



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

September 11, 1997

## CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. W. Jeffrey Pardue, Director  
Environmental Service Department  
Florida Power Corp.  
3201 34th Street South  
St. Petersburg, Florida 33733

Re: FPC UF Cogen - AC01-204652/PSD-FL-181(A) <sup>B</sup>  
Final Permit Amendment

Dear Mr. Pardue:

The Department has evaluated your request for an increase in the heat input to the combustion turbine for operation at ambient temperatures near 45°F and a corresponding increase in the short term NO<sub>x</sub> emission standard (lb/hr). Your request (page 8 of application) and subsequent information submitted on March 7, 1997 indicated that no increase in annual NO<sub>x</sub> emissions would occur as a result of this amendment. The Department hereby amends the above referenced permit Specific Conditions 2 and 3 as follows and clarifies that continuous monitors are to be used to quantify the contribution from the combined cycle combustion turbine and duct burner in order to demonstrate compliance with the annual emissions caps for NO<sub>x</sub>.

2. Emissions from this facility shall not exceed the limits listed below:

Pollutant	Source	Fuel	Basis of Limit	lbs/hr	tons/yr
NO <sub>x</sub>	Turbine	Gas	EBM*: 25 ppmvd @ 15% O <sub>2</sub>	<del>35.0</del> 39.6	142.7
	Turbine	Oil	EBM*: 42 ppmvd @ 15% O <sub>2</sub>	66.3	7.3
	D. Burner	Gas	EBM*: 0.1 lb/MMBtu	18.7	24.6
	Facility	Gas/Oil			194.3
SO <sub>2</sub>	Turbine	Oil	BACT: 0.5% Sulfur Max.	---	---
	Boiler 4	Oil	BACT: 0.5% Sulfur Max.	---	---
	Boiler 5	Oil	BACT: 0.5% Sulfur Max.	---	---
VE	Turbine	Gas/Oil	Equivalent of mass EBM*	10%/20% opacity**	
	D. Burner	Gas	" " "	10% opacity	
	Boiler 4	Gas/Oil	" " "	10%/20% opacity**	
	Boiler 5	Gas/Oil	" " "	10%/20% opacity**	
CO	Turbine	Gas	BACT: 42 ppmvd	38.8	158.0
	Turbine	Oil	EBA***: 75 ppmvd	70.5	7.7
	D. Burner	Gas	BACT: 0.15 lb/MMBtu****	28.1	36.9

\* EBM: Established by manufacturer

\*\* Except for one 6-minute period per hour of not more than 27% opacity

\*\*\* EBA: Established by applicant

\*\*\*\* BACT limit proposed by applicant in Table A-2 of application

P 265 659 455

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

PS Form 3800, April 1995

Sent to	
Jeffrey Pardue	
Street & Number	
EPC	
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	9-12-97
UF Cogen PSD-FI-181(A)	

Fold at line over top of envelope to  
front 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):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

Is your RETURN ADDRESS completed on the reverse side?

3. Article Addressed to:  
Mr. W. Jeffrey Pardue, Dir.  
Environmental Serv. Dept.  
Fla. Power Corp  
3201 34th St. South  
St. Petersburg, FL  
33733

4a. Article Number  
P 265 659 455

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

7. Date of Delivery  
SEP 18 1997

5. Received By: (Print Name)

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

6. Signature: (Addressee or Agent)

X Frank Chapin

PS Form 3811, December 1994

Domestic Return Receipt

Thank you for using Return Receipt Service.

3. Fuel consumption rates and hours of operation for the turbine and duct burner shall not exceed those listed below:

	<u>Natural Gas</u>			<u>No. 2 Fuel Oil</u>		
	<u>M ft3/hr*</u>	<u>MM ft3/yr</u>	<u>hrs/yr*</u>	<u>M gal/hr*</u>	<u>Mgal/yr</u>	<u>hrs/yr*</u>
Turbine	367.9 <u>420.3</u>	2997.2**	8146.8**	2.9	635.1	219.0**
Duct Burner	197.7	519.5	2628.0	0	0	0

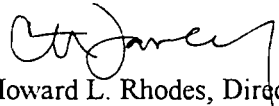
\*Based on maximum firing rates. Units may run at lower rates for more hours within annual fuel limits.

\*\*An additional 1.9 hours/yr operation on natural gas will be allowed for each 1.0 hour/yr that fuel oil is not burned (up to 219 x 1.9 hrs/yr), in which case, the emissions limits in Specific Condition No. 2 shall be adjusted accordingly.

Boilers Nos. 4 and 5, firing natural gas or No. 2 fuel oil, may be operated as necessary for backup, as long as total NO<sub>x</sub> emissions from the four sources emissions units within the permitted facility do not exceed 194.3 tons NO<sub>x</sub> per year. The permittee shall maintain the required fuel use records ~~to demonstrate compliance with this condition~~ and include the total NO<sub>x</sub> emission calculation in each annual operating report. For purposes of demonstrating compliance with the annual limits the NO<sub>x</sub> emission rate (lbs/MMBtu) from the combustion turbine and duct burner shall be calculated using the NO<sub>x</sub> analyzer data and equation F-6 from 40 CFR 75 Appendix F. Hourly heat input rates (MMBtu/hr) shall be used to convert lb/MMBtu of NO<sub>x</sub> to lb/hour of NO<sub>x</sub> and actual operating hours shall be used to obtain tons per year.

This permit amendment replaces the one issued on March 17, 1997. A copy of this permit amendment shall be filed with the referenced permit and shall become part of the permit. Any party to this order (permit amendment) 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 permit amendment is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

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

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this FINAL PERMIT AMENDMENT was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 9-12-97 to the person(s) listed:

Mr. W. Jeffrey Pardue, FPC \*  
Mr. Brian Beals, EPA  
Mr. John Bunyak, NPS  
Mr. Chris Kirts, NED  
Dr. Pat Reynolds, DEP, Gainesville

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.

Keri Joken      9-12-97  
(Clerk)                      (Date)

Florida Department of  
Environmental Protection

Memorandum

---

TO: Howard Rhodes

THROUGH: Clair Fancy

THROUGH: Al Linero *Al Linero* 9/10

FROM: Martin Costello <sup>mc</sup>

DATE: August 29, 1997

SUBJECT: Florida Power Corporation  
University of Florida Cogen  
Amendment of Permit No. AC01-204652 / PSD-FL-181(A)

Attached for your review and approval is a permit amendment which supersedes the previous amendment dated March 17, 1997 (attached) and clarifies how compliance is demonstrated for the annual NO<sub>x</sub> emissions cap. The permittee originally requested an increase in the fuel usage rate limit (from 367.9 to 420.3 thousand cubic feet of natural gas per hour) for the combustion turbine with a corresponding increase in the short term NO<sub>x</sub> emission standard (from 35.0 to 39.6 lb/hr). FPC requested a higher heat input limit to allow for higher output from the combustion turbine at temperatures near 45 °F. Although annual hours when ambient temperatures are near 45 °F are limited, the higher heat rates represents approximately a 14 percent increase in gas usage and NO<sub>x</sub> emission rates. The facility's annual emissions cap for NO<sub>x</sub> emissions will not increase.

I recommend your approval of this amendment.

## FINAL DETERMINATION

Florida Power Corporation

Amendment of Permit No. AC01-204652, PSD-FL-181(A)  
University of Florida Cogen

An Intent to Issue an air construction permit amendment for Florida Power Corporation (FPC), University of Florida Cogen Plant located the campus at the University of Florida, Alachua County was distributed on February 23, 1996. The Notice of Intent was published in the *Gainesville Sun* March 20, 1996. Comments from within the Department resulted in a request for FPC to evaluate emission changes as a result of this action. The response from FPC (letter dated March 7, 1997) indicates that only minor increases in nitrogen oxide (NO<sub>x</sub>) emissions will occur as a result of this amendment and the emission cap for NO<sub>x</sub> will not be exceeded.

The final action of the Department will be to issue the permit amendment with an additional requirement to use the CEMS monitoring data to quantify NO<sub>x</sub> emissions more accurately from the combustion turbine and duct burner.



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

March 17, 1997

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. W. Jeffrey Pardue, Director  
Environmental Service Department  
Florida Power Corp.  
3201 34th Street South  
St. Petersburg, Florida 33733

Dear Mr. Pardue:

RE: FPC UF Cogen - AC01-204652/PSD-FL-181(A)  
Request to Amend Permit

The Department has evaluated your request for an increase in the heat input to the combustion turbine for operation at ambient temperatures near 45°F and a corresponding increase in the short term NO<sub>x</sub> emission standard (lb/hr). Your request (page 8 of application) and subsequent information submitted on March 7, 1997 indicated that no increase in annual NO<sub>x</sub> emissions would occur as a result of this modification. The Department will monitor annual emission rates for a 5 year period to verify that emissions do not increase significantly as a result of this modification. The Department hereby amends the above referenced permit Specific Conditions 2 and 3 as follows:

2. Emissions from this facility shall not exceed the limits listed below:

Pollu- tant	Source	Fuel	Basis of Limit	lbs/hr	tons/yr
NO <sub>x</sub>	Turbine	Gas	EBM*:25 ppmvd @ 15% O <sub>2</sub>	35.0 <u>39.6</u>	142.7
	Turbine	Oil	EBM*:42 ppmvd @ 15% O <sub>2</sub>	66.3	7.3
	D. Burner	Gas	EBM*:0.1 lb/MMBtu	18.7	24.6
	Facility	Gas/Oil			194.3
SO <sub>2</sub>	Turbine	Oil	BACT:0.5% Sulfur Max.	---	---
	Boiler 4	Oil	BACT:0.5% Sulfur Max.	---	---
	Boiler 5	Oil	BACT:0.5% Sulfur Max.	---	---
VE	Turbine	Gas/Oil	Equivalent of mass EBM*	10%/20% opacity**	
	D. Burner	Gas	" " "	10% opacity	
	Boiler 4	Gas/Oil	" " "	10%/20% opacity**	
	Boiler 5	Gas/Oil	" " "	10%/20% opacity**	
CO	Turbine	Gas	BACT: 42 ppmvd	38.8	158.0
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	D. Burner	Gas	BACT:0.15 lb/MMBtu****	28.1	36.9

\*EBM: Established by manufacturer

\*\*Except for one 6-minute period per hour of not more than 27% opacity

\*\*\*EBA: Established by applicant

\*\*\*\*BACT limit proposed by applicant in Table A-2 of application

Mr. W. Jeffrey Pardue  
Page Two  
March 17, 1997

3. Fuel consumption rates and hours of operation for the turbine and duct burner shall not exceed those listed below:

	<u>Natural Gas</u>			<u>No. 2 Fuel Oil</u>		
	<u>M ft<sup>3</sup>/hr*</u>	<u>MM ft<sup>3</sup>/yr</u>	<u>hrs/yr*</u>	<u>M gal/hr*</u>	<u>M gal/yr</u>	<u>hrs/yr*</u>
Turbine	367-9 420.3	2997.2**	8146.8**	2.9	635.1	219.0**
Duct Burner	197.7	519.5	2628.0	0	0	0

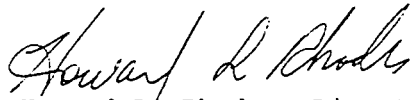
\*Based on maximum firing rates. Units may run at lower rates for more hours within annual fuel limits.

\*\*An additional 1.9 hours/yr operation on natural gas will be allowed for each 1.0 hour/yr that fuel oil is not burned (up to 219 x 1.9 hrs/yr), in which case, the emissions limits in Specific Condition No. 2 shall be adjusted accordingly.

Boilers Nos. 4 and 5, firing natural gas or No. 2 fuel oil, may be operated as necessary for backup, as long as total NO<sub>x</sub> emissions from the four sources, emissions units within the permitted facility do not exceed 194.3 tons NO<sub>x</sub> per year. The permittee shall maintain the required fuel use records to demonstrate compliance with this condition and include the total NO<sub>x</sub> emission calculation in each annual operating report. Beginning in 1997, the NO<sub>x</sub> emission rate (lbs/MMBtu) from the combustion turbine and duct burner shall be calculated using the NO<sub>x</sub> analyzer data and equation F-6 from 40 CFR 75 Appendix F. Hourly heat input rates (MMBtu/hr) shall be used to convert lb/MMBtu of NO<sub>x</sub> to lb/hour of NO<sub>x</sub>.

A copy of this amendment letter shall be attached to and shall become a part of Air Construction Permit AC01-204652/PSD-FL-181(A).

Sincerely,



Howard L. Rhodes, Director  
Division of Air Resources  
Management

HLR/mc/t





August 28, 1997

Ms. Kathy Carter  
Office of General Counsel  
Florida Department of Environmental Protection  
2600 Blair Stone Rd.  
Tallahassee, FL 32399-2400

**RECEIVED**

AUG 29 1997

BUREAU OF  
AIR REGULATION

Dear Ms. Carter:

RE: Florida Power Corporation, University of Florida Cogeneration Plant  
REQUEST FOR EXTENSION OF TIME on *Amendment to Permit No. AC01-204652, PSD-FL-181(A)* and the *Intent to Issue Title V Air Operation Permit, Draft Permit No. 1270028-001-AV*

On March 20, 1997, Florida Power Corporation (FPC) received the above-referenced air construction permit amendment. A review of the permit conditions has revealed that several issues remain to be resolved. Similar permit conditions have been written into the above-referenced Draft Title V permit. Therefore, resolution of both permitting actions is linked. The Department previously granted Orders under OGC Case Nos. 97-0618 (PSD permit) and 97-1208 (Title V permit), extending the time to file a petition until September 2, 1997 and August 29, 1997, respectively. Mr. Scott Osbourn of my staff has had discussions with Mr. Charles Logan of the Department and he has agreed that an extension of time for 14 days to discuss these issues is appropriate. Therefore, based upon the Department's concurrence and pursuant to Rules 62-103.050 and 28-106.111, Fla. Admin. Code, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing on both the PSD permit amendment and the draft Title V permit under Sections 120.569 and 120.57, Fla. Stat., up to and including September 12, 1997.

If you should have any questions, please contact Mr. Scott Osbourn at (813) 866-5158.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Jeffrey Pardue", written over a circular stamp or seal.

W. Jeffrey Pardue, C.E.P.  
Director, Environmental Services Department  
Title V Responsible Official

A handwritten signature in black ink, appearing to read "Robert A. Manning", written in a cursive style.

Robert A. Manning, Esq.  
Hopping Green Sams & Smith

cc: Al Linero, DEP  
Scott Sheplak, DEP

cc: M. Costello, BAR

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

# ROUTING AND TRANSMITTAL SLIP

TO: (NAME, OFFICE, LOCATION)

1. ~~At Linero, MS# 5505~~
2. Kim - FPC Cogen File. UofF
3. ~~Cory Marty~~ ✓
- 4.

## RECEIVED

AUG 26 1997

BUREAU OF  
AIR REGULATION

FROM:

Jeff Brown, OGC

DATE

8-25

PHONE

8-9730

**STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

FLORIDA POWER CORPORATION,  
UNIVERSITY OF FLORIDA COGEN,

Petitioner,

vs.

OGC CASE NO. 97-0618

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION,

Respondent.

---

**ORDER GRANTING REQUEST FOR EXTENSION  
OF TIME TO FILE PETITION FOR HEARING**

This cause has come before the Florida Department of Environmental Protection (Department) on receipt of a request made by Petitioner FLORIDA POWER CORPORATION to grant an extension of time to file a petition for an administrative hearing on Application No. AC01-204652, PSD-FL-181(A). See Exhibit 1.

Although Counsel for Petitioner has not discussed this request with counsel for the Respondent State of Florida Department of Environmental Protection, the Department has no objection to it. Therefore,

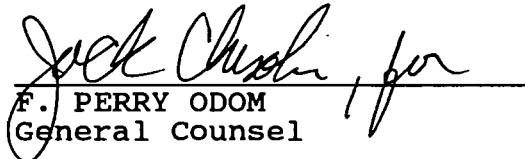
IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until September 2, 1997, to file a petition in this matter. Filing shall be complete on receipt by the Office of General Counsel, Mail Station 35, Department of

Environmental Protection, 3900 Commonwealth Boulevard,  
Tallahassee, Florida 32399-3000.

DONE AND ORDERED on this 25 day of August, 1997 in  
Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

  
F. PERRY ODOM  
General Counsel

Douglas Building, MS #35  
3900 Commonwealth Boulevard  
Tallahassee, FL 32399-3000  
Telephone: (904) 488-9314

**CERTIFICATE OF SERVICE**

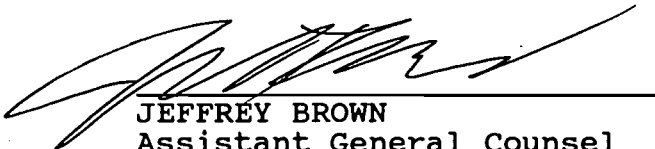
I CERTIFY that a true copy of the foregoing was mailed  
to:

Robert A. Manning, Esquire  
HOPPING, GREEN, SAMS & SMITH  
123 South Calhoun Street  
Post Office Box 6526  
Tallahassee, Florida 32314-6526

W. Jeffrey Pardue, C.E.P.  
Director, Environmental  
Services Department  
FLORIDA POWER CORPORATION  
3201 Thirty-fourth St. S.  
Post Office Box 14042  
St. Petersburg, FL 33733

on this 25<sup>th</sup> day of August, 1997.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

  
JEFFREY BROWN  
Assistant General Counsel  
Florida Bar No. 0843430

Mail Station 35  
3900 Commonwealth Boulevard  
Tallahassee, FL 32399-3000  
Telephone: (904) 488-9730

**HOPPING GREEN SAMS & SMITH**

PROFESSIONAL ASSOCIATION

ATTORNEYS AND COUNSELORS

123 SOUTH CALHOUN STREET

POST OFFICE BOX 6526

TALLAHASSEE, FLORIDA 32314

(904) 222-7500

FAX (904) 224-8551

FAX (904) 425-3415

July 30, 1997

JAMES S. ALVES  
BRIAN H. BIBEAU  
KATHLEEN BLIZZARD  
ELIZABETH C. BOWMAN  
RICHARD S. BRIGHTMAN  
PETER C. CUNNINGHAM  
RALPH A. DeMEO  
THOMAS M. DeROSE  
WILLIAM H. GREEN  
WADE L. HOPPING  
FRANK E. MATTHEWS  
RICHARD D. MELSON  
MICHAEL P. PETROVICH  
DAVID L. POWELL  
WILLIAM D. PRESTON  
CAROLYN S. RAEPPLE  
DOUGLAS S. ROBERTS  
GARY P. SAMS  
ROBERT P. SMITH  
CHERYL G. STUART

GARY K. HUNTER, JR.  
JONATHAN T. JOHNSON  
ROBERT A. MANNING  
ANGELA R. MORRISON  
GARY V. PERKO  
KAREN M. PETERSON  
R. SCOTT RUTH  
W. STEVE SYKES  
T. KENT WETHERELL, II

OF COUNSEL  
W. ROBERT FOXES

**RECEIVED**

JUL 30 1997

Dept. of Environmental Protection  
Office of General Counsel

Ms. Kathy Carter  
Office of General Counsel  
Florida Department of Environmental Protection  
2600 Blair Stone Rd.  
Tallahassee, FL 32399-2400

Re: OGC Case No. 97-0618  
Florida Power Corporation, University of Florida  
Cogeneration Plant  
Amendment to Permit No. AC01-204652, PSD-FL-181(A)

Dear Ms. Carter:

Attached for filing is a Request for Extension of Time on the above-referenced permitting matter. The Department previously granted an Order under OGC Case No. 97-0618, dated June 27, 1997, extending the time to file a petition until July 30, 1997. Accordingly, the attached Request asks that the time to file a Petition for Administrative Hearing be extended for an additional 30 days until August 30, 1997.

Sincerely,

*Robert A. Manning*

Robert A. Manning

Attorney for  
Florida Power Corporation

RAM/pak  
Enclosure



July 29, 1997

Ms. Kathy Carter  
Office of General Counsel  
Florida Department of Environmental Protection  
2600 Blair Stone Rd.  
Tallahassee, FL 32399-2400

Dear Ms. Carter:

RE: Florida Power Corporation, University of Florida Cogeneration Plant  
Amendment to Permit No. AC01-204652, PSD-FL-181(A)

On March 20, 1997, Florida Power Corporation (FPC) received the above-referenced permit amendment. A review of the permit conditions has revealed that several issues remain to be resolved. Mr. Scott Osbourn of my staff has had discussions with Messrs. Al Linero and Martin Costello of the Department and they have agreed that an extension of time for 30 days to discuss these issues is appropriate. Therefore, based upon the Department's concurrence and pursuant to Rules 62-103.050 and 28-106.111, Fla. Admin. Code, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing under Sections 120.569 and 120.57, Fla. Stat., up to and including August 30, 1997.

If you should have any questions, please contact Mr. Scott Osbourn at (813) 866-5158.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Jeffrey Pardue".

W. Jeffrey Pardue, C.E.P.  
Director, Environmental Services Department  
Title V Responsible Official

A handwritten signature in black ink, appearing to read "Robert A. Manning".

Robert A. Manning, Esq.  
Hopping Green Sams & Smith

cc: Al Linero, BARM  
Chris Kirts, NE District  
Charles Logan, DEP

HOPPING GREEN SAMS & SMITH

PROFESSIONAL ASSOCIATION

ATTORNEYS AND COUNSELORS

123 SOUTH CALHOUN STREET

POST OFFICE BOX 6526

TALLAHASSEE, FLORIDA 32314

(904) 222-7500

FAX (904) 224-8551

FAX (904) 425-3415

JAMES S. ALVES  
BRIAN H. BIBEAU  
KATHLEEN BLIZZARD  
ELIZABETH C. BOWMAN  
RICHARD S. BRIGHTMAN  
PETER C. CUNNINGHAM  
RALPH A. DEMEO  
THOMAS M. DEROSE  
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GARY V. PERKO  
KAREN M. PETERSON  
R. SCOTT RUTH  
W. STEVE SYKES  
T. KENT WETHERELL, II

OF COUNSEL  
W. ROBERT FOKES

July 30, 1997  
**RECEIVED**

JUL 31 1997

BUREAU OF  
AIR REGULATION

**RECEIVED**

JUL 30 1997

Dept. of Environmental Protection  
Office of General Counsel

Ms. Kathy Carter  
Office of General Counsel  
Florida Department of Environmental Protection  
2600 Blair Stone Rd.  
Tallahassee, FL 32399-2400

Re: OGC Case No. 97-0618  
Florida Power Corporation, University of Florida  
Cogeneration Plant  
Amendment to Permit No. AC01-204652, PSD-FL-181(A)

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Sincerely,

*Robert A. Manning*  
Robert A. Manning

Attorney for  
Florida Power Corporation

RAM/pak  
Enclosure

cc: M. Costello



July 29, 1997

Ms. Kathy Carter  
Office of General Counsel  
Florida Department of Environmental Protection  
2600 Blair Stone Rd.  
Tallahassee, FL 32399-2400

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RE: Florida Power Corporation, University of Florida Cogeneration Plant  
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If you should have any questions, please contact Mr. Scott Osbourn at (813) 866-5158.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Jeffrey Pardue", written over a circular scribble.

W. Jeffrey Pardue, C.E.P.  
Director, Environmental Services Department  
Title V Responsible Official

A handwritten signature in black ink, appearing to read "Robert A. Manning", written in a cursive style.

Robert A. Manning, Esq.  
Hopping Green Sams & Smith

cc: Al Linero, BARM  
Chris Kirts, NE District  
Charles Logan, DEP



STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

FLORIDA POWER CORPORATION,  
UNIVERSITY OF FLORIDA COGEN,

Petitioner,

vs.

OGC CASE NO. 97-0618

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION,

Respondent.

---

**ORDER GRANTING REQUEST FOR EXTENSION  
OF TIME TO FILE PETITION FOR HEARING**

This cause has come before the Florida Department of Environmental Protection (Department) on receipt of a request made by Petitioner FLORIDA POWER CORPORATION to grant an extension of time to file a petition for an administrative hearing on Application No. AC01-204652, PSD-FL-181(A). See Exhibit 1.

Although Counsel for Petitioner has not discussed this request with counsel for the Respondent State of Florida Department of Environmental Protection, the Department has no objection to it. Therefore,

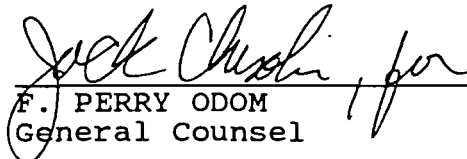
IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until September 2, 1997, to file a petition in this matter. Filing shall be complete on receipt by the Office of General Counsel, Mail Station 35, Department of

Environmental Protection, 3900 Commonwealth Boulevard,  
Tallahassee, Florida 32399-3000.

DONE AND ORDERED on this 25 day of August, 1997 in  
Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

  
F. PERRY ODOM  
General Counsel

Douglas Building, MS #35  
3900 Commonwealth Boulevard  
Tallahassee, FL 32399-3000  
Telephone: (904) 488-9314

CERTIFICATE OF SERVICE

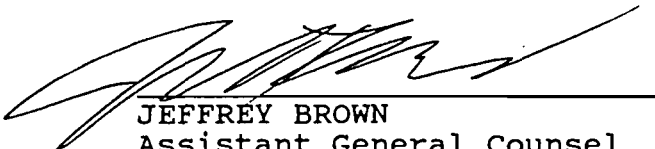
I CERTIFY that a true copy of the foregoing was mailed  
to:

Robert A. Manning, Esquire  
HOPPING, GREEN, SAMS & SMITH  
123 South Calhoun Street  
Post Office Box 6526  
Tallahassee, Florida 32314-6526

W. Jeffrey Pardue, C.E.P.  
Director, Environmental  
Services Department  
FLORIDA POWER CORPORATION  
3201 Thirty-fourth St. S.  
Post Office Box 14042  
St. Petersburg, FL 33733

on this 25<sup>th</sup> day of August, 1997.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

  
JEFFREY BROWN  
Assistant General Counsel  
Florida Bar No. 0843430

Mail Station 35  
3900 Commonwealth Boulevard  
Tallahassee, FL 32399-3000  
Telephone: (904) 488-9730

HOPPING GREEN SAMS & SMITH

PROFESSIONAL ASSOCIATION

ATTORNEYS AND COUNSELORS

123 SOUTH CALHOUN STREET

POST OFFICE BOX 6526

TALLAHASSEE, FLORIDA 32314

(904) 222-7500

FAX (904) 224-8551

FAX (904) 425-3415

July 30, 1997

JAMES S. ALVES  
BRIAN H. BIBEAU  
KATHLEEN BLIZZARD  
ELIZABETH C. BOWMAN  
RICHARD S. BRIGHTMAN  
PETER C. CUNNINGHAM  
RALPH A. DeMEO  
THOMAS M. DeROSE  
WILLIAM H. GREEN  
WADE L. HOPPING  
FRANK E. MATTHEWS  
RICHARD D. MELSON  
MICHAEL P. PETROVICH  
DAVID L. POWELL  
WILLIAM D. PRESTON  
CAROLYN S. RAEPPEL  
DOUGLAS S. ROBERTS  
GARY P. SAMS  
ROBERT P. SMITH  
CHERYL G. STUART

GARY K. HUNTER, JR.  
JONATHAN T. JOHNSON  
ROBERT A. MANNING  
ANGELA R. MORRISON  
GARY V. PERKO  
KAREN M. PETERSON  
R. SCOTT RUTH  
W. STEVE SYKES  
T. KENT WETHERELL, II

OF COUNSEL  
W. ROBERT FOKES

RECEIVED

JUL 30 1997

Dept. of Environmental Protection  
Office of General Counsel

Ms. Kathy Carter  
Office of General Counsel  
Florida Department of Environmental Protection  
2600 Blair Stone Rd.  
Tallahassee, FL 32399-2400

Re: OGC Case No. 97-0618  
Florida Power Corporation, University of Florida  
Cogeneration Plant  
Amendment to Permit No. AC01-204652, PSD-FL-181(A)

Dear Ms. Carter:

Attached for filing is a Request for Extension of Time on the above-referenced permitting matter. The Department previously granted an Order under OGC Case No. 97-0618, dated June 27, 1997, extending the time to file a petition until July 30, 1997. Accordingly, the attached Request asks that the time to file a Petition for Administrative Hearing be extended for an additional 30 days until August 30, 1997.

Sincerely,

*Robert A. Manning*  
Robert A. Manning

Attorney for  
Florida Power Corporation

RAM/pak  
Enclosure



July 29, 1997

Ms. Kathy Carter  
Office of General Counsel  
Florida Department of Environmental Protection  
2600 Blair Stone Rd.  
Tallahassee, FL 32399-2400

Dear Ms. Carter:

RE: Florida Power Corporation, University of Florida Cogeneration Plant  
Amendment to Permit No. AC01-204652, PSD-FL-181(A)

On March 20, 1997, Florida Power Corporation (FPC) received the above-referenced permit amendment. A review of the permit conditions has revealed that several issues remain to be resolved. Mr. Scott Osbourn of my staff has had discussions with Messrs. Al Linero and Martin Costello of the Department and they have agreed that an extension of time for 30 days to discuss these issues is appropriate. Therefore, based upon the Department's concurrence and pursuant to Rules 62-103.050 and 28-106.111, Fla. Admin. Code, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing under Sections 120.569 and 120.57, Fla. Stat., up to and including August 30, 1997.

If you should have any questions, please contact Mr. Scott Osbourn at (813) 866-5158.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Jeffrey Pardue", written in a cursive style.

W. Jeffrey Pardue, C.E.P.  
Director, Environmental Services Department  
Title V Responsible Official

A handwritten signature in black ink, appearing to read "Robert A. Manning", written in a cursive style.

Robert A. Manning, Esq.  
Hopping Green Sams & Smith

cc: Al Linero, BARM  
Chris Kirts, NE District  
Charles Logan, DEP

Date: 6/20/97 3:17:37 PM  
From: Marjane Monahan TAL  
Subject: Florida Power Corp. Univ. of Fla. Cogen

Re: Florida Power Corporation, University of Florida Cogen  
Amendment to Permit No. AC01-204652, PSD-FL-181(A)  
OGC Case No. 97-0963

On May 30, 1997, OGC received a request for extension of time until July 30, 1997 to file a petition regarding the above referenced matter. Jeffrey Brown is the OGC attorney assigned to handle the case.

Please send a copy of the copy of the permit amendment. Also, please let me know if this was timely. Was there an Intent to Issue that was published? If so, when? If not, did they receive the permit amendment by certified mail?

Thanks.



**RECEIVED**

JUN 02 1997

BUREAU OF  
AIR REGULATION

May 28, 1997

Ms. Kathy Carter, Esq.  
Office of General Counsel  
Florida Department of Environmental Protection  
2600 Blair Stone Rd.  
Tallahassee, FL 32399-2400

Dear Ms. Carter:

Re: Florida Power Corporation, University of Florida Cogen  
Amendment to Permit No. AC01-204652, PSD-FL-181(A)

On March 20, 1997, Florida Power Corporation (FPC) received the above-referenced permit amendment. A review of the permit conditions has revealed that several issues remain to be resolved. Mr. Scott Osbourn of my staff has had discussions with Mr. Al Linero of the Department and he has agreed that an extension of time to discuss these issues is appropriate. Therefore, based upon Mr. Linero's concurrence and pursuant to Section 62-103.050, FAC, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing under Sections 120.569 and 120.57 FS, up to and including July 30, 1997.

If you should have any questions, please contact Mr. Scott Osbourn at (813) 866-5158.

Sincerely,

Handwritten signature of W. Jeffrey Pardue in black ink.

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

Handwritten signature of James S. Alves in black ink.

James S. Alves, Esq.  
Hopping, Green, Sams and Smith

cc: Al Linero, BARM  
Chris Kirts, NE District

cc: A. Linero  
M. Costello } BARM  
T. Hewitt }

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

**RECEIVED**

MAY 23 1997

BUREAU OF  
AIR REGULATION

FLORIDA POWER CORPORATION,  
UNIVERSITY OF FLORIDA COGEN,

Petitioner,

vs.

OGC CASE NO. 97-0618

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION,

Respondent.

---

**ORDER GRANTING REQUEST FOR EXTENSION  
OF TIME TO FILE PETITION FOR HEARING**

This cause has come before the Florida Department of Environmental Protection (Department) on receipt of a request made by Petitioner FLORIDA POWER CORPORATION to grant an extension of time to file a petition for an administrative hearing on Application No. AC01-204652, PSD-FL-181(A). See Exhibit 1.

Although Counsel for Petitioner has not discussed this request with counsel for the Respondent State of Florida Department of Environmental Protection, the Department has no objection to it. Therefore,

IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until May 30, 1997, to file a petition in this matter. Filing shall be complete on receipt by the Office of General Counsel, Mail Station 35, Department of Environmental

--ATTENTION MAIL ROOM--

PLEASE ROUTE THIS  
DOCUMENT TO:

Al Linero / DARM  
Name of Individual/Office

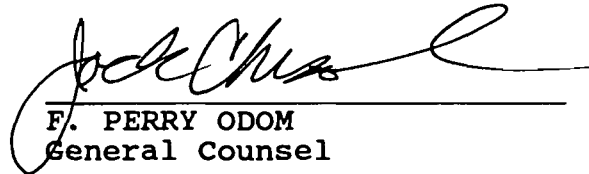
5505  
Mail Station Number



Protection, 3900 Commonwealth Boulevard, Tallahassee,  
Florida 32399-3000.

DONE AND ORDERED on this 22 day of May, 1997 in  
Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

  
F. PERRY ODOM  
General Counsel

Douglas Building, MS #35  
3900 Commonwealth Boulevard  
Tallahassee, FL 32399-3000  
Telephone: (904) 488-9314

CERTIFICATE OF SERVICE


I CERTIFY that a true copy of the foregoing was mailed  
to:

James S. Alves, Esquire  
HOPPING, GREEN, SAMS & SMITH  
123 South Calhoun Street  
Post Office Box 6526  
Tallahassee, Florida 32314-6526

W. Jeffrey Pardue, C.E.P.  
Director, Environmental  
Services Department  
FLORIDA POWER CORPORATION  
3201 Thirty-fourth St. S.  
Post Office Box 14042  
St. Petersburg, FL 33733

on this 23<sup>rd</sup> day of May, 1997.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

  
JEFFREY BROWN  
Assistant General Counsel  
Florida Bar No. 0843430

Mail Station 35  
3900 Commonwealth Boulevard  
Tallahassee, FL 32399-3000  
Telephone: (904) 488-9730



RECEIVED

APR 2 1997

Dept. of Environmental Protection  
Office of General Counsel

April 1, 1997

Ms. Kathy Carter, Esq.  
Office of General Counsel  
Florida Department of Environmental Protection  
2600 Blair Stone Rd.  
Tallahassee, Florida 32399-2400

Dear Ms. Carter:

Re: Florida Power Corporation, University of Florida Cogen  
Amendment to Permit No. AC01-204652, PSD-FL-181(A)

On March 20, 1997, Florida Power Corporation (FPC) received the above-referenced permit amendment. A review of the permit conditions has revealed that several issues remain to be resolved. Mr. Scott Osbourn of my staff has had discussions with Mr. Al Linero of the Department and he has agreed that an extension of time to discuss these issues is appropriate. Therefore, based upon Mr. Linero's concurrence and pursuant to Section 62-103.050, FAC, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing under Sections 120.569 and 120.57 FS, up to and including May 20, 1997.

If you should have any questions, please contact Mr. Scott Osbourn at (813) 866-5158.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Jeffrey Pardue".

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

A handwritten signature in black ink, appearing to read "James S. Alves".

James S. Alves, Esq.  
Hopping, Green, Sams and Smith

cc: Al Linero, BARM  
Chris Kirts, NE District

EXHIBIT 1



April 1, 1997

Ms. Kathy Carter, Esq.  
Office of General Counsel  
Florida Department of Environmental Protection  
2600 Blair Stone Rd.  
Tallahassee, Florida 32399-2400

Dear Ms. Carter:

Re: Florida Power Corporation, University of Florida Cogen  
Amendment to Permit No. AC01-204652, PSD-FL-181(A)

On March 20, 1997, Florida Power Corporation (FPC) received the above-referenced permit amendment. A review of the permit conditions has revealed that several issues remain to be resolved. Mr. Scott Osbourn of my staff has had discussions with Mr. Al Linero of the Department and he has agreed that an extension of time to discuss these issues is appropriate. Therefore, based upon Mr. Linero's concurrence and pursuant to Section 62-103.050, FAC, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing under Sections 120.569 and 120.57 FS, up to and including May 20, 1997.

If you should have any questions, please contact Mr. Scott Osbourn at (813) 866-5158.

Sincerely,

A handwritten signature in dark ink, appearing to read "W. Jeffrey Pardue".

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

A handwritten signature in dark ink, appearing to read "James S. Alves".

James S. Alves, Esq.  
Hopping, Green, Sams and Smith

cc: Al Linero, BARM  
Chris Kirts, NE District

cc: M. Costello, BAR

**RECEIVED**

APR 04 1997

BUREAU OF  
AIR REGULATION



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

March 17, 1997

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. W. Jeffrey Pardue, Director  
Environmental Service Department  
Florida Power Corp.  
3201 34th Street South  
St. Petersburg, Florida 33733

Dear Mr. Pardue:

RE: FPC UF Cogen - AC01-204652/PSD-FL-181(A)  
Request to Amend Permit

The Department has evaluated your request for an increase in the heat input to the combustion turbine for operation at ambient temperatures near 45°F and a corresponding increase in the short term NO<sub>x</sub> emission standard (lb/hr). Your request (page 8 of application) and subsequent information submitted on March 7, 1997 indicated that no increase in annual NO<sub>x</sub> emissions would occur as a result of this modification. The Department will monitor annual emission rates for a 5 year period to verify that emissions do not increase significantly as a result of this modification. The Department hereby amends the above referenced permit Specific Conditions 2 and 3 as follows:

2. Emissions from this facility shall not exceed the limits listed below:

Pollutant	Source	Fuel	Basis of Limit	lbs/hr	tons/yr
NO <sub>x</sub>	Turbine	Gas	EBM*:25 ppmvd @ 15% O <sub>2</sub>	35-0 39.6	142.7
	Turbine	Oil	EBM*:42 ppmvd @ 15% O <sub>2</sub>	66.3	7.3
	D. Burner	Gas	EBM*:0.1 lb/MMBtu	18.7	24.6
	Facility	Gas/Oil			194.3
SO <sub>2</sub>	Turbine	Oil	BACT:0.5% Sulfur Max.	---	---
	Boiler 4	Oil	BACT:0.5% Sulfur Max.	---	---
	Boiler 5	Oil	BACT:0.5% Sulfur Max.	---	---
VE	Turbine	Gas/Oil	Equivalent of mass EBM*	10%/20% opacity**	
	D. Burner	Gas	" " "	10% opacity	
	Boiler 4	Gas/Oil	" " "	10%/20% opacity**	
	Boiler 5	Gas/Oil	" " "	10%/20% opacity**	
CO	Turbine	Gas	BACT: 42 ppmvd	38.8	158.0
	Turbine	Oil	EBA***:75 ppmvd	70.5	7.7
	D. Burner	Gas	BACT:0.15 lb/MMBtu****	28.1	36.9

\*EBM: Established by manufacturer

\*\*Except for one 6-minute period per hour of not more than 27% opacity

\*\*\*EBA: Established by applicant

\*\*\*\*BACT limit proposed by applicant in Table A-2 of application

Mr. W. Jeffrey Pardue  
Page Two  
March 17, 1997

3. Fuel consumption rates and hours of operation for the turbine and duct burner shall not exceed those listed below:

	<u>Natural Gas</u>			<u>No. 2 Fuel Oil</u>		
	<u>M ft<sup>3</sup>/hr*</u>	<u>MM ft<sup>3</sup>/yr</u>	<u>hrs/yr*</u>	<u>M gal/hr*</u>	<u>M gal/yr</u>	<u>hrs/yr*</u>
Turbine	367.9	420.3	2997.2**	2.9	635.1	219.0**
Duct Burner	197.7	519.5	2628.0	0	0	0

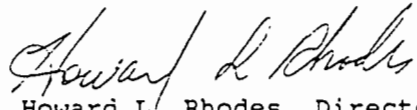
\*Based on maximum firing rates. Units may run at lower rates for more hours within annual fuel limits.

\*\*An additional 1.9 hours/yr operation on natural gas will be allowed for each 1.0 hour/yr that fuel oil is not burned (up to 219 x 1.9 hrs/yr), in which case, the emissions limits in Specific Condition No. 2 shall be adjusted accordingly.

Boilers Nos. 4 and 5, firing natural gas or No. 2 fuel oil, may be operated as necessary for backup, as long as total NO<sub>x</sub> emissions from the four sources emissions units within the permitted facility do not exceed 194.3 tons NO<sub>x</sub> per year. The permittee shall maintain the required fuel use records to demonstrate compliance with this condition and include the total NO<sub>x</sub> emission calculation in each annual operating report. Beginning in 1997, the NO<sub>x</sub> emission rate (lbs/MMBtu) from the combustion turbine and duct burner shall be calculated using the NO<sub>x</sub> analyzer data and equation F-6 from 40 CFR 75 Appendix F. Hourly heat input rates (MMBtu/hr) shall be used to convert lb/MMBtu of NO<sub>x</sub> to lb/hour of NO<sub>x</sub>.

A copy of this amendment letter shall be attached to and shall become a part of Air Construction Permit ACO1-204652/PSD-FL-181(A).

Sincerely,




Howard L. Rhodes, Director  
Division of Air Resources  
Management


HLR/mc/t

Florida Department of  
Environmental Protection


Memorandum

TO: Howard L. Rhodes

THRU: Clair Fancy 

FROM: Al Linero  3/14

DATE: March 14, 1997

SUBJECT: FPC UF Cogen AC01-204652, PSD-FL-181(A)   
FINAL Permit Amendment

Attached for approval and signature is a letter that will amend construction permit number AC01-204652, PSD-FL-181(A). This amendment increases the maximum heat input to the combustion turbine with a corresponding increase in the mass emission standard (lb/hr) for NO<sub>x</sub> without increasing the annual facility cap (tpy). This change was requested based on manufacturers curves and operational data which indicated that at 45° F the heat input achievable was higher than originally projected for this unit in the application to construct. The applicant took restrictions to net out of PSD for NO<sub>x</sub> (net emissions increase was 39.6 tpy) in 1992 when the combustion turbine was added to the facility. This action requires more accurate monitoring of annual NO<sub>x</sub> emissions, using the CEMS required under Title IV rather than the predictive equations used in the past, to ensure that the synthetic minor status is maintained following this modification.

The applicant has provided data which shows that annual NO<sub>x</sub> emissions will not increase significantly as a result of this change.

I recommend your approval and signature. If you have any questions, Marty Costello or I will be glad to discuss the details.

AAL/mc

P 265 659 135

US Postal Service  
**Receipt for Certified Mail**

No Insurance Coverage Provided.  
Do not use for International Mail (See reverse)

PS Form 3800, April 1995

Street & Number W. Jeffrey Pardue	
City, State & ZIP Code Fla. Power Corp	
Post Office, State & ZIP Code St. Peter 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	3-18-97
ACD1-204652 PSD-F1-181(A)	

Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and 2
- Complete items 3, 4, and 5
- 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.

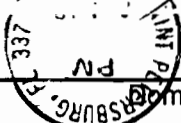
Give the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to: M. W. Jeffrey Pardue, Dir. Environmental Serv. Dept. Fla. Power Corp. 3201 34th St. South St. Petersburg, FL 33711	4a. Article Number P 265 659 135
5. Received By: (Print Name)	4b. Service Type <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD
6. Signature: (Addressee or Agent) <i>[Signature]</i>	7. Date of Delivery 3/20/97
	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.

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

In the Matter of an  
Application for Permit Amendment

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

DEP File No. AC01-204652  
PSD-FL-181(A)

Enclosed is a letter that amends previously-issued Permit Number AC01-204652 (PSD-FL-181) Specific Condition Nos. 2 and 3 allowing for an increase in the heat input to the combustion turbine. This permit amendment 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

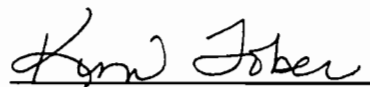
**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT AMENDMENT (including the FINAL permit amendment) was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 3-18-97 to the person(s) listed:

Mr. W. Jeffrey Pardue, FPC \*  
Mr. Chris Kirts, NED  
Mr. Brian Beals, EPA

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.

  
(Clerk) 3-18-97  
(Date)



## FINAL DETERMINATION

Florida Power Corporation

Amendment of Permit No. AC01-204652, PSD-FL-181(A)  
University of Florida Cogen

An Intent to Issue an air construction permit amendment for Florida Power Corporation (FPC), University of Florida Cogen Plant located the campus at the University of Florida, Alachua County was distributed on February 23, 1996. The Notice of Intent was published in the *Gainesville Sun* March 20, 1996. Comments from within the Department resulted in a request for FPC to evaluate emission changes as a result of this action. The response from FPC (letter dated March 7, 1997) indicates that only minor increases in nitrogen oxide (NO<sub>x</sub>) emissions will occur as a result of this amendment and the emission cap for NO<sub>x</sub> will not be exceeded.

The final action of the Department will be to issue the permit amendment with an additional requirement to use the CEMS monitoring data to quantify NO<sub>x</sub> emissions more accurately from the combustion turbine and duct burner.



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

March 17, 1997

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. W. Jeffrey Pardue, Director  
Environmental Service Department  
Florida Power Corp.  
3201 34th Street South  
St. Petersburg, Florida 33733

Dear Mr. Pardue:

RE: FPC UF Cogen - AC01-204652/PSD-FL-181(A) <sup>B</sup>  
Request to Amend Permit

The Department has evaluated your request for an increase in the heat input to the combustion turbine for operation at ambient temperatures near 45°F and a corresponding increase in the short term NO<sub>x</sub> emission standard (lb/hr). Your request (page 8 of application) and subsequent information submitted on March 7, 1997 indicated that no increase in annual NO<sub>x</sub> emissions would occur as a result of this modification. The Department will monitor annual emission rates for a 5 year period to verify that emissions do not increase significantly as a result of this modification. The Department hereby amends the above referenced permit Specific Conditions 2 and 3 as follows:

2. Emissions from this facility shall not exceed the limits listed below:

Pollu- tant	Source	Fuel	Basis of Limit	lbs/hr	tons/yr
NO <sub>x</sub>	Turbine	Gas	EBM*:25 ppmvd @ 15% O <sub>2</sub>	35-0 39.6	142.7
	Turbine	Oil	EBM*:42 ppmvd @ 15% O <sub>2</sub>	66.3	7.3
	D. Burner	Gas	EBM*:0.1 lb/MMBtu	18.7	24.6
	Facility	Gas/Oil			194.3
SO <sub>2</sub>	Turbine	Oil	BACT:0.5% Sulfur Max.	---	---
	Boiler 4	Oil	BACT:0.5% Sulfur Max.	---	---
	Boiler 5	Oil	BACT:0.5% Sulfur Max.	---	---
VE	Turbine	Gas/Oil	Equivalent of mass EBM*	10%/20% opacity**	
	D. Burner	Gas	" " "	10% opacity	
	Boiler 4	Gas/Oil	" " "	10%/20% opacity**	
	Boiler 5	Gas/Oil	" " "	10%/20% opacity**	
CO	Turbine	Gas	BACT: 42 ppmvd	38.8	158.0
	Turbine	Oil	EBA***:75 ppmvd	70.5	7.7
	D. Burner	Gas	BACT:0.15 lb/MMBtu****	28.1	36.9

\*EBM: Established by manufacturer

\*\*Except for one 6-minute period per hour of not more than 27% opacity

\*\*\*EBA: Established by applicant

\*\*\*\*BACT limit proposed by applicant in Table A-2 of application

Mr. W. Jeffrey Pardue  
Page Two  
March 17, 1997

3. Fuel consumption rates and hours of operation for the turbine and duct burner shall not exceed those listed below:

	<u>Natural Gas</u>			<u>No. 2 Fuel Oil</u>		
	<u>M ft<sup>3</sup>/hr*</u>	<u>MM ft<sup>3</sup>/yr</u>	<u>hrs/yr*</u>	<u>M gal/hr*</u>	<u>M gal/yr</u>	<u>hrs/yr*</u>
Turbine	367.9 420.3	2997.2**	8146.8**	2.9	635.1	219.0**
Duct Burner	197.7	519.5	2628.0	0	0	0

\*Based on maximum firing rates. Units may run at lower rates for more hours within annual fuel limits.

\*\*An additional 1.9 hours/yr operation on natural gas will be allowed for each 1.0 hour/yr that fuel oil is not burned (up to 219 x 1.9 hrs/yr), in which case, the emissions limits in Specific Condition No. 2 shall be adjusted accordingly.

Boilers Nos. 4 and 5, firing natural gas or No. 2 fuel oil, may be operated as necessary for backup, as long as total NO<sub>x</sub> emissions from the four sources emissions units within the permitted facility do not exceed 194.3 tons NO<sub>x</sub> per year. The permittee shall maintain the required fuel use records to demonstrate compliance with this condition and include the total NO<sub>x</sub> emission calculation in each annual operating report. Beginning in 1997, the NO<sub>x</sub> emission rate (lbs/MMBtu) from the combustion turbine and duct burner shall be calculated using the NO<sub>x</sub> analyzer data and equation F-6 from 40 CFR 75 Appendix F. Hourly heat input rates (MMBtu/hr) shall be used to convert lb/MMBtu of NO<sub>x</sub> to lb/hour of NO<sub>x</sub>.

A copy of this amendment letter shall be attached to and shall become a part of Air Construction Permit AC01-204652/PSD-FL-181(A).

Sincerely,



Howard L. Rhodes, Director  
Division of Air Resources  
Management

HLR/mc/t



RECEIVED

MAR 12 1997

BUREAU OF  
AIR REGULATION

March 7, 1997

Mr. Martin Costello  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
2600 Blair Stone Rd.  
Tallahassee, Florida 32399-2400

Dear Mr. Costello:

Re: FPC University of Florida Cogeneration Facility  
AC01-204652/PSD-FL-181(A)

As you recall, Florida Power Corporation (FPC) had requested an increase in the heat input to the combustion turbine for operation at inlet temperatures near 45°F and a corresponding increase in the short-term NO<sub>x</sub> emission standard (lb/hr). This letter serves to provide additional information to the Department for the period of time that has elapsed since the Department authorized an increase in the short-term NO<sub>x</sub> emission rate (approximately the fourth quarter of 1995 to the present).

Specifically, the Department requested that FPC review emissions data generated from approximately the fourth quarter of 1995 to the fourth quarter of 1996 to determine the frequency and magnitude of NO<sub>x</sub> emissions in excess of the previous 35.0 lb/hr limit since the requested increase to a 39.6 lb/hr limit. A review of all of the daily logs during this time period indicated 17 hours of data in excess of 35.0 lb/hr. The incremental difference in emissions (i.e., above 35.0 lb/hr) is approximately 46.6 total pounds. A summary of these hourly periods is provided as an attachment.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Scott H. Osbourn", is written over a horizontal line.

Scott H. Osbourn  
Senior Environmental Engineer

Attachment

UF Cogen NO<sub>x</sub> Emissions in Excess  
of 35.0 lb/hr for the Period of the 4th  
Q'95 to the 4th Q'96

DATE	NO <sub>x</sub> EMISSIONS (lb/hr)
12/10/95	35.1
12/11/95	35.2
12/12/95	35.1
12/12/95	35.1
1/8/96	46.7
1/8/96	44.5
1/10/96	35.6
1/10/96	35.1
2/5/96	35.6
2/6/96	35.9
3/10/96	35.2
3/10/96	35.3
3/10/96	35.3
3/10/96	35.3
3/10/96	35.4
8/19/96	36.5
10/27/96	55.7



April 3, 1996

**RECEIVED**  
APR 05 1996  
BUREAU OF  
AIR REGULATION

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

Dear Mr. Linero:

Re: Request to Amend Permit at FPC's UF Cogen Plant  
DEP Permit No. AC01-204652; PSD-FL-181(A)

Enclosed please find the notarized proof of publication received from the Gainesville Sun for the Florida Department of Environmental Protection *Notice of Intent to Issue Permit* referenced to the above request. The notice was published on March 20, 1996.

It is our understanding that a final permit could be issued by the Department as early as next week, assuming no adverse comments were received.

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

Sincerely,

A handwritten signature in black ink, appearing to read "S. Osbourn", is written over a horizontal line.

Scott H. Osbourn  
Senior Environmental Engineer

cc: Ernest Frey, DEP NE District  
Martin Costello, DEP DARM  
Patricia Reynolds, GBO

Attachment

STATE OF FLORIDA  
DEPARTMENT OF  
ENVIRONMENTAL  
PROTECTION  
NOTICE OF INTENT  
TO ISSUE PERMIT  
AC01-204652/PSD-FL-181(A)

The Department of Environmental Protection (Department) gives notice of its intent to issue an amended permit to Florida Power Corp.(FPC), P.O. Box 14042, St. Petersburg, FL 33733 to increase the fuel usage rate limit (from 367.9 to 420.3 thousand cubic feet of natural gas per hour) for the combustion turbine with a corresponding increase in the short term NOx emission standard (from 35.0 to 39.6 lb/hr) at FPC's facility located on the campus of the University of Florida on Mowry Road in Alachua County. This action was requested to accommodate operation at ambient conditions (45°F) which allow for higher operation rates for this unit equipped with an evaporative cooler on the inlet to the turbine. The facility's annual emissions cap for NOx emissions will not increase.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth

DA  
ALACHUA

No 11266  
THE GAINESVILLE SUN  
Published Daily and Sunday  
GAINESVILLE, FLORIDA

Designated authority personally appeared Naomi Williams-Jordan

at he/she is Assistant Classified Mgr. of THE GAINESVILLE SUN, a daily

located at Gainesville in Alachua County, Florida, that the attached copy of advertisement, being a

Notice of Intent

..... Court, was published in said newspaper in the issue of,

March 20, 19 96

..... 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.

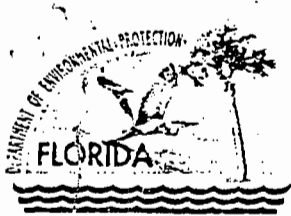
Sworn to and subscribed before me this

20 day of Mar, 1996  
..... day of ..... A.D., 19.....

Martha A. Jackson  
(Seal) Notary Public



Naomi Williams-Jordan



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

February 23, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Jeffrey Pardue, Director  
Environmental Service Department  
Florida Power Corp.  
P.O. Box 14042  
St. Petersburg, FL 33733

Dear Mr. Pardue:

RE: FPC UF Cogen  
AC01-204652/PSD-FL-181(A)  
Request to Amend Permit

Attached is one copy of the proposed amendment to the construction permit, Intent to Issue, and Notice of Intent to Issue (for publication by the applicant) for the above referenced emission unit.

Please submit any comments you may have concerning the Department's proposed action to Mr. A. A. Linero, P.E., at the above address. If you have any questions, please call Mr. Martin Costello or Mr. Linero at (904) 488-1344.

Sincerely,

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

CHF/mc/t

cc: Ernest Frey, NED  
Jewell Harper, EPA



DRAFT

February XX, 1996

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Jeffrey Pardue, Director  
Environmental Service Department  
Florida Power Corp.  
P.O. Box 14042  
St. Petersburg, FL 33733

Dear Mr. Pardue:

RE: FPC UF Cogen  
AC01-204652/PSD-FL-181(A)  
Request to Amend Permit

The Department has evaluated your request for an increase in the heat input to the combustion turbine for operation at ambient temperatures near 45 F and a corresponding increase in the short term NO<sub>x</sub> emission standard (lb/hr). Your request indicated that no increase in annual NO<sub>x</sub> emissions would occur as a result of this change (application page 8). The Department hereby amends the above referenced permit Specific Conditions 2 and 3 as follows:

2. Emissions from this facility shall not exceed the limits listed below:

Pollu- tant	Source	Fuel	Basis of Limit	lbs/hr	tons/yr
NOx	Turbine	Gas	EBM*:25 ppmvd @ 15% O2	35-0	<u>39.6</u> 142.7
	Turbine	Oil	EBM*:42 ppmvd @ 15% O2	66.3	7.3
	D. Burner	Gas	EBM*:0.1 lb/MMBtu	18.7	24.6
SO <sub>2</sub>	Turbine	Oil	BACT:0.5% Sulfur Max.	---	---
	Boiler 4	Oil	BACT:0.5% Sulfur Max.	---	---
	Boiler 5	Oil	BACT:0.5% Sulfur Max.	---	---
VE	Turbine	Gas/Oil	Equivalent of mass EBM*	10%/20%	opacity**
	D. Burner	Gas	" " "	10%	opacity**
	Boiler4	Gas/Oil	" " "	10%/20%	opacity**
	Boiler 5	Gas/Oil	" " "	10%/20%	opacity**
CO	Turbine	Gas	BACT: 42 ppmvd	38.8	158.0
	Turbine	Oil	EBA***:75 ppmvd	70.5	7.7
	D. Burner	Gas	BACT:0.15 lb/MMBtu****	28.1	36.9

\*EBM: Established by manufacturer

\*\*Except for one 6-minute period per hour of not more than 27% opacity

\*\*\*EBA: Established by applicant

\*\*\*\*BACT limit proposed by applicant in Table A-2 of application

DRAFT

3. Fuel consumption rates and hours of operation for the turbine and duct burner shall not exceed those listed below:

	<u>Natural Gas</u>			<u>No. 2 Fuel Oil</u>		
	<u>M ft<sup>3</sup>/hr*</u>	<u>MM ft<sup>3</sup>/yr</u>	<u>hrs/yr*</u>	<u>M gal/hr*</u>	<u>M gal/yr</u>	<u>hrs/yr*</u>
Turbine	367.9 <u>420.3</u>	2997.2**	8146.8**	2.9	635.1	219.0**
Duct Burner	197.7	519.5	2628.0	0	0	0

\*Based on maximum firing rates. Units may run at lower rates for more hours within annual fuel limits.

\*\*An additional 1.9 hours/yr operation on natural gas will be allowed for each 1.0 hour/yr that fuel oil is not burned (up to 219 x 1.9 hrs/yr), in which case, the emissions limits in Specific Condition No. 2 shall be adjusted accordingly.

A copy of this amendment letter shall be attached to and shall become a part of Air Construction Permit AC01-204652/PSD-FL-181(A).

Sincerely,

Howard L. Rhodes, Director  
Division of Air Resources  
Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this PERMIT AMENDMENT and all copies were mailed by certified mail before the close of business on \_\_\_\_\_ to the listed persons.

Clerk Stamp  
FILING AND ACKNOWLEDGMENT FILED,  
on this date, pursuant to  
120.52(11), Florida Statutes,  
with the designated Department  
Clerk, receipt of which is hereby  
acknowledged.

\_\_\_\_\_  
Clerk Date

Copies to be furnished to:

Ernest Frey, NED  
Jewell Harper, EPA

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

CERTIFIED MAIL

In the Matter of an  
Application for Permit Amendment  
Florida Power Corp.  
P.O. Box 14042  
St. Petersburg, FL 33733  
Alachua County

---

DEP File No. AC01-204652  
PSD-FL-181(A)

INTENT TO ISSUE

The Department of Environmental Protection (Department) gives notice of its intent to issue a amendment to the above referenced permit for the proposed changes detailed in the application specified above, for the reasons stated below.

The applicant, Florida Power Corp., applied to the Department of Environmental Protection to amend the air construction permit to provide an increase in the fuel usage rate limit (from 367.9 to 420.3 thousand cubic feet of natural gas per hour) for the combustion turbine with a corresponding increase in the short term NOx emission standard (from 35.0 to 39.6 lb/hr). This action was requested to accommodate operation at ambient conditions (45°F) which allows for higher operation rates for this unit equipped with an evaporative cooler on the inlet to the turbine. The facility's annual emissions cap for NOx emissions will not increase. This facility is located on the campus of the University of Florida, Alachua County, Florida.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-212 and 62-4, Florida Administrative Code (F.A.C.). The project is not exempt from permitting procedures. The Department has determined that the previous construction permit has expired and that a new permit with the approved amendments is required for the proposed changes.

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 Notice of Intent to Issue Permit. The notice shall be published one time only within 30 days in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "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. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 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.

The Department will issue the permit with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 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 at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information;

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department 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 facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this intent. Persons whose substantial interests will be affected by any decision of the Department with regard to the application/request have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this intent in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as

a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION




C. H. Fancy, P.E., Chief  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399  
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this **INTENT TO ISSUE PERMIT** all copies were mailed by certified mail before the close of business on 2-27-96 to the listed persons.

Clerk Stamp  
**FILING AND ACKNOWLEDGMENT**  
FILED, on this date, pursuant to  
§120.52(11), Florida Statutes,  
with the designated Department  
Clerk, receipt of which is hereby  
acknowledged.

  
Clerk

2-27-96  
Date

Copies furnished to: Ernest Frey, NED  
Jewell Harper, EPA

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
NOTICE OF INTENT TO ISSUE PERMIT  
AC01-204652/PSD-FL-181(A)

The Department of Environmental Protection (Department) gives notice of its intent to issue an amended permit to Florida Power Corp. (FPC), P.O. Box 14042, St. Petersburg, FL 33733 to increase the fuel usage rate limit (from 367.9 to 420.3 thousand cubic feet of natural gas per hour) for the combustion turbine with a corresponding increase in the short term NOx emission standard (from 35.0 to 39.6 lb/hr) at FPC's facility located on the campus of the University of Florida on Mowry Road in Alachua County. This action was requested to accommodate operation at ambient conditions (45°F) which allow for higher operation rates for this unit equipped with an evaporative cooler on the inlet to the turbine. The facility's annual emissions cap for NOx emissions will not increase.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (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 at 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information; (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department 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 facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and, (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application/request have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

The application/request 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

Department of Environmental Protection  
Northeast District  
7825 Baymeadows Way, Suite 200B  
Jacksonville, Florida 32256-7577

Department of Environmental Protection  
Gainesville Branch Office  
5700 S.W. 34th Street, Suite 1204  
Gainesville, Florida 32608

Any person may send written comments on the proposed action to Administrator, New Source Review at the Department's Tallahassee address. All comments received within 30 days of the publication of this notice will be considered in the Department's final determination.

Florida Department of  
**Environmental Protection**

Memorandum

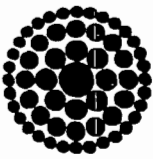
TO: C. H. Fancy  
THROUGH: A. A. Linero *aal*  
FROM: Martin Costello *mc*  
DATE: February 22 1996  
SUB: FPC UF Cogen  
AC01-204652/PSD-FL-181(A)  
Request to Amend Permit

Attached for your review and approval is a permit amendment which amends the above referenced construction permit to provide an increase in the fuel usage rate limit (from 367.9 to 420.3 thousand cubic feet of natural gas per hour) for the combustion turbine with a corresponding increase in the short term NOx emission standard (from 35.0 to 39.6 lb/hr). This represents approximately a 14 percent increase in gas usage and NOx emission rate. This change was requested based on manufacturers curves and operational data which indicated that at ambient conditions near 45 F the heat input achievable from the CT was higher than originally projected for this unit in the application to construct. The facility's annual emissions cap for NOx emissions will not increase.

If you have any questions, I will be glad to discuss the details.

AAL/mc/t





**Florida Power**  
CORPORATION

ACCOUNTS PAYABLE DEPT. B3F

P. O. BOX 14042

ST. PETERSBURG, FL 33733-4042

(813) 866-5257

**REMITTANCE ADVICE**

89

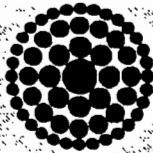
CHECK DATE 03/03/95 VENDOR FLA DEPT OF ENVIRONMENTAL

VENDOR NO. 278473 CHECK NO. 1715821

INVOICE NO.	DATE	OUR ORDER NO.	VOUCHER	GROSS AMOUNT	DISCOUNT	NET AMOUNT
CK96617	02/24/95		9503184809	250.00	.00 TOTAL	250.00 250.00

THE ATTACHED REMITTANCE IS IN FULL SETTLEMENT OF ACCOUNT AS STATED. IF NOT CORRECT PLEASE RETURN TO ABOVE ADDRESS.

Accounts Payable Department B3F  
P.O. Box 14042  
St. Petersburg, Fl 33733-4042



**Florida Power**  
CORPORATION

DATE 03/03/95

CHECK NO. [REDACTED]

PAY:

\$250 DOLLARS AND 00 CENTS

\$\*\*\*\*\*250.00

SunBank / Mid-Florida

TO  
THE  
ORDER  
OF

FLA DEPT OF ENVIRONMENTAL  
PROTECTION  
111 S MAGNOLIA ST SUITE 29  
TALLAHASSEE FL 32399-2400

Void after 80 days

*[Signature]*  
Treasurer



# Department of Environmental Protection

*original  
signature*

## 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 provides general information on the scope of this application, the purpose for which this application is being submitted, and the nature of any construction or modification activities proposed as a part 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 on diskette, 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 name, if any; and a brief reference to the facility's physical location. If known, also enter the ARMS or AIRS facility identification number. This information is intended to give a quick reference, on the first page of the application form, to the facility addressed in this application. Elsewhere in the form, numbered data fields are provided for entry of the facility data in computer-input format.


Florida Power Corporation; University of Florida Cogeneration Project; Gainesville, Alachua County
--

#### Application Processing Information (DEP Use)


1. Date of Receipt of Application:	
2. Permit Number:	
3. PSD Number (if applicable):	
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, Director, Environmental Services Department
2.	Owner/Authorized Representative or Responsible Official Mailing Address:  Organization/Firm: Florida Power Corporation Street Address: 3201 34th Street South (P.O. Box 14042, Zip 33733) City: St. Petersburg State: FL Zip Code: 33711
3.	Owner/Authorized Representative or Responsible Official Telephone Numbers:  Telephone: ( 813 ) 866-5151 Fax: ( 813 ) 866-4926
4.	Owner/Authorized Representative or Responsible Official Statement:  <i>I, the undersigned, am the owner or authorized representative* of the facility (non-Title V source) addressed in this Application for Air Permit or the responsible official, as defined in Chapter 62-213, 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. Further, I agree to operate and maintain the air pollutant emissions units and air pollution control equipment described in this application 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. If the purpose of this application is to obtain an air operation permit or operation permit revision for one or more emissions units which have undergone construction or modification, I 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. 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.</i>

  
Signature

3-31-95  
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 (or Title V source). 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
CT	Combustion Turbine

**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 revised: \_\_\_\_\_

- Air operation permit revision or administrative correction for a Title V source to address one or more proposed new or modified emissions units and to be processed concurrently with the air 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 Operation 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:

- 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: AC 01-204652

- 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:

Attached - Amount: \$ 250.00

Not Applicable.

**Construction/Modification Information**

1. Description of Proposed Project or Alterations:
2. Projected or Actual Date of Commencement of Construction (DD-MON-YYYY):
3. Projected Date of Completion of Construction (DD-MON-YYYY):

**Professional Engineer Certification**

1. Professional Engineer Name: Kennard F. Kosky Registration Number: 14996
2. Professional Engineer Mailing Address: Organization/Firm: KBN Engineering & 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: ( 904 ) 336-5600 Fax: ( 904 ) 336-6603
4. Professional Engineer Statement:  <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i>  <i>(1) To the best of my knowledge, there is reasonable assurance (a) 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; or (b) for any application for a Title V source air operation permit, 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;</i>  <i>(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; and</i>  <i>(3) For any application for an air construction permit for one or more proposed new or modified emissions units, 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.</i>  _____ Signature  _____ Date 1/18/95



Attach any exception to certification statement.



**Application Contact**

1. Name and Title of Application Contact: Scott Osbourn, Sr. Environmental Engineer
2. Application Contact Mailing Address:  Organization/Firm: Florida Power Corporation Street Address: 3201 34th Street South (P.O. Box 14042, Zip 33733) City: St. Petersburg                      State: FL                      Zip Code: 33711
3. Application Contact Telephone Numbers:  Telephone: ( 813 ) 866-5158                      Fax: ( 813 ) 866-4926

**Application Comment**

This application is submitted to obtain an increase in the short-term (hourly) permit limitation for NO<sub>x</sub> emissions and fuel flow (heat input).

It is requested that the heat input be increased based on the performance tests. The maximum fuel usage rate to the turbine when firing natural gas in the current permit is 367.9 Mcf/hr. The maximum operating condition is at 45°F with a fuel input of 420.3 Mcf/hr and is based on GE data and the test results. During the compliance tests, the CT averaged 97 percent of the maximum heat input based on CT inlet temperature conditions. The requested maximum heat input corresponds to the maximum emission limit requested for NO<sub>x</sub>.

Increase short-term [pounds per hour (lb/hr)] CT emission rate to 39.6 lb/hr when firing natural gas based on a requested increase in heat input. The basis for the limit is still 25 parts per million by volume, dry (ppmvd) corrected to 15 percent O<sub>2</sub>.

There will be no increase in annual NO<sub>x</sub> emissions.

## II. FACILITY INFORMATION

### A. GENERAL FACILITY INFORMATION

#### Facility Name, Location, and Type

1. Facility Owner or Operator: Florida Power Corporation			
2. Facility Name: University of Florida Cogeneration Facility			
3. Facility Identification Number: [ ] Unknown			
4. Facility Location Information: Facility Street Address: P.O. Box 112295, Mowry Road; University of Florida City: Gainesville County: Alachua Zip Code: 32611-2295			
5. Facility UTM Coordinates: Zone: 17 East (km): 369.4 North (km): 3279.3			
6. Facility Latitude/Longitude: Latitude (DD/MM/SS): 29/38/23 Longitude (DD/MM/SS): 82/20/55			
7. Governmental Facility Code: 0	8. Facility Status Code: A	9. Relocatable Facility? [ ] Yes [ X ] No	10. Facility Major Group SIC Code: 49
11. Facility Comment:			

#### Facility Contact

1. Name and Title of Facility Contact: R.W. Anderson, Plant Manager			
2. Facility Contact Mailing Address: Organization/Firm: Florida Power Corporation Street Address: P.O. Box 112295 City: Gainesville State: Florida Zip Code: 32611-2295			
3. Facility Contact Telephone Numbers: Telephone: ( 904 ) 337-6900 Fax: ( 904 ) 337-6920			



**B. FACILITY REGULATIONS**

Depending on the application category, this subsection of the Application for Air Permit form provides either a brief analysis or detailed listing of federal, state, and local regulations applicable to the facility as a whole. (Regulations applicable to individual emissions units within the facility are addressed in Subsection III-B of the form.)

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

Not applicable for this application



**C. FACILITY POLLUTANT INFORMATION**

This subsection of the Application for Air Permit form allows for the reporting of potential and estimated emissions of selected pollutants on a facility-wide basis. It must be completed for each pollutant for which the applicant proposes to establish a facility-wide emissions cap and for each pollutant for which emissions are not reported at the emissions-unit level.

**Facility Pollutant Information:** Pollutant \_\_\_\_ of \_\_\_\_ **Not Applicable**

1. Pollutant Emitted:		
2. Estimated Emissions:		(tons/yr)
3. Requested Emissions Cap:	(lb/hr)	(tons/yr)
4. Basis for Emissions Cap Code:		
5. Facility Pollutant Comment:		

**Facility Pollutant Information** Pollutant \_\_\_\_ of \_\_\_\_

1. Pollutant Emitted:		
2. Estimated Emissions:		(tons/yr)
3. Requested Emissions Cap:	(lb/hr)	(tons/yr)
4. Basis for Emissions Cap Code:		
5. Facility Pollutant Comment:		

**Facility Pollutant Information** Pollutant \_\_\_\_ of \_\_\_\_

1. Pollutant Emitted:		
2. Estimated Emissions:		(tons/yr)
3. Requested Emissions Cap:	(lb/hr)	(tons/yr)
4. Basis for Emissions Cap Code:		
5. Facility Pollutant Comment:		

**Facility Pollutant Information** Pollutant \_\_\_\_ of \_\_\_\_

1. Pollutant Emitted:		
2. Estimated Emissions:		(tons/yr)
3. Requested Emissions Cap:	(lb/hr)	(tons/yr)
4. Basis for Emissions Cap Code:		
5. Facility Pollutant Comment:		

## D. FACILITY SUPPLEMENTAL INFORMATION

This subsection of the Application for Air Permit form provides supplemental information related to the facility as a whole. (Supplemental information related to individual emissions units within the facility is provided in Subsection III-I of the form.) Supplemental information must be submitted as an attachment to each copy of the form, in hard-copy or computer-readable form.

### Supplemental Requirements for All Applications

1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Facility Plot Plan: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Process Flow Diagram(s): <input type="checkbox"/> Attached, Document ID(s): _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
5. Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
6. Supplemental Information for Construction Permit Application: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

### Additional Supplemental Requirements for Category I Applications Only

Not Applicable

7. List of Insignificant Activities: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
8. List of Equipment/Activities Regulated under Title VI: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Equipment/Activities Onsite but Not Required to be Individually Listed <input type="checkbox"/> Not Applicable



<p>9. Alternative Methods of Operation:</p> <p><input type="checkbox"/> Attached, Document ID: _____</p> <p><input type="checkbox"/> Not Applicable</p>
<p>10. Alternative Modes of Operation (Emissions Trading):</p> <p><input type="checkbox"/> Attached, Document ID: _____</p> <p><input type="checkbox"/> Not Applicable</p>
<p>11. Enhanced Monitoring Plan:</p> <p><input type="checkbox"/> Attached, Document ID: _____</p> <p><input type="checkbox"/> Not Applicable</p>
<p>12. Risk Management Plan Verification:</p> <p><input type="checkbox"/> Plan Submitted to Implementing Agency - Verification Attached Attached, Document ID: _____</p> <p><input type="checkbox"/> Plan to be Submitted to Implementing Agency by Required Date</p> <p><input type="checkbox"/> Not Applicable</p>
<p>13. Compliance Report and Plan</p> <p><input type="checkbox"/> Attached, Document ID: _____</p> <p><input type="checkbox"/> Not Applicable</p>
<p>14. Compliance Statement (Hard-copy Required)</p> <p><input type="checkbox"/> Attached, Document ID: _____</p> <p><input type="checkbox"/> Not Applicable</p>

### III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through I 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.

#### A. GENERAL EMISSIONS UNIT INFORMATION

This subsection of the Application for Air Permit form provides general information on the emissions unit addressed in this Emissions Unit Information Section, including information on the type, control equipment, operating capacity, and operating schedule of the emissions unit.

##### Type of Emissions Unit Addressed in This Section

Check one:

- This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).
- This Emissions Unit Information Section addresses, as a single emissions unit, an individually-regulated emission point (stack or vent) serving a single process or production unit, or activity, which also has other individually-regulated emission points.
- This Emissions Unit Information Section addresses, as a single emissions unit, a collectively-regulated 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.



Emissions Unit Control Equipment

A.

<p>1. Description: Steam Injection</p> <p>2. Control Device or Method Code: 028</p>
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B.

<p>1. Description:</p> <p>2. Control Device or Method Code:</p>
---

C.

<p>1. Description:</p> <p>2. Control Device or Method Code:</p>
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**B. EMISSIONS UNIT REGULATIONS**

Depending on the application category, this subsection of the Application for Air Permit form provides either a brief analysis or detailed listing of all federal, state, and local regulations applicable to the emissions unit addressed in this Emissions Unit Information Section.

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

<p>Not Applicable</p>
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**C. EMISSION POINT (STACK/VENT) INFORMATION**

This subsection of the Application for Air Permit form provides information about the emission point associated with the emissions unit addressed in this Emissions Unit Information Section. An emission point is typically a stack or vent but can be any identifiable location at which air pollutants, including fugitive emissions, are discharged into the atmosphere.

**Emission Point Description and Type**

<p>1. Identification of Point on Plot Plan or Flow Diagram:  <i>Not Applicable</i></p>
<p>2. Emission Point Type Code:  <input checked="" type="checkbox"/> 1                      <input type="checkbox"/> 2                      <input type="checkbox"/> 3                      <input type="checkbox"/> 4</p>
<p>3. Descriptions of Emissions Points Comprising this Emissions Unit:                  Combustion turbine exhaust through a heat recovery steam generator (HRSG) and a single stack.</p>
<p>4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:  <i>Not Applicable</i></p>
<p>5. Discharge Type Code:  <input type="checkbox"/> D                      <input type="checkbox"/> F                      <input type="checkbox"/> H                      <input type="checkbox"/> P  <input type="checkbox"/> R                      <input checked="" type="checkbox"/> V                      <input type="checkbox"/> W</p>



Emissions Unit Information Section  1  of  1

6. Stack Height:	93 ft
7. Exit Diameter:	9.75 ft
8. Exit Temperature:	257 °F
9. Actual Volumetric Flow Rate:	365,700 acfm
10. Percent Water Vapor:	11.25 %
11. Maximum Dry Standard Flow Rate:	235,380 dscfm
12. Nonstack Emission Point Height:	Not Applicable ft
13. Emission Point UTM Coordinates:	
Zone:	East (km): North (km):
14. Emission Point Comment:	
Information for natural gas firing and based on a fuel flow of 420.3 mcf/hr	

**D. SEGMENT (PROCESS/FUEL) INFORMATION**

For the emissions unit addressed in this Emissions Unit Information Section, a separate set of segment data (Fields 1-10) must be completed for each segment required to be reported and for each alternative operating method or mode (emissions trading scenario) under Chapter 62-213, F.A.C., for which the maximum hourly or annual segment-related rate would vary. A segment is a material handling, process, fuel burning, volatile organic liquid storage, production, or other such operation to which emissions of the unit are directly related. See instructions for further details on this subsection of the Application for Air Permit.

**Segment Description and Rate Information:** Segment  1  of  1

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode): <b>Natural Gas Firing</b>	
2. Source Classification Code (SCC): <b>20100201</b>	
3. SCC Units: <b>Million cubic feet burned</b>	
4. Maximum Hourly Rate: <b>0.4203</b>	5. Maximum Annual Rate: <b>2,997.2*</b>
6. Estimated Annual Activity Factor: <b>Not Applicable</b>	
7. Maximum Percent Sulfur: <b>0.003</b>	8. Maximum Percent Ash: <b>&lt;0.1</b>
9. Million Btu per SCC Unit: <b>1,030</b>	
10. Segment Comment: <b>Emission unit is capable of and authorized to fire distillate oil. No change is requested for distillate oil; therefore, segment information is not included in this application.</b>	
*Refer to Specific Condition 3 of construction permit for more detail.	

**Segment Description and Rate Information:** Segment \_\_\_\_ of \_\_\_\_ Not Applicable

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode):	
2. Source Classification Code:	
3. SCC Units:	
4. Maximum Hourly Rate:	5. Maximum Annual Rate:
6. Estimated Annual Activity Factor:	
7. Maximum Percent Sulfur:	8. Maximum Percent Ash:
9. Million Btu per SCC Unit:	
10. Segment Comment:	

**E. POLLUTANT INFORMATION**

For the emissions unit addressed in this Emissions Unit Information Section, a separate set of pollutant information must be completed for each pollutant required to be reported. See instructions for further details on this subsection of the Application for Air Permit.

**Pollutant Potential/Estimated Emissions: Pollutant  1  of  1**

1. Pollutant Emitted: NO <sub>x</sub>		
2. Total Percent Efficiency of Control:	~80 %	
3. Primary Control Device Code: 028		
4. Secondary Control Device Code:		
5. Potential Emissions:	39.6 lbs/hr	142.7 tons/yr
6. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
7. Range of Estimated Fugitive/Other Emissions: Not Applicable		
<input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/yr		
8. Emission Factor: 25 ppmvd corrected to 15% O <sub>2</sub>		
Reference: Permit limit		
9. Emissions Method Code:		
<input type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5		
10. Calculation of Emissions: Provided by manufacturer and performance tests		
11. Pollutant Potential/Estimated Emissions Comment: Increase in short-term (hourly) NO <sub>x</sub> emission rate requested based on performance of combustion turbine during initial compliance testing. Existing limit is 35 lbs/hr. No increase in annual NO <sub>x</sub> emissions requested.		

**Allowable Emissions** (Pollutant identified on front page)

**A.**

1. Basis for Allowable Emissions Code: <b>Other</b>		
2. Future Effective Date of Allowable Emissions: <b>Not Applicable</b>		
3. Requested Allowable Emissions and Units: <b>39.6 lbs/hr</b>		
4. Equivalent Allowable Emissions:	<b>39.6 lbs/hr</b>	<b>142.7 tons/yr</b>
5. Method of Compliance: <b>Annual Compliance Test</b>		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode): <b>A continuous monitoring system (CMS) of steam-to-fuel ratio is used as a monitoring technique.</b>		

**B. Not Applicable**

1. Basis for Allowable Emissions Code:		
2. Future Effective Date of Allowable Emissions:		
3. Requested Allowable Emissions and Units:		
4. Equivalent Allowable Emissions:	lbs/hr	tons/yr
5. Method of Compliance:		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode):		





**G. CONTINUOUS MONITOR INFORMATION**

This subsection of the Application for Air Permit form must be completed for only those emissions units which are required by rule or permit to install and operate one or more continuous emission, opacity, flow, or other type monitors. A separate set of continuous monitor information (fields 1-6) must be completed for each monitoring system required.

**Continuous Monitoring System** Continuous Monitor  1  of  1

1. Parameter Code: NO <sub>x</sub>	
2. CMS Requirement:	<input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Monitor Information: (see comment)	
Manufacturer: Model Number:	Serial Number:
4. Installation Date (DD-MON-YYYY): 1994	
5. Performance Specification Test Date (DD-MON-YYYY): 1994	
6. Continuous Monitor Comment: Steam-to-fuel ratio is monitored on a continuous basis using steam and fuel flow devices. Information is used to calculate hourly emissions based on an equation developed during initial testing. The equation is:	
$\text{NO}_x \text{ (lb/hr)} = 8.4783 + (-17.33488) * \text{S/F ratio} + 0.00014 * \text{FF}$	
where: S/F ratio is the steam to fuel ratio. $r^2 = 0.98709$ for equation. FF is fuel flow in 1,000 scf/hr.	



Continuous Monitoring System Continuous Monitor      of      Not Applicable

1. Parameter Code:
2. CMS Requirement: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Monitor Information: Manufacturer: Model Number: <span style="float: right;">Serial Number:</span>
4. Installation Date (DD-MON-YYYY):
5. Performance Specification Test Date (DD-MON-YYYY):
6. Continuous Monitor Comment:

Continuous Monitoring System Continuous Monitor      of    

1. Parameter Code:
2. CMS Requirement: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Monitor Information: Manufacturer: Model Number: <span style="float: right;">Serial Number:</span>
4. Installation Date (DD-MON-YYYY):
5. Performance Specification Test Date (DD-MON-YYYY):
6. Continuous Monitor Comment: