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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)

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,

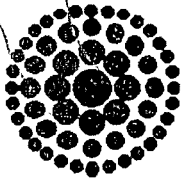
A handwritten signature in black ink, appearing to read "W. Jeffrey Pardue".

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



**Florida
Power**
CORPORATION

March 31, 1995

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

RECEIVED

APR 05 1995

Bureau of
Air Regulation

Dear Mr. Fancy:

Re: UF Cogeneration Facility
AC01-204652; PSD-FL-181; Alachua County
Request for Amendment of Construction Permit

This correspondence and attached application are submitted to request some minor changes to the construction permit issued for the University of Florida (UF) Cogeneration Facility. The source is a nominal 43-megawatt (MW) cogeneration facility located adjacent to the University of Florida Central Heating Plant in Gainesville, Alachua County, Florida. The cogeneration facility consists of one combustion turbine (CT) exhausting through a heat recovery steam generator (HRSG). The primary fuel for the CT is natural gas with a maximum fuel input of 367.9 thousand cubic feet per hour (Mcf/hr). Distillate fuel oil is used for the CT only as backup. The transition duct from the CT to the HRSG was permitted with duct burners (DBs) having a maximum fuel (natural gas) input of 197.7 Mcf/hr.

The construction permit was issued August 17, 1992, and expires October 1, 1995. Initial compliance tests were performed on June 3 and 4, 1994, and test results indicate that compliance was demonstrated for all units. However, detailed review of these tests and an inspection of the facility revealed some areas where changes to permit conditions are necessary. Changes to Specific Conditions 2, 3 and 8 are requested. Please be advised, however, that this request for amendments does not constitute any change in total emissions from the facility. The initial tests for the facility demonstrated that the CT and DBs can achieve the basis of the nitrogen oxides (NO_x) emission limit. This is an extremely low emission rate given the energy efficiency of the CT.

Further, in response to New Source Performance Standard (NSPS) requirement 40 CFR 60.334(b), Florida Power Corporation (FPC) has requested a customized fuel monitoring schedule. The EPA has indicated concurrence with FPC's approach and the Department has indicated that this request would require a permit amendment. All pertinent correspondence on this issue from FPC, the Department and EPA Region IV is presented in Attachment 1 to this letter.

The following paragraphs present a discussion of the amendments requested for each of the specific conditions. Attachment 2 contains a mark-up of these conditions with the revisions requested.

ENVIRONMENTAL SERVICES DEPARTMENT

H2G • 3201 Thirty-fourth Street South • P.O. Box 14042 • St. Petersburg, Florida 33733 • (813) 866-5151



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A Florida Progress Company

Mr. Clair H. Fancy
March 31, 1995
Page 2

Specific Condition 2

This condition sets forth the emission limits for the facility (see attached Specific Condition). As discussed in the construction permit application, the CT selected for this project is the most efficient of all CTs and is the newest aircraft-derivative CT available from General Electric (i.e., the LM 6000). Indeed, when the application was submitted, there were no operating data on this machine while achieving the performance and emission guarantees proposed for this project. The initial testing of the CT indicated several areas where performance has been higher than expected. The maximum fuel flow rate of the CT is slightly higher than that initially specified by the manufacturer (GE). Accordingly, an increase in the short-term [pounds per hour (lb/hr)] NO_x emission rate for the CT to 39.6 lb/hr is requested based on a requested increase in heat input (see Specific Condition 3). The basis for the limit is still 25 parts per million by volume, dry (ppmvd) corrected to 15 percent O₂.

Specific Condition 3

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 (See discussion for Specific Condition 2 above).


Specific Condition 8

It is requested that this condition be amended to delete the reference to boiler no. 2. FPC proposes to continue operation of boiler no. 2, which is equipped to fire natural gas as its primary fuel. FPC proposes that the same fuel use restrictions apply to this boiler as currently apply to boilers 4 and 5. Therefore, there would be no increase in emissions since the facility will demonstrate compliance with its annual emissions limits in tons per year.

Also, as a result of discussions between FPC and the Department, a draft Emergency Order has been prepared for the Department's review. This order would allow a back-up boiler to be used in an emergency (e.g., in the event that the cogeneration facility and the backup boilers become inoperable) in order to meet the steam demands required for the University of Florida and Shands Hospital.

Finally, a draft letter is enclosed regarding an alternative approach for demonstrating compliance with the NSPS for cogeneration or combined cycle systems with duct firing. This letter represents the understanding reached between FPC and the Department and is meant for the Department's use in obtaining concurrence from the EPA. Please contact Mr. Scott Osbourn if you should have any questions at (813) 866-5158. As always, your consideration in this matter is appreciated.

Sincerely,



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

Attachments

ATTACHMENT A



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

AUG 14 1997

OFFICE OF
AIR QUALITY

MEMORANDUM

SUBJECT: Authority for Approval of Custom Fuel Monitoring
Schedules Under NSPS Subpart CC

FROM: John B. Rennie, Chief *John B. Rennie*
Compliance Monitoring Branch

TO: Air Compliance Branch Chiefs
Regions II, III, IV, V, VI and IX

Air Programs Branch Chiefs
Regions I-X

The NSPS for Stationary Gas Turbines (Subpart CC) at 40 CFR 60.154(b)(2) allows for the development of custom fuel monitoring schedules as an alternative to daily monitoring of the sulfur and nitrogen content of fuel fired in the turbines. Regional Offices have been forwarding custom fuel monitoring schedules to the Stationary Source Compliance Division (SSCD) for consideration since it was understood that authority for approval of these schedules was not delegated to the Regions. However, in consultation with the Emission Standards and Engineering Division, it has been determined that the Regional Offices do have the authority to approve subpart CC custom fuel monitoring schedules. Therefore it is no longer necessary to forward these requests to Headquarters for approval.

Over the past few years, SSCD has issued over twenty custom schedules for sources using pipeline quality natural gas. In order to maintain national consistency, we recommend that any schedules Regional Offices issue for natural gas be no less stringent than the following: sulfur monitoring should

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2

be bimonthly, followed by quarterly, then semiannual, given at least six months of data demonstrating little variability in sulfur content and compliance with (60.11) at each monitoring frequency; nitrogen monitoring can be waived for pipeline quality natural gas, since there is no fuel-bound nitrogen and since the free nitrogen does not contribute appreciably to NO_x emissions. Please see the attached sample custom schedule for details. Given the increasing trend in the use of pipeline quality natural gas, we are investigating the possibility of waiving Subpart DD to allow for less frequent sulfur monitoring and a waiver of nitrogen monitoring requirements where natural gas is used.

Where sources using oil request custom fuel monitoring schedules, Regional Offices are encouraged to contact OROD for consultation on the appropriate fuel monitoring schedule. However, Regions are not required to send the request itself to OROD for approval.

If you have any questions, please contact Sally K. Maxwell at RRS 187-2618.

Attachment

cc: John Cronshaw
George Walsh
Robert Ajax
Evel Sale

BEST AVAILABLE COPY Enclosure

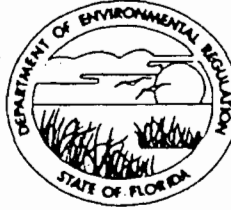
Conditions for Custom Fuel Sampling Schedule for Stationary Gas Turbines

1. Monitoring of fuel nitrogen content shall not be required while natural gas is the only fuel fired in the gas turbine.
2. Sulfur Monitoring
 - a. Analysis for fuel sulfur content of the natural gas shall be conducted using one of the approved ASTM reference methods for the measurement of sulfur in gaseous fuels, or an approved alternative method. The reference methods are: ASTM D1072-80; ASTM D3031-81; ASTM D3246-81; and ASTM D4084-82 as referenced in 40 CFR 60.333(b)(2).
 - b. Effective the date of this custom schedule, sulfur monitoring shall be conducted twice monthly for six months. If this monitoring shows little variability in the fuel sulfur content, and indicates consistent compliance with 40 CFR 60.333, then sulfur monitoring shall be conducted once per quarter for six quarters.
 - c. If after the monitoring required in item 2(b) above, or herein, the sulfur content of the fuel shows little variability and, calculated as sulfur dioxide, represents consistent compliance with the sulfur dioxide emission limits specified under 40 CFR 60.333, sample analysis shall be conducted twice per annum. This monitoring shall be conducted during the first and third quarters of each calendar year.
 - d. Should any sulfur analysis as required in items 2(b) or 2(c) above indicate noncompliance with 40 CFR 60.333, the owner or operator shall notify the State Air Control Board of such excess emissions and the custom schedule shall be re-examined by the Environmental Protection Agency. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.
3. If there is a change in fuel supply, the owner or operator must notify the state of such change for re-examination of this custom schedule. A substantial change in fuel quality shall be considered as a change in fuel supply. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.
4. Records of sample analysis and fuel supply pertinent to this custom schedule shall be retained for a period of three years, and be available for inspection by personnel of federal, state, and local air pollution control agencies.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHEAST DISTRICT

3428 BILLS ROAD
JACKSONVILLE, FLORIDA 32207
904/798-4200



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

ERNEST E. FREY
DISTRICT MANAGER
GARY L. SHAFFER
ASSISTANT DISTRICT MANAGER

PERMITTEE:

Mr. Ken Kisida, Utilities Manager
University of Florida
Physical Plant Division
Building 702, Room 110
Gainesville, Florida 32611

I.D. Number: 31GVL01001411
Permit/Cert Number: A001-136570
Date of Issue: October 1, 1987
Expiration Date: August 1, 1992
County: Alachua
Lat/Long: 29°38'24"N/82°20'52"W
Section/Township/Range:
Project: No. 4 Steam Boiler at CHP
UTM: E-(17) 369.5; N-3279.4

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the operation of No. 4 Steam Boiler at the Central Heat Plant (CHP).

Located west of Center Drive, north of Mowery Road, University of Florida, Gainesville, Alachua County, Florida.

In accordance with operational permit application dated August 23, 1977, renewal application dated June 21, 1982, renewal application dated July 8, 1987 and BACT Determination received September 24, 1987.

PERMITTEE:

University of Florida
No. 4 Steam Boiler at CHP

I.D. Number: 31GVL01001411
Permit Number: A001-136570
Date of Issue: October 1, 1987
Expiration Date: August 1, 1992

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants, or representatives.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by an order from the department.
6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

PERMITTEE:

University of Florida
No. 4 Steam Boiler at CHP

I.D. Number: 31GVL01001411
Permit Number: A001-136570
Date of Issue: October 1, 1987
Expiration Date: August 1, 1992

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

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

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

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

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

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

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

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

PERMITTEE:

University of Florida
No. 4 Steam Boiler at CHP

I.D. Number: 31GVL01001411
Permit Number: A001-136570
Date of Issue: October 1, 1987
Expiration Date: August 1, 1992

13. This permit also constitutes:

- Determination of Best Available Control Technology (BACT)
- Determination of Prevention of Significant Deterioration (PSD)
- Certification of Compliance with State Water Quality Standards
- (Section 401, PL 92-500)
- Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.
- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

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

PERMITTEE:

University of Florida
No. 4 Steam Boiler at CHP

I.D. Number: 31GVL01001411
Permit Number: A001-136570
Date of Issue: October 1, 1987
Expiration Date: August 1, 1992

SPECIFIC CONDITIONS:

1. The maximum input rate (operating rate) is 68.333 cf/hr of natural gas or 444 gals/hr of No. 6 fuel oil and shall not be exceeded without prior approval.
2. Testing of emissions must be performed at an operating rate of at least 90% of the rate in Specific Condition (SC) No. 1, or SC No. 3 will become effective.
3. The operating rate shall not exceed 110% of the operating rate during the most recent test except for testing purposes, but shall not exceed the rate in SC No. 1. After testing at an operating rate greater than 110% of the last test operating rate, the operating rate shall not exceed 110% of the last (submitted) test operating rate until the test report at the higher rate has been reviewed and accepted by the Department.
4. The permitted maximum allowable emission rate for each pollutant is as follows:

| Pollutant | Regulation | Emission Rate | |
|-----------------------------------|---------------------|--|--------|
| | | lbs/hr | TPY |
| Particulate Matter (PM) | 17-2.600(6)(b), FAC | 7.99 ¹ | 31.97 |
| Sulfur Dioxide (SO ₂) | 17-2.600(6)(c), FAC | 110.56 ² | 442.23 |
| Visible Emissions (VE) | 17-2.600(6)(a), FAC | 20% opacity, except 40% for 2 mins/hr | |

¹Basis: 444³ gals/hr; 1.5%⁴ S in FO; AP-42 emission factor

²Basis: 444³ gals/hr; 1.5%⁴ S in FO; 8.3³ lbs/gal

³Basis: 08-23-77 application

⁴Basis: BACT determination dated September 21, 1987 which limits the fuel fired to "new" No. 6 fuel oil (FO) with a sulfur content not to exceed 1.5% by weight. "New" means oil refined from crude oil and has not been used.

5. Test the emission for the following pollutant(s) at the interval(s) indicated, notify GBO office* fourteen (14) days prior to testing, and submit the test report documentations to GBO office* within 45 days after completion of the testing:

| Pollutant | Interval from 01-20-87 |
|-----------------|--|
| SO ₂ | 12 months; Send certified fuel oil analysis with the annual opn rpt if this unit is fired with No. 6 oil for more than 400 hours the previous calendar year. |

* GBO at 5700 S.W. 34th Street, Suite 1204, Gainesville, Florida 32608
Phone No. (904)377-7528

PERMITTEE:

University of Florida
No. 4 Steam Boiler at CHP

I.D. Number: 316VLO1001411
Permit Number: A001-136570
Date of Issue: October 1, 1987
Expiration Date: August 1, 1992

CONDITIONAL VE BASED ON FUEL USED

| <u>Pollutant</u> | <u>Interval</u> from 01-20-87 |
|------------------|-------------------------------|
| VE | 12 months 1,2,3 |

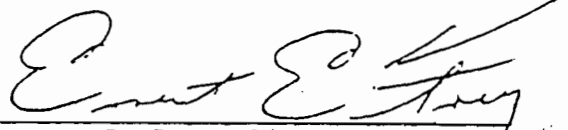
- ¹Basis: Rule 17-2.700(2)(a)4., FAC - test annually unless otherwise specified
²Basis: Rule 17-2.700(2)(a)3., FAC - test not required when liquid fuel is burned for a total of no more than 400 hours
³Basis: If this unit was fired only with natural gas during the previous calendar year, so state in the annual operation report

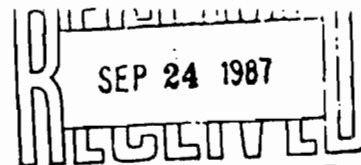
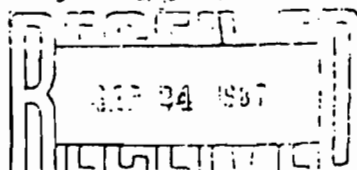
Tests and test reports shall comply with the requirements of FAC Rule 17-2.700(6) and (7), respectively.

6. In each test report, submit the maximum input/production rate at which this source was operated since the most recent test.
7. Submit an annual operation report for this source on the form supplied by the Department for each calendar year on or before March 1.
8. Any revision(s) to a permit (and application) must be submitted and approved prior to implementing.
9. Forms for the renewal will be sent five (5) months prior to August 1, 1992 and the completed forms with test results are due 90 days prior to August 1, 1992.

Issued this 1st day of October 1987

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


Ernest E. Frey, District Manager



Best Available Control Technology (BACT) Determination
 University of Florida
 Alachua County

The applicant plans to operate five boilers (Heat Plant No. 2) located at their facility in Gainesville, Florida. The five boilers which will be fired on a rotating basis with a maximum of three boilers operating simultaneously are capable of firing either natural gas or No. 6 fuel oil.

A BACT determination is required for the source as set forth in the Florida Administrative Code Rule 17-2.600 (6) - Emissions Limiting and Performance Standards.

BACT Determination Request by the Applicant:

Particulate and sulfur dioxide emissions to be controlled by the firing of natural gas or by firing No. 6 fuel oil containing 2.0 percent sulfur, by weight.

Date of Receipt of a BACT Application:

July 17, 1987:

Review Group Members:

The determination was based upon comments received from the Stationary Source Control Section and the Northeast District.

Review Determined by DER:

The amount of particulate and sulfur dioxide emissions from the boilers will be limited by the firing of natural gas or firing new [1] No. 6 fuel oil having a sulfur content not to exceed 1.5 percent, by weight.

Visible Emissions Not to exceed 20% opacity. 40% opacity is permitted for not more than two minutes in any one hour.

DER Method 9 (17-2.700(6)(a)9, FAC) will be used to determine compliance with the opacity standard.

[1] The term "new" means an oil which has been refined from crude oil and has not been used.

BACT Determination Rationale:

Sulfur in fuel oil is a primary air pollution concern in that most of the fuel sulfur becomes SO₂. The emission factors for SO₂ and particulate emissions from oil burning are related to

the sulfur content. The emission factors used by the applicant and the Department are from AP-42, Table 1.3-1.

The applicant has stated that the maximum steam load would require approximately 44 percent of the combined boiler capacity. At this level of operation, dispersion modeling indicates that the ambient air quality standards (AAQS) would not be exceeded for either particulates or sulfur dioxide. There is also no exceedances of the PSD increment since the boilers were each installed prior to the baseline date of December 27, 1977 and therefore do not consume increment.

Although the air quality impacts analysis does not indicate exceedances of the standards when firing the proposed 2.0% sulfur fuel oil, the economic impact of using lower sulfur content fuels needs to be addressed. A review of previous BACT determinations for boilers of similar size which fire No. 6 fuel oil indicates that the sulfur content has generally been limited to 1.5%.

In accordance with the 1.5% sulfur content limitation which is generally required for this type of boiler, the cost of fuel switching can be determined. The applicant has a contract rate of \$20.65 per barrel for 2.0 percent No. 6 fuel oil. At the contract rate, No. 6 fuel oil with a sulfur content not to exceed 1.5 percent would cost \$21.15 which corresponds to an additional 1.19 cents per gallon.


Assuming the maximum firing rate of 25 percent of total annual capacity, the additional annual cost of using the 1.5% sulfur content fuel oil instead of the proposed 2.0% sulfur content No. 6 fuel oil would be \$97,129. The sulfur dioxide reductions from switching to the 1.5% sulfur fuel oil are estimated to be 313.5 tons per year. Based on this reduction, the annual cost per ton of sulfur dioxide removed is approximately \$310.00 which is less than the EPA guideline of up to \$2,000 per ton for sulfur dioxide removal.

Based on the information presented in this analysis, the Bureau has determined that BACT is represented by the firing of either natural gas or No. 6 fuel oil with a sulfur content not to exceed 1.5 percent, by weight.

Details of the Analysis May be Obtained by Contacting:

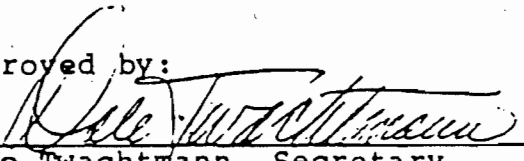
Barry Andrews, P.E. BACT Coordinator
Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blainstone Road
Tallahassee, Florida 32399-2400

Recommended by:



C. H. Fancy, P.E.
Deputy Bureau Chief, BAQM

9/16/87
Date

Approved by:


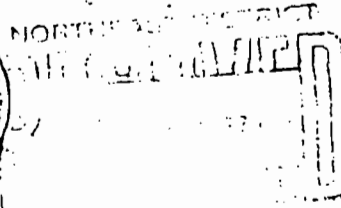
Dale Twachtmann, Secretary

21 Sept 87
Date

DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHEAST DISTRICT

5000 BILLS ROAD
JACKSONVILLE, FLORIDA 32207
(904) 380-8858



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHNICKEL
SECRETARY

ERNEST E. FREY
DISTRICT MANAGER

APPLICATION FOR RENEWAL OF
PERMIT TO OPERATE AIR POLLUTION SOURCE(S)

If major alterations have occurred, the applicant should complete the Standard Air Permit Application Form.

Source Type: NO. 4 STEAM BOILER Renewal of DER Permit No. A001-57683

Company Name: UNIVERSITY OF FLORIDA County: ALACHUA

Identify the specific emission point source(s) addressed in this application (i.e., Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired):

NO. 4 STEAM BOILER SECOND BLACK STEEL STACK FROM THE NORTH END OF PLANT

Source Location: Street: Bldg. 473 North of Mowbray ROAD City: GAINESVILLE

UTM: East _____ North _____

Latitude: ____ ° ____ ' ____ "N. Longitude: ____ ° ____ ' ____ "W.

1. Attach a check made payable to the Department of Environmental Regulation in accordance with operation permit fee schedule set forth in Florida Administrative Code Rule 17-4.05.
2. Have there been any alterations to the plant since last permitted? [] Yes [X] No
If minor alterations have occurred, describe on a separate sheet and attach.
3. Attach the last compliance test report required per permit conditions if not submitted previously.
4. Have previous permit conditions been adhered to? [X] Yes [] No If no, explain on a separate sheet and attach.
5. Has there been any malfunction of the pollution control equipment during tenure of current permit? [] Yes [X] No If yes, and not previously reported, give brief details and what action was taken on a separate sheet and attach.
6. Has the pollution control equipment been maintained to preserve the collection efficiency last permitted by the Department? [X] Yes [] No
7. Has the annual operating report for the last calendar year been submitted? [] Yes [X] No If no, please attach.



8. Please provide the following information if applicable:

A. Raw Materials and Chemical Used in Your Process:

| Description | Contaminant | | Utilization | |
|-------------|-------------|-----|-------------|--------|
| | Type | Zwt | Rate | lbs/hr |
| | | | | |
| | | | | |
| | | | | |

B. Product Weight (lbs/hr): 50,000

C. Fuels No. 6 Oil

| Type (Be Specific) | Consumption* | | Maximum Heat Input (MMBTU/hr) |
|-----------------------|--------------|----------------|----------------------------------|
| | Avg/hr* | Max/hr** | |
| <u>No. 6 Fuel Oil</u> | | <u>250 GAL</u> | <u>148,000 BTU per gal, avil</u> |
| | | | |
| | | | |

D. Normal Equipment Operating Time: (hrs/day 24) ; days/wk ; wks/yr ;
hrs/yr (power plants only) ; if seasonal, describe

The undersigned owner or authorized representative*** of _____
fully swears that the statements made in this application for a renewal of a permit to
operate an air pollution source are true, correct and complete to the best of his knowledge
and belief. Further, the undersigned agrees to maintain and operate the pollution source
and pollution control facilities in such a manner as to comply with the provisions of Chap-
ter 403, Florida Statutes, and all the rules and regulations of the Department. He also
understands that a permit, if granted by the Department, will be non-transferable and he
will promptly notify the Department upon sale or legal transfer of the permitted facility.

- *During actual time of operation.
- **Units: Natural Gas-MMCF/hr;
Fuel Oils-barrels/hr; Coal-lbs/hr.
- ***Attach letter of authorization if not previously submitted

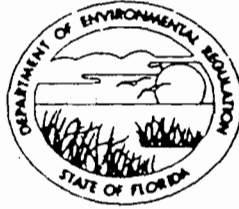
Ken Kisida
Signature, Owner or Authorized Representative
(Notarization is mandatory)
Utilities Manager - Ken Kisida
Typed Name and Title
Physical Plant Division - Building 702 Room 110
Address
Gainesville, Florida 32611
City State Zip
July 8, 1987 904-392-1157
Date Telephone No.

Joseph E. Eisdale
7/8/87

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHEAST DISTRICT

3426 BILLS ROAD
JACKSONVILLE, FLORIDA 32207
904/798-4200



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY
ERNEST E. FREY
DISTRICT MANAGER
GARY L. SHAFFER
ASSISTANT DISTRICT MANAGER

PERMITTEE:

Mr. Ken Kisida, Utilities Manager
University of Florida
Physical Plant Division
Building 702, Room 110
Gainesville, Florida 32611

I.D. Number: 31GVL01001415
Permit/Cert Number: A001-136571
Date of Issue: October 1, 1987
Expiration Date: August 1, 1992
County: Alachua
Lat/Long: 29°38'24"N/82°20'52"W
Section/Township/Range:
Project: No. 5 Steam Boiler at CHP
UTM: E-(17)369.5; N-3279.4

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the operation of No.5 Steam Boiler at the Central Heal Plant (CHP).

Located west of Center Drive, north of Mowery Road, University of Florida, Gainesville, Alachua County, Florida.

In accordance with operating permit application dated August 23, 1977, renewal application dated June 21, 1982, renewal application dated July 8, 1987 and BACT Determination received September 24, 1987.

PERMITTEE:

University of Florida
No. 5 Steam Boiler at CHP

I.D. Number: 31GVLD1001415
Permit Number: A001-1136571
Date of Issue: October 1, 1987
Expiration Date: August 1, 1992

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants, or representatives.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by an order from the department.
6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

PERMITTEE:

University of Florida
No. 5 Steam Boiler at CHP

I.D. Number: 31GVL01001415
Permit Number: A001-136571
Date of Issue: October 1, 1987
Expiration Date: August 1, 1992

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

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

8. If, for any reason, the permittee does not comply with, or will be unable to comply with, any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:
 - a. A description of and cause of non-compliance; and
 - b. the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

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

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.
10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or department rules.
11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the department.
12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

PERMITTEE:

University of Florida
No. 5 Steam Boiler at CHP

I.D. Number: 31GVL01001415
Permit Number: A001-136571
Date of Issue: October 1, 1987
Expiration Date: August 1, 1992

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Certification of Compliance with State Water Quality Standards
- () (Section 401, PL 92-500)
- () Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.
- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

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

PERMITTEE:

University of Florida
No. 5 Steam Boiler at CHP

I.D. Number: 31GVL01001415
Permit Number: A001-136571
Date of Issue: October 1, 1987
Expiration Date: August 1, 1992

SPECIFIC CONDITIONS:

1. The maximum input rate (operating rate) is 164,000 cf/hr of natural gas or 1066.6 gals/hr of No. 6 fuel oil and shall not be exceeded without prior approval.
2. Testing of emissions must be performed at an operating rate of at least 90% of the rate in Specific Condition (SC) No. 1, or SC No. 3 will become effective.
3. The operating rate shall not exceed 110% of the operating rate during the most recent test except for testing purposes, but shall not exceed the rate in SC No. 1. After testing at an operating rate greater than 110% of the last test operating rate, the operating rate shall not exceed 110% of the last (submitted) test operating rate until the test report at the higher rate has been reviewed and accepted by the Department.
4. The permitted maximum allowable emission rate for each pollutant is as follows:

| Pollutant | Regulation | Emission Rate | |
|-----------------------------------|---------------------|---|---------|
| | | lbs/hr | TPY |
| Particulate Matter (PM) | 17-2.600(6)(b), FAC | 19.20 ¹ | 76.80 |
| Sulfur Dioxide (SO ₂) | 17-2.600(6)(c), FAC | 265.58 ² | 1062.33 |
| Visible Emissions (VE) | 17-2.600(6)(a), FAC | 20% opacity, except 40% for 2 mins/hr ⁴ | |

¹Basis: 1066.6³ gals/hr; 1.5%⁴ S in FO; AP-42 emission factor

²Basis: 1066.6³ gals/hr; 1.5%⁴ S in FO; 8.3³ lbs/gal

³Basis: 08-23-77 application

⁴Basis: BACT determination dated September 21, 1987 which limits the fuel fired to "new" No. 6 fuel oil (FO) with a sulfur content not to exceed 1.5% by weight. "New" means oil refined from crude oil and has not been used.

5. Test the emission for the following pollutant(s) at the interval(s) indicated, notify GBO office* fourteen (14) days prior to testing, and submit the test report documentations to GBO office* within 45 days after completion of the testing:

| Pollutant | Interval |
|-----------------|---|
| SO ₂ | from 01-20-87 12 months; Send certified fuel oil analysis with the annual opn rpt if this unit is fired with No. 6 oil for more than 400 hours the previous calendar year. |

* GBO at 5700 S.W. 34th Street, Suite 1204, Gainesville, Florida 32608
Phone No. (904)377-7528

PERMITTEE:
University of Florida
No. 5 Steam Boiler at CHP

I.D. Number: 31GVL01001415
Permit Number: A001-136571
Date of Issue: October 1, 1987
Expiration Date: August 1, 1992

CONDITIONAL VE BASED ON FUEL USED

| <u>Pollutant</u> | <u>Interval</u> from 01-20-87 |
|------------------|-------------------------------|
| VE | 12 months 1,2,3 |

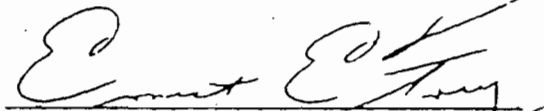
- ¹Basis: Rule 17-2.700(2)(a)4., FAC - test annually unless otherwise specified
- ²Basis: Rule 17-2.700(2)(a)3., FAC - test not required when liquid fuel is burned for a total of no more than 400 hours
- ³Basis: If this unit was fired only with natural gas during the previous calendar year, so state in the annual operation report

Tests and test reports shall comply with the requirements of FAC Rule 17-2.700(6) and (7), respectively.

- In each test report, submit the maximum input/production rate at which this source was operated since the most recent test.
- Submit an annual operation report for this source on the form supplied by the Department for each calendar year on or before March 1.
- Any revision(s) to a permit (and application) must be submitted and approved prior to implementing.
- Forms for the renewal will be sent five (5) months prior to August 1, 1992 and the completed forms with test results are due 90 days prior to August 1, 1992.

Issued this 1st day of October 1987

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


Ernest E. Frey, District Manager

SEP 24 1987

Best Available Control Technology (BACT) Determination
 University of Florida
 Alachua County

DER-JACKSONVILLE

The applicant plans to operate five boilers (Heat Plant No. 2) located at their facility in Gainesville, Florida. The five boilers which will be fired on a rotating basis with a maximum of three boilers operating simultaneously are capable of firing either natural gas or No. 6 fuel oil.

A BACT determination is required for the source as set forth in the Florida Administrative Code Rule 17-2.600 (6) - Emissions Limiting and Performance Standards.

BACT Determination Request by the Applicant:

Particulate and sulfur dioxide emissions to be controlled by the firing of natural gas or by firing No. 6 fuel oil containing 2.0 percent sulfur, by weight.

Date of Receipt of a BACT Application:

July 17, 1987

Review Group Members:

The determination was based upon comments received from the Stationary Source Control Section and the Northeast District.

Review Determined by DER:

The amount of particulate and sulfur dioxide emissions from the boilers will be limited by the firing of natural gas or firing new [1] No. 6 fuel oil having a sulfur content not to exceed 1.5 percent, by weight.

Visible Emissions Not to exceed 20% opacity. 40% opacity is permitted for not more than two minutes in any one hour.

DER Method 9 (17-2.700(6)(a)9, FAC) will be used to determine compliance with the opacity standard.

[1] The term "new" means an oil which has been refined from crude oil and has not been used.

BACT Determination Rationale:

Sulfur in fuel oil is a primary air pollution concern in that most of the fuel sulfur becomes SO₂. The emission factors for SO₂ and particulate emissions from oil burning are related to

the sulfur content. The emission factors used by the applicant and the Department are from AP-42, Table 1.3-1.

The applicant has stated that the maximum steam load would require approximately 44 percent of the combined boiler capacity. At this level of operation, dispersion modeling indicates that the ambient air quality standards (AAQS) would not be exceeded for either particulates or sulfur dioxide. There is also no exceedances of the PSD increment since the boilers were each installed prior to the baseline date of December 27, 1977, and therefore do not consume increment.

Although the air quality impacts analysis does not indicate exceedances of the standards when firing the proposed 2.0% sulfur fuel oil, the economic impact of using lower sulfur content fuels needs to be addressed. A review of previous BACT determinations for boilers of similar size which fire No. 6 fuel oil indicates that the sulfur content has generally been limited to 1.5%.

In accordance with the 1.5% sulfur content limitation which is generally required for this type of boiler, the cost of fuel switching can be determined. The applicant has a contract rate of \$20.65 per barrel for 2.0 percent No. 6 fuel oil. At the contract rate, No. 6 fuel oil with a sulfur content not to exceed 1.5 percent would cost \$21.15 which corresponds to an additional 1.19 cents per gallon.

Assuming the maximum firing rate of 25 percent of total annual capacity, the additional annual cost of using the 1.5% sulfur content fuel oil instead of the proposed 2.0% sulfur content No. 6 fuel oil would be \$97,129. The sulfur dioxide reductions from switching to the 1.5% sulfur fuel oil are estimated to be 313.5 tons per year. Based on this reduction, the annual cost per ton of sulfur dioxide removed is approximately \$310.00 which is less than the EPA guideline of up to \$2,000 per ton for sulfur dioxide removal.

Based on the information presented in this analysis, the Bureau has determined that BACT is represented by the firing of either natural gas or No. 6 fuel oil with a sulfur content not to exceed 1.5 percent, by weight.

the sulfur content. The emission factors used by the applicant and the Department are from AP-42, Table 1.3-1.

The applicant has stated that the maximum steam load would require approximately 44 percent of the combined boiler capacity. At this level of operation, dispersion modeling indicates that the ambient air quality standards (AAQS) would not be exceeded for either particulates or sulfur dioxide. There is also no exceedances of the PSD increment since the boilers were each installed prior to the baseline date of December 27, 1977, and therefore do not consume increment.

Although the air quality impacts analysis does not indicate exceedances of the standards when firing the proposed 2.0% sulfur fuel oil, the economic impact of using lower sulfur content fuels needs to be addressed. A review of previous BACT determinations for boilers of similar size which fire No. 6 fuel oil indicates that the sulfur content has generally been limited to 1.5%.

In accordance with the 1.5% sulfur content limitation which is generally required for this type of boiler, the cost of fuel switching can be determined. The applicant has a contract rate of \$20.65 per barrel for 2.0 percent No. 6 fuel oil. At the contract rate, No. 6 fuel oil with a sulfur content not to exceed 1.5 percent would cost \$21.15 which corresponds to an additional 1.19 cents per gallon.

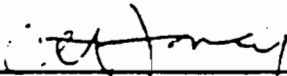
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Based on the information presented in this analysis, the Bureau has determined that BACT is represented by the firing of either natural gas or No. 6 fuel oil with a sulfur content not to exceed 1.5 percent, by weight.

Details of the Analysis May be Obtained by Contacting:

Barry Andrews, P.E. BACT Coordinator
Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blairstone Road
Tallahassee, Florida 32399-2400

Recommended by:



C. H. Fancy, P.E.
Deputy Bureau Chief, BAQM

1/16/87
Date

Approved by:



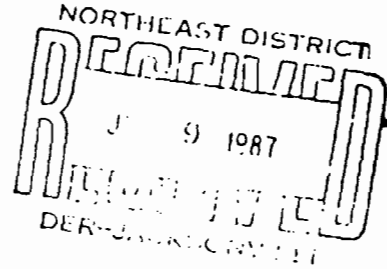
Dale Twachtmann, Secretary

21 Sept 87
Date

DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHEAST DISTRICT

1525 BILLS ROAD
JACKSONVILLE, FLORIDA 32207
(904) 388-8854



BOB GRAM
GOVERNOR
VICTORIA J. TECHINIK
SECRETARY
ERNEST E. FR
DISTRICT MANAGER

APPLICATION FOR RENEWAL OF
PERMIT TO OPERATE AIR POLLUTION SOURCE(S)

If major alterations have occurred, the applicant should complete the Standard Air Permit Application Form.

Source Type: No. 5 Steam Boiler Renewal of DER Permit No. A001-57683

Company Name: UNIVERSITY OF FLORIDA County: ALACHUA

Identify the specific emission point source(s) addressed in this application (i.e., Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired):

Black Steel Stack North End of Plant No. 5 Steam Boiler

Source Location: Street: Bkg 473 North of Mowery Road City: GAINESVILLE

UTM: East _____ North _____
Latitude: ____° ____' ____"N. Longitude: ____° ____' ____"W.

1. Attach a check made payable to the Department of Environmental Regulation in accordance with operation permit fee schedule set forth in Florida Administrative Code Rule 17-4.05.
2. Have there been any alterations to the plant since last permitted? Yes No
If minor alterations have occurred, describe on a separate sheet and attach.
3. Attach the last compliance test report required per permit conditions if not submitted previously.
4. Have previous permit conditions been adhered to? Yes No If no, explain on separate sheet and attach.
5. Has there been any malfunction of the pollution control equipment during tenure of current permit? Yes No If yes, and not previously reported, give brief detail and what action was taken on a separate sheet and attach.
6. Has the pollution control equipment been maintained to preserve the collection efficiency last permitted by the Department? Yes No
7. Has the annual operating report for the last calendar year been submitted? Yes No If no, please attach.

8. Please provide the following information if applicable:

A. Raw Materials and Chemical Used in Your Process:

| Description | Contaminant | | Utilization lbs/hr |
|-------------|-------------|-----|-----------------------|
| | Type | %Wt | |
| | | | |
| | | | |
| | | | |

B. Product Weight (lbs/hr): 120,000

C. Fuels NO. 6 Oil

| Type (Be Specific) | Consumption* | | Maximum Heat Input (MMBTU/hr) |
|-----------------------|--------------|-----------------|----------------------------------|
| | Avg/hr* | Max/hr** | |
| <u>NO. 6 FUEL OIL</u> | | <u>600 GALS</u> | <u>148,000 BTU per GAL, Min.</u> |
| | | | |
| | | | |

D. Normal Equipment Operating Time: hrs/day 24; days/wk _____; wks/yr _____;
 hrs/yr (power plants only) _____; if seasonal, describe _____

The undersigned owner or authorized representative** of _____ is fully aware that the statements made in this application for a renewal of a permit to operate an air pollution source are true, correct and complete to the best of his knowledge and belief. Further, the undersigned agrees to maintain and operate the pollution source and pollution control facilities in such a manner as to comply with the provisions of Chapter 403, Florida Statutes, and all the rules and regulations of the Department. He also understands that a permit, if granted by the Department, will be non-transferable and he will promptly notify the Department upon sale or legal transfer of the permitted facility.

- *During actual time of operation.
- **Units: Natural Gas-MMCF/hr; Fuel Oils-barrels/hr; Coal-lbs/hr.
- ***Attach letter of authorization if not previously submitted

Ken Kisida
 Signature, Owner or Authorized Representative
 (Notarization is mandatory)

Utilities Manager - Ken Kisida

Physical Plant Division - Building 702 Room 110

Address
Gainesville, Florida 32611
 City State Zip

July 8, 1987 Date 904-392-1157 Telephone No.

Notary Public, State of Florida

My Commission Expires June 17, 1989

Joseph E. Furdale