275	248	225	7	6	12	1,176
DEBARY	7	23	14	14	3	125	192	283	255	230	5	2	12	1,157
DEBARY	8	21	13	14	5	148	179	267	242	216	7	3	11	1,125
DEBARY	9	20	13	12	2	103	166	252	230	201	4	2	10	1,016
DEBARY	10	19	12	15	9	63	136	219	202	165	2	5	8	854
INT CITY	1	11	6	9	1	2	20	31	31	20	0	1	2	135
INT CITY	2	2	1	1	0	0	8	13	13	8	0	0	0	47
INT CITY	3	6	3	10	2	5	36	55	55	38	0	1	1	214
INT CITY	4	3	2	2	0	1	12	19	19	12	0	0	1	69
INT CITY	5	12	7	16	11	7	41	64	64	44	0	6	3	275
INT CITY	6	4	2	8	1	3	27	42	42	28	0	1	1	159
INT CITY	7	63	38	74	156	283	312	381	360	345	64	37	25	2,139
INT CITY	8	57	33	59	119	268	297	369	348	333	54	31	24	1,992
INT CITY	9	52	29	48	91	255	283	355	334	315	44	27	22	1,854
INT CITY	10	48	26	38	72	238	269	343	320	299	36	23	21	1,732
INT CITY	11	30	17	23	33	198	0	0	0	0	14	11	15	341
P SWAN	1	15	9	17	16	76	160	248	228	194	2	8	5	979
P SWAN	2	7	4	1	0	29	101	156	152	113	1	0	2	565
P SWAN	3	13	8	17	19	42	123	199	183	148	1	8	3	763

PM-960542
01/22/97

FORECAST OF UNIT SERVICE HOURS FOR 1997

UNIT		JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	ANNUAL
PAVON PK	1	26	17	24	39	201	220	305	278	257	16	13	15	1,412
PAVON PK	2	1	1	0	0	0	6	9	9	6	0	0	0	32
PBARTOW	1	9	5	2	0	0	10	15	16	10	0	0	2	69
PBARTOW	2	14	9	6	0	2	23	36	36	24	0	0	4	155
PBARTOW	3	14	9	4	0	1	17	26	26	17	0	0	4	118
PBARTOW	4	15	9	14	6	24	91	138	135	100	1	4	5	542
PBAYBORO	1	4	2	1	0	4	31	48	48	33	0	0	1	172
PBAYBORO	2	2	1	1	0	1	14	22	22	14	0	0	1	79
PBAYBORO	3	8	5	5	0	20	84	127	125	91	0	0	2	468
PBAYBORO	4	5	3	2	0	9	47	73	73	51	0	0	1	265
PHIGGINS	1	24	17	24	38	207	221	310	282	259	16	13	16	1,427
PHIGGINS	2	2	1	1	0	0	6	9	9	6	0	0	0	34
PHIGGINS	3	34	18	28	48	210	237	317	292	271	29	14	16	1,515
PHIGGINS	4	30	17	26	43	202	224	304	279	259	21	14	16	1,434
PINAR	1	1	1	0	0	0	5	8	8	5	0	0	0	29
PTURNER	1	1	1	0	0	0	5	7	7	4	0	0	0	25
PTURNER	2	1	1	0	0	0	5	7	8	4	0	0	0	26
PTURNER	3	17	11	6	0	37	110	175	167	127	1	0	7	660
PTURNER	4	14	9	5	0	9	46	71	71	50	0	0	6	281
ST JOE	1	1	1	0	0	0	5	8	8	5	0	0	0	28
UNIVERS	1	714	645	714	691	438	691	714	714	691	714	691	714	8,133
TOTAL		1,464	1,089	1,298	1,442	3,714	5,274	7,246	6,825	5,945	1,057	932	1,031	37,316

S4--- NUCLEAR UNIT DOWN TILL 10/1/97, WITH GAS CONVERSIONS

PM-960540
01/22/97

FORECAST OF UNIT SERVICE HOURS FOR 1997

UNIT		JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	ANNUAL
DEBARY	1	20	13	7	0	57	90	137	134	98	1	0	6	563
DEBARY	2	26	15	19	23	137	108	169	163	122	1	1	6	792
DEBARY	3	18	12	7	1	37	80	121	119	87	0	0	5	488
DEBARY	4	15	9	3	0	15	45	69	69	49	0	0	3	276
DEBARY	5	16	10	5	0	14	43	67	66	46	0	0	2	269
DEBARY	6	23	13	15	12	109	89	138	134	100	1	1	5	640
DEBARY	7	23	14	14	3	85	312	381	360	345	65	27	25	1,653
DEBARY	8	21	13	14	5	103	297	369	348	333	54	32	23	1,612
DEBARY	9	20	13	12	2	69	283	355	334	315	44	20	21	1,488
DEBARY	10	19	12	15	9	47	269	343	320	299	36	38	20	1,426
INT CITY	1	11	6	9	1	2	14	22	22	14	0	1	2	105
INT CITY	2	2	1	1	0	0	8	13	13	8	0	0	0	47
INT CITY	3	6	3	10	2	5	23	36	36	24	0	1	1	149
INT CITY	4	3	2	2	0	1	10	15	16	10	0	0	1	59
INT CITY	5	12	7	16	11	7	27	42	42	28	0	1	2	196
INT CITY	6	4	2	8	1	3	17	26	26	17	0	0	1	107
INT CITY	7	63	38	74	156	283	255	329	306	284	29	16	18	1,851
INT CITY	8	57	33	59	119	268	235	317	290	269	19	14	17	1,698
INT CITY	9	52	29	48	91	255	215	296	276	252	16	12	16	1,557
INT CITY	10	48	26	38	72	238	198	280	252	221	13	10	16	1,411
INT CITY	11	30	17	23	33	167	0	0	0	0	1	2	7	280
P SWAN	1	15	9	17	16	226	175	263	241	239	8	3	11	1,223
P SWAN	2	7	4	1	0	183	141	225	208	171	2	2	7	952
P SWAN	3	13	8	17	19	186	158	241	221	191	2	8	7	1,070

PM-960540
01/22/97

FORECAST OF UNIT SERVICE HOURS FOR 1997

UNIT		JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	ANNUAL
PAVON PK	1	26	17	24	39	196	110	177	166	129	3	3	8	899
PAVON PK	2	1	1	0	0	0	6	9	9	6	0	0	0	32
PBARTOW	1	9	5	2	0	0	135	219	200	164	5	6	13	758
PBARTOW	2	14	9	6	0	2	157	244	224	190	7	8	14	876
PBARTOW	3	14	9	4	0	1	150	237	219	182	6	7	13	841
PBARTOW	4	15	9	14	6	24	179	267	243	209	10	9	15	1,000
PBAYBORO	1	4	2	1	0	4	20	31	31	21	0	0	1	114
PBAYBORO	2	2	1	1	0	1	12	19	19	12	0	0	1	68
PBAYBORO	3	8	5	5	0	20	57	89	88	62	0	0	2	335
PBAYBORO	4	5	3	2	0	9	31	49	49	33	0	0	1	182
PHIGGINS	1	24	17	24	38	201	111	175	167	128	2	3	8	898
PHIGGINS	2	2	1	1	0	0	6	9	9	6	0	0	0	34
PHIGGINS	3	34	18	28	48	205	121	196	181	145	3	4	11	994
PHIGGINS	4	30	17	26	43	197	114	182	171	135	3	4	8	929
PINAR	1	1	1	0	0	0	5	8	8	5	0	0	0	29
PTURNER	1	1	1	0	0	0	5	7	7	4	0	0	0	25
PTURNER	2	1	1	0	0	0	5	7	8	4	0	0	0	26
PTURNER	3	17	11	6	0	30	68	104	103	74	0	0	4	420
PTURNER	4	14	9	5	0	9	31	48	47	32	0	0	3	198
ST JOE	1	1	1	0	0	0	5	8	8	5	0	0	0	28
UNIVERS	1	714	645	714	691	438	691	714	714	691	714	691	714	8,133
TOTAL		1,464	1,089	1,298	1,442	3,836	5,112	7,052	6,670	5,759	1,045	923	1,040	36,731

Int. City 1993

APIS ID	District	Office	County	Facility	Source	INPUT
	3 0	0 R L	4 9	0 0 1 4	0 7	

SOURCE OPERATION REPORT - PAGE 1 & 2 (SOURCE REPORT 7 OF 10)

FACILITY NAME: Intercession City Combustion Turbine

SOURCE INFORMATION (AIR030)

1. Source Description		
A 92.9MW Simple Cycle Gas Combustion Turbine		
2. DEP Permit or PPS Number	3. Source APIS ID	4. Source Status
AC 49-203114	300RL49001407	A
5. Source Startup Date (MM/DD/YY)	6. Source Shutdown date (MM/DD/YY)	

SOURCE EMISSION POINT/CONTROL INFORMATION (AIR033)

1. Source Emission Point Type
Single Point
2a. Description of Control Equipment "a"
Water Injection
2b. Description of Control Equipment "b"
No Controls

SOURCE OPERATING SCHEDULE INFORMATION (AIR050)

1. Operated During Year?	2. Average Operation During Year	hour/day	day/week	3. Total Operation During Year (hour/year)	
Yes		24	7	193	
4. Percent Hours of Operation by Season		OJF	MAM	JJA	SON
		0%	0%	0%	100%

Shaded areas are for DEP use.

APIS ID	District	Office	County	Facility	Source	INPUT
	3 0	0 R L	4 9	0 0 1 4	0 8	

SOURCE OPERATION REPORT - PAGE 1 & 2 (SOURCE REPORT 8 OF 10)

FACILITY NAME: Intercession City Combustion Trubine

SOURCE INFORMATION (AIR030)

1. Source Description		
A 92.9 MW Simple Cycle Combustion Turbine		
2. DEP Permit or PPS Number	3. Source APIS ID	4. Source Status
AC 49-203114	300RL49001408	A
5. Source Startup Date (MM/DD/YY)	6. Source Shutdown date (MM/DD/YY)	

SOURCE EMISSION POINT/CONTROL INFORMATION (AIR033)

1. Source Emission Point Type
Single Point
2a. Description of Control Equipment "a"
Water Injection
2b. Description of Control Equipment "b"
No Controls

SOURCE OPERATING SCHEDULE INFORMATION (AIR050)

1. Operated During Year?	2. Average Operation During Year	hour/day	day/week	3. Total Operation During Year (hour/year)	
Yes		24	7	222	
4. Percent Hours of Operation by Season		DJF	MAM	JJA	SON
		0%	0%	0%	100%

Shaded areas are for DEP use.

APIS ID	District	Office	County	Facility	Source	INPUT
	3 0	0 R L	4 9	0 0 1 4	0 9	

SOURCE OPERATION REPORT - PAGE 1 & 2 (SOURCE REPORT 9 OF 10)

FACILITY NAME: Intercession City Combustion Turbine

SOURCE INFORMATION (AIR030)

1. Source Description		
A 92.9MW Simple Cycle Gas Combustion Turbine		
2. DEP Permit or PPS Number	3. Source APIS ID	4. Source Status
AC 49-203114	300RL49001409	A
5. Source Startup Date (MM/DD/YY)	6. Source Shutdown date (MM/DD/YY)	

SOURCE EMISSION POINT/CONTROL INFORMATION (AIR033)

1. Source Emission Point Type
Single Point
2a. Description of Control Equipment "a"
Water Injection
2b. Description of Control Equipment "b"
No Controls

SOURCE OPERATING SCHEDULE INFORMATION (AIR050)

1. Operated During Year?	2. Average Operation During Year	hour/day	day/week	3. Total Operation During Year (hour/year)	
Yes		24	7	68	
4. Percent Hours of Operation by Season		DJF	MAM	JJA	SON
		0%	0%	0%	100%

Shaded areas are for DEP use.

APIS ID	District	Office	County	Facility	Source	INPUT
	3 0	0 R L	4 9	0 0 1 4	1 0	

SOURCE OPERATION REPORT - PAGE 1 & 2 (SOURCE REPORT 10 OF 10)

FACILITY NAME: **Intercession City Combustion Turbine**

SOURCE INFORMATION (AIR030)

1. Source Description		
A 92.9MW Simple Cycle Combustion Turbine		
2. DEP Permit or PPS Number	3. Source APIS ID	4. Source Status
AC 49-203114	**300RL49001410**	**A**
5. Source Startup Date (MM/DD/YY)	6. Source Shutdown date (MM/DD/YY)	

SOURCE EMISSION POINT/CONTROL INFORMATION (AIR033)

1. Source Emission Point Type
Single Point
2a. Description of Control Equipment "a"
Water Injection
2b. Description of Control Equipment "b"
No Controls

SOURCE OPERATING SCHEDULE INFORMATION (AIR050)

1. Operated During Year?	2. Average Operation During Year	hour/day	day/week	3. Total Operation During Year (hour/year)	
Yes		**24**	**7**	**155**	
4. Percent Hours of Operation by Season		DJF	MAM	JJA	SON
		0%	0%	0%	100%

Shaded areas are for DEP use.

Int. City 1994

	DISTRICT	OFFICE	COUNTY	FACILITY	EMISSIONS UNIT	
APIS ID	30	ORL	49	0014	07	INPUT

EMISSIONS UNIT OPERATION REPORT (EMISSIONS UNIT REPORT 7 OF 12)

FACILITY NAME: FLORIDA POWER

EMISSIONS UNIT INFORMATION

1. Emissions Unit Description		2. Ozone SIP Base Year Emissions Unit?
A 92.9MW SIMPLE CYCLE GAS COMBUSTION TURBINE		No
3. DEP Permit or PPS Number	4. Emissions Unit ID	5. Emissions Unit Status
AC49203114	30ORL49001407	ACTIVE
6. Emissions Unit Startup Date	7. Long-term Reserve Shutdown Date	8. Permanent Shutdown Date

EMISSION POINT/CONTROL INFORMATION

1. Emission Point Type
SINGLE POINT
2a. Description of Control Equipment 'a'
Water injection
2b. Description of Control Equipment 'b'

EMISSIONS UNIT OPERATING SCHEDULE INFORMATION

1. Operated During Year?	2. Average Annual Operation hour/day	day/week	3. Average Ozone Season Operation (June 1 to August 31) hour/day	day/week	4. Total Operation During Year) (hour/year)
Yes	8	7			872.8
5. Percent Hours of Operation by Season	DJF	MAM	JJA	SON	
	17%	35%	40%	8%	

Shaded areas are for DEP use.

DEP Form 62-210.900(5) - Form
Effective: 11-23-94

Date: _____

	DISTRICT	OFFICE	COUNTY	FACILITY	EMISSIONS UNIT	
APIS ID	30	ORL	49	0014	08	INPUT

EMISSIONS UNIT OPERATION REPORT (EMISSIONS UNIT REPORT 8 OF 12)

FACILITY NAME: FLORIDA POWER

EMISSIONS UNIT INFORMATION

1. Emissions Unit Description		2. Ozone SIP Base Year Emissions Unit?
A 92.9MW SIMPLE CYCLE COMBUSTION TURBINE		No
3. DEP Permit or PPS Number	4. Emissions Unit ID	5. Emissions Unit Status
AC49203114	30ORL49001408	ACTIVE
6. Emissions Unit Startup Date	7. Long-term Reserve Shutdown Date	8. Permanent Shutdown Date

EMISSION POINT/CONTROL INFORMATION

1. Emission Point Type
SINGLE POINT
2a. Description of Control Equipment 'a'
Water injection
2b. Description of Control Equipment 'b'

EMISSIONS UNIT OPERATING SCHEDULE INFORMATION

1. Operated During Year?	2. Average Annual Operation hour/day	day/week	3. Average Ozone Season Operation (June 1 to August 31) hour/day	day/week	4. Total Operation During Year) (hour/year)
Yes	8	7			724.2
5. Percent Hours of Operation by Season		DJF	MAM	JJA	SON
		7%	45%	41%	7%

Shaded areas are for DEP use.

DEP Form 62-210.900(5) - Form
Effective: 11-23-94

Date: _____

	DISTRICT	OFFICE	COUNTY	FACILITY	EMISSIONS UNIT	
APIS ID	30	ORL	49	0014	09	INPUT

EMISSIONS UNIT OPERATION REPORT (EMISSIONS UNIT REPORT 9 OF 12)

FACILITY NAME: FLORIDA POWER

EMISSIONS UNIT INFORMATION

1. Emissions Unit Description		2. Ozone SIP Base Year Emissions Unit?
A 92.9MW SIMPLE CYCLE GAS COMBUSTION TURBINE		No
3. DEP Permit or PPS Number	4. Emissions Unit ID	5. Emissions Unit Status
AC49203114	30ORL49001409	ACTIVE
6. Emissions Unit Startup Date	7. Long-term Reserve Shutdown Date	8. Permanent Shutdown Date

EMISSION POINT/CONTROL INFORMATION

1. Emission Point Type
SINGLE POINT
2a. Description of Control Equipment 'a'
Water Injection
2b. Description of Control Equipment 'b'

EMISSIONS UNIT OPERATING SCHEDULE INFORMATION

1. Operated During Year?	2. Average Annual Operation hour/day	day/week	3. Average Ozone Season Operation (June 1 to August 31) hour/day	day/week	4. Total Operation During Year) (hour/year)
Yes	8	7			697.0
5. Percent Hours of Operation by Season		DJF	MAM	JJA	SON
		11%	42%	41%	6%

Shaded areas are for DEP use.

	DISTRICT	OFFICE	COUNTY	FACILITY	EMISSIONS UNIT	
APIS ID	30	ORL	49	0014	10	INPUT

EMISSIONS UNIT OPERATION REPORT (EMISSIONS UNIT REPORT 10 OF 12)

FACILITY NAME: FLORIDA POWER

EMISSIONS UNIT INFORMATION

1. Emissions Unit Description		2. Ozone SIP Base Year Emissions Unit?
A 92.9MW SIMPLE CYCLE COMBUSTION TURBINE		No
3. DEP Permit or PPS Number	4. Emissions Unit ID	5. Emissions Unit Status
AC49203114	30ORL49001410	ACTIVE
6. Emissions Unit Startup Date	7. Long-term Reserve Shutdown Date	8. Permanent Shutdown Date

EMISSION POINT/CONTROL INFORMATION

1. Emission Point Type
SINGLE POINT
2a. Description of Control Equipment 'a'
Water injection
2b. Description of Control Equipment 'b'

EMISSIONS UNIT OPERATING SCHEDULE INFORMATION

1. Operated During Year?	2. Average Annual Operation hour/day	day/week	3. Average Ozone Season Operation (June 1 to August 31) hour/day	day/week	4. Total Operation During Year) (hour/year)
Yes	8	7			579.3

5. Percent Hours of Operation by Season	DJF	MAM	JJA	SON
	7%	52%	35%	5%

Shaded areas are for DEP use.

Date: _____

II. EMISSIONS UNIT REPORT

Int. City 1995

A. EMISSIONS UNIT INFORMATION

1. Emissions Unit Description		
92.9 MW SIMPLE CYCLE GAS/DIESEL COMBUSTION TURBINE (P7)		
2. Emissions Unit ID **007**	3. Emissions Unit Classification **R**	4. Operated During Year? **YES**
5. DEP Permit or PPS Number **AC49203114**	6. Emission Unit Status **ACTIVE**	7. Ozone SIP Base Year Emissions Unit? **NO**
8. Emissions Unit Startup Date **17-Aug-93**	9. Long-term Reserve Shutdown Date	10. Permanent Shutdown Date

B. EMISSION POINT/CONTROL INFORMATION

1. Emission Point Type
1 - SINGLE POINT SERVING ONE TURBINE
2a. Description of Control Equipment "a"
NOX CONTROLLED BY WATER INJECTION
2b. Description of Control Equipment "b"

C. EMISSIONS UNIT OPERATING SCHEDULE INFORMATION

1. Average Annual Operation				2. Total Operation During Year (hours/year)
2	hours/day	**1**	days/week	**649**

3. Percent Hours of Operation by Season							
DJF:	**18%**	MAM:	**26%**	JJA:	**26%**	SON:	**30%**

4. Average Ozone Season Operation (June 1 to August 31)				5. Total Operation During Ozone Season
n/a	hours/day	**n/a**	days/week	(days/season) **n/a**

II. EMISSIONS UNIT REPORT

A. EMISSIONS UNIT INFORMATION

1. Emissions Unit Description		
92.9 MW SIMPLE CYCLE GAS/DIESEL COMBUSTION TURBINE (P8)		
2. Emissions Unit ID **008**	3. Emissions Unit Classification **R**	4. Operated During Year? **YES**
5. DEP Permit or PPS Number **AC49203114**	6. Emission Unit Status **ACTIVE**	7. Ozone SIP Base Year Emissions Unit? **NO**
8. Emissions Unit Startup Date **13-Jul-93**	9. Long-term Reserve Shutdown Date	10. Permanent Shutdown Date

B. EMISSION POINT/CONTROL INFORMATION

1. Emission Point Type
1 - SINGLE POINT SERVING ONE TURBINE
2a. Description of Control Equipment "a"
NOX CONTROLLED BY WATER INJECTION
2b. Description of Control Equipment "b"

C. EMISSIONS UNIT OPERATING SCHEDULE INFORMATION

1. Average Annual Operation				2. Total Operation During Year (hours/year)
2	hours/day	**1**	days/week	**562**

3. Percent Hours of Operation by Season							
DJF:	**19%**	MAM:	**23%**	JJA:	**32%**	SON:	**26%**

4. Average Ozone Season Operation (June 1 to August 31)				5. Total Operation During Ozone Season
n/a	hours/day	**n/a**	days/week	(days/season) **n/a**

II. EMISSIONS UNIT REPORT

A. EMISSIONS UNIT INFORMATION

1. Emissions Unit Description		
92.9 MW SIMPLE CYCLE GAS/DIESEL COMBUSTION TURBINE (P9)		
2. Emissions Unit ID **009**	3. Emissions Unit Classification **R**	4. Operated During Year? **YES**
5. DEP Permit or PPS Number **AC49203114**	6. Emission Unit Status **ACTIVE**	7. Ozone SIP Base Year Emissions Unit? **NO**
8. Emissions Unit Startup Date **2-Sep-93**	9. Long-term Reserve Shutdown Date	10. Permanent Shutdown Date

B. EMISSION POINT/CONTROL INFORMATION

1. Emission Point Type
1 - SINGLE POINT SERVING ONE TURBINE
2a. Description of Control Equipment "a"
NOX CONTROLLED BY WATER INJECTION
2b. Description of Control Equipment "b"

C. EMISSIONS UNIT OPERATING SCHEDULE INFORMATION

1. Average Annual Operation				2. Total Operation During Year (hours/year)
2	hours/day	**1**	days/week	**715**

3. Percent Hours of Operation by Season							
DJF:	**16%**	MAM:	**20%**	JJA:	**20%**	SON:	**44%**

4. Average Ozone Season Operation (June 1 to August 31)				5. Total Operation During Ozone Season
n/a	hours/day	**n/a**	days/week	(days/season) **n/a**

II. EMISSIONS UNIT REPORT

A. EMISSIONS UNIT INFORMATION

1. Emissions Unit Description		
92.9 MW SIMPLE CYCLE GAS/DIESEL COMBUSTION TURBINE (P10)		
2. Emissions Unit ID **010**	3. Emissions Unit Classification **R**	4. Operated During Year? **YES**
5. DEP Permit or PPS Number **AC49203114**	6. Emission Unit Status **ACTIVE**	7. Ozone SIP Base Year Emissions Unit? **NO**
8. Emissions Unit Startup Date **19-Jul-93**	9. Long-term Reserve Shutdown Date	10. Permanent Shutdown Date

B. EMISSION POINT/CONTROL INFORMATION

1. Emission Point Type
1 - SINGLE POINT SERVING ONE TURBINE
2a. Description of Control Equipment "a" **NOX CONTROLLED BY WATER INJECTION**
2b. Description of Control Equipment "b"

C. EMISSIONS UNIT OPERATING SCHEDULE INFORMATION

1. Average Annual Operation				2. Total Operation During Year (hours/year)
1	hours/day	**1**	days/week	**512**
3. Percent Hours of Operation by Season				
DJF: **18%**	MAM: **18%**	JJA: **40%**	SON: **25%**	
4. Average Ozone Season Operation (June 1 to August 31)				5. Total Operation During Ozone Season
n/a	hours/day	**n/a**	days/week	(days/season) **n/a**

DeBary 1993

APIS ID	District	Office	County	Facility	Source	INPUT

SOURCE OPERATION REPORT - PAGE 1 & 2 (SOURCE REPORT 9 OF 12)

FACILITY NAME: DeBary Combustion Turbine

SOURCE INFORMATION (AIR030)

1. Source Description		
Peaking Unit 7		
2. DEP Permit or PPS Number	3. Source APIS ID	4. Source Status
AC 64-191015	300RL640028	A
5. Source Startup Date (MM/DD/YY)	6. Source Shutdown date (MM/DD/YY)	

SOURCE EMISSION POINT/CONTROL INFORMATION (AIR033)

1. Source Emission Point Type
1
2a. Description of Control Equipment "a"
Water Injection for NOx Control
2b. Description of Control Equipment "b"

SOURCE OPERATING SCHEDULE INFORMATION (AIR050)

1. Operated During Year?	2. Average Operation During Year	hour/day	day/week	3. Total Operation During Year (hour/year)	
Yes		24	7	16.5	
4. Percent Hours of Operation by Season		DJF	MAM	JJA	SON
		0%	0%	0%	100%

Shaded areas are for DEP use.

APIS ID	District	Office	County	Facility	Source	INPUT

SOURCE OPERATION REPORT - PAGE 1 & 2 (SOURCE REPORT 10 OF 12)

FACILITY NAME: DeBary Combustion Turbine

SOURCE INFORMATION (AIR030)

1. Source Description		
Peaking Unit 8		
2. DEP Permit or PPS Number	3. Source APIS ID	4. Source Status
AC 64-191015	300RL640028	A
5. Source Startup Date (MM/DD/YY)	6. Source Shutdown date (MM/DD/YY)	

SOURCE EMISSION POINT/CONTROL INFORMATION (AIR033)

1. Source Emission Point Type
1
2a. Description of Control Equipment "a"
Water Injection for NOx Control
2b. Description of Control Equipment "b"

SOURCE OPERATING SCHEDULE INFORMATION (AIR050)

1. Operated During Year?	2. Average Operation During Year	hour/day	day/week	3. Total Operation During Year (hour/year)	
Yes		24	7	679.0	
4. Percent Hours of Operation by Season		DJF	MAM	JJA	SON
		6%	23%	53%	18%

Shaded areas are for DEP use.

APIS ID	District	Office	County	Facility	Source	INPUT

SOURCE OPERATION REPORT - PAGE 1 & 2 (SOURCE REPORT 11 OF 12)

FACILITY NAME: DeBary Combustion Turbine

SOURCE INFORMATION (AIR030)

1. Source Description		
Peaking Unit 9		
2. DEP Permit or PPS Number	3. Source APIS ID	4. Source Status
AC 64-191015	300RL640028	A
5. Source Startup Date (MM/DD/YY)	6. Source Shutdown date (MM/DD/YY)	

SOURCE EMISSION POINT/CONTROL INFORMATION (AIR033)

1. Source Emission Point Type
1
2a. Description of Control Equipment "a"
Water Injection for NOx Control
2b. Description of Control Equipment "b"

SOURCE OPERATING SCHEDULE INFORMATION (AIR050)

1. Operated During Year?	2. Average Operation During Year	hour/day	day/week	3. Total Operation During Year (hour/year)	
Yes		24	7	573.1	
4. Percent Hours of Operation by Season		DJF	MAM	JJA	SON
		4%	26%	46%	24%

Shaded areas are for DEP use.

APIS ID	District	Office	County	Facility	Source	INPUT

SOURCE OPERATION REPORT - PAGE 1 & 2 (SOURCE REPORT 12 OF 12)

FACILITY NAME: DeBary Combustion Turbine

SOURCE INFORMATION (AIR030)

1. Source Description		
Peaking Unit 10		
2. DEP Permit or PPS Number	3. Source APIS ID	4. Source Status
AC 64-191015	300RL640028	A
5. Source Startup Date (MM/DD/YY)	6. Source Shutdown date (MM/DD/YY)	

SOURCE EMISSION POINT/CONTROL INFORMATION (AIR033)

1. Source Emission Point Type
1
2a. Description of Control Equipment "a"
Water Injection for NOx Control
2b. Description of Control Equipment "b"

SOURCE OPERATING SCHEDULE INFORMATION (AIR050)

1. Operated During Year?	2. Average Operation During Year	hour/day	day/week	3. Total Operation During Year (hour/year)	
Yes		24	7	728.3	
4. Percent Hours of Operation by Season		DJF	MAM	JJA	SON
		2%	20%	63%	16%

Shaded areas are for DEP use.

DeBary 1994

APIS ID	District	Office	County	Facility	Emissions Unit	INPUT
	3 0	0 R L	6 4	0 0 2 8	0 0 9	

EMISSIONS UNIT OPERATION REPORT (SOURCE REPORT 9 OF 12)

FACILITY NAME: **DEBARY COMBUSTION TURBINE FACILITY**

EMISSIONS UNIT INFORMATION

1. Emissions Unit Description		2. Ozone SIP Base Year Emissions Unit?
92.9 MW SIMPLE CYCLE COMB TURBINE (P7)		NO
3. DEP Permit or PPS Number	4. Source APIS ID	5. Emissions Unit Status
A064233544	300RL640028~~08~~ 09	ACTIVE
6. Emissions Unit Startup Date	7. Lont-term Reserve Shutdown Date	8. Permanent Shutdown Date

EMISSION POINT/CONTROL INFORMATION

1. Source Emission Point Type
N/A
2a. Description of Control Equipment "a"
N/A
2b. Description of Control Equipment "b"
N/A

EMISSIONS UNIT OPERATING SCHEDULE INFORMATION

1. Operated During Year?	2. Average Annual Operation hour/day	2. Average Annual Operation day/week	3. Average Ozone Season Operation (June 1 to Aug 31) hour/day	3. Average Ozone Season Operation (June 1 to Aug 31) day/week	4. Total Operation During Year (hour/year)
YES	8	7			499
5. Percent Hours of Operation by Season	DJF	MAM	JJA	SON	
	10%	51%	38%	2%	

Shaded areas are for DEP use.

Date: _____

APIS ID	District	Office	County	Facility	Emissions Unit	INPUT
	3 0	0 R L	6 4	0 0 2 8	0 1 0	

EMISSIONS UNIT OPERATION REPORT (SOURCE REPORT 10 OF 12)

FACILITY NAME: **DEBARY COMBUSTION TURBINE FACILITY**

EMISSIONS UNIT INFORMATION

1. Emissions Unit Description		2. Ozone SIP Base Year Emissions Unit?
92.9 MW SIMPLE CYCLE COMB TURBINE (P8)		NO
3. DEP Permit or PPS Number	4. Source APIS ID	5. Emissions Unit Status
A064233544	300RL64002810	ACTIVE
6. Emissions Unit Startup Date	7. Lont-term Reserve Shutdown Date	8. Permanent Shutdown Date

EMISSION POINT/CONTROL INFORMATION

1. Source Emission Point Type
SINGLE POINT
2a. Description of Control Equipment "a"
NOX CONTROLLED BY WATER INJECTION
2b. Description of Control Equipment "b"
N/A

EMISSIONS UNIT OPERATING SCHEDULE INFORMATION

1. Operated During Year?	2. Average Annual Operation		3. Average Ozone Season Operation (June 1 to Aug 31)		4. Total Operation During Year (hour/year)
	hour/day	day/week	hour/day	day/week	
YES	8	7	2	1	492
5. Percent Hours of Operation by Season		DJF	MAM	JJA	SON
		12%	61%	34%	4%

Shaded areas are for DEP use.

Date: _____

APIS ID	District	Office	County	Facility	Emissions Unit	INPUT
	3 0	0 R L	6 4	0 0 2 8	0 / /	

EMISSIONS UNIT OPERATION REPORT (SOURCE REPORT // OF 12)

FACILITY NAME: **DEBARY COMBUSTION TURBINE FACILITY**

EMISSIONS UNIT INFORMATION

1. Emissions Unit Description		2. Ozone SIP Base Year Emissions Unit?
92.9 MW SIMPLE CYCLE COMB TURBINE (P9)		NO
3. DEP Permit or PPS Number	4. Source APIS ID	5. Emissions Unit Status
A064233544	300RL6400281	ACTIVE
6. Emissions Unit Startup Date	7. Lont-term Reserve Shutdown Date	8. Permanent Shutdown Date

EMISSION POINT/CONTROL INFORMATION

1. Source Emission Point Type
SINGLE POINT
2a. Description of Control Equipment "a"
NOX CONTROLLED BY WATER INJECTION
2b. Description of Control Equipment "b"
N/A

EMISSIONS UNIT OPERATING SCHEDULE INFORMATION

1. Operated During Year?	2. Average Annual Operation hour/day	2. Average Annual Operation day/week	3. Average Ozone Season Operation (June 1 to Aug 31) hour/day	3. Average Ozone Season Operation (June 1 to Aug 31) day/week	4. Total Operation During Year (hour/year)
YES	8	7	1	0	426
5. Percent Hours of Operation by Season	DJF	MAM	JJA	SON	
	12%	53%	32%	3%	

Shaded areas are for DEP use.

Date:_____

APIS ID	District	Office	County	Facility	Emissions Unit	INPUT
	3 0	0 R L	6 4	0 0 2 8	0 1 2	

EMISSIONS UNIT OPERATION REPORT (SOURCE REPORT 12 OF 12)

FACILITY NAME: **DEBARY COMBUSTION TURBINE FACILITY**

EMISSIONS UNIT INFORMATION

1. Emissions Unit Description		2. Ozone SIP Base Year Emissions Unit?
92.9 MW SIMPLE CYCLE COMB TURBINE (P10)		NO
3. DEP Permit or PPS Number	4. Source APIS ID	5. Emissions Unit Status
A064233544	300RL6400281**2**	ACTIVE
6. Emissions Unit Startup Date	7. Lont-term Reserve Shutdown Date	8. Permanent Shutdown Date

EMISSION POINT/CONTROL INFORMATION

1. Source Emission Point Type
SINGLE POINT
2a. Description of Control Equipment "a"
NOX CONTROLLED BY WATER INJECTION
2b. Description of Control Equipment "b"
N/A

EMISSIONS UNIT OPERATING SCHEDULE INFORMATION

1. Operated During Year?	2. Average Annual Operation hour/day	2. Average Annual Operation day/week	3. Average Ozone Season Operation (June 1 to Aug 31) hour/day	3. Average Ozone Season Operation (June 1 to Aug 31) day/week	4. Total Operation During Year (hour/year)
YES	8	7			382
5. Percent Hours of Operation by Season		DJF	MAM	JJA	SON
		12%	59%	29%	1%

Shaded areas are for DEP use.

Date: _____

II. EMISSIONS UNIT REPORT

A. EMISSIONS UNIT INFORMATION

DeBary 1995

1. Emissions Unit Description		
92.9 MW SIMPLE COMBUSTION TURBINE (P7)		
2. Emissions Unit ID 015	3. Emissions Unit Classification R	4. Operated During Year? YES
5. DEP Permit or PPS Number A064233544	6. Emission Unit Status ACTIVE	7. Ozone SIP Base Year Emissions Unit? NO
8. Emissions Unit Startup Date 30-Jan-93	9. Long-term Reserve Shutdown Date	10. Permanent Shutdown Date

B. EMISSION POINT/CONTROL INFORMATION

1. Emission Point Type
1 - SINGLE POINT SERVING ONE TURBINE
2a. Description of Control Equipment "a"
NOX CONTROLLED BY WATER INJECTION
2b. Description of Control Equipment "b"

C. EMISSIONS UNIT OPERATING SCHEDULE INFORMATION

1. Average Annual Operation				2. Total Operation During Year (hours/year)
1	hours/day	1	days/week	438

3. Percent Hours of Operation by Season							
DJF:	13%	MAM:	22%	JJA:	40%	SON:	25%

4. Average Ozone Season Operation (June 1 to August 31)				5. Total Operation During Ozone Season
n/a	hours/day	n/a	days/week	(days/season)

II. EMISSIONS UNIT REPORT

A. EMISSIONS UNIT INFORMATION

1. Emissions Unit Description		
92.9 MW SIMPLE COMBUSTION TURBINE (P8)		
2. Emissions Unit ID 016	3. Emissions Unit Classification R	4. Operated During Year? YES
5. DEP Permit or PPS Number A064233544	6. Emission Unit Status ACTIVE	7. Ozone SIP Base Year Emissions Unit? NO
8. Emissions Unit Startup Date 30-Jan-93	9. Long-term Reserve Shutdown Date	10. Permanent Shutdown Date

B. EMISSION POINT/CONTROL INFORMATION

1. Emission Point Type
1 - SINGLE POINT SERVING ONE TURBINE
2a. Description of Control Equipment "a"
NOX CONTROLLED BY WATER INJECTION
2b. Description of Control Equipment "b"

C. EMISSIONS UNIT OPERATING SCHEDULE INFORMATION

1. Average Annual Operation				2. Total Operation During Year (hours/year)
1	hours/day	1	days/week	371

3. Percent Hours of Operation by Season							
DJF:	14%	MAM:	27%	JJA:	51%	SON:	9%

4. Average Ozone Season Operation (June 1 to August 31)				5. Total Operation During Ozone Season (days/season)
n/a	hours/day	n/a	days/week	

II. EMISSIONS UNIT REPORT

A. EMISSIONS UNIT INFORMATION

1. Emissions Unit Description		
92.9 MW SIMPLE COMBUSTION TURBINE (P9)		
2. Emissions Unit ID 017	3. Emissions Unit Classification R	4. Operated During Year? YES
5. DEP Permit or PPS Number A064233544	6. Emission Unit Status ACTIVE	7. Ozone SIP Base Year Emissions Unit? NO
8. Emissions Unit Startup Date 30-Jan-93	9. Long-term Reserve Shutdown Date	10. Permanent Shutdown Date

B. EMISSION POINT/CONTROL INFORMATION

1. Emission Point Type
1 - SINGLE POINT SERVING ONE TURBINE
2a. Description of Control Equipment "a"
NOX CONTROLLED BY WATER INJECTION
2b. Description of Control Equipment "b"

C. EMISSIONS UNIT OPERATING SCHEDULE INFORMATION

1. Average Annual Operation				2. Total Operation During Year (hours/year)
1	hours/day	1	days/week	439

3. Percent Hours of Operation by Season							
DJF:	14%	MAM:	16%	JJA:	49%	SON:	21%

4. Average Ozone Season Operation (June 1 to August 31)				5. Total Operation During Ozone Season (days/season)
n/a	hours/day	n/a	days/week	

II. EMISSIONS UNIT REPORT

A. EMISSIONS UNIT INFORMATION

1. Emissions Unit Description		
92.9 MW SIMPLE COMBUSTION TURBINE (P10)		
2. Emissions Unit ID 018	3. Emissions Unit Classification R	4. Operated During Year? YES
5. DEP Permit or PPS Number A064233544	6. Emission Unit Status ACTIVE	7. Ozone SIP Base Year Emissions Unit? NO
8. Emissions Unit Startup Date 30-Jan-93	9. Long-term Reserve Shutdown Date	10. Permanent Shutdown Date

B. EMISSION POINT/CONTROL INFORMATION

1. Emission Point Type
1 - SINGLE POINT SERVING ONE TURBINE
2a. Description of Control Equipment "a"
NOX CONTROLLED BY WATER INJECTION
2b. Description of Control Equipment "b"

C. EMISSIONS UNIT OPERATING SCHEDULE INFORMATION

1. Average Annual Operation				2. Total Operation During Year (hours/year)
1	hours/day	1	days/week	379

3. Percent Hours of Operation by Season							
DJF:	18%	MAM:	1%	JJA:	59%	SON:	22%

4. Average Ozone Season Operation (June 1 to August 31)				5. Total Operation During Ozone Season (days/season)
n/a	hours/day	n/a	days/week	

Suwannee 1993

APIS ID	District	Office	County	Facility	Source	INPUT

SOURCE OPERATION REPORT - PAGE 1 & 2 (SOURCE REPORT 4 OF 6)

FACILITY NAME: Suwannee Power Plant Combustion Turbine

SOURCE INFORMATION (AIR030)

1. Source Description		
Peaking Unit 1		
2. DEP Permit or PPS Number	3. Source APIS ID	4. Source Status
AO 61-189579	31JAX610003	A
5. Source Startup Date (MM/DD/YY)	6. Source Shutdown date (MM/DD/YY)	

SOURCE EMISSION POINT/CONTROL INFORMATION (AIR033)

1. Source Emission Point Type
1
2a. Description of Control Equipment "a"
Water Injection for NOx Control
2b. Description of Control Equipment "b"

SOURCE OPERATING SCHEDULE INFORMATION (AIR050)

1. Operated During Year?	2. Average Operation During Year	hour/day	day/week	3. Total Operation During Year (hour/year)	
Yes		24	7	329.3	
4. Percent Hours of Operation by Season		DJF	MAM	JJA	SON
		6%	33%	47%	14%

Shaded areas are for DEP use.

APIS ID	District	Office	County	Facility	Source	INPUT

SOURCE OPERATION REPORT - PAGE 1 & 2 (SOURCE REPORT 5 OF 6)

FACILITY NAME: Suwannee Power Plant Combustion Turbine

SOURCE INFORMATION (AIR030)

1. Source Description		
Peaking Unit 2		
2. DEP Permit or PPS Number	3. Source APIS ID	4. Source Status
AO 61-189579	31JAX610003	A
5. Source Startup Date (MM/DD/YY)	6. Source Shutdown date (MM/DD/YY)	

SOURCE EMISSION POINT/CONTROL INFORMATION (AIR033)

1. Source Emission Point Type
1
2a. Description of Control Equipment "a"
Water Injection for NOx Control
2b. Description of Control Equipment "b"

SOURCE OPERATING SCHEDULE INFORMATION (AIR050)

1. Operated During Year?	2. Average Operation During Year	hour/day	day/week	3. Total Operation During Year (hour/year)	
Yes		24	7	308	
4. Percent Hours of Operation by Season		DJF	MAM	JJA	SON
		9%	32%	45%	14%

Shaded areas are for DEP use.

APIS ID	District	Office	County	Facility	Source	INPUT

SOURCE OPERATION REPORT - PAGE 1 & 2 (SOURCE REPORT 6 OF 6)

FACILITY NAME: Suwannee Power Plant Combustion Turbine

SOURCE INFORMATION (AIR030)

1. Source Description		
Peaking Unit 3		
2. DEP Permit or PPS Number	3. Source APIS ID	4. Source Status
AO 61-189579	31JAX610003	A
5. Source Startup Date (MM/DD/YY)	6. Source Shutdown date (MM/DD/YY)	

SOURCE EMISSION POINT/CONTROL INFORMATION (AIR033)

1. Source Emission Point Type
1
2a. Description of Control Equipment "a"
Water Injection for NOx Control
2b. Description of Control Equipment "b"

SOURCE OPERATING SCHEDULE INFORMATION (AIR050)

1. Operated During Year?	2. Average Operation During Year	hour/day	day/week	3. Total Operation During Year (hour/year)	
Yes		24	7	174	
4. Percent Hours of Operation by Season		DJF	MAM	JJA	SON
		5%	3%	73%	19%

Shaded areas are for DEP use.

Suwannee 1994

DISTRICT	OFFICE	COUNTY	FACILITY	EMISSIONS UNIT	
APIS ID 31	JAX	51	0003	04	INPUT

EMISSIONS UNIT OPERATION REPORT (EMISSIONS UNIT REPORT 4 OF 6)

FACILITY NAME: FLORIDA POWER CORPORATION SUWANNEE

EMISSIONS UNIT INFORMATION

1. Emissions Unit Description	2. Ozone SIP Base Year Emissions Unit?
#1 PEAKING UNIT 739MMBTU #2FO .5%S 2 EXH/1 62.4MW GEN	1500HRMX No

3. DEP Permit or PPS Number	4. Emissions Unit ID	5. Emissions Unit Status
AO61189579	31JAX61000304	ACTIVE
6. Emissions Unit Startup Date	**7. Long-term Reserve Shutdown Date**	**8. Permanent Shutdown Date**

EMISSION POINT/CONTROL INFORMATION

1. Emission Point Type
SINGLE POINT
2a. Description of Control Equipment 'a'
WATER INJECTION FOR NOX CONTROL
2b. Description of Control Equipment 'b'

EMISSIONS UNIT OPERATING SCHEDULE INFORMATION

1. Operated During Year?	2. Average Annual Operation hour/day	day/week	3. Average Ozone Season Operation (June 1 to August 31) hour/day	day/week	4. Total Operation During Year) (hour/year)
Yes	8	1			91.6 ✓

5. Percent Hours of Operation by Season	DJF	MAM	JJA	SON
	30%	42%	20%	8% ✓

Shaded areas are for DEP use.

DEP Form 62-210.900(5) - Form
Effective: 11-23-94

Date: _____

DISTRICT	OFFICE	COUNTY	FACILITY	EMISSIONS UNIT	
APIS ID: 31	JAX	61	0003	05	INPUT

EMISSIONS UNIT OPERATION REPORT (EMISSIONS UNIT REPORT 5 OF 6)

FACILITY NAME: FLORIDA POWER CORPORATION SUWANNEE

EMISSIONS UNIT INFORMATION

1. Emissions Unit Description		2. Ozone SIP Base Year Emissions Unit?
#2 PEAKING UNIT 739MMBTU #2FO .5%S 2EXH/1 62.4MW GEN		1500 ~~HRMX~~ NOx
3. DEP Permit or PPS Number	4. Emissions Unit ID	5. Emissions Unit Status
A061189579	31JAX61000305	ACTIVE
6. Emissions Unit Startup Date	7. Long-term Reserve Shutdown Date	8. Permanent Shutdown Date

EMISSION POINT/CONTROL INFORMATION

1. Emission Point Type
SINGLE POINT
2a. Description of Control Equipment 'a'
WATER INJECTION FOR NOX CONTROL
2b. Description of Control Equipment 'b'

EMISSIONS UNIT OPERATING SCHEDULE INFORMATION

1. Operated During Year?	2. Average Annual Operation hour/day	day/week	3. Average Ozone Season Operation (June 1 to August 31) hour/day	day/week	4. Total Operation During Year (hour/year)
Yes	8	1			100.0 ✓
5. Percent Hours of Operation by Season	DJF	MAM	JJA	SON	
	29%	35%	12%	24% ✓	

Shaded areas are for DEP use.

DEP Form 62-210.900(5) - Form
Effective: 11-23-94

Date: _____

DISTRICT	OFFICE	COUNTY	FACILITY	EMISSIONS UNIT	
APIS ID 31	JAX	61	0003	06	INPUT

EMISSIONS UNIT OPERATION REPORT (EMISSIONS UNIT REPORT 6 OF 6)

FACILITY NAME: FLORIDA POWER CORPORATION SUWANNEE

EMISSIONS UNIT INFORMATION

1. Emissions Unit Description		2. Ozone SIP Base Year Emissions Unit?
#3 PEAKING UNIT 739MMBTU #2FO .5%S 2 EXH/162.4MW GEN		1500 ~~HRMX~~ NO
3. DEP Permit or PPS Number	4. Emissions Unit ID	5. Emissions Unit Status
AO61189579	31JAX61000306	ACTIVE
6. Emissions Unit Startup Date	7. Long-term Reserve Shutdown Date	8. Permanent Shutdown Date

EMISSION POINT/CONTROL INFORMATION

1. Emission Point Type
SINGLE POINT
2a. Description of Control Equipment 'a'
WATER INJECTION FOR NOX CONTROL
2b. Description of Control Equipment 'b'

EMISSIONS UNIT OPERATING SCHEDULE INFORMATION

1. Operated During Year?	2. Average Annual Operation hour/day	day/week	3. Average Ozone Season Operation (June 1 to August 31) hour/day	day/week	4. Total Operation During Year) (hour/year)
Yes	8	1			60.7 ✓
5. Percent Hours of Operation by Season	DJF	MAM	JJA	SON	
	31%	19%	19%	31% ✓	

Shaded areas are for DEP use.

DEP Form 62-210.900(5) - Form
Effective: 11-23-94

Date: _____

II. EMISSIONS UNIT REPORT

Suwannee 1995

A. EMISSIONS UNIT INFORMATION

1. Emissions Unit Description		
#1 PEAKING UNIT 739 MMBTU #2FO 0.5%S 2 EXH/I 62.4 MW GEN 1500HR		
2. Emissions Unit ID 004	3. Emissions Unit Classification R	4. Operated During Year? YES
5. DEP Permit or PPS Number A061189579	6. Emission Unit Status ACTIVE	7. Ozone SIP Base Year Emissions Unit? NO
8. Emissions Unit Startup Date 29-Oct-80	9. Long-term Reserve Shutdown Date	10. Permanent Shutdown Date

B. EMISSION POINT/CONTROL INFORMATION

1. Emission Point Type
1 - SINGLE POINT SERVING ONE EMISSION UNIT
2a. Description of Control Equipment "a"
WATER INJECTION FOR NOx CONTROL
2b. Description of Control Equipment "b"

C. EMISSIONS UNIT OPERATING SCHEDULE INFORMATION

1. Average Annual Operation				2. Total Operation During Year (hours/year)
1	hours/day	1	days/week	98
3. Percent Hours of Operation by Season				
DJF: 16%	MAM: 34%	JJA: 46%	SON: 4%	
4. Average Ozone Season Operation (June 1 to August 31)				5. Total Operation During Ozone Season
n/a	hours/day	n/a	days/week	(days/season) n/a

II. EMISSIONS UNIT REPORT

A. EMISSIONS UNIT INFORMATION

1. Emissions Unit Description		
#2 PEAKING UNIT 739 MMBTU #2FO 0.5%S 2 EXH/I 62.4 MW GEN 1500HR		
2. Emissions Unit ID 005	3. Emissions Unit Classification R	4. Operated During Year? YES
5. DEP Permit or PPS Number A061189579	6. Emission Unit Status ACTIVE	7. Ozone SIP Base Year Emissions Unit? NO
8. Emissions Unit Startup Date 29-Oct-80	9. Long-term Reserve Shutdown Date	10. Permanent Shutdown Date

B. EMISSION POINT/CONTROL INFORMATION

1. Emission Point Type
1 - SINGLE POINT SERVING ONE EMISSION UNIT
2a. Description of Control Equipment "a"
WATER INJECTION FOR NOx CONTROL
2b. Description of Control Equipment "b"

C. EMISSIONS UNIT OPERATING SCHEDULE INFORMATION

1. Average Annual Operation				2. Total Operation During Year (hours/year)
1	hours/day	1	days/week	94

3. Percent Hours of Operation by Season							
DJF:	9%	MAM:	29%	JJA:	54%	SON:	7%

4. Average Ozone Season Operation (June 1 to August 31)				5. Total Operation During Ozone Season
n/a	hours/day	n/a	days/week	(days/season) n/a

II. EMISSIONS UNIT REPORT

A. EMISSIONS UNIT INFORMATION

1. Emissions Unit Description		
#3 PEAKING UNIT 739 MMBTU #2FO 0.5%S 2 EXH/I 62.4 MW GEN 1500HR		
2. Emissions Unit ID 006	3. Emissions Unit Classification R	4. Operated During Year? YES
5. DEP Permit or PPS Number A061189579	6. Emission Unit Status ACTIVE	7. Ozone SIP Base Year Emissions Unit? NO
8. Emissions Unit Startup Date 29-Oct-80	9. Long-term Reserve Shutdown Date	10. Permanent Shutdown Date

B. EMISSION POINT/CONTROL INFORMATION

1. Emission Point Type
1 - SINGLE POINT SERVING ONE EMISSION UNIT
2a. Description of Control Equipment "a"
WATER INJECTION FOR NOx CONTROL
2b. Description of Control Equipment "b"

C. EMISSIONS UNIT OPERATING SCHEDULE INFORMATION

1. Average Annual Operation				2. Total Operation During Year (hours/year)
1	hours/day	1	days/week	86

3. Percent Hours of Operation by Season							
DJF:	13%	MAM:	33%	JJA:	47%	SON:	6%

4. Average Ozone Season Operation (June 1 to August 31)				5. Total Operation During Ozone Season
n/a	hours/day	n/a	days/week	(days/season) n/a

All CTs - 1996

fuelheat

Plant	Unit	Nlooper_Yr	Fuel	Sum_Oper_Hrs	Sum_Fuel_Burn	Avg_Fuel_BTU	Sum_Fuel_BTU	Total_Heat
AN	01	1996	#6	6222.2	2642179	6489879.417	77878553	17147423.11
AN	02	1996	#6	5991.4	2504459	6489879.417	77878553	16253636.91
APP	01	1996	#2	307.2	581	5020142.917	60241715	2916.703035
APP	01	1996	Gas	307.2	106221	1046.916667	12563	111204.5353
APP	02	1996	#2	71.7	437	5393816.917	64725803	2357.097993
APP	02	1996	Gas	71.7	27685	959.75	11517	26570.67875
BA	01	1996	#2	7272.1	1060	5833306.75	69999681	6183.305155
BA	01	1996	#6	7272.1	793657	6414211.833	76970542	5090684.121
BA	02	1996	#6	7444.5	820932	6479719	77756628	5319408.678
BA	03	1996	#6	7018.5	1163246	5936060.917	71232731	6905099.117
BA	03	1996	Gas	7018.5	2437497	873.75	10485	2129763.004
BAP	01	1996	#2	264.4	21752	5833320.083	69999841	126886.3785
BAP	02	1996	#2	306.2	25034	5832486.75	69989841	146010.4733
BAP	03	1996	#2	289	24142	5832486.75	69989841	140807.8951
BAP	04	1996	#2	269.8	22983	5832486.75	69989841	134048.043
BYP	01	1996	#2	610.5	58133	5817583	69810996	338193.5525
BYP	02	1996	#2	559.4	49526	5817583	69810996	288121.6157
BYP	03	1996	#2	465.3	42596	5817583	69810996	247805.7655
BYP	04	1996	#2	493.6	46569	5817583	69810996	270919.0227
CN	04	1996	#2	7617.2	18969	5856890.333	70282684	111099.3527
CN	04	1996	Coal	7617.2	1698309	12516.41667	150197	42513486.15
CN	05	1996	#2	8613.1	25864	5856600.583	70279207	151475.1175
CN	05	1996	Coal	8613.1	2002582	12516.41667	150197	50130301.44
CS	01	1996	#2	7149.2	11728	5841584.667	70099016	68510.10497
CS	01	1996	Coal	7149.2	848799	12583.25	150999	21361300.03
CS	02	1996	#2	8150.8	6078	5352243.75	64226925	32530.93751
CS	02	1996	Coal	8150.8	1219227	12583.25	150999	30683676.3
DBP	01	1996	#2	281.4	21149	5804973.083	69659677	122769.3757
DBP	02	1996	#2	236	18746	5804973.083	69659677	108820.0254
DBP	03	1996	#2	260.7	19645	5804973.083	69659677	114038.6962
DBP	04	1996	#2	223.9	16688	5804973.083	69659677	96873.39081
DBP	05	1996	#2	263	19722	5804973.083	69659677	114485.6791
DBP	06	1996	#2	242.7	18204	5804973.083	69659677	105673.73
DBP	07	1996	#2	663.1	75068	5804973.083	69659677	435767.7194
DBP	08	1996	#2	710.6	81074	5804973.083	69659677	470632.3878
DBP	09	1996	#2	753	78835	5804973.083	69659677	457635.053
DBP	10	1996	#2	629.5	72439	5804973.083	69659677	420506.4452
HGP	01	1996	#2	252.4	1462	5855855	70270260	8561.26001
HGP	01	1996	Gas	252.4	81185	1047.25	12567	85020.99125
HGP	02	1996	#2	427.9	1348	5855855	70270260	7893.69254
HGP	02	1996	Gas	427.9	159017	1046.25	12555	166371.5363
HGP	03	1996	#2	173.6	1317	5855855	70270260	7712.161035
HGP	03	1996	Gas	173.6	59400	1046.25	12555	62147.25
HGP	04	1996	#2	448.1	2241	5855855	70270260	13122.97106
HGP	04	1996	Gas	448.1	199799	1046.25	12555	209039.7038
ICP	01	1996	#2	47.3	4386	5726978.083	68723737	25118.52587
ICP	02	1996	#2	78.1	6748	5727230.583	68726767	38647.35198
ICP	03	1996	#2	71	5714	5726978.083	68723737	32723.95277
ICP	04	1996	#2	98.1	8555	5726978.083	68723737	48994.2975
ICP	05	1996	#2	91.4	8287	5726978.083	68723737	47459.46738
ICP	06	1996	#2	107.9	10253	5726978.083	68723737	58718.70629
ICP	07	1996	#2	1125	13449	5726978.083	68723737	77022.12824
ICP	07	1996	Gas	1125	700866	1046.916667	12563	733748.2965
ICP	08	1996	#2	1269.2	27576	5726978.083	68723737	157927.1476
ICP	08	1996	Gas	1269.2	717194	784.5	9414	562638.693
ICP	09	1996	#2	1176.9	14657	5726978.083	68723737	83940.31777
ICP	09	1996	Gas	1176.9	750155	1046.916667	12563	785349.7721
ICP	10	1996	#2	1185.7	27213	5726978.083	68723737	155848.2546
ICP	10	1996	Gas	1185.7	673692	784.5	9414	528511.374

X 10^6 Btu

gas - Btu/cf

oil - Btu/bbl

cf? mmcf?

Plant	Unit	Nbooper_Yr	Fuel	Sum_Oper_Hrs	Sum_Fuel_Burn	Avg_Fuel_BTU	Sum_Fuel_BTU	Total_Heat
ICP	11	1996	#2	106.5	124579	488600.25	5863203	60869.33054
NU	03	1996	#2	3109.5	812	5800000	69600000	4709.6
PJP	01	1996	#2	35.4	1346	5819275.417	69831305	7832.744711
RPP	01	1996	#2	22.6	992	5816024	69792288	5769.495808
SR	01	1996	#2	2236.8	334	5863045.917	70356551	1958.257336
SR	01	1996	#6	2236.8	56436	6338318.083	76059817	357709.3194
SR	01	1996	Gas	2236.8	329515	1020.5	12246	336270.0575
SR	02	1996	#2	2025.9	290	5863045.917	70356551	1700.283316
SR	02	1996	#6	2025.9	51488	6338318.083	76059817	326347.3215
SR	02	1996	Gas	2025.9	292546	1020.5	12246	298543.193
SR	03	1996	#2	4765.8	440	5863045.917	70356551	2579.740203
SR	03	1996	#6	4765.8	95671	6361351.75	76336221	608596.8833
SR	03	1996	Gas	4765.8	2065807	1020.416667	12245	2107983.893
SRP	01	1996	#2	196.4	20070	5863367	70360404	117677.7757
SRP	02	1996	#2	214.9	22027	5863367	70360404	129152.3849
SRP	03	1996	#2	191.7	19960	5863375.333	70360504	117032.9717
TUP	01	1996	#2	29.3	1324	5850495.667	70205948	7746.056263
TUP	02	1996	#2	25.6	1113	5850662.333	70207948	6511.787177
TUP	03	1996	#2	159.1	24748	5850495.667	70205948	144788.0668
TUP	04	1996	#2	189.6	29460	5850495.667	70205948	172355.6023
UFP	01	1996	Gas	8422.8	2824464	1042.25	12507	2943797.604
UFP	04	1996	#2	720	95	5855692	70268304	556.29074
UFP	04	1996	Gas	720	43389	1042.25	12507	45222.18525
UFP	05	1996	#2	720	95	5855692	70268304	556.29074
UFP	05	1996	Gas	720	43385	1042.25	12507	45218.01625
UFP	06	1996	#2	720	0	0	0	0
UFP	06	1996	Gas	720	212591	1042.25	12507	221572.9698

Florida Power
CORPORATION

RECEIVED
JAN 09 1997
BUREAU OF
AIR REGULATION

January 6, 1997

Mr. Al Linero, P.E.
Administrator, New Source Review Section
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Linero:

1270028

Re: DeBary- DEP Permit No. AO49-203114 and PSD-FL-181 167A
Request to Burn Natural Gas in Units P7 through P10

Florida Power Corporation (FPC) has received your December 2, 1996 letter requesting additional information regarding the submittal referenced above. Each request item is discussed in detail below.

Issue-- Were each of these CTs capable of firing natural gas when they were originally permitted? Was there any intention or consideration or provision made for firing natural gas when these units were originally permitted? If so, provide a description. What additional equipment (new combustors, new water injectors, ...) is needed to fire natural gas on these units which were permitted to fire only fuel oil? What additional pipeline equipment, including gas compressors, pipeline to connect to a main line, regulators and meters, and other equipment, will be added to convert these turbines to fire natural gas?

Response-- Natural gas was not available when the units were originally permitted and so it was not considered to be a viable option. Natural gas has only very recently become available from the supplier. Each of the GE units at DeBary is capable of firing natural gas, provided that some modifications are made. Specifically, to combust natural gas, the units require replacement of the combustion covers, the addition of gas and purge air manifold systems, the installation of a gas control cabinet, gas metering tubes, instrumentation and control logic changes. In addition, a 3.3 mile pipeline, as well as gas regulation and filtration equipment must be installed. The installation will not require gas compression, as the pipeline pressure supplied to DeBary will be greater than required and must be regulated down to the needed pressure.

Issue-- Compare past actual emissions, in tpy, to future potential emissions after the natural gas conversion, for determining PSD applicability of NO_x, CO, particulates and VOCs.

ENVIRONMENTAL SERVICES DEPARTMENT • H2G
GENERAL OFFICE: 3201 Thirty-fourth Street South • P.O. Box 14042 • St. Petersburg • Florida 33733 • (813) 866-5151
A Florida Progress Company

Response--This comment is difficult to address due to the uncertainty concerning the amount of interruptible natural gas that may be available to burn. The circumstances responsible for this uncertainty are presented in the response below relating to the restrictions or limitations in the contract for supplying natural gas. It should be noted that, under the definition of *actual emissions* (62-210.200(12)(b)), the Department may presume that unit-specific allowable emissions for an emissions unit are equivalent to the actual emissions of the emissions unit (i.e., past actual emissions may be considered to be equivalent to allowable emissions) provided that, for any regulated air pollutant, such unit-specific allowable emissions limits are federally enforceable. It is important to note that comparing potential-to-potential emissions for the switch from No. 2 fuel oil to natural gas results in significant decreases of all criteria pollutants:

Pollutant	No. 2 Fuel Oil		Natural Gas	
	lb/hr	tons/yr	lb/hr	tons/yr
NO_x	182	1,234	107	726
PM/PM_{10}	17	116	7.5	51
CO	54	365	21	144
VOCs	5	34	3	20
SO_2	555	1,925	3	20
SAM	69	469	0.4	3

Issue-- Compare capacity factors before and after the natural gas conversion.

Response-- Further discussion with DEP staff indicated that this issue was raised in the DEP's letter due to a misunderstanding regarding FPC's request. FPC is not proposing to double the existing allowable capacity factor for these peaking units (i.e., 3,390 hr/yr on oil plus 3,390 hr/yr on natural gas). The intention of FPC's application was to request that the current allowable capacity factors be retained, whether the peaking units are firing fuel oil or natural gas.

Issue-- Provide your fuel costs for fuel oil and natural gas. Provide a description of any restrictions or limitations in the contract for supplying natural gas to each unit.

Response-- Florida Gas Transmission (FGT) cannot guarantee the daily or annual amount of natural gas that will be available. Since the supply will be interruptible, restrictions are day-to-day, and FGT has indicated to FPC that as little as no gas may be available. Based on FGT's representations, FPC expects to use oil as the primary fuel, but will take advantage of natural gas availability when it occurs. The DeBary units are run mainly during peak load demand periods, which often coincide with peak natural gas demand periods. This and the interruptible nature of the natural gas supply, make it very difficult to estimate total annual gas consumption. One certainty is that the units will pollute less when running on natural gas, resulting in a benefit to the environment.

Issue-- What is the lowest NO_x emission rate achievable for these units using wet injection controls? Are dry low NO_x burners commercially available for these units?

Response-- The lowest NO_x emission rate continuously achievable for these units using wet injection is the 25 ppmvd level proposed by FPC in the permit application. Before discussing the feasibility of installing dry low NO_x technology on these units, it is FPC's position that it is inappropriate to consider the retrofit of BACT technology for a non-PSD permit review. FPC is proposing to use natural gas as a supplemental fuel to No. 2 fuel oil and is proposing to decrease pollutant emissions while burning natural gas. Since emissions will not increase above those permitted for burning oil, the project is not subject to PSD review and the accompanying BACT determination.

In addition, it is FPC's understanding that the BACT determinations resulting in the application of dry low NO_x technology were for combined cycle units firing primarily natural gas with oil as a back-up fuel. The DeBary units are simple cycle peaking units that will remain primarily oil-fired with natural gas used as an interruptible supplemental fuel that is in limited supply.

FPC has received an estimate of the cost to install dry low NO_x control technology on Units P7 through P10 from General Electric, which is the manufacturer. Retrofitting this technology on these units would require a substantial rebuilding of the units, including the combustors and the computer control system. The cost would be approximately $5 million per unit for a total of $20 million for the four units. Since natural gas will be available in a limited, interruptible supply, such an expense would cause FPC to withdraw the request and abandon the use of natural gas at the DeBary facility.

FPC hopes that the information given satisfactorily addresses your questions. FPC wishes to use the limited amount of natural gas which has become available to it. The already- installed water injection control technology will limit NO_x emissions to 25 ppmvd, reducing emissions when compared to those from burning fuel oil, and resulting in a benefit to the environment.

Please feel free to contact me at (813) 866-5158 if you should have any questions.

Sincerely,

Scott H. Osbourn
Senior Environmental Engineer

cc: Martin Costello, DEP DARM
Len Kozlov, DEP Central District
Ken Kosky, KBN/Golder

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

December 2, 1996

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Jeffrey Pardue, Director
Environmental Service Department
Florida Power Corp.
3201 34th Street South
St. Petersburg, FL 33711

Dear Mr. Pardue:

RE: FPC Debary
1270028-AC/PSD-FL-167~~A~~I
Request to Amend Permit

The Department has evaluated your request for natural gas firing on Turbines P7, P8, P9 and P10. The following information is required to further evaluate your request:

1. Were each of these combustion turbines capable of firing natural gas when they were originally permitted? Was there any intention or consideration or provisions made for firing natural gas when these units were originally permitted? If so, provide a description. What additional equipment (new combustors, new water injectors, ...) is needed to fire natural gas on these units which were permitted to fire only fuel oil? What additional pipeline equipment, including gas compressors, pipeline to connect to a main line, regulators and meters, and other equipment, will be added to convert these turbines to fire natural gas?

2. Compare past actual emissions, in tpy, to future potential emissions after the natural gas conversion for determining PSD applicability of NOx, CO, particulates and VOC.

3. Compare capacity factors before and after the natural gas conversion.

4. Provide your fuel costs for fuel oil and natural gas. Provide a description of any restrictions or limitations in the contract for supplying natural gas to each unit.

5. What is the lowest NOx emission rate achievable for these units using wet injection controls? Are dry low NOx burners commercially available for these units?

If you need clarification or have any questions please contact me at (904) 488-1344, or email (COSTELLO_M@DEP.STATE.FL.US).

Sincerely,

Martin Costello

Martin Costello, P.E.
New Source Review Section

cc: Len Kozlov, CD
Ellen Porter, NPS

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Florida Power
CORPORATION

November 7, 1996

Mr. Clair Fancy
Florida Department of Environmental Protection
2600 Blair Stone Rd.
Tallahassee, Florida 32399-2400

Dear Mr. Fancy:

Re: Air Construction Permit Application for Combustion Turbine Natural Gas Conversion at FPC's DeBary Plant Site (DEP Permit No. AO64-233544; PSD FL-167)

This letter serves to transmit Florida Power Corporation's (FPC) application for an air construction permit to install natural gas-firing capability for combustion turbines at the above-referenced site. Please find enclosed four copies of the application, as well as a check in the amount of $250.00 for the processing of this application.

FPC has the opportunity to use, on an interruptible basis, natural gas as a supplemental fuel in peaking units P7-P10 at DeBary. Because the natural gas will be supplied on an interruptible basis, the currently permitted No. 2 fuel oil will continue to be the primary fuel for these units.

If you should have any questions or require additional information, please do not hesitate to contact me at (813) 866-5158.

Sincerely,

Scott H. Osbourn
Senior Environmental Engineer

Enclosure

cc: Vivian Garfein, DEP Central District
Ken Kosky, P.E., KBN

ENVIRONMENTAL SERVICES DEPARTMENT • H2G
GENERAL OFFICE: 3201 Thirty-fourth Street South • P.O. Box 14042 • St. Petersburg • Florida 33733 • (813) 866-5151
A Florida Progress Company

Accounts Payable Department C2N
P.O. Box 14042
St. Petersburg, Fl 33733-4042

Florida Power
CORPORATION

63-115
631

DATE 10/16/96 CHECK NO. 1845422

PAY: $250*DOLLARS AND 00 CENTS $*******250.00

SunBank / Mid-Florida

TO THE ORDER OF

STATE OF FLORIDA
DEPARTMENT OF ENVIRON PROT
2600 BLAIR STONE RD
TALLAHASSEE FL 32399-2400

Void after 60 days

J. V. Smallwood
Treasurer

[redacted]

FPC/ DeBary Plant

Air Construction Permit Application for Natural Gas Conversion at Combustion Turbines P7, P8, P9 and P10

Department of
Environmental Protection

DIVISION OF AIR RESOURCES MANAGEMENT

APPLICATION FOR AIR PERMIT - LONG FORM

See Instructions for Form No. 62-210.900(1)

I. APPLICATION INFORMATION

This section of the Application for Air Permit form identifies the facility and provides general information on the scope and purpose of this application. This section also includes information on the owner or authorized representative of the facility (or the responsible official in the case of a Title V source) and the necessary statements for the applicant and professional engineer, where required, to sign and date for formal submittal of the Application for Air Permit to the Department. If the application form is submitted to the Department using ELSA, this section of the Application for Air Permit must also be submitted in hard-copy.

Identification of Facility Addressed in This Application

Enter the name of the corporation, business, governmental entity, or individual that has ownership or control of the facility; the facility site name, if any; and the facility's physical location. If known, also enter the facility identification number.

1. Facility Owner/Company Name: **Florida Power Corporation**	
2. Site Name: **DeBary Facility**	
3. Facility Identification Number: **1270028**	[ ] Unknown
4. Facility Location Information: Street Address or Other Locator: **West Highbanks Road** City: **DeBary** County: **Volusia** Zip Code: **33713**	
5. Relocatable Facility? [ ] Yes [X] No	6. Existing Permitted Facility? [X] Yes [ ] No

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	11-8-96
2. Permit Number:	1270028-002-AC
3. PSD Number (if applicable):	PSD-FL-167A I
4. Siting Number (if applicable):	

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official:

W. Jeffrey Pardue, C.E.P., Director Environmental Services Dep

2. Owner/Authorized Representative or Responsible Official Mailing Address:

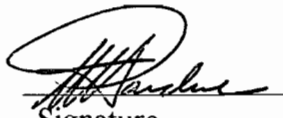
Organization/Firm: **Florida Power Corporation**
Street Address: **3201 34th Street South**
City: **St. Petersburg** State: **FL** Zip Code: **33711**

3. Owner/Authorized Representative or Responsible Official Telephone Numbers:

Telephone: **(813) 866-4387** Fax: **(813) 866-4926**

4. Owner/Authorized Representative or Responsible Official Statement:

I, the undersigned, am the owner or authorized representative of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.*



Signature

11/6/96

Date

* Attach letter of authorization if not currently on file.

Scope of Application

This Application for Air Permit addresses the following emissions unit(s) at the facility. An Emissions Unit Information Section (a Section III of the form) must be included for each emissions unit listed.

Emissions Unit ID		Description of Emissions Unit	Permit Type
Unit #	Unit ID		
1R	*	Combustion Turbine Units 7,8,9 and 10	ACM2

See individual Emissions Unit (EU) sections for more detailed descriptions.
Multiple EU IDs indicated with an asterisk (*). Regulated EU indicated with an "R".

Purpose of Application and Category

Check one (except as otherwise indicated):

Category I: All Air Operation Permit Applications Subject to Processing Under Chapter 62-213, F.A.C.

This 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 renewed: _____

[ ] 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 construction permit application. Also check Category III.

Operation permit to be revised/corrected: _____

_____

[ ] Air operation permit revision for a Title V source for reasons other than construction or modification of an emissions unit. Give reason for the revision e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit to be revised: _____

Reason for revision: _____

_____

Category II: All Air Construction Permit Applications Subject to Processing Under Rule 62-210.300(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 Rule 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. Give reason for revision; e.g.; to address one or more newly constructed or modified emissions units.

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).

Current operation permit number(s), if any: _____

AO64-233544

[ ] 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.

Application Processing Fee

Check one:

[X] Attached - Amount: $ **$ 250.00** [ ] Not Applicable.

Construction/Modification Information

1. Description of Proposed Project or Alterations:

This application is for the installation of natural gas firing for combustion turbine units P7, P8, P9 and P10.

2. Projected or Actual Date of Commencement of Construction :

1 Jan 1997

3. Projected Date of Completion of Construction :

1 Apr 1997

Professional Engineer Certification

1. Professional Engineer Name: **Kennard F. Kosky**
   Registration Number: **14996**

2. Professional Engineer Mailing Address:
   Organization/Firm: **KBN Eng. and Applied Sciences, Inc.**
   Street Address: **6241 NW 23rd Street, Suite 500**
   City: **Gainesville** State: **FL** Zip Code: **32653-1500**

3. Professional Engineer Telephone Numbers:
   Telephone: **(352)336-5600** Fax: **(352)366-6603**

4. Professional Engineer's 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 pollution 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 [X] 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 unit 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

10/22/96
Date

(seal)

STATE OF FLORIDA REGISTERED ENGINEER

* Attach any exception to certification statement.

Application Contact

1. Name and Title of Application Contact:
   Scott H. Osbourn, Senior Environmental Engineer

2. Application Contact Mailing Address:

   Organization/Firm: **Florida Power Corporation**
   Street Address: **3201 34th St. South**
   City: **St. Petersburg** State: **FL** Zip Code: **33711**

3. Application Contact Telephone Numbers:

   Telephone: **(813) 866-5158** Fax: **(813) 866-4926**

Application Comment

See Attachment DB-AI-AC

ATTACHMENT DB-AI-AC

APPLICATION COMMENT

ATTACHMENT DB-AI-AC

This application is for the Florida Power Corporation's DeBary Facility. The application's structure for regulated emission units is as follows:

Emission Unit	EU1
General	Combustion Turbine Units 7, 8, 9, and 10
Emission Points	1 Stack per unit
Segments	No. 2 fuel oil Natural Gas
Pollutants	SO_2, PM/PM10, NO_x, CO, VOC, SAM
CMS	SO_2, NO_x; water-to-fuel ratio
PSD	SO_2, PM/PM10, NO_x

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates:
   Zone: **17** East (km): **467.5** North (km): **3197.2**

2. Facility Latitude/Longitude:
   Latitude (DD/MM/SS): **28 / 54 / 17** Longitude: (DD/MM/SS): **81 / 19 / 55**

3. Governmental Facility Code:	4. Facility Status Code:	5. Facility Major Group SIC Code:	6. Facility SIC(s):
0	**A**	**49**	**4911**

7. Facility Comment (limit to 500 characters):

The DeBary Facility consists of 6 combustion turbine peaking units which are fired by No. 6 or No. 2 fuel oil and 4 combustion turbines, which are fired by No. 2 fuel oil and limited in hours of operation. This application is for a permit to construct the capability for natural gas firing at the DeBary site for the 4 combustion turbines operated under Permit No. AO64-233544.

Facility Contact

1. Name and Title of Facility Contact:
   W.B. Hicks, Plant Manager

2. Facility Contact Mailing Address:
   Organization/Firm: **Florida Power Corporation**
   Street Address: **P.O. Box 79**
   City: **Debary** State: **FL** Zip Code: **32713**

3. Facility Contact Telephone Numbers:
   Telephone: **(407) 668-5103** Fax: **(407) 646-8370**

Facility Regulatory Classifications

1. Small Business Stationary Source?		
[ ] Yes	[x] No	[ ] Unknown
2. Title V Source?		
[x] Yes	[ ] No	
3. Synthetic Non-Title V Source?		
[ ] Yes,	[x] No	
4. Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?		
[x] Yes	[ ] No	
5. Synthetic Minor Source of Pollutants Other than HAPs?		
[ ] Yes	[x] No	
6. Major Source of Hazardous Air Pollutants (HAPs)?		
[x] Yes	[ ] No	
7. Synthetic Minor Source of HAPs?		
[ ] Yes	[x] No	
8. One or More Emissions Units Subject to NSPS?		
[x] Yes	[ ] No	
9. One or More Emissions Units Subject to NESHAP?		
[ ] Yes	[x] No	
10. Title V Source by EPA Designation?		
[ ] Yes	[x] No	

11. Facility Regulatory Classifications Comment (limit to 200 characters):

Combustion Turbine Nos. 7,8,9,10 - NSPS, 40 CFR 60 Subpart GG.

B. FACILITY REGULATIONS

Rule Applicability Analysis (Required for Category II applications and Category III applications involving non Title-V sources. See Instructions.)

Not Applicable

List of Applicable Regulations (Required for Category I applications and Category III applications involving Title-V sources. See Instructions.)

See Attachment DB-FI-B

C. FACILITY POLLUTANTS

Facility Pollutant Information

1. Pollutant Emitted		2. Pollutant Classification
SO2	Sulfur Dioxide	A
PM	Particulate Matter - Total	A
PM10	Particulate Matter - PM10	A
NOX	Nitrogen Oxides	A
CO	Carbon Monoxide	A
VOC	Volatile Organic Compounds	A
SAM	Sulfuric Acid Mist	A

D. FACILITY POLLUTANT DETAIL INFORMATION

Facility Pollutant Detail Information:

1. Pollutant Emitted:		
2. Requested Emissions Cap:	(lb/hr)	(tons/yr)
3. Basis for Emissions Cap Code:		
4. Facility Pollutant Comment (limit to 400 characters):		

Facility Pollutant Detail Information:

1. Pollutant Emitted:		
2. Requested Emissions Cap:	(lb/hr)	(tons/yr)
3. Basis for Emissions Cap Code:		
4. Facility Pollutant Comment (limit to 400 characters):		

E. FACILITY SUPPLEMENTAL INFORMATION

Supplemental Requirements for All Applications

1. Area Map Showing Facility Location:
   [X] Attached, Document ID: DB-FI-E1
   [ ] Not Applicable [ ] Waiver Requested

2. Facility Plot Plan:
   [X] Attached, Document ID: DB-FI-E2
   [ ] Not Applicable [ ] Waiver Requested

3. Process Flow Diagram(s):
   [X] Attached, Document ID(s): DB-FI-E3
   [ ] Not Applicable [ ] Waiver Requested

4. Precautions to Prevent Emissions of Unconfined Particulate Matter:
   [ ] Attached, Document ID: _____
   [X] Not Applicable [ ] Waiver Requested

5. Fugitive Emissions Identification:
   [ ] Attached, Document ID: _____
   [X] Not Applicable [ ] Waiver Requested

6. Supplemental Information for Construction Permit Application:
   [ ] Attached, Document ID: _____
   [X] Not Applicable

Additional Supplemental Requirements for Category I Applications Only

7. List of Proposed Exempt Activities:
   [ ] Attached, Document ID: _____
   [X] Not Applicable

8. List of Equipment/Activities Regulated under Title VI:
   [ ] Attached, Document ID: _____
   [ ] Equipment/Activities On site but Not Required to be Individually Listed
   [X] Not Applicable

9. Alternative Methods of Operation:
   [ ] Attached, Document ID: _____
   [X] Not Applicable

10. Alternative Modes of Operation (Emissions Trading):
    [ ] Attached, Document ID: _____
    [X] Not Applicable

11. Identification of Additional Applicable Requirements:
[ ] Attached, Document ID: _____
[X] Not Applicable

12. Compliance Assurance Monitoring Plan:
[ ] Attached, Document ID: _____
[X] Not Applicable

13. Risk Management Plan Verification:

[ ] Plan Submitted to Implementing Agency - Verification Attached
Document ID: _____

[ ] Plan to be Submitted to Implementing Agency by Required Date

[X] Not Applicable

14. Compliance Report and Plan
[ ] Attached, Document ID: _____
[X] Not Applicable

15. Compliance Statement (Hard-copy Required)
[ ] Attached, Document ID: _____
[X] Not Applicable

ATTACHMENT DB-FI-B

(The following requirements are consistent with the requirements identified in the Title V application.)

ATTACHMENT DB-FI-B
APPLICABLE REQUIREMENTS LISTING - POWER PLANTS

FACILITY: FPC DeBary Plant

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 (Asbetos)

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
62-210.300(3)(a)10.	- steam cleaning equipment
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
62-210.300(3)(a)20.	- emergency generators < 32,000 gal/yr
62-210.300(3)(a)21.	- general purpose engines < 32,000 gal.yr
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)	- AOR's
62-210.900(5)	- AOR Form

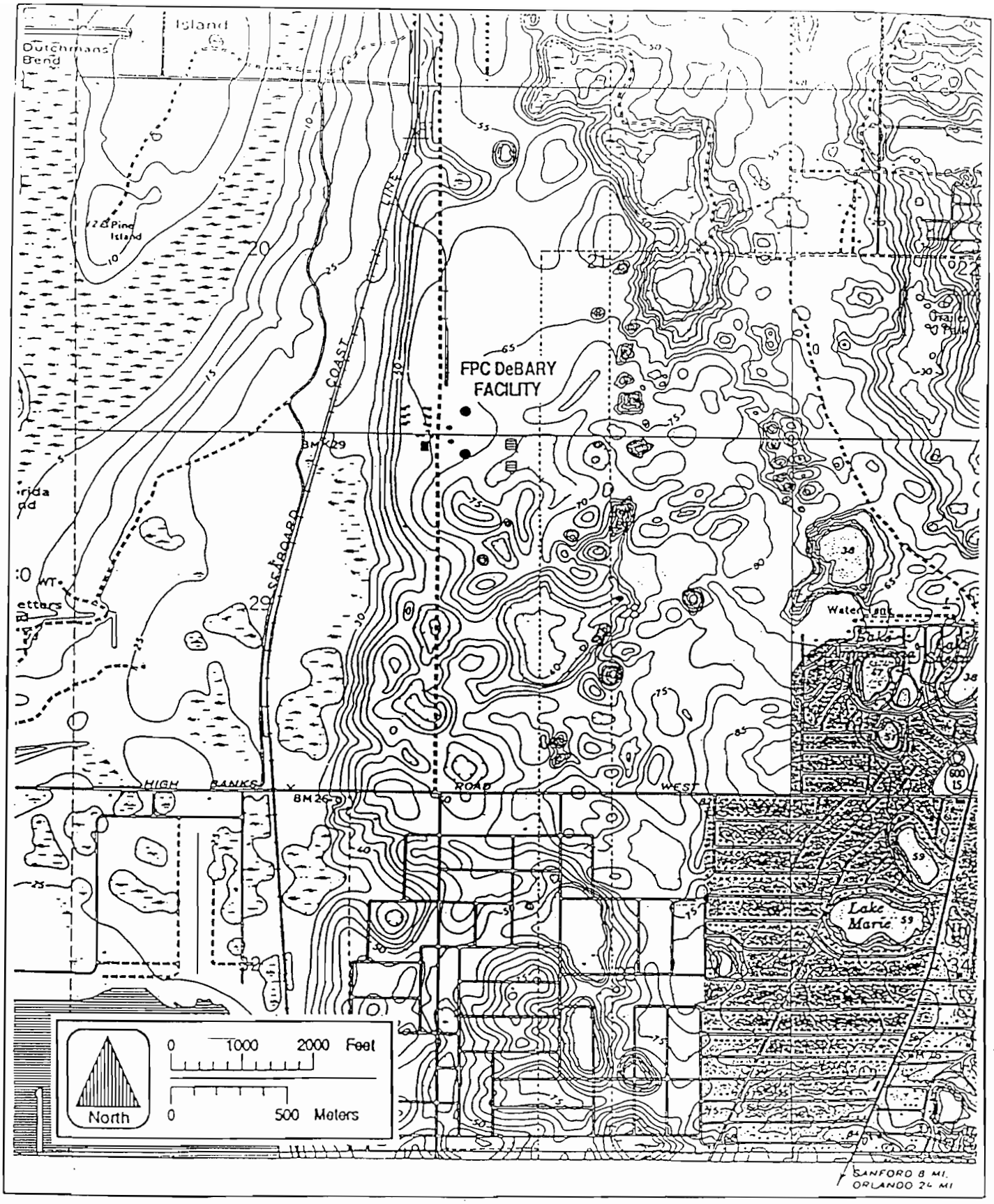
Title V Permits:	
62-213.205(1)(a)	- Fees
62-213.205(1)(b)	
62-213.205(1)(c)	
62-213.205(1)(e)	
62-213.205(1)(f)	
62-213.205(1)(g)	
62-213.205(1)(i)	
62-213.205(1)(j)	
62-213.400	- Permits/Revisions
62-213.410	- Changes without permit revisions
62-213.420.(1)(b)2.	- Permits-allows continued operation
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	- Notification and Fee
62-257.400	- Fee Schedule
62-257.900	- Form
Stationary Sources-Emission Standards:	
62-296.320(2) (State Only)	- Odor
62-296.320(3)(b)(State Only)	- Emergency Open Burning
62-296.320(4)(b)	- General VE Standard
62-296.320(4)(c)	- Unconfined Emissions of Particulate Matter
Stationary Sources-Emission Monitoring	
62-297.310(7)(a)10.	- Exemption of annual VE for 210.300(3)(a) sources/Gen. Per.

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 reguired)
40 CFR 61.19	- Circumvention
40 CRF 61.145	- Demolition and Renovation
40 CFR 61.148	- Standard for Insulating Material

ATTACHMENT DB-FI-E1

AREA MAP

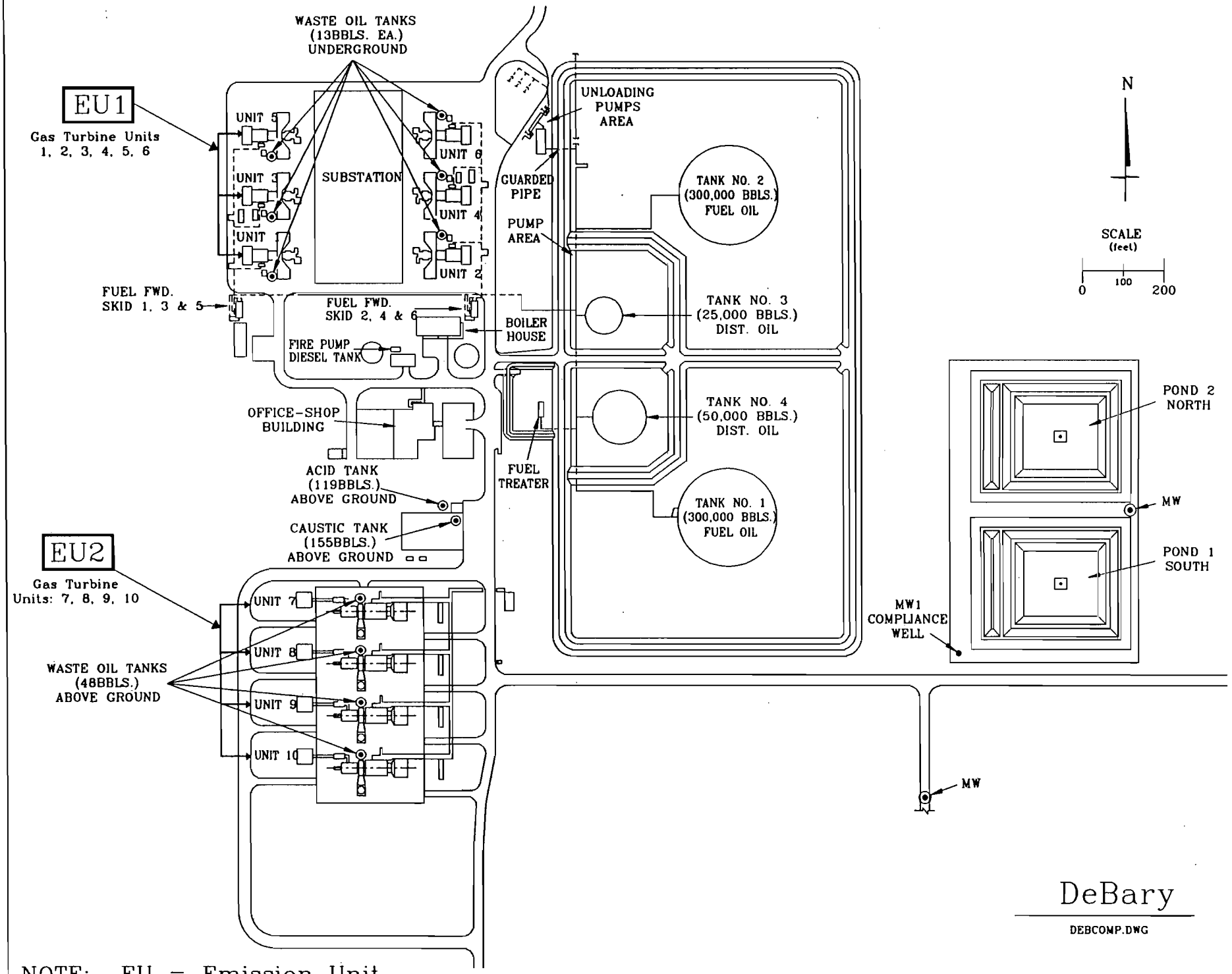


LOCATION OF THE FPC DeBARY FACILITY

KBN

ATTACHMENT DB-FI-E2

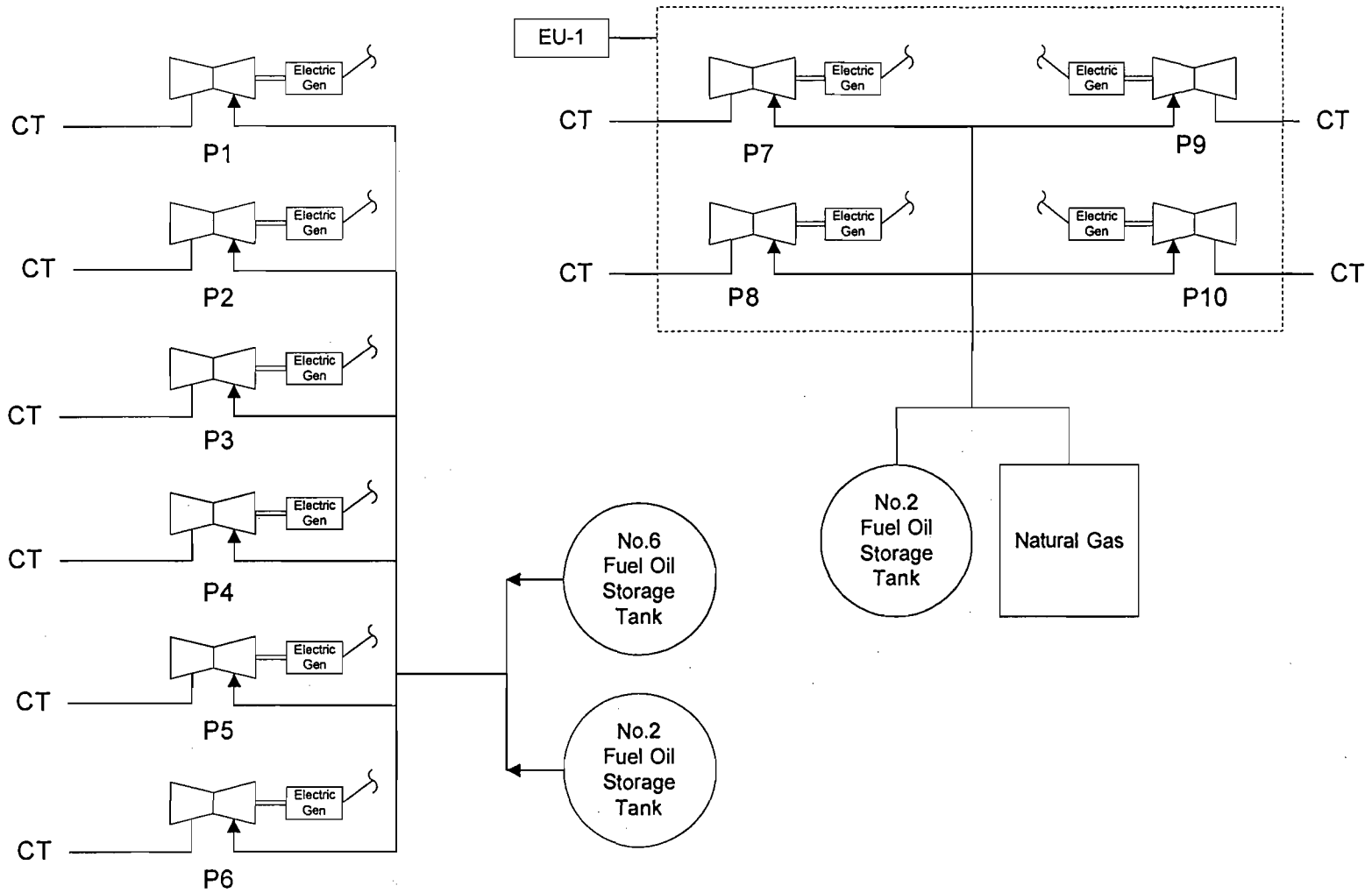
FACILITY PLOT PLAN



NOTE: EU = Emission Unit

ATTACHMENT DB-FI-E3

PROCESS FLOW DIAGRAM



Note:
GT = Gas Turbine
EU = Emission Unit Number
See segment section for the operating rate of each emission unit

Florida Power Corporation DeBary, Florida Facility Process Flow Diagram	Process Flow Legend: Solid / Liquid Gas Steam	Emission Unit: Overall Plant Process Area: Overall Plant *Filename:* FPCDBGAS.VSD *Latest Revision Date:* 10/30/96	KBN Engineering and Applied Sciences, Inc.

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through L as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application. Some of the subsections comprising the Emissions Unit Information Section of the form are intended for regulated emissions units only. Others are intended for both regulated and unregulated emissions units. Each subsection is appropriately marked.

A. TYPE OF EMISSIONS UNIT (Regulated and Unregulated Emissions Units)

Type of Emissions Unit Addressed in This Section

1. Regulated or Unregulated Emissions Unit? Check one:

[X] 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 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).

[X] 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.

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

Emissions Unit Description and Status

1. Description of Emissions Unit Addressed in This Section (limit to 60 characters): **Combustion Turbine Units 7, 8, 9 and 10**		
2. Emissions Unit Identification Number: [ ] No Corresponding ID [ ] 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 (limit to 500 characters): **ID No.: P7, P8, P9, P10, 015, 016, 017, 018. Each turbine is currently permitted to burn fuel oil and operate up to the equivalent of 3,390 hrs/yr at peak or other lesser loads and 38.7% capacity factor. The capacity factor shall be limited to 33% based on a weighted 12-month rolling average sulfur content not to exceed 0.3%. If the sulfur content is less than 0.3%, the capacity factor can be adjusted up to 38.7%. This application is for the installation of natural gas firing.**		

Emissions Unit Control Equipment Information

A.

1. Description (limit to 200 characters):

Water injection

2. Control Device or Method Code: **28**

B.

1. Description (limit to 200 characters):

2. Control Device or Method Code:

C.

1. Description (limit to 200 characters):

2. Control Device or Method Code:

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

Emissions Unit Details

1. Initial Startup Date:	**1 Nov 1992**
2. Long-term Reserve Shutdown Date:	
3. Package Unit: Manufacturer:	**General Electric** Model Number: **PG7111EA**
4. Generator Nameplate Rating:	**96** MW
5. Incinerator Information: Dwell Temperature:	°F
Dwell Time:	seconds
Incinerator Afterburner Temperature:	°F

Emissions Unit Operating Capacity

1. Maximum Heat Input Rate:		**1,159**	mmBtu/hr
2. Maximum Incineration Rate:	lbs/hr		tons/day
3. Maximum Process or Throughput Rate:			
4. Maximum Production Rate:			
5. Operating Capacity Comment (limit to 200 characters):			

Max. heat input rate based on natural gas firing at 20°F.Gen. nameplate rating at ISO conditions (59 °F)during natural gas firing.

Emissions Unit Operating Schedule

1. Requested Maximum Operating Schedule:			
	hours/day		days/week
	weeks/yr	**3,390**	hours/yr

D. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)

Rule Applicability Analysis (Required for Category II Applications and Category III applications involving non Title-V sources. See Instructions.)

Not Applicable

List of Applicable Regulations (Required for Category I applications and Category III applications involving Title-V sources. See Instructions.)

See Attachment DB-E02-D

E. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: **See DB-FI-E2**
2. Emission Point Type Code: [X] 1 [ ] 2 [ ] 3 [ ] 4
3. Descriptions of Emissions Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): **Combustion turbine gases exhaust through single stack per turbine.**
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: **Not Applicable**
5. Discharge Type Code: [ ] D [ ] F [ ] H [ ] P [ ] R [X] V [ ] W
6. Stack Height: **50** feet
7. Exit Diameter: **13.8** feet
8. Exit Temperature: **1,050** °F

9. Actual Volumetric Flow Rate:	**1,586,172** acfm
10. Percent Water Vapor:	%
11. Maximum Dry Standard Flow Rate:	dscfm
12. Nonstack Emission Point Height:	feet
13. Emission Point UTM Coordinates: Zone: East (km): North (km):	
14. Emission Point Comment (limit to 200 characters): **Exit temperature and flow rate given for natural gas firing at an ambient temperature of 59 °F. Stack data for one CT. Exit Diameter = 13.75 ft (rounded to 13.8).**	

F. SEGMENT (PROCESS/FUEL) INFORMATION
(Regulated and Unregulated Emissions Units)

Segment Description and Rate: Segment 1 of 2

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters): **No. 2 fuel oil**	
2. Source Classification Code (SCC): **20100101**	
3. SCC Units: **thousand gallons burned**	
4. Maximum Hourly Rate: **8.212**	5. Maximum Annual Rate: **27,838**
6. Estimated Annual Activity Factor:	
7. Maximum Percent Sulfur: **0.5**	8. Maximum Percent Ash: **0.1**
9. Million Btu per SCC Unit: **132**	
10. Segment Comment (limit to 200 characters): **Data for one CT at 59 °F. Heat content - 131.5 (LHV). Max annual rate - 33% capacity factor, weighted 12-mo. roll. 0.3% avg. sulfur content. If 12-mo. avg. less than 0.3%, cap. adj. to 38.7%.**	

Segment Description and Rate: Segment 2 of 2

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters): **Natural Gas**	
2. Source Classification Code (SCC): **2-01-002-01**	
3. SCC Units: **Million cubic feet**	
4. Maximum Hourly Rate: **1.048**	5. Maximum Annual Rate: **3,553**
6. Estimated Annual Activity Factor:	
7. Maximum Percent Sulfur:	8. Maximum Percent Ash:
9. Million Btu per SCC Unit: **1,000**	
10. Segment Comment (limit to 200 characters): **Maximum % Sulfur: 1 grain/100cf. 1)Max. hourly rate at 59°F for one CT. Annual rate based on 59°F (1,048 MMBtu/hr) and 3,390 hours (38.7% capacity factor). 2) Heat content - LHV**	

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

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

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

Pollutant Detail Information:

1. Pollutant Emitted: **SO2**
2. Total Percent Efficiency of Control: **0** %
3. Potential Emissions: **555** lb/hour **1,925** tons/year
4. Synthetically Limited? [**X**] Yes [ ] No
5. Range of Estimated Fugitive/Other Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/yr
6. Emission Factor: **0.5 %sulfur content** Reference: **AC Permit limit**
7. Emissions Method Code: [**X**] 0 [ ] 1 [ ] 2 [ ] 3 [ ] 4 [ ] 5
8. Calculation of Emissions (limit to 600 characters): **The potential emissions were based on No. 2 fuel oil. The capacity factor for these turbines were limited to 33% based on a weighted 12 month rolling maximum sulfur content of 0.3%. However, if the weighted rolling average sulfur content of the fuel oil is less than 0.3%, the capacity factor may be adjusted up to 38.7%. The SO2 emissions from natural gas for one CT are as follows: SO2 (lb/hr) = 2.99; SO2 (tons/yr) = 5.06. Assume 1 gr sulfur/100 cf (maximum sulfur content from fuel analysis).**
9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters): **Emissions, lb/hr - 1 unit, 0.5% sulfur content fuel oil and ambient temperature of 59 °F. Annual emissions - 4 units, 0.3% sulfur content fuel oil (59°F), 33% capacity factor.**

Emissions Unit Information Section 1 of 1
Allowable Emissions (Pollutant identified on front page)

A.

1. Basis for Allowable Emissions Code: **Other**	
2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: **0.3 % Sulfur avg.**	
4. Equivalent Allowable Emissions: **555** lb/hour	**1,925** tons/year
5. Method of Compliance (limit to 60 characters): **Fuel Analysis or EPA Method 6**	
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters): **Based on Permit Limit from fuel oil firing. Actual and potential emissions while firing natural gas will be lower.**	

B.

1. Basis for Allowable Emissions Code:	
2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units:	
4. Equivalent Allowable Emissions: lb/hour	tons/year
5. Method of Compliance (limit to 60 characters):	
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters):	

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

Pollutant Detail Information:

1. Pollutant Emitted: **NOX**
2. Total Percent Efficiency of Control: **80** %
3. Potential Emissions: **182** lb/hour **1,234** tons/year
4. Synthetically Limited? [**X**] Yes [ ] No
5. Range of Estimated Fugitive/Other Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/yr
6. Emission Factor: **42 ppmvd** Reference: **AC Permit limit**
7. Emissions Method Code: [**X**] 0 [ ] 1 [ ] 2 [ ] 3 [ ] 4 [ ] 5
8. Calculation of Emissions (limit to 600 characters): **The potential emissions are based on the permit limit firing fuel oil. The NOx emissions from natural gas for one CT are as follows: NOx (lb/hr) = 107; NOx (ton/yr) = 181.4. Basis is 25 ppmvd @ 15% O2.**
9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters): **Emissions, lb/hr - 1 unit, ambient temperature of 59°F. Annual emissions - 4 units, 59 °F and 38.7% capacity factor.**

Emissions Unit Information Section 1 **of** 1

Allowable Emissions (Pollutant identified on front page)

A.

1. Basis for Allowable Emissions Code: **OTHER**	
2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: **42 ppmvd @ 15% O2**	
4. Equivalent Allowable Emissions:	**182** lb/hour **1,234** tons/year
5. Method of Compliance (limit to 60 characters): **Annual compliance test, EPA Method 20**	
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters): **Based on permit limit from fuel oil firing. Actual and potential emissions while firing natural gas will be lower.**	

B.

1. Basis for Allowable Emissions Code:	
2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units:	
4. Equivalent Allowable Emissions:	lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters):	

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

Pollutant Detail Information:

1. Pollutant Emitted: **PM**
2. Total Percent Efficiency of Control: %
3. Potential Emissions: **17.2** lb/hour **116** tons/year
4. Synthetically Limited? [**X**] Yes [ ] No
5. Range of Estimated Fugitive/Other Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/yr
6. Emission Factor: **0.015 lb/MMBtu** Reference: **AC Permit limit**
7. Emissions Method Code: [**X**] 0 [ ] 1 [ ] 2 [ ] 3 [ ] 4 [ ] 5
8. Calculation of Emissions (limit to 600 characters): **The potential emissions are based on the permit limit firing fuel oil. The PM emissions from natural gas for one CT are as follows: PM (lb/hr) = 7.5; PM (ton/yr) = 12.71.**
9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters): **Emissions, lb/hr - 1 unit, ambient temperature of 59°F. Annual emissions - 4 units, 59°F and 38.7% capacity factor.**

Emissions Unit Information Section 1 **of** 1

Allowable Emissions (Pollutant identified on front page)

A.

1. Basis for Allowable Emissions Code: **OTHER**	
2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: **0.015 lb/MMBtu**	
4. Equivalent Allowable Emissions:	**17.2** lb/hour **116** tons/year
5. Method of Compliance (limit to 60 characters): **Annual Compliance test, EPA Method 5 or 17**	
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters): **Based on permit limit from fuel oil firing. Actual and potential emissions while firing natural gas will be lower. If VE limits are met, PM test is not required.**	

B.

1. Basis for Allowable Emissions Code:	
2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units:	
4. Equivalent Allowable Emissions:	lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters):	

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

Pollutant Detail Information:

1. Pollutant Emitted: **PM10**
2. Total Percent Efficiency of Control: %
3. Potential Emissions: **17.2** lb/hour **116** tons/year
4. Synthetically Limited? [**X**] Yes [ ] No
5. Range of Estimated Fugitive/Other Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/yr
6. Emission Factor: **0.015 lb/MMBtu** Reference: **AC Permit limit**
7. Emissions Method Code: [**X**] 0 [ ] 1 [ ] 2 [ ] 3 [ ] 4 [ ] 5
8. Calculation of Emissions (limit to 600 characters): **The potential emissions are based on the permit limit firing fuel oil. The PM10 emissions from natural gas for one CT are as follows: PM10 (lb/hr) = 7.5; PM10 (ton/yr) = 12.71**
9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters): **Emissions, lb/hr - 1 unit, ambient temperature of 59°F. Annual emissions - 4 units, 59°F and 38.7% capacity factor.**

Emissions Unit Information Section 1 of 1
Allowable Emissions (Pollutant identified on front page)

A.

1. Basis for Allowable Emissions Code: **OTHER**	
2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: **0.015 lb/MMBtu**	
4. Equivalent Allowable Emissions:	**17.2** lb/hour **116** tons/year
5. Method of Compliance (limit to 60 characters): **Annual Compliance test, EPA Method 5 or 17**	
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters): **Based on permit limit from firing fuel oil. Actual and potential emissions while firing natural gas will be lower. If VE limits are met, PM test is not required.**	

B.

1. Basis for Allowable Emissions Code:	
2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units:	
4. Equivalent Allowable Emissions:	lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters):	

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

Pollutant Detail Information:

1. Pollutant Emitted: **CO**
2. Total Percent Efficiency of Control: %
3. Potential Emissions: **54** lb/hour **365** tons/year
4. Synthetically Limited? [**X**] Yes [ ] No
5. Range of Estimated Fugitive/Other Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/yr
6. Emission Factor: **25 ppmvd** Reference: **AC Permit limit**
7. Emissions Method Code: [**X**] 0 [ ] 1 [ ] 2 [ ] 3 [ ] 4 [ ] 5
8. Calculation of Emissions (limit to 600 characters): **The potential emissions are based on the permit limit firing fuel oil. The CO emissions from natural gas for one CT are as follows: CO (lb/hr) = 21.3; CO (ton/yr) = 36.1.**
9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters): **Emissions, lb/hr - 1 unit, ambient temperature of 59°F. Annual emissions - 4 units, 59°F and 38.7% capacity factor.**

Emissions Unit Information Section 1 **of** 1

Allowable Emissions (Pollutant identified on front page)

A.

1. Basis for Allowable Emissions Code: **OTHER**		
2. Future Effective Date of Allowable Emissions:		
3. Requested Allowable Emissions and Units: **54 lb/hr**		
4. Equivalent Allowable Emissions:	**54** lb/hour	**365** tons/year
5. Method of Compliance (limit to 60 characters): **Annual Compliance test, EPA Method 10**		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters): **Based on permit limit from fuel oil firing. Actual and potential emissions while firing natural gas will be lower.**		

B.

1. Basis for Allowable Emissions Code:		
2. Future Effective Date of Allowable Emissions:		
3. Requested Allowable Emissions and Units:		
4. Equivalent Allowable Emissions:	lb/hour	tons/year
5. Method of Compliance (limit to 60 characters):		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters):		

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

Pollutant Detail Information:

1. Pollutant Emitted: **VOC**
2. Total Percent Efficiency of Control: %
3. Potential Emissions: **5** lb/hour **34** tons/year
4. Synthetically Limited? [**X**] Yes [ ] No
5. Range of Estimated Fugitive/Other Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/yr
6. Emission Factor: **5 ppmvd** Reference: **AC Permit limit**
7. Emissions Method Code: [**X**] 0 [ ] 1 [ ] 2 [ ] 3 [ ] 4 [ ] 5
8. Calculation of Emissions (limit to 600 characters): **The potential emissions are based on the permit limit firing fuel oil. The VOC emissions from natural gas for one CT are as follows: VOC (lb/hr) = 3.0; VOC (ton/yr) = 5.08.**
9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters): **Emissions, lb/hr - 1 unit, ambient temperature of 59°F. Annual emissions - 4 units, 59°F and 38.7% capacity factor.**

Emissions Unit Information Section 1 **of** 1

Allowable Emissions (Pollutant identified on front page)

A.

1. Basis for Allowable Emissions Code: **OTHER**		
2. Future Effective Date of Allowable Emissions:		
3. Requested Allowable Emissions and Units: **5 lb/hr**		
4. Equivalent Allowable Emissions:	**5** lb/hour	**34** tons/year
5. Method of Compliance (limit to 60 characters): **Annual Compliance test, EPA Method 25A**		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters): **Based on permit limit from firing fuel oil. Actual and potential emissions while firing natural gas will be lower. Testing not required if compliance with CO limit is shown.**		

B.

1. Basis for Allowable Emissions Code:		
2. Future Effective Date of Allowable Emissions:		
3. Requested Allowable Emissions and Units:		
4. Equivalent Allowable Emissions:	lb/hour	tons/year
5. Method of Compliance (limit to 60 characters):		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters):		

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

Pollutant Detail Information:

1. Pollutant Emitted: **SAM**

2. Total Percent Efficiency of Control: %

3. Potential Emissions: **69** lb/hour **469** tons/year

4. Synthetically Limited? [**X**] Yes [ ] No

5. Range of Estimated Fugitive/Other Emissions:

   [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/yr

6. Emission Factor: **0.5 % sulfur - max***

   Reference: **AC Permit limit**

7. Emissions Method Code:

   [**X**] 0 [ ] 1 [ ] 2 [ ] 3 [ ] 4 [ ] 5

8. Calculation of Emissions (limit to 600 characters):

   The potential emissions are based on the permit limit firing fuel oil. The SAM emissions from natural gas for one CT are as follows: SAM (lb/hr) = 0.44; SAM (ton/yr) = 0.75. Basis is 1 gr S/100 cf and 10% conversion to H2SO4.

9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):

   *** 0.3% S - avg, 12-mo. roll. avg. Emissions, lb/hr - 1 unit, 0.5% sulfur content fuel oil & ambient temp. 59°F. Annual emissions - 4 units, 0.3% sulfur content fuel oil (59°F), 33% capacity factor.**

Emissions Unit Information Section 1 **of** 1

Allowable Emissions (Pollutant identified on front page)

A.

1. Basis for Allowable Emissions Code: **OTHER**	
2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: **0.5 % sulfur max***	
4. Equivalent Allowable Emissions:	**69** lb/hour **469** tons/year
5. Method of Compliance (limit to 60 characters): **Fuel analysis or EPA Method 8**	
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters): *** 0.3% sulfur avg (12-mo. rolling avg). If the %S is met, SAM test not required. Based on permit limit from fuel oil firing. Actual and potential emissions while firing natural gas will be lower.**	

B.

1. Basis for Allowable Emissions Code:	
2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units:	
4. Equivalent Allowable Emissions:	lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters):	

I. VISIBLE EMISSIONS INFORMATION
(Regulated Emissions Units Only)

Visible Emissions Limitations: Visible Emissions Limitation 1 of 2

1.	Visible Emissions Subtype: **VE10**
2.	Basis for Allowable Opacity: [ ] Rule [X] 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 (limit to 200 characters): **1. Based on permit limit. 2. Visible emission limit under normal conditions at full load; exceptional conditions are specified for other loads.**

Visible Emissions Limitations: Visible Emissions Limitation 2 of 2

1.	Visible Emissions Subtype: **VE**
2.	Basis for Allowable Opacity: [X] Rule [ ] Other
3.	Requested Allowable Opacity Normal Conditions: % Exceptional Conditions: **100** % Maximum Period of Excess Opacity Allowed: **60** min/hour
4.	Method of Compliance: **Best operation practice**
5.	Visible Emissions Comment (limit to 200 characters): **Not to exceed 2 hr in 24 hrs for startup, shutdown, and malfunction. Rule 62-210.700(1), F.A.C.**

J. CONTINUOUS MONITOR INFORMATION
(Regulated Emissions Units Only)

Continuous Monitoring System Continuous Monitor 1 of 2

1. Parameter Code: EM	2. Pollutant(s): NOx
3. CMS Requirement: [X] Rule [ ] Other	
4. Monitor Information: Monitor Manufacturer: Model Number: Serial Number:	
5. Installation Date: 01 Nov 1992	
6. Performance Specification Test Date: 01 Nov 1992	
7. Continuous Monitor Comment (limit to 200 characters): Water to fuel ratio is monitored on a continuous basis (40 CFR 60.334).	

Continuous Monitoring System Continuous Monitor 2 of 2

1. Parameter Code: EM	2. Pollutant(s): NOx
3. CMS Requirement: [X] Rule [ ] Other	
4. Monitor Information: Monitor Manufacturer: Model Number: Serial Number:	
5. Installation Date: 01 Nov 1995	
6. Performance Specification Test Date: 01 Nov 1995	
7. Continuous Monitor Comment (limit to 200 characters): 40 CFR 75, Appendix E	

K. PREVENTION OF SIGNIFICANT DETERIORATION (PSD) INCREMENT TRACKING INFORMATION
(Regulated and Unregulated Emissions Units)

PSD Increment Consumption Determination

1. Increment Consuming for Particulate Matter or Sulfur Dioxide?

   If the emissions unit addressed in this section emits particulate matter or sulfur dioxide, answer the following series of questions to make a preliminary determination as to whether or not the emissions unit consumes PSD increment for particulate matter or sulfur dioxide. Check the first statement, if any, that applies and skip remaining statements.

   [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 the 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 the 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 consume or expand increment.

2. Increment Consuming for Nitrogen Dioxide?

If the emissions unit addressed in this section emits nitrogen oxides, answer the following series of questions to make a preliminary determination as to whether or not the emissions unit consumes PSD increment for nitrogen dioxide. Check first statement, if any, that applies and skip remaining statements.

[X] The emissions unit addressed in this section is undergoing PSD review as part of this application, or has undergone PSD review previously, for nitrogen 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 February 8, 1988. If so, baseline emissions are zero, and the source 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 the source 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 the emissions unit consumes increment.

[ ] None of the above apply. If so, 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 consume or expand increment.

3.	Increment Consuming/Expanding Code:			
	PM	[X] C	[ ] E	[ ] Unknown
	SO_2	[X] C	[ ] E	[ ] Unknown
	NO_2	[X] C	[ ] E	[ ] Unknown
4.	Baseline Emissions:			
	PM	lb/hour		tons/year
	SO_2	lb/hour		tons/year
	NO_2			tons/year
5.	PSD Comment (limit to 200 characters):			

L. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)

Supplemental Requirements for All Applications

1.	Process Flow Diagram	
	[X] Attached, Document ID: DB-E02-L1	
	[ ] Not Applicable	[ ] Waiver Requested
2.	Fuel Analysis or Specification	
	[X] Attached, Document ID: DB-E02-L2	
	[ ] Not Applicable	[ ] Waiver Requested
3.	Detailed Description of Control Equipment	
	[X] Attached, Document ID: DB-E02-L3	
	[ ] Not Applicable	[ ] Waiver Requested
4.	Description of Stack Sampling Facilities	
	[X] Attached, Document ID: DB-E02-L4	
	[ ] Not Applicable	[ ] Waiver Requested
5.	Compliance Test Report	
	[ ] Attached, Document ID: _____	[X] Not Applicable
	[ ] Previously Submitted, Date: _____	
6.	Procedures for Startup and Shutdown	
	[X] Attached, Document ID: DB-E02-L6	[ ] Not Applicable
7.	Operation and Maintenance Plan	
	[ ] Attached, Document ID: _____	[X] Not Applicable
8.	Supplemental Information for Construction Permit Application	
	[ ] Attached, Document ID: _____	[X] Not Applicable
9.	Other Information Required by Rule or Statute	
	[ ] Attached, Document ID: _____	[X] Not Applicable

Additional Supplemental Requirements for Category I Applications Only

10. Alternative Methods of Operation

[ ] Attached, Document ID: _____ [X] Not Applicable

11. Alternative Modes of Operation (Emissions Trading)

[ ] Attached, Document ID: _____ [X] Not Applicable

12. Identification of Additional Applicable Requirements

[ ] Attached, Document ID: _____ [X] Not Applicable

13. Compliance Assurance Monitoring Plan

[ ] Attached, Document ID: _____ [X] Not Applicable

14. Acid Rain Permit Application (Hard Copy Required)

[ ] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a))
Attached, Document ID: _____

[ ] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)
Attached, Document ID: _____

[ ] New Unit Exemption (Form No. 62-210.900(1)(a)2.)
Attached, Document ID: _____

[ ] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)
Attached, Document ID: _____

[X] Not Applicable

ATTACHMENT DB-E01-D

EMISSION UNIT REGULATIONS

(The following requirements are consistent with the requirements identified in the Title V application.)

ATTACHMENT DB-E02-D
APPLICABLE REQUIREMENTS LISTING - POWER PLANTS

EMISSION UNIT: Combustion Turbines 7-10 - FPC DeBary Plant

FDEP Rules:

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)
62-214.330 - Compliance Options (if 62-214.430)
62-214.350(2),(3),(6) - Acid Rain Units (Certification)
62-214.370 - Revisions; corrections; (potentially applicable)
62-214.430 - Acid Rain Units (Compliacne 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
62-297.310(4)(c) - Required Flow Rate Range-PM/H2SO4/F
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
62-297.310(6)(d) - Work Platforms
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
62-297.310(7)(a)3. - Permit Renewal Test Required

62-297.310(7)(a)4.	
62-297.310(7)(a)5.	- PM exemption if <400 hrs/yr
62-297.310(7)(a)6.	- PM exemption if < 200 hrs/6 month
62-297.310(7)(a)9.	- FDEP Notification - 15 days
62-297.310(7)(c)	- Waiver of Compliance Tests (fuel sampling)
62-297.310(8)	- Test Reports

Federal Rules:
NSPS General Requirements:

40 CFR 60.7(b)	- Notification/Recordkeeping (startup/shutdown/malfunction)
40 CFR 60.7(f)	- Notification/Recordkeeping (maintain records-2 years)
40 CFR 60.8(c)	- Performance Tests (representative conditions)
40 CFR 60.8(e)	- Performance Tests (Provide stack sampling facilities)
40 CFR 60.8(f)	- Test Runs
40 CFR 60.11(a)	- Compliance (ref. S. 60.8)
40 CFR 60.11(d)	- Compliance (maintain air pollution control equipment)
40 CFR 60.12	- 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)	- SO2 Allowances- other utility units
40 CFR 72.9(c)(4)	- SO2 Allowances-allowances held in ATS
40 CFR 72.9(c)(5)	- SO2 Allowances-no deduction for 72.9(c)(1)(i)
40 CFR 72.9(e)	- Excess Emission Requirements
40 CFR 72.9(f)	- Recordkeeping and Reporting
40 CFR 72.9(g)	- 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

Monitoring Part 75:

40 CFR 75.5	- Prohibitions
40 CFR 75.10(a)(2)	- Primary Measurement; NOx; except 75.12&.17; Subpart E
40 CFR 75.10(b)	- Primary Measurement; Performance Requirements
40 CFR 75.10(c)	- Primary Measurement; Heat Input; Appendix F
40 CFR 75.10(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; 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; Addendix 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 Porcedures
40 CFR 75.36	- Missing Data Procedures for Heat Input
40 CFR 75.53	- Monitoring Plan (revisions)
40 CFR 75.54(a)	- Recordkeeping-general
40 CFR 75.54(b)	- Recordkeeping-operating parameter
40 CFR 75.54(d)	- Recordkeeping-NOx
40 CFR 75.55(c);(e)	- Recordkeeping; Special Situations (gas & oil firing)
40 CFR 75.56	- Certification; QA/QC Provisions

40 CFR 75.60	- Reporting Requirements-General
40 CFR 75.61	- Reporting Requirements-Notification cert/recertification
40 CFR 75.63	- Reporting Requirements-Certification/Recertification
40 CFR 75.64(a)	- Reporting Requirements-Quarterly reports; submission
40 CFR 75.64(b)	- Reporting Requirements-Quarterly reports; DR statement
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.	- Determination of CO2; from combustion sources
Appendix H	- Traceability Protocol
40 CFR Part 77.3	- Offset Plans (future)
40 CFR Part 77.5(b)	- Deductions of Allowances (future)
40 CFR Part 77.6	- Excess Emissions Penalties SO2 and NOx

ATTACHMENT DB-E01-H8

CALCULATION OF EMISSIONS

Table DB-EU1-H8. Design Information and Stack Parameters for DeBary, Simple Cycle-
GE PG7111(EA), Quiet Combustor, Natural Gas, Peak Load

Data	Natural Gas @ 59 F			
	Unit P7	Unit P8	Unit P9	Unit P10
General				
Power (kW)	96,250.0	96,250.0	96,250.0	96,250.0
Estimated Heat Rate (Btu/kwh,	10,890.0	10,890.0	10,890.0	10,890.0
Heat Input (MMBtu/hr, LHV)	1,048.2	1,048.2	1,048.2	1,048.2
Water Flow (lb/hr)	56,480	56,480.0	56,480.0	56,480.0
Hours of Operation	3,390	3,390.0	3,390.0	3,390.0
CT Exhaust Flow				
Mass Flow (lb/hr)	2,418,000	2,418,000.0	2,418,000.0	2,418,000.0
Temperature (oF)	1,050	1,050.0	1,050.0	1,050.0
Moisture (% Vol.)	11.73	11.7	11.7	11.7
Oxygen (% Vol.)	12.10	12.1	12.1	12.1
Molecular Weight	28.00	28.0	28.0	28.0
Natural Gas Consumption (lb/hr)= Heat Input (MMBtu/hr) x 1,000,000 Btu/MMBtu ÷ Fuel Heat Content, LHV (Btu/				
(cf/hr)= Heat Input (MMBtu/hr) x 1,000,000 Btu/MMBtu ÷ Fuel Heat Content, LHV (Bt				
Heat Input (MMBtu/hr, LHV)	1,048.2	1,048.2	1,048.2	1,048.2
Heat Content (Btu/lb, LHV)	21,515	21,515.0	21,515.0	21,515.0
Natural Gas (lb/hr)	48,718	48,717.8	48,717.8	48,717.8
Heat Content, LHV (Btu/cf)	1,000	1,000.0	1,000.0	1,000.0
Natural Gas (cf/hr)	1,048,163	1,048,162.5	1,048,162.5	1,048,162.5
(million cf/yr)	3,553.3	3,553.3	3,553.3	3,553.3
Volume Flow (acfm)= [(Mass Flow (lb/hr) x 1,545 x (Temp. (°F)+ 460°F)] ÷ [Molecular weight x 2116.8] ÷ 60 min/				
Mass Flow (lb/hr)	2,418,000	2,418,000.0	2,418,000.0	2,418,000.0
Temperature (°F)	1,050	1,050.0	1,050.0	1,050.0
Molecular Weight	28.00	28.0	28.0	28.0
Volume Flow (acfm)	1,586,172	1,586,171.8	1,586,171.8	1,586,171.8
Volume Flow (dscfm)= [(Mass Flow (lb/hr) x 1,545 x (68°F + 460°F)] ÷ [Molecular weight x 2116.8] ÷ 60 min/hr				
[(1 - Moisture(%)/100)]				
Mass Flow (lb/hr)	2,418,000	2,418,000.0	2,418,000.0	2,418,000.0
Temperature (°F)	68	68.0	68.0	68.0
Molecular Weight	28.00	28.0	28.0	28.0
Moisture (% Vol.)	11.73	11.7	11.7	11.7
Volume Flow (dscfm)	489,576	489,576.2	489,576.2	489,576.2
CT Stack Data				
Stack Height (ft)	50	50.0	50.0	50.0
Diameter (ft)	13.8	13.8	13.8	13.8
Velocity (ft/sec)= Volume flow (acfm) from CT ÷ [((diameter)²÷ 4) x 3.14159] ÷ 60 sec/min				
Volume Flow (acfm) from CT	1,586,172	1,586,171.8	1,586,171.8	1,586,171.8
Diameter (ft)	13.8	13.8	13.8	13.8
Velocity (ft/sec)	176.7	176.7	176.7	176.7
[Velocity (ft/sec) w/o 5% flow	168.3	168.3	168.3	168.3

Note: Universal gas constant= 1,545 ft-lb(force)/°R; atmospheric pressure= 2,116.8 lb(force)/ft²

Source: GE, 1995.

Table DB-EU1-H8b. Maximum Emissions for Criteria Pollutants for DeBary, Simple Cycle-
GE PG7111(EA), Quiet Combustor, Natural Gas, Peak Load

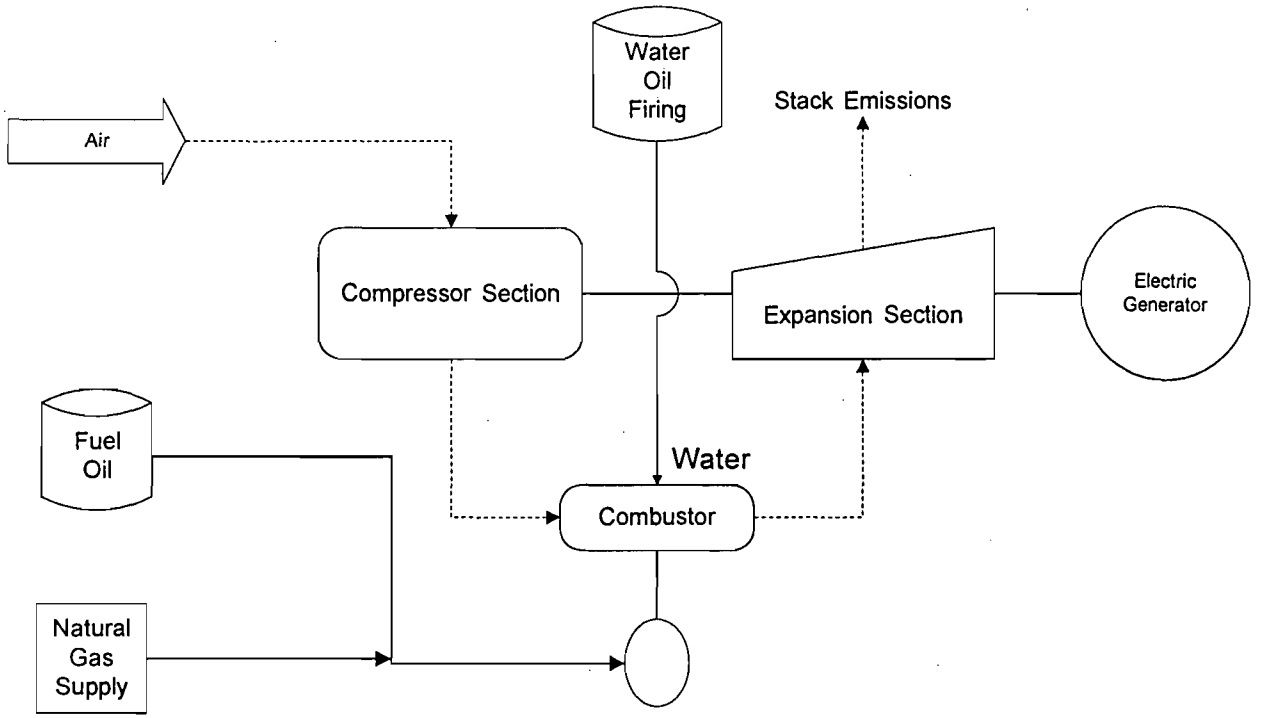
Pollutant	Natural Gas @ 59 F			
	Unit P7	Unit P8	Unit P9	Unit P10
Hours of Operation	3,390	3,390	3,390	3390
Particulate (lb/hr)= Emission rate (lb/hr) from manufacturer				
Basis (including H2SO4), lb/hr	7.5	7.5	7.5	7.5
lb/hr	7.5	7.5	7.5	7.5
TPY- 1 Unit	12.7	12.7	12.7	12.7
- 4 Units	50.9	50.9	50.9	50.9
Sulfur Dioxide (lb/hr)= Natural gas (cf/hr) x sulfur content(gr/100 cf) x 1 lb/7000 gr x (lb SO2/lb S) + 100				
Natural Gas (cf/hr)	1,048,163	1,048,163	1,048,163	1,048,163
Basis, gr/100 cf	1.0	1.0	1.0	1.0
lb SO2/lb S (64/32)	2.0	2.0	2.0	2.0
lb/hr	2.99	2.99	2.99	2.99
TPY- 1 Unit	5.08	5.08	5.08	5.08
- 4 Units	20.30	20.30	20.30	20.30
Nitrogen Oxides (lb/hr)= NOx(ppm) x {[20.9 x (1 - Moisture(%)/100)] - Oxygen(%)} x 2116.8 x Volume flow (acfm) x 46 (mole. wgt NOx) x 60 min/hr + [1545 x (CT temp.(°F) + 460°F) x 5.9 x 1,000,000 (adj. f				
Basis, ppmvd @15% O2 (1)	25.0	25.0	25.0	25.0
Moisture (%)	11.73	11.73	11.73	11.73
Oxygen (%)	12.10	12.10	12.10	12.10
Volume Flow (acfm)	1,586,172	1,586,172	1,586,172	1,586,172
Temperature (°F)	1,050	1,050	1,050	1,050
lb/hr	106.85	106.85	106.85	106.85
TPY- 1 Unit	181.12	181.12	181.12	181.12
- 4 Units	724.47	724.47	724.47	724.47
Carbon Monoxide (lb/hr)= CO(ppm) x [1 - Moisture(%)/100] x 2116.8 lb/ft2 x Volume flow (acfm) x 28 (mole. wgt CO) x 60 min/hr + [1545 x (CT temp.(°F) + 460°F) x 1,000,000 (adj. for p				
Basis, ppmvd (1)	10.0	10.0	10.0	10.0
Moisture (%)	11.73	11.73	11.73	11.73
Volume Flow (acfm)	1,586,172	1,586,172	1,586,172	1,586,172
Temperature (°F)	1,050	1,050	1,050	1,050
lb/hr	21.34	21.34	21.34	21.34
TPY- 1 Unit	36.18	36.18	36.18	36.18
- 4 Units	144.70	144.70	144.70	144.70
VOCs (lb/hr)= VOC(ppm) x [1 - Moisture(%)/100] x 2116.8 lb/ft2 x Volume flow (acfm) x 16 (mole. wgt as methane) x 60 min/hr + [1545 x (CT temp.(°F) + 460°F) x 1,000,000 (adj. for ppm)]				
Basis, ppmvd (1)	2.5	2.5	2.5	2.5
Moisture (%)	11.73	11.73	11.73	11.73
Volume Flow (acfm)	1,586,172	1,586,172	1,586,172	1,586,172
Temperature (°F)	1,050	1,050	1,050	1,050
lb/hr	3.05	3.05	3.05	3.05
TPY- 1 Unit	5.17	5.17	5.17	5.17
- 4 Units	20.67	20.67	20.67	20.67
Sulfuric Acid Mist (lb/hr) = Fuel consumption (lb/hr) x sulfur content (%) x (Conversion (fraction) of S to H2SO4) x I				
Fuel consumption (lb/hr)	48,718	48,718	48,718	48,718
Sulfur Content (gr/100 cf)	1.0	1.0	1.0	1.0
Fuel density (lb/scf)	0.0486	0.04860	0.04860	0.04860
Sulfur content (%) (a)	0.00294	0.00294	0.00294	0.00294
lb H2SO4/lb S (98/32)	3.06	3.06	3.06	3.06
CT Exhaust- % S Conversion to	10.00	10.00	10.00	10.00
lb/hr	0.44	0.44	0.44	0.44
TPY - 1 Unit	0.74	0.74	0.74	0.74
- 4 Units	3.0	3.0	3.0	3.0

Note: ppmvd= parts per million, volume dry; O2= oxygen.

Source: (1) GE, 1995

ATTACHMENT DB-E02-L1

PROCESS FLOW DIAGRAM



Note:
GT = Gas Turbine
EU = Emission Unit Number
See segment section for the operating rate of each emission unit

Florida Power Corporation DeBary, Florida Emission Unit Process Flow Diagram	Process Flow Legend: Solid / Liquid Gas Steam	Emission Unit: Emission Unit No 1 Process Area: Turbines 7, 8, 9, 10 *Filename:* FPCDBGS1.VSD *Latest Revision Date:* 10/30/96	KBN Engineering and Applied Sciences, Inc.

ATTACHMENT DB-E02-L2

FUEL ANALYSIS OR SPECIFICATION

ATTACHMENT DB-E02-L2

FUEL ANALYSIS
NO. 2 FUEL OIL

Parameter	Typical Value	Max Value
API gravity @ 60 F	30[1]	-
Relative density	7.09 lb/gal [2]	
Heat content	18,550 Btu/lb (LHV)	
% sulfur	0.3 [2]	0.5 [3]
% nitrogen	0.025-0.030	
% ash	negligible	0.10 [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.

ATTACHMENT IC-EU2-L2

FUEL ANALYSIS
NATURAL GAS ANALYSIS

Parameter	Typical Value	Max Value
Relative density	0.58 (compared to air)	
heat content	950 - 1124 Btu/cu ft.	
% sulfur	0.43 grains/CCF [1]	1 grain/100 CF
% nitrogen	0.8% by volume	
% ash	negligible	

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 DB-E02-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 DB-E02-L4

DESCRIPTION OF STACK SAMPLING FACILITIES

ATTACHMENT DB-E02-L4

Description of Stack Sampling Facilities

The DeBary Combustion Turbine No. 7, 8, 9, and 10 are required by Permit AO64-233544 to perform annual stack testing in accordance with standard EPA reference methods. Pursuant to Rule 62-297.310, F.A.C., the annual stack test required is performed with the required stack sampling facilities. A diagram depicting stack sampling facilities is presented as an attachment. As specified by Rule 62-297.310(6) , the permanent test facilities meet the following:

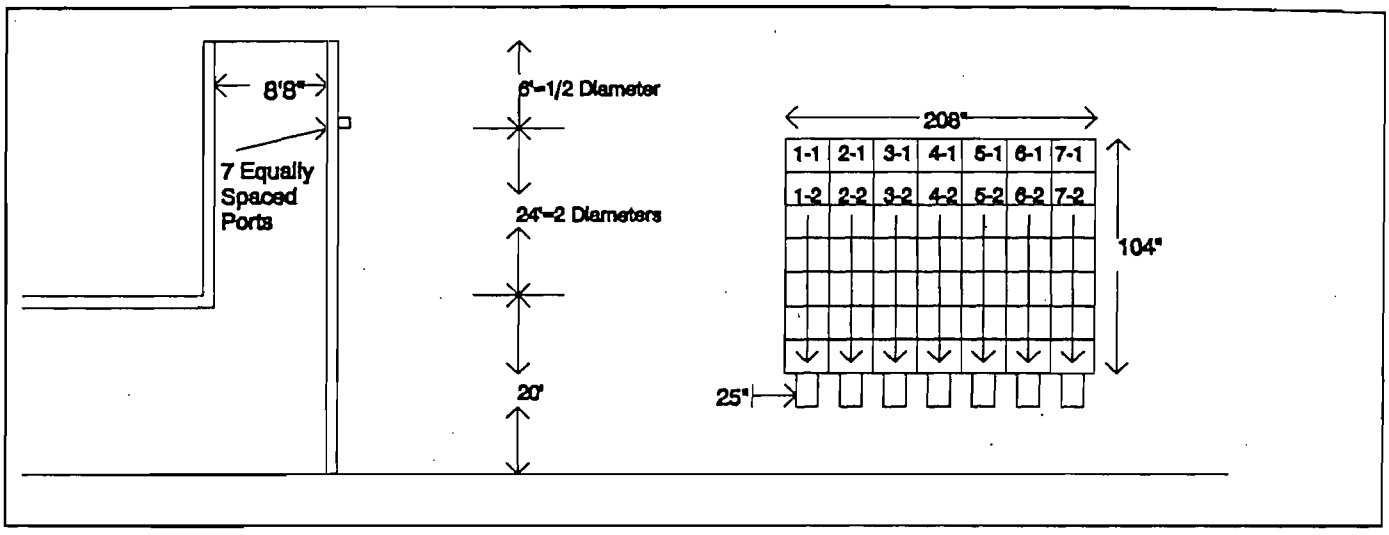
- The sampling ports have a minimum effective diameter of 3 inches.
- The location of the sampling ports are 2 stack diameters downstream and 0.5 stack diameters upstream of flow disturbances.
- Sampling ports are provided to allow access to each sampling point in the cross sectional area of the rectangular stack.
- The working platform is at least 24 square feet in area, at least three feet wide, extends 180 degrees around the stack, has safety rails, toeboards, and a hinged floor opening attached to it. There are no obstructions 14 inches below the port and 6 inches on either side of the port.
- The platform access ladder is equipped with a safety cage.

Rectangular Stack Sampling Traverse Point Layout
(EPA Method 1)

Intercession City Power Station

Date:_____ Port + Stack ID: 129 in.
Plant: Florida Power Corporation Port Extension (Ref. Pt.) 25 in.
Source: P-7,8,9,10 Stack ID: 104 in.
Technician(s)_____ Stack Area 150.2 ft.^{2}.
Stack Length (L) 104 in. Total Req'd Trav. Pts (P). 49
Stack Width (W) 208 in. No. of Traverse Pts. 7 /dimen.
No. of Traverse Pts. 7 /port

Stack Diagram (Side View showing major unit components, dimensions and nearest upstream & downstream flow disturbances. Top view showing length, width, and sample ports.



Calculate the Equivalent Diameter of Rectangular Stack

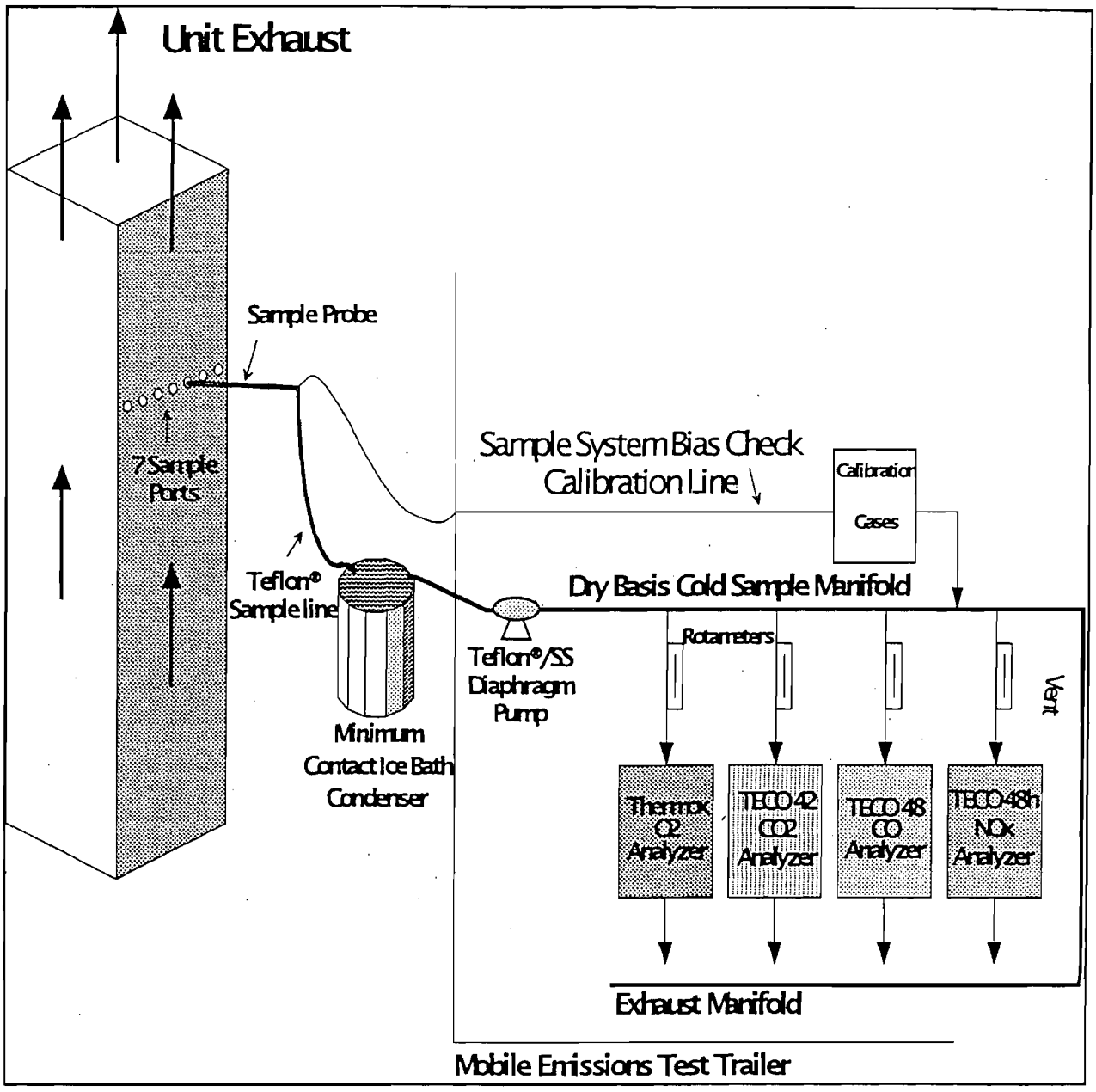
$De = \frac{2 \times L \times W}{(L + W)}$ 140 in. $= \frac{2 \times (104 \text{ in}) \times (208 \text{ in.})}{((104 \text{ in.}) + (208 \text{ in.}))}$

Calculte Distance from Stack Wall to Traverse Points
(Example for Point No. 2)

$\text{Distance} = \frac{L \times 1.5}{P}$ 22.3 in. $= \frac{(104 \text{ in}) \times 1.5}{7}$

Point No.	Length Factor	Distance from Ref. Point (inches)	Distance Sample Pt. to Probe Tip
1	0.5	7.4	32.4
2	1.5	22.3	47.3
3	2.5	37.1	62.1
4	3.5	52.0	77.0
5	4.5	66.9	91.9
6	5.5	81.7	106.7
7	6.5	96.6	121.6

Figure 1
Gaseous Sampling and Analysis Diagram



ATTACHMENT DB-E02-L6

PROCEDURES FOR STARTUP AND SHUTDOWN

ATTACHMENT DB-E02-L6

PROCEDURES FOR STARTUP/SHUTDOWN

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

If excess emissions are encountered during startup or shutdown, the nature and cause of any malfunction is identified, along with the corrective actions taken or preventative measures adopted. Corrective actions may include switching the unit from automatic (remote) to local control. 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.

Date: 11/5/96 7:31:52 AM
From: Alvaro Linero TAL
Subject: Re: Florida Power Amendment Request
To: Alan Zahm ORL
CC: John Brown TAL
CC: Martin Costello TAL
CC: Charles Logan TAL

Our office has received an amendment request regarding the Debary Plant, permit AO64-233544 which had construction permit AC64-191015 issued in Tally.

The company wants a permit condition deleted and claims it is not in the construction permit. There is a notice of violation regarding this condition since the records have not been kept.

19. "The permittee shall maintain monthly records, in a permanent form suitable for inspection, documenting the sulfur content of all fuel burned. The records shall contain, at a minimum, the pounds per hour and pounds per MMBtu heat input. Compliance with SO2 shall be based on the monthly report. The records shall contain sufficient detail to allow the Department to determine whether or not the emissions were properly computed. All recorded data shall be maintained on file for a period of at least two years. The permittee shall submit a monthly summary of the averages for fuel sulfur content and sulfur dioxide emissions on a quarterly basis, within 30 days following each calendar quarter."

As this condition is not in the AC, our office can delete it. However the AC does contain hourly emission limits referenced in Table 1 and not in a specific condition. It would appear that this table should be in the operate permit. And wouldn't this table go into the Title V permit also?

Please explain what conditions of Table 1 are to be placed in the existing permit before we delete specific condition 19.

I would be happy to fax the request, just ask.

**********REPLY**********
Alan. According page 5 of the construction permit dated October 18, 1991, Specific Condition 1 states that "the maximum allowable emissions from these sources shall not exceed the emission rates listed in Table 1." Obviously Table 1 is an applicable requirement.

I should caution (before you incorporate Table 1 into the operating permit) that Table 1 has been modified. One example is an amendment dated August 30, 1993. It specifically reduced PM/PM10 limits from 0.025 to 0.015 lb/million Btu and sulfuric acid mist from 76 lb/hr to 69 lb/hr. You would need to review at least all changes in construction permits to make sure you got it right. I am copying the Title V Program to let them know about this in case they did not.

On the matter of recordkeeping, have a look at the Construction Permit Specific Condition 16 and 40CFR60.334 (in Subpart GG - CTs) before deleting the condition.

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

FAX TRANSMITTAL

TO:

NAME: Alvaro Linero

AGENCY: DEP Darm

TELEPHONE NO. (FAX NO.):

NUMBER OF PAGES (INCLUDING COVER PAGE): 3

FROM:

NAME: Alan Zahm

PROGRAM: DEP Central

(Orlando Fax Telephone No. (407) 897-5963 SC 342-5963
(Orlando Telephone No. (407) 893-3333 /3334 SC 325-3333/3334

SENDER'S NAME: Alan Zahm

COMMENTS: Request for Operating Permit Amendment

CS AS 10-25

CS AS File

See me on this

Len

Florida Power
CORPORATION

October 22, 1996

Mr. L. T. Kozlov
Administrator, Air Programs
Florida Department of Environm
3319 Maguire Boulevard, Suite 2
Orlando, FL 32803-3767

Dear Mr. Kozlov:

Re: Request for Operation Permit Amendment, FPC DeBary Facility
DEP Permit Number AO64-233544

On October 14, 1996, representatives of Florida Power Corporation (FPC) met with Ms. Caroline Shine and Mr. Anatolly Sobolevskiy regarding recent inspection findings. One of the findings concerned the failure to submit quarterly reports as required by Specific Condition 19 of the permit referenced above. This condition is reproduced below.

19. *The permittee shall maintain monthly records, in a permanent form suitable for inspection, documenting the sulfur content of all fuel burned. The records shall contain, at a minimum, the pounds per hour and pounds per MMBtu heat input. Compliance with SO_2 shall be based on the monthly report. The records shall contain sufficient detail to allow the Department to determine whether or not the emissions were properly computed. All recorded data shall be maintained on file for a period of at least 2 years. The permittee shall submit a monthly summary of the averages for fuel sulfur content and sulfur dioxide emissions on a quarterly basis, within 30 days following each calendar quarter.*

See Table

This condition is confusing and it requires information that has no relevance to the permitted emission limits. For example, the permit does not contain a lb/mmBtu limit, so the requirement to provide reports containing this information is unnecessary. Specific Conditions 2 and 17 correspond to language contained in the construction permit, requiring that the weighted 12-month rolling average sulfur content not exceed 0.30%, and that records of the sulfur content from fuel delivery receipts be kept. The language contained in Specific Condition 19 does not appear in the construction permit for the DeBary facility. In addition, FPC submits quarterly excess emissions reports in accordance with 40 CFR Part 60, Subpart GG.

Because Specific Conditions 2 and 17 provide enough information to determine compliance with sulfur dioxide emission limits, FPC requests that Specific Condition 19 be deleted from the operation permit. Ms. Shine and Mr. Sobolevskiy indicated their initial concurrence with this request at the October 14 meeting.

Specific Condition 11 contains the date by which annual compliance testing is to be performed. In order to better reflect the optimum time period for testing this facility, FPC requests that the date in Specific Condition 11 be changed to March 1.

Thank you for your consideration of these requested changes. Please contact Mr. Mike Kennedy at (813) 866-4344 if you have any questions.

Sincerely,

W. Jeffrey Pardue, C.E.P.
Director

cc: Ms. Caroline Shine, DEP Central District

Date: 10/30/96 10:41:42 AM
From: Alan Zahm ORL
Subject: Florida Power Amendment Request
To: Alvaro Linero TAL
CC: Martin Costello TAL
CC: John Brown TAL

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Reply from AL

P 265 659 207

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PS Form **3800**, April 1995

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PSD-FL-167B

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3. Article Addressed to:
Jeffrey Pardue, CEP
Director, Env. Serv. Dept.
Florida Power Corp
3201 34th St. South
St. Petersburg, FL 33711

4a. Article Number
P 265 659 207

4b. Service Type
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☐ Return Receipt for Merchandise ☐ COD

7. Date of Delivery
5/8/97

5. Received By: *(Print Name)*

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6. Signature: *(Addressee or Agent)*
X Frankie Chupp

PS Form **3811**, December 1994 Domestic Return Receipt

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The News-Journal

Published Daily and Sunday
Daytona Beach, Volusia County, Florida

State of Florida,
County of Volusia:

Before the undersigned authority personally appeared

Bryan P. Stephens

who, on oath says that he is.....

Classified Advertising Manager

of The News-Journal, a daily and Sunday newspaper, published at Daytona Beach in Volusia County, Florida; that the attached copy of advertisement, being a .....

Public Notice of Intent to Issue

Air Construction Permit Modification

in the matter of From The Department of Environmental

Protection to DeBary Facility/Volusia County

in the .....Court, was published

in said newspaper in the issues.....

March 25, 1997

Affiant further says that The News-Journal is a newspaper published at Daytona Beach, in said Volusia County, Florida, and that the said newspaper has heretofore been continuously published in said Volusia County, Florida, each day and Sunday and has been entered as second-class mail matter at the post office in Daytona Beach, in said Volusia County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

.....

Sworn to and subscribed before me

this 25th day of March

A.D. 19 97

.....

CAROL A. TAYLOR
Notary Public, State of Florida
My Comm. Exp. Apr. 13, 1999
Comm. No. CC 452734

LEGAL ADVERTISEMENT

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION
STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL PROTECTION
DRAFT Permit Modification No.:
AC64-191015(B), PSD-FL-167(B)
File No. 1270028-002
DeBary Facility/Volusia County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit modification to Florida Power Corporation (FPC), for Combustion Turbines (Peaking Units) P7, P8, P9, and P10 at its DeBary Facility located at West Highbanks Road, Volusia County. A Best Available Control Technology (BACT) determination was not required pursuant to Rule 62-212.400, F.A.C. and 40 CFR 52.21, Prevention of Significant Deterioration (PSD). The applicant's name and address are: Florida Power Corporation, 3201 34th Street South, St. Petersburg, FL 33711.

The modification is to reissue the expired construction permit for six 92.9 megawatt, oil-fired simple cycle combustion turbines; revise the number of units to the four already constructed; and allow installation of natural gas firing capability.

The four peaking units were each permitted to operate up to 3,390 hours per year. Since their startup in late 1992, usage has been less than 800 hours each. In the near future, increased service to 900-1700 hours of operation per year is expected. FPC plans to burn available natural gas, an inherently clean fuel which is available to FPC on an interruptible basis, in lieu of some fuel oil to meet the anticipated demand.

Because of the great variability of usage from year-to-year inherent in peaking units and the relatively short period of operation for the four units, the Department does not believe that representative past actual emissions have yet been established. Also, hourly emissions will be very substantially reduced when natural gas is fired in lieu of fuel. Per Rule 62-210.200(1)(b), F.A.C. the Department may pressure that unit-specific allowable emissions for an emissions unit are equivalent to the actual emissions of the emissions unit. Therefore, there will be no significant increase in PSD pollutants and the project is exempt from PSD and BACT. Burning natural gas will minimize emissions of particulate matter, sulfur dioxide, and nitrogen oxides (NOx). NOx will be further controlled to 25 parts per million by the installed water injection equipment.

The Department will issue the FINAL Permit Modification, in accordance with the conditions of the DRAFT Permit Modification unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed DRAFT Permit Modification issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahasee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit Modification, the Department shall issue a Revised DRAFT Permit Modification and require, if applicable, another Public Notice.

The Department will issue FINAL Permit Modification with the conditions of the DRAFT Permit Modification unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S. or a party requests mediation as an alternative remedy under Section 120.573 before the deadline for filing a petition. Choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement. The procedures for petitioning for a hearing are set forth below, followed by the procedures for requesting mediation.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, telephone: 904/488-9370, fax: 904/487-4938. Petitions must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition (or a request for mediation, as discussd below) within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207 of the Florida Administrative Code.

A petition must contain the following information: (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by petitioner, if any; (e) A statement of the facts that the petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take with respect to the Department's action or proposed action addressed in this notice of intent.

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

A person whose substantial interests are affected by the Department's proposed permitting decision, may elect to pursue mediation by asking all parties to the proceeding to agree to such mediation and by filing with the Department a request for mediation and the written agreement of all such parties to mediate the dispute. The request and agreement must be filed in (received by) the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, by the same deadline as set forth above for the filing of a petition.

A request for mediation must contain the following information: (a) The name, address, and telephone number of the person requesting mediation and that person's representative, if any; (b) A statement of the preliminary agency action; (c) A statement of the relief sought; and (d) Either an explanation of how the requester's substantial interests will be affected by the action or proposed action addressed in this notice of intent or a statement clearly identifying the petition for hearing that the requester has already filed, and incorporating it by reference.

The agreement to mediate must include the following: (a) The names, addresses, and telephone numbers of any persons who may attend the mediation; (b) The name, address, and telephone number of the mediator selected by the parties, or a provision for selecting a mediator within a specified time; (c) The agreed allocation of the costs and fees associated with the mediation; (d) The agreement of the parties on the confidentiality of discussions and documents introduced during mediation; (e) The date, time, and place of the first mediation session, or a deadline for holding the first session, if no mediator has yet been chosen; (f) The name of each party's representative who shall have authority to settle or recommend settlement; and (g) The signatures of all parties or their authorized representatives.

As provided in Section 120.573 F.S., the timely agreement of all parties to mediate will toll the time limitations imposed by Sections 120.569 and 120.57 F.S. for requesting and holding an administrative hearing. Unless otherwise agreed by the parties, the mediation must be concluded within sixty days of the execution of the agreement. if mediation results in settlement of the administrative dispute, the Department must enter a final order incorporating the agreement of the parties. Persons whose substantial interests will be affected by such modified final decision of the Department have a right to petition for a hearing only in accordance with the requirements for such petitions set forth above. If mediation terminates without settlement of the dispute, the Department shall notify all parties in writing that the administrative hearing processes under Sections 120.569 and 120.57 F.S. remain available for disposition of the dispute, and the notice will specify the deadlines that then will apply for challenging the agency action and electing remedies under those two statutes.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, exept legal holidays, at:
Department of
Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 904/488-1344
Fax: 904/922-6979

Department of
Environmental Protection
Central District Office
3319 Maguire Boulevard, Suite 232
Orlando, FL 32803-3767
Telephone: 407/893-3333
Fax: 407/897-5963

The complete project file includes the Draft Permit Modification, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 904/488-1344, for additional information.

Legal L27803. March 25, 1997 1t.

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	Peaking Units P7-P10

PS Form **3800**, April 1995

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- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):
1. ☐ Addressee's Address
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Consult postmaster for fee.

3. Article Addressed to:
Jeffrey Pardue, Director
Fla. Power Corp.
3201 34th St. South
St. Petersburg, Fl
33711

4a. Article Number
P 265 659 171

4b. Service Type
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☐ Express Mail ☐ Insured
☐ Return Receipt for Merchandise ☐ COD

7. Date of Delivery
2/20/97

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Kathy DeLong

6. Signature: *(Addressee or Agent)*
X Kathy DeLong

8. Addressee's Address *(Only if requested and fee is paid)*

PS Form **3811**, December 1994 Domestic Return Receipt

Thank you for using Return Receipt Service.

Check Sheet

Company Name: FLORIDA POWER Corp - DeBARY
Permit Number: 1270028-002-AC
PSD Number: 167(B)I
Permit Engineer: AL LINERO

Application:

- [x] Initial Application
  - [x] Incompleteness Letters
  - [x] Responses
  - [ ] Waiver of Department Action
  - [ ] Department Response
  - [ ] Other

Cross References:

- [ ]
- [ ]
- [ ]

Intent:

- [x] Intent to Issue
- [x] Notice of Intent to Issue
- [ ] Technical Evaluation
- [ ] BACT Determination
- [x] Unsigned Permit

Correspondence with:

- [ ] EPA
- [ ] Park Services
- [ ] Other

- [x] Proof of Publication
  - [ ] Petitions - (Related to extensions, hearings, etc.)
  - [ ] Waiver of Department Action
  - [ ] Other

Final Determination:

- [x] Final Determination
- [x] Signed Permit
- [ ] BACT Determination
  - [ ] Other

Post Permit Correspondence:

- [ ] Extensions/Amendments/Modifications
- [ ] Other