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BUREAU OF AIR REGULATION

November 7, 2002

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

Dear Mr. Linero:

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

On April 29 of this year, Florida Power submitted a request to modify the above-referenced construction permit. Following review, the DEP rejected the request due to the potential applicability of PSD review to the combustion turbine because of the uncertainty of the total emissions from that unit under the proposal.

Florida Power has reconsidered the earlier submittal, and proposes to modify the request. In addition to committing to the facility-wide emissions cap, Florida Power will commit to maintaining total annual emissions from the combustion turbine to 141 tons/year. In this way, the operation of the unit obtains the flexibility to achieve the increased heat input level while ensuring that NOx emissions do not reach the PSD threshold. Heat input curve changes have been approved at other Florida Power combustion turbine units in a similar manner, in that the heat input was changed while maintaining permitted emission limits. The proposed changes in the April 29 submittal are discussed again in detail as follows, and changes to the original proposal are indicated in strike-through and bold type.

The current construction permit was issued on May 18, 2001. Specific Condition 5 in Section III contains a designed maximum heat input for the combustion turbine (CT) of 392 mmBtu/hour at 59 degrees F when firing natural gas. This heat input was based on information provided to the DEP in the permit application, and it corresponds to data provided by General Electric (GE). Florida Power has found that the CT can attain a heat input level that is slightly higher than the currently permitted amount. Florida Power is ensuring that the daily average heat input of 392 mmBtu/hour is not exceeded, but this results in the loss of approximately 3 MW that could be produced.

The CT can actually attain a heat input of approximately 408 mmBtu/hour at 59 deg. F as shown on the enclosed heat input vs. engine inlet temperature graph. Florida Power requests that the permit be changed to incorporate this heat input curve. Florida Power is not seeking a

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change in the emission limits contained in the permit; compliance with all lb/hour and tons/year limits will be maintained.

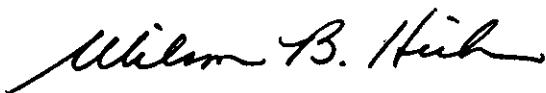
In addition, Condition 6 of Section III of the construction permit contains a fuel usage limit. If the revised heat input curve is incorporated as requested, the potential exists for the annual fuel usage to also require minor adjustment. Florida Power requests that the language in the permit regarding the fuel use limit be changed to reflect an approach similar to that for the annual hours of operation limit - that is, a stated baseline amount with the provision that the facility-wide annual NOx emissions limit is not exceeded. Florida Power requests that the second sentence of Condition 6 be changed to the following language:

*The turbine/~~duct burner~~ may operate for more hours per year and at a higher annual fuel consumption provided that the ~~facility-wide~~ NOx emissions **from the combustion turbine** do not exceed ~~104.3~~ 141 TPY.*

The combination of continuous monitoring and the associated reporting for both the short-term lb/hour limit and the long-term annual limit will ensure adequate monitoring for purposes of determining continuous compliance with the emissions limits.

Thank you for your continued consideration of this submittal. Please contact Mike Kennedy at (727) 826-4334 or Matt Lydon at (727) 826-4152 if you have any questions.

Sincerely,



Wilson B. Hicks
Plant Manager
Responsible Official

cc. John Reynolds
enclosures

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

Engine Inlet Temp. Vs. Heat Input (LHV) and MW Output LM6000PC-Esprint - University of Florida Cogen - Florida Power

