



RECEIVED

MAY 16 2001

BUREAU OF AIR REGULATION

May 14, 2001

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

Dear Mr. Reynolds:

Re: University of Florida Construction Permit - Proof of Publication

I have enclosed the proof of publication of the Public Notice of Intent to Issue Air Construction Permit for Florida Power Corporation's University of Florida facility.

Please contact me at (727) 826-4334 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Michael Kennedy", written in a cursive style.

J. Michael Kennedy, Q.E.P.  
Manager, Air Programs



**Florida Power**

A Progress Energy Company

fax

To: John Reynolds

From: Mike Kennedy

Company: \_\_\_\_\_

Phone No.: (727) 826-4334

Fax No.: (850) 922-6979

Date: 5/14/01

Subject: \_\_\_\_\_

Pages: 3

Comments:  
*U of F Proof of Publication. Original  
 is in the mail to you. Thanks.*

20017

NO \_\_\_\_\_

**THE GAINESVILLE SUN**  
**Published Daily and Sunday**  
**GAINESVILLE, FLORIDA**

**STATE OF FLORIDA**  
**COUNTY OF ALACHUA**

Naomi Williams-Jordan

Before the undersigned authority appeared.....  
Classified Assistant Manager

Who on oath says that he/she is.....of THE GAINESVILLE SUN, a daily  
newspaper published at Gainesville in Alachua County, Florida, that the attached copy of advertisement, being a  
Public Notice of Intent  
in the matter of.....  
in the.....Court, was published in said newspaper in the issue of  
April 21,  
.....2001

Affiant further says that the said THE GAINESVILLE SUN is a newspaper published at Gainesville, in said  
Alachua County, Florida, and that the said newspaper has heretofore been continuously published in said  
Alachua County, each day, and has been entered as second class mail matter at the post office in Gainesville, in  
Said Alachua 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 for publication in the said newspaper.

Sworn to and subscribed before me this

24 day of April A.D., 2001

*Sharon K. Williams*

(seal) Notary Public

*Naomi Williams-Jordan*



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MAY 14 2001

BUREAU OF AIR REGULATION

**INTENT**

**CONSTRUCTION PERMIT  
STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL  
PROTECTION  
39001 361AC  
University of Florida  
Cagan Facility  
Alachua County**

The Department of Environment Protection (Department) gives notice of its intent to issue an air construction permit to Florida Power Corporation. The permit is for the replacement of a 43 MW combustion power turbine at the University of Florida with a more efficient unit rated at 48 MW. A new (NAC) determination was not required. The applicant's name and address is Florida Power Corporation, Post Office Box 13246, Gainesville, Florida 32613-0246.

The applicant and its General Electric (GE) 7FA2800PA synchronous condenser turbine will be replaced with a more efficient unit. The unit was installed in 1974 and will be replaced with the GE 7FA2800PA synchronous condenser turbine.

Nitrogen Oxides (NOx) emissions will be controlled by steam injection to achieve 14 parts per million by volume (ppm) at 1% excess air. All units are 48 percent while burning 4.91% sulfur fuel oil. Emissions of NOx will be controlled to 8.5 and 7.5 percent while burning gas and oil respectively. Air quality indicators of various pollutants (PM10/PM10.5, sulfur dioxide (SO2), and particulate matter (TSP)) will be controlled to very low levels by open combustion and use of low sulfur fuels. The facility natural gas and No. 2 fuel oil.

The Department determined that the Rules for the Prevention of Significant Deterioration of Air Quality (PMD) do not apply to this project because the degradation will not result in a substantial increase greater than the significant degradation rate given in table 11F.003-2.F.2. An air quality impact analysis was not required.

The Department will issue the permit with the following conditions: The attached permits address the conditions that will be required for the project.

The Department will accept written comments regarding the permit application. Comments should be submitted to the Department's Bureau of Air Regulation at 3900 University Blvd, Mail Station #3900, Tallahassee, FL 32309-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change to the proposed agency action, the Department will review the proposed permit and notify the applicant. Another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 119.060 and 119.071, F.S. The deadline for filing a petition for a hearing is set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 119.060 and 119.071 of the Florida Statutes. The petition must contain the information set forth below and must be filed with the Office of General Counsel at the Department at 3900 Commonwealth Boulevard, Mail Station 3900, Tallahassee, Florida 32309-2400. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any person other than those listed in the petition must be filed within ten days of receipt of the public notice or within seven days of receipt of the notice of intent, whichever occurs first. The Department will review the petition and issue a final order within ten days of receipt of the petition.

Section 120.500, however, any person who seeks the Department for notice of a permit may file a petition within fourteen days of receipt of that notice, regardless of the date of decision. A petitioner will mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination. The Department will review the petition in this proceeding and participate as a party to it. Any subsequent intervention will be only if the approval of the process. After the filing of a motion in compliance with Rule 19.001 of the Florida Administrative Code.

A petition that does not dispute the material facts set forth in the Department's notice of intent must contain the following information: (a) The name and address of each agency affected and each agency's title or identification number known to the petitioner; the address and telephone number of the petitioner; the name, address, and telephone number of the petitioner's representative; the date of the petition; the date of the hearing; the date of the proceeding; the petitioner's substantial interest in the proceeding; a statement of how and where the petitioner's interest will be affected by the proposed action; (b) A statement of all disputed issues of material fact; (c) A statement of how and where the petitioner's interest will be affected by the proposed action; (d) A statement of the relief sought by the petitioner; and (e) A statement of the relief sought by the petitioner. The petitioner shall file the petition with the Department and pay the fee required by Rule 19.001.

A petition that does not dispute the material facts set forth in the Department's notice of intent shall be deemed to be a petition for a hearing. The petitioner shall file the petition with the Department and pay the fee required by Rule 19.001.

The complete project file includes the application, technical evaluation, Draft Permit, and the information submitted by the responsible official, exclusive of confidential records used. Section 119.071, F.S. Information obtained may be subject to the Administrative Procedures Review Section at 111 South Washington Street, Suite 4, Tallahassee, Florida 32301, or call 904/605-0714 for additional information. The Department's technical evaluation and Draft Permit can be viewed at the following internet address: www.fwpd.com/permits/index.html. A public hearing will be held on the permit by clicking on the link and other facility permits.

Dept. of Environmental Protection  
Northwest District Office  
1225 Baywoodway Way,  
Suite 200B  
Jacksonville, Florida 32218  
Telephone: 904/441-4370  
Fax: 904/441-4380

Dept. of Environmental Protection  
Northwest District Branch Office  
181 NW 7th Street, Suite 3  
Gainesville, FL 32601  
Telephone: 352/331-8800  
Fax: 352/331-8800

The complete project file includes the application, technical evaluation, Draft Permit, and the information submitted by the responsible official, exclusive of confidential records used. Section 119.071, F.S. Information obtained may be subject to the Administrative Procedures Review Section at 111 South Washington Street, Suite 4, Tallahassee, Florida 32301, or call 904/605-0714 for additional information. The Department's technical evaluation and Draft Permit can be viewed at the following internet address: www.fwpd.com/permits/index.html. A public hearing will be held on the permit by clicking on the link and other facility permits.

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NO \_\_\_\_\_

**THE GAINESVILLE SUN  
Published Daily and Sunday  
GAINESVILLE, FLORIDA**

Naomi Williams-Jordan

Naomi Williams-Jordan  
Classified Assistant Manager  
of THE GAINESVILLE SUN, a daily newspaper published in Alachua County, Florida, that the attached copy of advertisement, being a copy of the advertisement, was published in said newspaper in the issue of \_\_\_\_\_, 2001.

THE GAINESVILLE SUN is a newspaper published at Gainesville, in said county, and the said newspaper has heretofore been continuously published in said county as second class mail matter at the post office in Gainesville, in the period of one year next preceding the first publication of the attached copy of said newspaper.

*Naomi Williams-Jordan*

this  
01  
M.O.

Florida Department of  
Environmental Protection

Memorandum

TO: Clair Fancy *copy for e4F*  
THRU: Al Linero *Al Linero 4/18*  
FROM: John Reynolds  
DATE: April 18, 2001  
SUBJECT: Florida Power Corporation/University of Florida Cogen Plant  
Replacement of 43 MW Combustion Turbine  
DEP File No. 0010001-003-AC

Attached is the public notice package for replacement of a 43 MW combustion turbine at the University of Florida Cogen Plant in Gainesville. The applicant is applying to replace the existing 43 MW GE LM6000 turbine with a new more efficient model incorporating GE's SPRay INtercooling (SPRINT) technology. This technology was developed for GE's LM6000 machines to address the limiting factor of high discharge temperatures and their adverse effect on operating life of the unit. The technology involves water spray injection at the low-pressure compressor inlet as well as between the low and high-pressure compressors.

Nitrogen Oxides (NO<sub>x</sub>) emissions from the new gas turbine will be controlled by the water injection system and the emission limit will remain the same (25 ppmvd) @15% O<sub>2</sub> for gas firing and 42 ppmvd for fuel oil firing. Since the new turbine has a maximum operating capacity of about 48 MW vs. 43 MW for the existing unit, allowable annual operating hours at maximum rates have been reduced from 8147 to 7211. The current annual NO<sub>x</sub> emission cap for the facility, which includes the combustion turbine, the duct burner, and two backup boilers, remains at 194.3 tons per year.

Due to the combustion characteristics of the replacement turbine, Carbon Monoxide (CO) emissions will be lower and will be limited to 36 ppmvd (corrected to 15% oxygen) for natural gas firing vs. the current 42 ppmvd. This amounts to a decrease in allowable CO emissions from 158 to 127.5 tons per year.

Emissions of carbon monoxide, volatile organic compounds, sulfur dioxide, sulfuric acid mist, and particulate matter (PM/PM<sub>10</sub>) will be very low because of the inherently clean pipeline quality natural gas, limited fuel oil use and, the design of the GE unit.

Today (April 18) is day 41. I recommend your approval of the attached Intent to Issue.

Attachments



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APR 16 2001

BUREAU OF AIR REGULATION

April 12, 2001

Mr. Al Linero, P.E.  
Florida Department of Environmental Protection  
2600 Blair Stone Rd.  
Tallahassee, Florida 32399-2400

Dear Mr. Linero:

Re: Florida Power University of Florida Facility  
Draft Permit No. 0010001-003-AC

Florida Power has received the preliminary draft construction permit referenced above. This letter serves to provide comments on the draft permit. These comments are as follows:

1. Authorized Representative: The correct spelling is Kris Edmondson.
2. Specific Condition 6: This condition contains both a total fuel use requirement and an annual NOx emissions cap. Given that the NOx emissions cap is the over-arching requirement, and CEMs will be used to track compliance with the cap, the fuel use limit appears somewhat superfluous. Florida Power requests that the fuel use limit be removed, and that compliance with the emissions cap using the CEMs be retained in this condition. Fuel use data would still be used to calculate the emissions from the back-up boilers, which would be added to the CEMs data for the combustion turbine (CT) and duct burner (DB).
3. Specific Condition 8.c.: Items 1 and 2 of this condition limit the NOx emissions from the CT/DB combination to 25 ppmvd corrected to 15% O<sub>2</sub> while on natural gas and 42 ppmvd corrected to 15% O<sub>2</sub> while burning distillate oil. These ppmvd limits would actually apply to the CT only. Since Specific Conditions 8.a. and 8.b. already limit the emissions of the CT and DB in terms of ppmvd, lbs/hr, and tons/year, Specific Conditions 8.c.1. and 8.c.2. may not be necessary. Another alternative is to state the additive emission limits for the CT and DB together in this condition.
4. Specific Condition 8.c.3.: Specific Condition 8.c.3. requires that the total NOx emissions for the calendar year be reported in the annual operating report for the facility. Specific Condition 6 requires that the NOx cap not be exceeded in any federal fiscal year. Florida Power requests that the time frame reflected in Specific Condition 6 be changed to a calendar year in order for Specific Condition 8.c.3. to be meaningful in terms of tracking compliance with the NOx cap.

Mr. Al Linero  
April 12, 2001  
Page 2

Florida Power appreciates the opportunity to review and comment on the draft permit. Please contact Mike Kennedy at (727) 826-4334 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Kris Edmondson". The signature is fluid and cursive, with a large initial "K" and "E".

Kris Edmondson  
Plant Manager

bcc: J. M. Kennedy  
S. H. Osbourn, ENSR