



September 15, 1999

Mr. Alvaro Linero, Administrator
New Source Review
Florida Dept. of Environmental Protection
2600 Blair Stone Road, MS 5505
Tallahassee, FL 32399-2400

RECEIVED

SEP 17 1999

BUREAU OF AIR REGULATION

Re: Gainesville Regional Utilities
J.R. Kelly Generating Station - Repowering Project
Application for Air Construction Permit and Title V Operating Permit Revision

Dear Mr. Linero:

By letter dated September 3, 1999 Gainesville Regional Utilities (GRU) submitted to the Department the above-referenced permit applications. As GRU would like to commence construction of the new unit by February 2000, it is of utmost importance to GRU to obtain the Air Construction Permit as expeditiously as possible. Therefore, GRU is requesting that the Department process the above-referenced permits individually and not contemporaneously as originally envisioned.

GRU appreciates your assistance in **this matter**. Please call me at (352) 334-3400 Ext. 1284 if you have any questions or need additional information.

Sincerely,

Yolanta E. Jonynas
Sr. Electric Utility Environmental Engineer

xc: D. Beck
D. DuBose
R. Klemans
M. Kurtz
S. Manasco
B. Mitchell, FDEP- Tall.
E. Regan
S. Sheplak, FDEP - Tall.
G. Swanson
JRK CC1

jrkcclpermit91599.y31

Scott
Lennon
great work!



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

clear
from Howard
8/14
RECEIVED
AUG 14 1998
DIVISION OF AIR
RESOURCES MANAGEMENT

AUG 7 1998

4APT-ARB

Howard L. Rhodes, Director
Department of Environmental Protection
Division of Air Resources Management
Mail Station 5500
2600 Blair Stone Road
Tallahassee, Florida 3299-2400

SUBJ: Proposed Title V Permit for J.R. Kelly Generating Station

Dear Mr. Rhodes:

The purpose of this letter is to acknowledge receipt of the State of Florida's proposed changes to the City of Gainesville - J. R. Kelly Generating Station proposed title V permit which was a subject of a U.S. Environmental Protection Agency (EPA) title V objection on May 4, 1998. EPA Region 4 has completed its review of the proposed changes to the permit and believes that the State has adequately addressed each of the issues enumerated in the objection. Therefore, EPA considers the objection to be resolved. Once the state's proposed changes are incorporated into the permit, the State may proceed with permit issuance.

We commend the efforts of Mr. Lennon Anderson of your staff for facilitating the resolution of the permit issues. If you have any questions about this letter, please contact Ms. Carla E. Pierce, Chief, Operating Source Section at (404) 562-9099.

Sincerely,

Winston A. Smith
Director
Air, Pesticides & Toxics
Management Division



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

July 27, 1998

Mr. R. Douglas Neeley, Chief
Air, Pesticide and Toxics Management Division
United States Environmental Protection Agency
Region 4
61 Forsyth Street, SW
Atlanta, GA 30303-8909

Re: Proposed Changes to J.R. Kelly Proposed Title V Permit to Satisfy EPA Objections

Dear Mr. Neeley:

This letter is to document changes that the Department proposes to satisfy EPA Region 4 objections to Florida's Proposed Title V permit for the J.R. Kelly Generating Station. These objections were detailed in a letter from EPA Region 4 dated May 4, 1998 in which EPA indicated the primary basis for objection was that the permit did not meet the periodic monitoring requirements of 40 CFR 70.6(a)(3)(i).

Please review the following proposed changes. If you concur with our changes, we will issue the final permit with these changes.

EPA Comment No. 1

As a result of this comment, the Department proposes to add the following permitting note to Conditions A.1. and B.1. as follows:

{Permitting note: The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limitations and to aid in determining future rule applicability.}

The following is being proposed to be added to the statement of basis:

Regular record keeping is not required for heat input. Instead the owner or operator is expected to determine heat input whenever emission testing is required, to demonstrate at what percentage of the rated capacity that the unit was tested. Rule 62-297.310(5),

Mr. R. Douglas Neeley
July 27, 1998
Page 2 of 5

F.A.C., included in the permit, requires measurement of process variables for emission tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate average hourly heat input during the test.

EPA Comment No. 2

As a result of this comment, the Department proposes to change Specific Conditions A.6. and A.7.

From:

A.6. Particulate Matter. Particulate matter emissions shall be controlled by the firing of natural gas.

[Rule 62-296.406(2), F.A.C.]

A.7. Sulfur Dioxide. Sulfur dioxide emissions shall be controlled by the firing of natural gas.

[Rule 62-296.406(3), F.A.C.]

To:

A.6. Particulate Matter. Particulate matter emissions shall be controlled by the firing of natural gas.

[Rule 62-296.406(2), F.A.C., and BACT dated October 9, 1991 and proposed by applicant on October 31, 1997]

A.7. Sulfur Dioxide. Sulfur dioxide emissions shall be controlled by the firing of natural gas.

[Rule 62-296.406(3), F.A.C., BACT dated October 9, 1991 and proposed by applicant on October 31, 1997]

The following is being proposed to be added to the statement of basis:

A BACT Determination was conducted for Unit No. 6 pursuant to state Rule 62-296.406, F.A.C. and was not related to federal New Source Review regulation. During the BACT Determination process, the entire facility was modeled to determine if there were any violation of the National Ambient Air Quality Standard (NAAQS) for sulfur dioxide (SO₂). The firing of natural gas or new No. 6 fuel oil with a sulfur content of 1.5% was determined as BACT. However, during the Title V process, the applicant proposed to fire Unit No. 6 on natural gas only and Unit Nos. 7 and 8 on natural gas and new residual fuel oils with a maximum sulfur content of 2.50%, which may be supplemented with on-

Mr. R. Douglas Neeley
July 27, 1998
Page 3 of 5

specification used oil. The proposed fuel firing was modeled and there were no exceedances of the NAAQS for SO₂.

EPA Comment No. 3

As a result of this comment, the Department proposes to add the following under the section titled Monitoring of Operations:

C.x. Additional Testing for Periodic Monitoring for Unit 7. In addition to the visible emission test required per Specific Condition C.x., (currently Specific Condition C.8.) upon exceeding 400 hours of operation on fuel oil, the owner or operator shall conduct an additional test for visible emissions using DEP Method 9 every 150 hours of operation on fuel oil thereafter, for the purposes of periodic monitoring. Furthermore, the owner or operator shall conduct a visible emissions test on fuel oil prior to renewal of the permit. [Rule 62-213.440, F.A.C. and applicant's agreement on June 26 and July 27, 1998]

C.x. COMS for Periodic Monitoring for Unit 8. The owner or operator is required to install a continuous opacity monitoring system (COMS) pursuant to 40 CFR Part 75. The owner or operator shall maintain and operate a COMS and shall make and maintain records of opacity measured by the COMS, for purposes of periodic monitoring. [Rule 62-213.440, F.A.C. and applicant's agreement on June 26, 1998]

{Permitting note: Unit No. 6 is permitted to burn natural gas only. The Department has concluded that the recordkeeping and reporting requirements specified in this permit are appropriate and adequate for purposes of periodic monitoring. }

The following is being proposed to be added to the statement of basis:

The Department has determined that the appropriate VE testing frequency for Unit No. 7 is a VE test upon exceeding 400 hours of operation on fuel oil, and every 150 hours of operation on fuel oil thereafter, in any given federal fiscal year (October 1 through September 30). A visible emissions test while burning fuel oil, however, will be required for permit renewal. This frequency is justified by the low historical operational use of fuel oil for this unit and the previous VE tests which documented compliance while firing fuel oil. This unit has fired fuel oil for a total of 30.0 hours in 1994, 43.0 hours in 1995, and 0.0 hours in 1996 and 1997.

EPA Comment No. 4

As a result of this comment, the Department proposes to add the following condition under the section titled Recordkeeping and Reporting Requirements:

Mr. R. Douglas Neeley
July 27, 1998
Page 4 of 5

C.x. Recordkeeping for periodic monitoring. The owner or operator is required to record the date, time and duration of each soot blowing and load change event.
[Rule 62-213.440, F.A.C.]

EPA's Concerns

Comment 1

Response: The Department made the change as requested.

Comment 2

As a result of this comment, Specific Condition B.3. has been changed to be consistent with Specific Condition B.1.

Comment 3

Response: The Department has decided to keep the conditions separate.

Comment 4

Response: The J.R. Kelly Generating Station prefers items 6, 7, and 9 as stated for operational flexibility; the Department agrees.

Comment 5

As a result of this comment, the Department proposes to add the following to the statement of basis:

The unregulated emissions units consist of three non-NSPS combustion turbines which are subjected to the general visible emission standard, only. Pursuant to the instructions for the Title V application form, the combustion turbines described are unregulated emissions units.

Mr. R. Douglas Neeley
July 27, 1998
Page 5 of 5

If you would like to discuss these issues further and attempt to resolve them,
please contact me at 850/488-1344.

Sincerely,

A handwritten signature in black ink, appearing to read "C. H. Fancy". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

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

CF/la

cc: Howard L. Rhodes, P.E., FDEP
Scott Sheplak, P.E., FDEP
Michael L. Krutz, GRU
Yolanta Jonynas, GRU



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION 4
 ATLANTA FEDERAL CENTER
 61 FORSYTH STREET, SW
 ATLANTA, GEORGIA 30303-8909

- Original - SCOTT

claim
 Howard
 5/6

MAY 4 1998

MAY 06 1998

DIVISION OF AIR
 RESOURCES MANAGEMENT

4APT-ARB

Howard L. Rhodes, Director
 Air Resources Management Division
 Florida Department of Environmental Protection
 Mail Station 5500
 2600 Blair Stone Road
 Tallahassee, Florida 32399-2400

RECEIVED

MAY 06 1998

BUREAU OF
 AIR REGULATION

SUBJ: EPA's Review of Proposed Title V Permit
 City of Gainesville - J.R. Kelly
 Generating Station
 Permit no. 0010005-001-AV

Dear Mr. Rhodes:

The purpose of this letter is to provide comments to the Florida Department of Environmental Protection (DEP) on the proposed title V operating permit for City of Gainesville - J.R. Kelly Generating Station, which was posted on DEP's web site on March 19, 1998. Based on the Environmental Protection Agency's (EPA's) review of the proposed permit and the supporting information for this facility, EPA formally objects, under the authority of Section 505(b) of the Clean Air Act (the Act) and 40 C.F.R. § 70.8(c) (see also Florida Regulation 62-213.450), to the issuance of the title V permit for this facility on the basis that the permit does not fully meet the periodic monitoring requirements of § 70.6(a)(3)(i).

As you know, 40 C.F.R. § 70.8(c) requires EPA to object to the issuance of a proposed permit in writing within 45 days of receipt of the proposed permit (and all necessary supporting information) if EPA determines that the permit is not in compliance with the applicable requirements under the Act or 40 C.F.R. Part 70. Section 70.8(c)(4) and Section 505(c) of the Act further provide that if the State fails to revise and resubmit a proposed permit within 90 days to satisfy the objection, the authority to issue or deny the permit passes to EPA and EPA will act accordingly. Because the objection issues must be fully addressed within the 90 days, we suggest that the revised permit be submitted in advance in order that any outstanding issues may be addressed prior to the expiration of the 90-day period.

Pursuant to 40 C.F.R. § 70.8(c), this letter and its enclosure provide a statement of EPA's reasons for its objection. The enclosure contains a detailed explanation of the objection issues and the changes necessary to make the permit consistent with the requirements of 40 C.F.R. Part 70. The enclosure also contains general comments applicable to the permit.

With regard to the imposition of periodic monitoring in title V permits, we also refer you to our objection letter of December 11, 1997, which clearly states EPA's position with regard to requiring additional monitoring in order to establish a credible basis for compliance certification.

If you have any questions or wish to discuss this further, please contact Ms. Carla Pierce, Chief, Operating Source Section at (404) 562-9099. Should your staff need additional information they may contact Ms. Gracy R. Danois, Florida Title V Contact, at (404) 562-9119, Mr. David McNeal, Regional Monitoring Expert, at (404) 562-9102, or Ms. Lynda Crum, Associate Regional Counsel, at (404) 562-9524.

Sincerely,



Winston A. Smith

Director

Air, Pesticides & Toxics
Management Division

cc: Mr. Michael L. Kurtz
General Manager
City of Gainesville, GRU

Enclosure

U.S. EPA Region 4 Objection
Proposed Part 70 Operating Permit
City of Gainesville, GRU
J.R. Kelly Generating Station
Permit no. 0010005-001-AV

EPA objects to the issuance of this permit due to the following reasons:

- (1) Periodic Monitoring - Conditions A.1. and B.1. describe the maximum operation heat input rate for units 006, and 007 and 008, respectively. In the past, the State has asserted that these types of conditions were included for purposes of establishing the baseline for determining the percent operating capacity at the time of testing. However, the permitting note in condition B.1. seems to imply that, at least, for units 007 and 008, the permittee is expected to demonstrate compliance with the heat input rate limitation. The State needs to explain the origin of these conditions (i.g., PSD permit conditions) either in the permit or the statement of basis and, if EPA's interpretation of condition B.1. is correct, the permit needs to include appropriate monitoring or recordkeeping to demonstrate compliance with the maximum operating heat input rate established by the condition. In order to satisfy the latter, the permit must require that the facility maintain fuel usage records to demonstrate compliance with the applicable heat input limit. Since this recordkeeping will be used to determine compliance with an hourly heat input rate limitation, the permit should contain an hourly fuel usage recordkeeping requirement in order to ensure that the facility remains in compliance with the hourly heat input limit.
- (2) Periodic Monitoring - Conditions A.6. and A.7. establish that the emissions of particulate matter and sulfur dioxide will be controlled by the firing of natural gas. The rule citation (62-296.406(2) and (3)) refers to a BACT determination. The permit or the statement of basis needs to contain further explanation regarding these BACT determinations (i.e., date, PSD permit no.) and the reason why there are no monitoring or recordkeeping requirements associated with these conditions.
- (3) Periodic Monitoring - The permit does not require sufficient periodic monitoring to ensure compliance with the applicable opacity standard. The J.R. Kelly permit only requires an annual one hour Method 9 visible emission reading. In most cases this does not constitute adequate periodic monitoring to ensure continuous compliance with the opacity standard.

We recommend that the source be required to conduct visible emissions readings on a daily basis for unit 007 when this unit is burning fuel oil, or a description in the statement of basis demonstrating why the State has chosen not to require any additional visible emissions testing. For unit 008, the continuous opacity monitor (COM) installed on the unit, should be used to ensure compliance with the opacity standard. Requiring that the opacity monitor be used for conducting periodic monitoring imposes little or no additional burden on the source. For unit 006, the statement of basis needs to include the reasons why no additional monitoring is needed.

- (4) Periodic Monitoring - Condition B.7. allows particulate matter emissions up to an average of 0.3 lbs. per million BTU heat input during a 3-hour period in any 24-hour period for soot blowing and load change. In addition, Condition A.5 allows visible emissions up to 60 percent opacity during soot blowing and load changes. A load change is defined to occur when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more. There does not, however, appear to be any conditions that require the source to record the time, date, and duration of these events. The permit must require that the facility keep records of these events to ensure compliance with this requirement or the statement of basis must describe the reasons why recordkeeping is not necessary.

In addition to the above objections, our review has identified the following concerns regarding this permit:

- (1) Condition 12 - Please replace "Operating Source Section" with "Air & EPCRA Enforcement Branch, Air Compliance Section."
- (2) Conditions B.1. and B.3. - Condition B.1. describes that units 007 and 008 are allowed to burn new residual fuel oil nos. 4 and 5. However, condition B.3. limits this facility to only burn new residual fuel oil no. 6. The statement of basis needs to justify why these units are being limited to only burn fuel oil no. 6. Also, the State should consider rewording condition B.1. to avoid any confusion.
- (3) Conditions B.13. and B.14. - The State should consider merging these two conditions into one since condition B.13. seems to be providing background information for condition B.14.

- (4) Appendix I-1 - Items 6, 7, and 9 need to be more specific as to the characteristics of the emission units that are found in this facility.
- (5) Appendix U-1 - The statement of basis needs to contain a description of the combustion turbines listed in this appendix. It is unclear in the permit what makes these units not subject to any unit specific requirement.

-Or original-



facsimile
TRANSMITTAL

Mississippi, Tennessee, Alabama, Georgia, Florida, Kentucky,
South Carolina, North Carolina

To: Scott Sheplak

cc: Chair Nancy

Cindy Phillips, Lennon Anderson

Fax #: 904/922-6979

Subject: City of Gainesville - J.R. Kelly Title V Proposed Permit
objection letter

From: Gracy R. Danois

Phone#: 404/562-9119

Date: 5/4/98

Pages: 6, including this cover sheet.

COMMENTS:



Air & Radiation Technology Branch
U.S. Environmental Protection Agency
61 Forsyth Street, SW, 12th Floor
Atlanta, Georgia 30303

404-562-9105
Fax: 404-562-9095

-5/4-



facsimile
TRANSMITTAL

Mississippi, Tennessee, Alabama, Georgia, Florida, Kentucky,
South Carolina, North Carolina

To: Scott Sheplak

cc: Clairancy
Cindy Phillips, Lennon Anderson

Fax #: 904/922-6979

Subject: City of Gainesville - J.R. Kelly Title V Proposed Permit
objection letter

From: Gracy R. Danois Phone#: 404/562-9119

Date: 5/4/98

Pages: 6, including this cover sheet.

COMMENTS:



Air & Radiation Technology Branch
U.S. Environmental Protection Agency
61 Forsyth Street, SW, 12th Floor
Atlanta, Georgia 30303

404-562-9105
Fax: 404-562-9095



November 12, 1997

Via Fax & Mail

Mr. Scott Sheplak, P.E.
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road, MS 5505
Tallahassee, FL 32399-2400

RE: City of Gainesville/Gainesville Regional Utilities
J. R. Kelly Generating Station
Draft Title V Permit No. 0010005-001-AV
Modeling Results - Unit 6

Dear Mr. Sheplak:

Pursuant to the Department's request, enclosed is the assessment of ambient SO2 impacts for the J. R. Kelly Generating Station Unit 6 while combusting natural gas. The assessment demonstrates that the combined impacts of Unit 6 burning natural gas and Units 7 and 8 burning 2.5% sulfur fuel oil will not cause an exceedance of the ambient air quality standards for SO2.

Please call me at (352) 334-3400 Ext. 1284 if you have any questions.

Sincerely,

Yolanta E. Jonynas
Sr. Environmental Engineer

Attachments

xc: L. Anderson, FDEP
D. Beck
R. Manasco
A. Morrison, HGSS
G. Swanson
CAA Title V

November12jrktv

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NOV 14 1997

BUREAU OF
AIR REGULATION

**GAINESVILLE REGIONAL UTILITIES
J.R. KELLY GENERATING STATION
ASSESSMENT OF AMBIENT SO₂ IMPACTS**

An assessment of ambient SO₂ impacts due to the operation of Units 7 and 8 at the Gainesville Regional Utilities (GRU) J.R. Kelly Generating Station was previously conducted using EPA's SCREEN3 dispersion model and submitted to FDEP. At the request of FDEP, additional SCREEN3 modeling was conducted to assess the impact of Unit 6 at the J.R. Kelly Generating Station. Specific data used in the SCREEN3 modeling analysis and model results are summarized in the following sections.

A. SO₂ Emission Rates and Stack Parameters

Modeled SO₂ emission rate was based on Unit 6 being fired with natural gas. Maximum SO₂ emission rate was calculated using the AP-42 emission factor of 0.6 lb/MMft³ (equivalent to 0.0006 lb SO₂/MMBtu using a natural gas heat content of 1,000 Btu/ft³) and maximum heat input rate of 187 MMBtu/hr.

Stack parameters for Unit 6 were based on historical conditions since the physical stack for Unit 6 was recently demolished. A summary of Unit 6 stack parameters is included on revised Attachment I. Building structures which could result in downwash (i.e., greater than 2.5 times the common stack height and within five times the lessor of the building structure's height or projected width) were assessed and appropriate building dimensions used in the modeling assessment.

Modeled SO₂ emission rates, common stack parameters, and building dimensions are summarized in the following table:

Parameter	Units	Value
SO ₂ Emission Rate	g/s	0.014
Stack Height	m	36.6
Stack Diameter	m	1.8
Stack Temperature	K	449.8
Stack Velocity	m/s	9.7
Building Dimensions:		
Height	m	18.0
Minimum Horizontal Dimension	m	28.9
Maximum Horizontal Dimension	m	47.9

**GAINESVILLE REGIONAL UTILITIES
J.R. KELLY GENERATING STATION
ASSESSMENT OF AMBIENT SO₂ IMPACTS**

B. SCREEN3 Model Options

The SCREEN3 modeling assessment utilized the regulatory defaults for mixing heights and anemometer height, full meteorology, and rural dispersion coefficients. Use of rural dispersion coefficients is consistent with the EPA recommended Auer classification method. The area within a 3-km radius of the J.R. Kelly Generating Station is predominately single family residential dwellings with undeveloped land (i.e., the Paynes Prairie area) beginning approximately 2.0 km to the south of the plant. Based on this land use, the area within a 3-km radius would be characterized as rural using the Auer classification method. SCREEN3 model output is provided as Attachment II.

C. SCREEN3 Model Results

The SCREEN3 dispersion model is a single-source model which yields maximum one-hour impacts. The maximum one-hour SO₂ impacts were converted to 3-, 24-hour, and annual averaging periods using the EPA recommended multipliers of 0.9, 0.4, and 0.08, respectively.

SCREEN3 SO₂ model results for the GRU J.R. Kelly Generating Station are summarized in the following table:

Unit	Maximum One Hour Impact ($\mu\text{g}/\text{m}^3$)	Downwind Distance (m)	Maximum SO ₂ Impacts		
			3-Hr ($\mu\text{g}/\text{m}^3$)	24-Hr ($\mu\text{g}/\text{m}^3$)	Annual ($\mu\text{g}/\text{m}^3$)
6	0.14	180	0.13	0.06	0.01
7 & 8	633.5	299	570	253	51
Totals	633.6	N/A	570.1	253.1	51
	FDEP Standards ($\mu\text{g}/\text{m}^3$)		1,300	260	60

**GAINESVILLE REGIONAL UTILITIES
J.R. KELLY GENERATING STATION
ASSESSMENT OF AMBIENT SO₂ IMPACTS**

D. Conclusions

As summarized in the above, conservative modeling of Unit 6 SO₂ emissions using the SCREEN3 model demonstrates that maximum impacts will be insignificant. The SCREEN3 model assessment provides reasonable assurance that maximum ambient SO₂ impacts due to operation of the J.R. Kelly Generating Station Units 6, 7, and 8 will not exceed applicable FDEP ambient standards. As noted previously, the SCREEN3 model was formulated to provide conservative estimates of maximum impacts; i.e., to over-estimate actual maximum impacts.

11/10/97
14:54:46

*** SCREEN3 MODEL RUN ***
 *** VERSION DATED 96043 ***

GRU; KELLY PLANT, UNIT 6

SIMPLE TERRAIN INPUTS:

SOURCE TYPE = POINT
 EMISSION RATE (G/S) = .140000E-01
 STACK HEIGHT (M) = 36.6000
 STK INSIDE DIAM (M) = 1.8300
 STK EXIT VELOCITY (M/S) = 9.7000
 STK GAS EXIT TEMP (K) = 449.8000
 AMBIENT AIR TEMP (K) = 293.0000
 RECEPTOR HEIGHT (M) = .0000
 URBAN/RURAL OPTION = RURAL
 BUILDING HEIGHT (M) = 17.9800
 MIN HORIZ BLDG DIM (M) = 28.9000
 MAX HORIZ BLDG DIM (M) = 47.9000

THE REGULATORY (DEFAULT) MIXING HEIGHT OPTION WAS SELECTED.
 THE REGULATORY (DEFAULT) ANEMOMETER HEIGHT OF 10.0 METERS WAS ENTERED).

BUOY. FLUX = 27.761 M**4/S**3; MOM. FLUX = 51.314 M**4/S**2.

*** FULL METEOROLOGY ***

 *** SCREEN AUTOMATED DISTANCES ***

*** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***

DIST (M)	CONC (UG/M**3)	STAB	U10M (M/S)	USTK (M/S)	MIX HT (M)	PLUME HT (M)	SIGMA Y (M)	SIGMA Z (M)	DWASH
50.	.0000	1	1.0	1.1	320.0	273.22	22.39	18.62	NO
100.	.8994E-01	4	20.0	24.3	6400.0	36.87	8.29	15.72	HS
200.	.1165	4	15.0	18.2	4800.0	42.15	15.78	22.30	HS
300.	.8618E-01	4	15.0	18.2	4800.0	44.97	22.87	25.18	HS
400.	.7047E-01	4	15.0	18.2	4800.0	47.28	29.73	27.97	HS
500.	.6663E-01	4	15.0	18.2	4800.0	47.28	36.37	30.61	HS
600.	.6433E-01	3	8.0	9.1	2560.0	63.46	65.22	47.15	HS
700.	.8031E-01	1	1.0	1.1	320.0	273.22	166.64	223.78	NO
800.	.8388E-01	1	1.0	1.1	320.0	273.22	184.25	290.97	NO
900.	.7877E-01	1	1.0	1.1	320.0	273.22	201.84	369.37	NO
1000.	.7265E-01	1	1.0	1.1	320.0	273.22	219.38	458.86	NO
1100.	.6729E-01	1	1.0	1.1	320.0	273.22	236.85	559.40	NO
1200.	.6270E-01	1	1.0	1.1	320.0	273.22	254.22	671.00	NO
1300.	.5871E-01	1	1.0	1.1	320.0	273.22	271.49	793.72	NO
1400.	.5522E-01	1	1.0	1.1	320.0	273.22	288.66	927.61	NO
1500.	.5213E-01	1	1.0	1.1	320.0	273.22	305.72	1072.73	NO
1600.	.4939E-01	1	1.0	1.1	320.0	273.22	322.68	1229.17	NO
1700.	.4804E-01	2	1.0	1.1	320.0	273.22	256.45	206.99	NO
1800.	.4874E-01	2	1.0	1.1	320.0	273.22	268.91	218.99	NO
1900.	.4892E-01	2	1.0	1.1	320.0	273.22	281.32	231.13	NO
2000.	.4867E-01	2	1.0	1.1	320.0	273.22	293.69	243.40	NO
2100.	.4810E-01	2	1.0	1.1	320.0	273.22	306.00	255.77	NO
2200.	.4728E-01	2	1.0	1.1	320.0	273.22	318.27	268.25	NO
2300.	.4629E-01	2	1.0	1.1	320.0	273.22	330.50	280.83	NO
2400.	.4520E-01	2	1.0	1.1	320.0	273.22	342.67	293.49	NO

*** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***

DIST (M)	CONC (UG/M**3)	STAB	U10M (M/S)	USTK (M/S)	MIX HT (M)	PLUME HT (M)	SIGMA Y (M)	SIGMA Z (M)	DWASH
2500.	.4404E-01	2	1.0	1.1	320.0	273.22	354.80	306.23	NO
2600.	.4287E-01	2	1.0	1.1	320.0	273.22	366.88	319.05	NO
2700.	.4169E-01	2	1.0	1.1	320.0	273.22	378.92	331.95	NO
2800.	.4054E-01	2	1.0	1.1	320.0	273.22	390.91	344.91	NO
2900.	.3942E-01	2	1.0	1.1	320.0	273.22	402.86	357.94	NO
3000.	.3834E-01	2	1.0	1.1	320.0	273.22	414.76	371.02	NO
3500.	.3590E-01	3	1.0	1.1	320.0	264.19	327.09	202.99	NO
4000.	.3577E-01	3	1.0	1.1	320.0	264.19	367.27	226.80	NO
4500.	.3454E-01	3	1.0	1.1	320.0	264.19	407.03	250.57	NO
5000.	.3521E-01	5	1.0	1.6	10000.0	113.96	219.97	59.93	NO

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 50. M:

180.	.1397	6	4.0	8.2	10000.0	54.44	8.89	22.26	HS
------	-------	---	-----	-----	---------	-------	------	-------	----

DWASH= MEANS NO CALC MADE (CONC = 0.0)
 DWASH=NO MEANS NO BUILDING DOWNWASH USED
 DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED
 DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED
 DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3*LB

 *** REGULATORY (Default) ***
 PERFORMING CAVITY CALCULATIONS
 WITH ORIGINAL SCREEN CAVITY MODEL
 (BRODE, 1988)

*** CAVITY CALCULATION - 1 ***	*** CAVITY CALCULATION - 2 ***
CONC (UG/M**3) = .0000	CONC (UG/M**3) = .0000
CRIT WS @10M (M/S) = 99.99	CRIT WS @10M (M/S) = 99.99
CRIT WS @ HS (M/S) = 99.99	CRIT WS @ HS (M/S) = 99.99
DILUTION WS (M/S) = 99.99	DILUTION WS (M/S) = 99.99
CAVITY HT (M) = 21.54	CAVITY HT (M) = 18.88
CAVITY LENGTH (M) = 42.89	CAVITY LENGTH (M) = 36.08
ALONGWIND DIM (M) = 28.90	ALONGWIND DIM (M) = 47.90

CAVITY CONC NOT CALCULATED FOR CRIT WS > 20.0 M/S. CONC SET = 0.0

 END OF CAVITY CALCULATIONS

 *** SUMMARY OF SCREEN MODEL RESULTS ***

CALCULATION PROCEDURE	MAX CONC (UG/M**3)	DIST TO MAX (M)	TERRAIN HT (M)
SIMPLE TERRAIN	.1397	180.	0.

 ** REMEMBER TO INCLUDE BACKGROUND CONCENTRATIONS **



October 30, 1997

Mr. Scott Sheplak, P.E.
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road, MS 5505
Tallahassee, FL 32399-2400

RE: City of Gainesville/Gainesville Regional Utilities
J. R. Kelly Generating Station
Draft Title V Permit No. 0010005-001-AV
Modeling Results – Unit 7 and 8

Dear Mr. Sheplak:

During our October 9, 1997 telephone conversation regarding the draft Title V permit for the above-referenced facility, Gainesville Regional Utilities agreed to perform modeling to support a request to have Units 7 and 8 permitted at an SO2 emission rate of 2.75 lbs/MMBtu heat input (equivalent to the use of approximately 2.5 percent sulfur fuel oil), consistent with the Department's Rule 62-296.405(1)(c)1 j.

At that time the Department indicated that based upon favorable modeling results (i.e., no modeled exceedances of the SO2 ambient air quality standards) the fuel oil sulfur limit for Unit 7 could be adjusted to 2.5%. The Department's proposed limit of 1.5% was based on a BACT determination conducted in October 1991. While the Department agreed that Unit 8 is not subject to the BACT determination, it requested assurances that the operation of this unit and Unit 7 at an SO2 emission rate of 2.75 lb/MMBtu would not cause an exceedance of the SO2 ambient air quality standards ("AAQS").

The results of this modeling are reported in Attachment 1 and demonstrate that the maximum SO2 impacts due to the operations of these units will not exceed applicable AAQS. It should be noted that Unit 6 was not modeled on fuel oil because GRU is willing to restrict this unit to burning natural gas only.

GRU is requesting that the applicable draft Title V permit conditions be revised accordingly. Attachment 2 details GRU's suggested revisions and also includes comments on the Department's responses to GRU's initial comments on the draft permit.

Please call me at (352) 334-3400 Ext. 1284 if you have any questions.

Sincerely,

Yolanta E. Jonynas
Yolanta E. Jonynas

Sr. Environmental Engineer

Attachments

xc: D. Beck
R. Manasco
A. Morrison, HGSS
G. Swanson
CAA Title V

11/12/97 cc: *Scott Sheplak*
Cindy Phillips
Lernon Anderson

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AIR REGULATION

Gainesville Regional Utilities J.R. Kelly Generating Station Attachment I

A. Stack Parameters

Unit	Load (MW)	Temperature		Flow Rate		Velocity		Height		Diameter	
		(°F)	(K)	(acfm)	(acmmd)	(ft/sec)	(m/s)	(ft)	(m)	(ft)	(m)
6	19.0	350.0	449.8	54,000.0	1,529.1	31.8	9.7	120.00	36.6	6.00	1.83
7	20.6	356.0	453.2	92,356.2 ¹	2,615.2	17.8	5.4	N/A	N/A	N/A	N/A
8 ²	40.0	252.3	395.5	159,173.7	4,507.3	30.6	9.3	N/A	N/A	N/A	N/A
7 & 8 Common	N/A	290.4	416.7	251,529.9	7,122.5	48.4	14.8	200.0	61.0	10.50	3.20

¹ Based on 9,190 dscf/10⁶ Btu °F factor, 5.94 % O₂, 12.1% moisture, and 249 x 10⁶ Btu/hr heat input.

² Based on 1997 RATA, average data for RA-79 through RA-87.

B. Stack Flow Rate Adjusted for Load

Unit	Load Ratio	Temperature		Flow Rate		Velocity		Height		Diameter	
		(°F)	(K)	(acfm)	(acmmd)	(ft/sec)	(m/s)	(ft)	(m)	(ft)	(m)
6	1.000	350.0	449.8	54,000.0	1,529.1	31.8	9.7	120.00	36.6	6.00	1.83
7 ¹	1.000	356.0	453.2	92,356.2	2,615.2	17.8	5.4	N/A	N/A	N/A	N/A
8 ²	1.250	252.3	395.5	198,967.1	5,634.1	38.3	11.7	N/A	N/A	N/A	N/A
7 & 8 Common		285.2	413.8	291,323.3	8,249.4	56.1	17.1	200.0	61.0	10.50	3.20

¹ Load ratio based on derate to 249 MMBtu/hr (22.9 MW).

² Load ratio based on design rate of 50 MW divided by rate occurring during RATA testing.

**GAINESVILLE REGIONAL UTILITIES
J.R. KELLY GENERATING STATION
ASSESSMENT OF AMBIENT SO₂ IMPACTS**

An assessment of ambient SO₂ impacts due to the operation of Units 7 and 8 at the Gainesville Regional Utilities (GRU) J.R. Kelly Generating Station was conducted using EPA's SCREEN3 dispersion model. The SCREEN3 model implements the procedures contained in the EPA document "Screening Procedures for Estimating the Air Quality Impact of Stationary Sources". As stated in this document, the SCREEN3 modeling procedures incorporate a relatively large degree of conservatism to provide a reasonable assurance that maximum concentrations will not be underestimated. Specific data used in the SCREEN3 modeling analysis and model results are summarized in the following sections.

A. SO₂ Emission Rates and Stack Parameters

Modeled SO₂ emission rates were based on a maximum allowable rate of 2.75 pounds of SO₂ per million British thermal units (lb SO₂/MMBtu) and design heat input rates of 249.0 and 539.5 MMBtu/hr for Units 7 and 8, respectively. These SO₂ emission rates are equivalent to the use of approximately 2.5 weight percent sulfur fuel oil.

Units 7 and 8 exhaust through one, common stack having a height above ground of 61.0 meters (m) and an exit inside diameter of 3.20 m. Stack flow rate for Unit 7 was estimated based on stack test data obtained in 1980 and EPA Reference Method 19 "F" factor procedures. Stack flow rate for Unit 8 was obtained from recent (1997) Relative Test Accuracy Audit (RATA) data conducted in accordance with 40 CFR Part 75 procedures. Common stack exit velocity was estimated by summing the flow rates for Units 7 and 8 (adjusted for peak load) and using the common stack exit area. Common stack exit temperature was estimated by proportioning the measured exhaust temperatures for each unit by the exhaust flow rates for each unit. Details of the common stack parameter estimates are provided on Attachment I.

Building structures which could result in downwash (i.e., greater than 2.5 times the common stack height and within five times the lessor of the building structure's height or projected width) were assessed and appropriate building dimensions used in the modeling assessment.

**GAINESVILLE REGIONAL UTILITIES
J.R. KELLY GENERATING STATION
ASSESSMENT OF AMBIENT SO₂ IMPACTS**

Modeled SO₂ emission rates, common stack parameters, and building dimensions are summarized in the following table:

Parameter	Units	Value
SO ₂ Emission Rate	g/s	273.2
Stack Height	m	61.0
Stack Diameter	m	3.2
Stack Temperature	K	413.8
Stack Velocity	m/s	17.1
Building Dimensions:		
Height	m	34.1
Minimum Horizontal Dimension	m	14.2
Maximum Horizontal Dimension	m	26.2

B. SCREEN3 Model Options

The SCREEN3 modeling assessment utilized the regulatory defaults for mixing heights and anemometer height, full meteorology, and rural dispersion coefficients. Use of rural dispersion coefficients is consistent with the EPA recommended Auer classification method. The area within a 3-km radius of the J.R. Kelly Generating Station is predominately single family residential dwellings with undeveloped land (i.e., the Paynes Prairie area) beginning approximately 2.0 km to the south of the plant. Based on this land use, the area within a 3-km radius would be characterized as rural using the Auer classification method. SCREEN3 model output is provided as Attachment II.

**GAINESVILLE REGIONAL UTILITIES
J.R. KELLY GENERATING STATION
ASSESSMENT OF AMBIENT SO₂ IMPACTS**

C. SCREEN3 Model Results

The SCREEN3 dispersion model is a single-source model which yields maximum one-hour impacts. The maximum one-hour SO₂ impacts were converted to 3-, 24-hour, and annual averaging periods using the EPA recommended multipliers of 0.9, 0.4, and 0.08, respectively.

SCREEN3 SO₂ model results for the GRU J.R. Kelly Generating Station are summarized in the following table:

Maximum One Hour Impact (µg/m ³)	Downwind Distance (m)	Maximum SO ₂ Impacts		
		3-Hr (µg/m ³)	24-Hr (µg/m ³)	Annual (µg/m ³)
633.5	299	570	253	51
FDEP Standards (µg/m ³)		1,300	260	60

D. Conclusions

The SCREEN3 model assessment provides reasonable assurance that maximum ambient SO₂ impacts due to operation of the J.R. Kelly Generating Station will not exceed applicable FDEP ambient standards. As noted previously, the SCREEN3 model was formulated to provide conservative estimates of maximum impacts; i.e., to over-estimate actual maximum impacts.

**Gainesville Regional Utilities
J.R. Kelly Generating Station
Attachment I**

A. Stack Parameters

Unit	Load (MW)	Temperature		Flow Rate		Velocity		Height		Diameter	
		(°F)	(K)	(acfm)	(acmm)	(ft/sec)	(m/s)	(ft)	(m)	(ft)	(m)
7	20.6	356.0	453.2	92,356.2 ¹	2,615.2	17.8	5.4	N/A	N/A	N/A	N/A
8 ²	40.0	252.3	395.5	159,173.7	4,507.3	30.6	9.3	N/A	N/A	N/A	N/A
Common	N/A	290.4	416.7	251,529.9	7,122.5	48.4	14.8	200.0	61.0	10.50	3.20

¹ Based on 9,190 dscf/10⁶ Btu "F" factor, 5.94 % O₂ , 12.1% moisture, and 249 x 10⁶ Btu/hr heat input.

² Based on 1997 RATA, average data for RA-79 through RA-87.

B. Stack Flow Rate Adjusted for Load

Unit	Load Ratio	Temperature		Flow Rate		Velocity		Height		Diameter	
		(°F)	(K)	(acfm)	(acmm)	(ft/sec)	(m/s)	(ft)	(m)	(ft)	(m)
7 ¹	1.000	356.0	453.2	92,356.2	2,615.2	17.8	5.4	N/A	N/A	N/A	N/A
8 ²	1.250	252.3	395.5	198,967.1	5,634.1	38.3	11.7	N/A	N/A	N/A	N/A
Common		285.2	413.8	291,323.3	8,249.4	56.1	17.1	200.0	61.0	10.50	3.20

¹ Load ratio based on derate to 249 MMBtu/hr (22.9 MW).

² Load ratio based on design rate of 50 MW divided by rate occurring during RATA testing.

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*** SCREEN3 MODEL RUN ***
*** VERSION DATED 96043 ***

GRU KELLY PLANT; UNITS 7 & 8, SO2 IMPACTS

SIMPLE TERRAIN INPUTS:

SOURCE TYPE = POINT
EMISSION RATE (G/S) = 273.200
STACK HEIGHT (M) = 61.0000
STK INSIDE DIAM (M) = 3.2000
STK EXIT VELOCITY (M/S) = 17.1000
STK GAS EXIT TEMP (K) = 413.8000
AMBIENT AIR TEMP (K) = 293.0000
RECEPTOR HEIGHT (M) = .0000
URBAN/RURAL OPTION = RURAL
BUILDING HEIGHT (M) = 34.1000
MIN HORIZ BLDG DIM (M) = 14.2000
MAX HORIZ BLDG DIM (M) = 26.2000

THE REGULATORY (DEFAULT) MIXING HEIGHT OPTION WAS SELECTED.
THE REGULATORY (DEFAULT) ANEMOMETER HEIGHT OF 10.0 METERS WAS ENTERED.

BUOY. FLUX = 125.317 M**4/S**3; MOM. FLUX = 530.041 M**4/S**2.

*** FULL METEOROLOGY ***

*** SCREEN AUTOMATED DISTANCES ***

*** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***

DIST (M)	CONC (UG/M**3)	STAB	U10M (M/S)	USTK (M/S)	MIX HT (M)	PLUME HT (M)	SIGMA Y (M)	SIGMA Z (M)	DWASH
50.	.0000	1	1.0	1.1	681.0	679.95	30.91	28.30	NO
100.	295.8	4	20.0	26.2	6400.0	62.15	8.41	21.65	HS
200.	496.5	4	20.0	26.2	6400.0	66.01	15.85	28.43	HS
300.	631.5	4	20.0	26.2	6400.0	69.25	22.95	36.01	HS
400.	482.8	4	20.0	26.2	6400.0	72.14	29.83	38.01	HS
500.	393.6	4	20.0	26.2	6400.0	74.80	36.56	39.96	HS
600.	333.7	4	20.0	26.2	6400.0	77.29	43.17	41.86	HS
700.	344.0	1	3.0	3.4	960.0	267.32	161.26	219.81	NO
800.	471.3	1	1.5	1.7	480.0	473.63	206.85	305.78	NO
900.	543.6	1	1.5	1.7	480.0	473.63	223.76	381.79	NO
1000.	546.4	1	1.5	1.7	480.0	473.63	239.70	468.91	NO
1100.	520.4	1	1.5	1.7	480.0	473.63	255.78	567.67	NO
1200.	490.4	1	1.5	1.7	480.0	473.63	271.95	677.92	NO
1300.	462.9	1	1.5	1.7	480.0	473.63	288.16	799.57	NO
1400.	438.2	1	1.5	1.7	480.0	473.63	304.39	932.62	NO
1500.	416.0	1	1.5	1.7	480.0	473.63	320.61	1077.07	NO
1600.	396.0	1	1.5	1.7	480.0	473.63	336.83	1232.96	NO
1700.	377.8	1	1.5	1.7	480.0	473.63	353.01	1400.31	NO
1800.	361.3	1	1.5	1.7	480.0	473.63	369.16	1579.20	NO
1900.	346.3	1	1.0	1.1	681.0	679.95	407.19	1774.56	NO
2000.	333.9	1	1.0	1.1	681.0	679.95	422.42	1976.14	NO
2100.	322.2	1	1.0	1.1	681.0	679.95	437.65	2189.49	NO
2200.	311.4	1	1.0	1.1	681.0	679.95	452.90	2414.64	NO
2300.	301.3	1	1.0	1.1	681.0	679.95	468.13	2651.63	NO
2400.	291.8	1	1.0	1.1	681.0	679.95	483.36	2900.52	NO
2500.	283.2	2	1.5	1.7	480.0	473.63	367.71	321.10	NO
2600.	286.6	2	1.5	1.7	480.0	473.63	379.38	333.35	NO
2700.	288.4	2	1.5	1.7	480.0	473.63	391.03	345.71	NO
2800.	288.8	2	1.5	1.7	480.0	473.63	402.67	358.18	NO
2900.	288.1	2	1.5	1.7	480.0	473.63	414.28	370.74	NO

10/27/97
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*** SCREEN3 MODEL RUN ***
*** VERSION DATED 96043 ***

GRU KELLY PLANT; UNITS 7 & 8, SO2 IMPACTS

*** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***

DIST (M)	CONC (UG/M**3)	STAB	U10M (M/S)	USTK (M/S)	MIX HT (M)	PLUME HT (M)	SIGMA Y (M)	SIGMA Z (M)	DWASH
3000.	286.3	2	1.5	1.7	480.0	473.63	425.86	383.39	NO
3500.	268.4	2	1.5	1.7	480.0	473.63	483.42	447.83	NO
4000.	245.1	2	1.5	1.7	480.0	473.63	540.33	513.90	NO
4500.	223.2	2	1.5	1.7	480.0	473.63	596.59	581.27	NO
5000.	208.0	2	1.0	1.1	681.0	679.95	665.40	662.96	NO

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 50. M:
 299. 633.5 4 20.0 26.2 6400.0 69.25 22.95 36.01 HS

DWASH= MEANS NO CALC MADE (CONC = 0.0)
 DWASH=NO MEANS NO BUILDING DOWNWASH USED
 DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED
 DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED
 DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3*LB

 *** REGULATORY (Default) ***
 PERFORMING CAVITY CALCULATIONS
 WITH ORIGINAL SCREEN CAVITY MODEL
 (BRODE, 1988)

*** CAVITY CALCULATION - 1 ***	*** CAVITY CALCULATION - 2 ***
CONC (UG/M**3) = .2768E+05	CONC (UG/M**3) = .0000
CRIT WS @10M (M/S) = 10.26	CRIT WS @10M (M/S) = 99.99
CRIT WS @ HS (M/S) = 14.73	CRIT WS @ HS (M/S) = 99.99
DILUTION WS (M/S) = 7.36	DILUTION WS (M/S) = 99.99
CAVITY HT (M) = 65.85	CAVITY HT (M) = 54.20
CAVITY LENGTH (M) = 64.59	CAVITY LENGTH (M) = 26.91
ALONGWIND DIM (M) = 14.20	ALONGWIND DIM (M) = 26.20

CAVITY CONC NOT CALCULATED FOR CRIT WS > 20.0 M/S. CONC SET = 0.0

 END OF CAVITY CALCULATIONS

 *** SUMMARY OF SCREEN MODEL RESULTS ***

CALCULATION PROCEDURE	MAX CONC (UG/M**3)	DIST TO MAX (M)	TERRAIN HT (M)
SIMPLE TERRAIN	633.5	299.	0.
BLDG. CAVITY-1	.2768E+05	65.	-- (DIST = CAVITY LENGTH)
BLDG. CAVITY-2	.0000	27.	-- (DIST = CAVITY LENGTH)

 ** REMEMBER TO INCLUDE BACKGROUND CONCENTRATIONS **

ATTACHMENT 2

GRU's Proposed Revisions to Draft Title V Permit Conditions Based on Modeling Results and Comments to the Department's Response on GRU's Initial Comments

PAGE 2 – Subsection A. Facility Description

COMMENT NO. 1.: Revise the facility description in DEP's response to GRU's original Comment No. 5 as follows:

“This facility consists of 3 fossil fuel fired steam generators. The facility is fired with either natural gas or new No. 6 fuel oil which may be supplemented with on-specification used oil. Unit 6 is permitted to burn natural gas only.”

PAGES 5 through 8 – Section III, Subsection A

COMMENT NO. 2.: Revise the emission unit description in DEP's response to GRU's original Comment No. 9 as follows:

“ Fossil Fuel Fired Steam Generator Unit ~~1~~ 6. The emissions unit is fired on natural gas ~~or new No. 6 fuel oil which may be supplemented with on specification used oil. The~~ with a maximum heat input ~~for natural gas and new No. 6 fuel oil is~~ of 187.3 MMBtu per hour...”

COMMENT NO. 3.: Revise Specific Condition A.1. in DEP's response to GRU's original Comment No. 10 as follows:

“Permitted Capacity: The maximum operation heat input rate based on the higher heating value of the fuel is as follows:

...	187.3	Natural Gas
	187.3	new No. 6 Fuel Oil
		on-specification used oil”

COMMENT NO. 4.: Revise Specific Condition A.3. in DEP's response to GRU's original Comment No. 11 as follows:

“Methods of Operation. Fuels.

- a- Startup: The only fuels allowed to be burned ~~are~~ is natural gas ~~and/or new No. 6 fuel oil, which may be supplemented with on-specification used oil with a PCB concentration of less than 2 ppm.~~
- b. Normal. The only fuels allowed to be burned ~~are~~ is natural gas ~~and/or new No. 6 fuel oil, which may be supplemented with on-specification used oil with a PCB concentration of less than 50 ppm.”~~

COMMENT NO. 5.: Revise Specific Condition A.6. in DEP's response to GRU's original Comment No. 13 as follows:

“Particulate Matter: Particulate matter emissions shall be controlled by the firing of natural gas ~~and/or new No. 6 fuel oil or on specification used oil containing no more than 1.5% sulfur, by weight.~~”

COMMENT NO. 6.: Revise Specific Condition A.8 in DEP’s response to GRU’s original Comment No. 14 as follows:

“Sulfur Dioxide. Sulfur dioxide emissions shall be controlled by the firing of natural gas ~~and/or liquid fuels containing no more than 1.5% sulfur, by weight.~~ [Rule 62-296.406(3), F.A.C., ~~and, BACT dated October 9, 1991.~~]”

COMMENT NO. 7.: Delete Specific Conditions A.10. and A.11. in DEP’s response to GRU’s original Comment No. 16. These conditions deal with sulfur analysis for liquid fuel and would no longer be applicable based on the proposed changes contained herein.

COMMENT NO. 8.: Revise Specific Condition A.13. in DEP’s response to GRU’s original Comment No. 19 as follows:

“... ”

- a) only gaseous fuel(s) ~~or~~
- b) ~~only liquid fuel(s) for less than 400 hours per calendar year.~~”

PAGE 9 – Subsection B

COMMENT NO. 9.: Revise the emission unit descriptions in DEP’s response to GRU’s original Comment No. 21 as indicated below. Note that the description in this section does not indicate that on-specification used oil is burned in these units.

“...Fossil Fuel Fired Steam Generator Unit 8...However, equipment is installed to continuously monitor ~~visible emissions~~ opacity, carbon dioxide, sulfur dioxide and ~~flow rates~~ nitrous oxides.”

COMMENT NO. 10.: Revise the permitting notes in DEP’S response to GRU’S original Comment No. 22 as indicated below.

“{Permitting note(s): The emissions units are regulated under ...; ~~and Best Available Control Technology (BACT) Determination, dated October 9, 1991....~~”

COMMENT NO. 11.: Revise Condition B.1. in DEP’S response to GRU’S original Comment No. 23 as indicated below. GRU previously requested this clarification, but it appears to have been omitted.

“...The maximum operation heat input rate for Unit 8 will not be based on the continuous emission monitoring system.”

COMMENT NO. 12.: Confirm that old Conditions B.7 and B.8. (new Conditions B.6. and B.7.) are as indicated in their original form in the draft Title V permit.

COMMENT NO. 13.: Revise Condition B.8 in DEP'S response to GRU'S original Comment No. 29 as indicated below based on the recent modeling.

"Sulfur Dioxide. Sulfur dioxide emissions from each unit shall not exceed 2.75 pounds per million Btu heat input. ~~be controlled by the firing of natural gas and/or~~ The sulfur content of liquid fuels shall not exceed ~~containing no more than~~ 2.5 % sulfur, by weight. [BACT dated October 9, 1991]"

COMMENT NO. 14.: Revise Condition B.9. in DEP'S response to GRU'S original Comment No. 30 as indicated below. GRU is proposing to demonstrate compliance with the sulfur dioxide limit by ensuring that the sulfur content of delivered fuel does not exceed 2.5%. There is no basis for requiring additional testing on blended fuels. The proposed condition is contained in other Title V permits and should provide reasonable assurances of compliance with the sulfur dioxide limits. Alternatively, the SO₂ CEMs could be used for demonstrating compliance on Unit 8.

"Sulfur Dioxide....upon each fuel delivery ~~and upon any liquid fuels blended on site...~~ devices. Alternatively, the permittee may use a CEMs to demonstrate compliance."

COMMENT NO. 15.: Delete Condition B.14. in DEP'S response to GRU'S original Comment No. 35 and replace it with the following:

"Fuel sampling and percent sulfur analysis shall be conducted using either ASTM D2622-92, ASTM D4292-90, ASTM D1552-90, ASTM D4177-82 or both ASTM D4057-88 and ASTM D129-91 or the latest edition of the above ASTM."

[Rule 61-213.440, 62-296.405(1)(e)3, 62-296.405(1)(f)1.b. and 62-297.440, F.A.C.]

COMMENT NO. 16.: Revise Condition B.19 in DEP'S response to GRU'S original Comment No. 36 as indicated below to address co-firing of gaseous and liquid fuels and the limitation on hours of firing fuels contained in Rule 62-297.310(7)(a)(5).

"By this permit, ...

- a. ...
- b. only liquid fuels, other than during startup, for less no more than 400 hours per year, or
- c. gaseous fuels in combination with any amount of liquid fuels, other than during startup, for no more than 400 hours per year."

COMMENT NO. 17.: Revise Condition B.20. in DEP'S response to GRU'S original Comment No. 37 as indicated below for the reasons stated above.

"Annual and permit renewal...

- a. ...
- b. only liquid fuels, other than during startup, for less no more than 400 hours per year, or
- c. gaseous fuels in combination with any amount of liquid fuels, other than during startup, for no more than 400 hours per year."

COMMENT NO. 18.: Revise Condition B.21 (original Condition B.20) in DEP'S response to GRU'S original Comment No. 38 as indicated below. Based on the recent modeling both Unit 7 and 8 will be subject to the reporting provisions of Rule 62-296.405(1)(g) for SO₂ only.

~~“For Unit 8, sSubmit...”~~

COMMENT NO. 19.: Revise Condition C.11.e. in DEP’s response to GRU’s original Comment No. 40 as indicated below. There is no reason to sample every batch of used oil for every parameter. For example, if there are no halogenated substances managed at a facility generating used oil, it would be reasonable to assume that halogens would not be present in the used oil. Likewise, if used oil from a particular source had previously been characterized as on-specification (based on analyses) and the process had not changed, it would be reasonable to expect future batches of used oil to be of similar character.

“(3) Alternatively, the owner or operator may ~~obtain rely on other copies of~~ analyses or other information documenting to make a determination that the used oil fuel meets the specifications in 40 CFR 279.11.”

COMMENT NO. 20.: In Condition C.11.g. in DEP’S response to GRU’S original Comment No. 43 GRU again respectfully requests that the *quarterly* reporting requirement on the amount of on-specification used oil placed in inventory be deleted. Notwithstanding that there is no regulatory basis for this requirement, this reporting will be administratively burdensome and will not have any environmental benefit. *If the Department retains this requirement, the permit condition should clarify that if no used oil is placed in inventory then no report is required.* This would ease the reporting burden somewhat.

COMMENT NO. 21.: Revise Appendix E-1 in DEP’s response to GRU’s original Comment No. 49 as indicated below. The tank changes were inadvertently omitted in the original comments. As long as the potential for hazardous air pollutant emissions from the degreasing units is below the thresholds in Rule 62-213.430(6), the units should qualify as exempt units.

13. Degreasing units using heavier-than air vapors ~~exclusively, except any such unit using or emitting any substance classified as a hazardous air pollutant~~
18. Two 115,000 (nominal) gallon storage tanks for new No. 2 fuel oil or new No. 6 fuel oil/on-specification used oil
19. Two 54,00 (nominal) gallon storage tanks for new No. 6 fuel oil/on-specification used or new No. 2 fuel oil.”

COMMENT NO. 22.: Revise Table 1-1, Summary of Air Pollutant Standards and Terms to be consistent with the proposed SO₂ limit (2.75 lb/MMBtu or 2.5% sulfur, by weight) for Units 7 and 8 based on the recent modeling results.

COMMENT NO. 23.: Delete Table 2-1 for Unit 6. This table will no longer be applicable if Unit 6 does not burn fuel oil.

COMMENT NO. 24.: Revise Table 2-1 for Units 7 and 8 to include all the ASTM methods for fuel sampling an analyses referenced in Condition b.14.

COMMENT NO. 25.: Based on DEP's responses to GRU's original comments, GRU understands that the following items are still pending:

- a. The definition of "new" as it describes fuel oil (GRU original Comment No. 4).
- b. The limitation on the origin of on-specification used oil (GRU original Comment No. 39).
- c. The designation of conditions as "Not Federally Enforceable" (GRU original Comment No. 50).
- d. Submittal by GRU of the ductwork configuration of Units 7 and 8 to the common stack.



September 18, 1997

Mr. Scott M. Sheplak, P.E.
Bureau of Air Regulation
Florida Dept. of Environmental Protection
2600 Blair Stone Road, MS 5505
Tallahassee, FL 32399-2400

RE: City of Gainesville
Gainesville Regional Utilities
J. R. Kelly Generating Station
Draft Title V Permit No. 0010005-001-AV

Dear Mr. Sheplak:

Enclosed are the following documents:

- GRU's comments on the Draft Title V Permit No. 0010005-001-AV.
- Revised Facility Plot Plan dated 09/15/97 (Document II.E.2. of the Title V Permit Application).
- Revised Alternative Methods of Operation dated 09/16/97 (Document III.L.10 of the Title V Permit Application).
- Responsible Official Certification for amendments to the Title V permit application.

GRU is hereby requesting that the Department issue and incorporate into the Title V permit an order extending the expiration date(s) of the existing air operating permits until the Title V permit becomes effective. This will clarify that the facility will continue to comply with the terms and conditions of the existing permits until such time that the Title V permit becomes effective.

GRU would appreciate the Department forwarding to GRU any comments received from the public or other regulatory agencies pertaining to the draft permit.

Mr. Scott Sheplak
September 18, 1997
Page 2

I will be vacation from September 19 – 30, 1997. In my absence, please call Angela Morrison at (904) 222-7500 if you have any questions.

Sincerely,



Yolanta E. Jonynas
Sr. Environmental Engineer

xc: D. Beck
R. Manasco
A. Morrison, HGSS
G. Swanson
CAA Title V


sheplakTV

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SEP 19 1997

BUREAU OF
AIR REGULATION

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: Name: Michael L. Kurtz Title: General Manager	
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: City of Gainesville, GRU Street Address: 605 SE 3rd Street City: Gainesville State: FL Zip Code: 32601	
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (352) 334 - 2811 Fax: (352) 334 - 2277	
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative* of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i>  _____ Signature 9/18/97 _____ Date	

* Attach letter of authorization if not currently on file.

**J. R. KELLY GENERATING STATION
ALTERNATIVE METHODS OF OPERATION**

Unit No. 6 – Fossil Fuel Steam Generator

Method No.	Fuel Type	Fuel Sulfur Content (Wt %)	Heat Input Range (MMBtu/hr)	Maximum Operating House		
				(Hrs/Dy)	(Dys/Wk)	(Hrs/Yr)
1	Natural Gas	N/A	0 – 187.3	24	7	8,760
2	No. 6 Fuel Oil/Used Oil	≤ 1.5	0 – 187.3	24	7	8,760
3	Co-firing Natural Gas/No. 6 Fuel Oil/Used Oil	≤ 1.5	0 – 187.3	24	7	8,760

Unit No. 7 – Fossil Fuel Steam Generator

Method No.	Fuel Type	Fuel Sulfur Content (Wt %)	Heat Input Range (MMBtu/hr)	Maximum Operating House		
				(Hrs/Dy)	(Dys/Wk)	(Hrs/Yr)
1	Natural Gas	N/A	0 – 272.0	24	7	8,760
2	No. 6 Fuel Oil/Used Oil	≤ 1.5	0 – 249.0	24	7	8,760
3	Co-firing Natural Gas/No. 6 Fuel Oil/Used Oil	≤ 1.5	0 – 272.0	24	7	8,760

**J. R. KELLY GENERATING STATION
ALTERNATIVE METHODS OF OPERATION
(continued)**

Unit No. 8 - Fossil Fuel Steam Generator

Method No.	Fuel Type	Fuel Sulfur Content (Wt %)	Heat Input Range (MMBtu/hr)	Maximum Operating House		
				(Hrs/Dy)	(Dys/Wk)	(Hrs/Yr)
1	Natural Gas	N/A	0 - 584.5	24	7	8,760
2	No. 6 Fuel Oil/Used Oil	¹	0 - 539.5	24	7	8,760
3	Co-firing Natural Gas/No. 6 Fuel Oil/Used Oil	¹	0 - 584.5	24	7	8,760

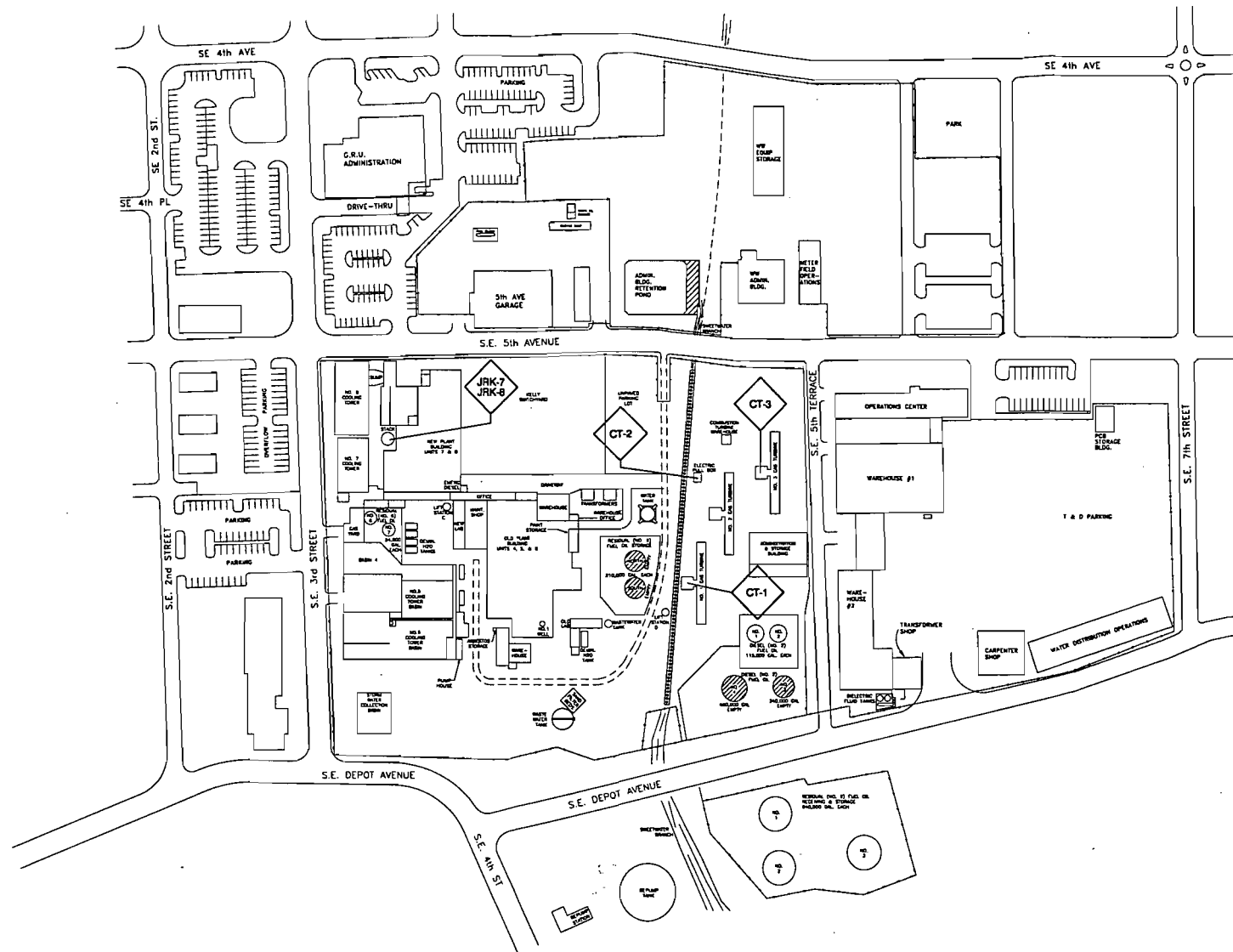
¹ - Fuel oil sulfur content equivalent to 2.75 lb SO₂/MMBtu heat input.

Combustion Turbines No. 1, 2, and 3

Method No.	Fuel Type	Fuel Sulfur Content (Wt %)	Heat Input Range (MMBtu/hr)	Maximum Operating House		
				(Hrs/Dy)	(Dys/Wk)	(Hrs/Yr)
1	Natural Gas	N/A	0 - 200.0	24	7	8,760
2	No. 2 Fuel Oil		0 - 207.0	24	7	8,760



GRAPHIC SCALE
 0 50 100 200
 SCALE IN FEET



LEGEND

 EMISSION POINT
 NUMBER AND LOCATION

(Portions based on original drawings by J.M.Reid)

DOCUMENT II.E.2.
 FACILITY PLOT PLAN

\\JRKELLY\TITLE-V.DWG

REVISION	DATE
DELETE UNIT 6 STACK	9/15/97



J. R. KELLY GENERATING STATION
COMMENTS ON DRAFT TITLE V PERMIT NO. 001005-001-AV

PAGE 1

COMMENT NO. 1: The following referenced attachment should be deleted: "FIGURE 1 - SUMMARY REPORT - GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE REPORT (version dated 7/96)."

RATIONALE: This form is prescribed per 40 CFR 60 for excess emission reporting by units subject to the New Source Performance Standards (NSPS). None of the units at this facility are NSPS units and since the use of this form is not prescribed by Department rules for non-NSPS units, its use should be left to the discretion of the permittee.

COMMENT NO. 2: The attachment referencing the alternate sampling procedure should be revised as follows:

"Alternate Sampling Procedure: ASP Number 97-B-01 (including the Order Correcting the Scrivener's Error dated July 9, 1997)"

RATIONALE: To clarify that the Order Correcting the Scrivener's Order is made part of the permit.

COMMENT NO. 3: GRU is requesting that the Department issue an order extending the expiration date(s) of its existing valid permit(s) until the effective date of its Title V permit. This order should be included as a referenced attachment in the Title V permit.

RATIONALE: To clarify that the facility may continue to operate under the terms and conditions of the existing permit(s) until the effective date of the Title V permit.

PAGE 2

COMMENT NO. 4 (General): Replace "new No. 6 fuel oil" with "No. 6 fuel oil" at each occurrence **throughout the draft permit.**

RATIONALE: The term "new No. 6 fuel oil" is undefined and is not consistent with long-standing terminology used by the petroleum industry to describe fuel oils. Description of an oil by its ASTM specification number (e.g., No. 6) connotes virgin fuel oil and therefore, it is unnecessary and potentially confusing to further describe such oils as "new."

Page 2 - SUBSECTION A. FACILITY DESCRIPTION

COMMENT NO. 5: The facility description should be revised to read as follows:

~~“...The facility is fired with either natural gas or new No. 6 fuel oil with natural gas being the primary fuel and new NO. 6 fuel oil as backup fuel. Two of three steam generators are allowed to burn which may be supplemented with on-specification used oil.~~

RATIONALE: GRU does not distinguish between primary and backup or standby fuels because the use of a particular fuel at any time is dependent on economics and availability. While in recent years these factors have favored natural gas, fuel oil is not considered to be solely a “backup” or “standby” fuel.

Additionally, GRU requested as an alternate method of operation (see Document III.L.10 of the Title V application dated June 1996) the option of burning on-specification used oil in Unit 6, consistent with the Department’s historical policy on the use of used oil in fossil fuel steam generators. GRU requests that the Department give this option favorable consideration.

PAGES 3 and 4 - SECTION II. FACILITY-WIDE CONDITIONS

COMMENT NO. 6: With respect to **Condition No. 7**, GRU requests that the Department add a permitting note stating that the Department has not ordered any control devices or systems under Rule 62-296.320(1)(a), F.A.C.

RATIONALE: Clarification.

COMMENT NO. 7: GRU requests that **Condition No. 8** be revised as follows:

~~“8. When appropriate, any recording, monitoring, or reporting requirements that are time specific shall be in accordance with The effective date of the permit which defines day one shall be considered as the beginning date for time-specific recording, monitoring or reporting requirements except those based on calendar quarters.”~~

RATIONALE: Clarification. The use of the term “day one” is confusing and ambiguous.

COMMENT NO. 8: GRU requests that the Department add the following to the facility-wide conditions:

~~“9. Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24-hour period unless specifically authorized by the Department. [Rule 62-210.700(1)]”~~

“10. Any combustion turbine that does not operate more than 400 hours per year shall conduct a visible emission compliance test once per each five-year period, coinciding with the term of its operation permit. [Rule 62-297.310(7)(a)8]”

RATIONALE: To specifically address requirements that are applicable to the combustion turbines which are unregulated units.

PAGE 5 - SECTION III, Subsection A

COMMENT NO. 9: The **emission unit description** should be revised as follows:

“Fossil Fuel Fired Steam Generator Unit # 6...The emissions unit is fired on natural gas with a maximum heat input of 187.3 MMBTU/hr. or new No. 6 fuel oil ...187.3 MMBTU/hr. The No. 6 fuel oil may be supplemented with on-specification used oil. Fossil ...1989.”

RATIONALE: See Comment No. 4 and 5.

COMMENT NO. 10: GRU requests the following revisions to **Specific Condition A.1.:**

- Under fuel type change “new No. 6 Fuel Oil” to “No. 6 fuel oil/On-specification used oil”
- Specify that heat input capacity is based on the Higher Heating Value (“HHV”) of the fuel
- Indicate that these conditions are “Not Federally Enforceable.”

RATIONALE: Clarification; no federally enforceable basis for capacity limitations for this unit under the Clean Air Act.

COMMENT NO. 11: Revise **Specific Condition A.3.** as follows:

“a. Startup: The only fuels allowed to be burned are natural gas and/or new No. 6 fuel oil which may be supplemented with on-specification used oil except as otherwise indicated in Condition B.24.d.”

“b. Normal: The only fuels allowed to be burned are natural gas and/or new No. 6 fuel oil which may be supplemented with on-specification used oil.”

~~Natural gas shall not be cofired with No. 6 fuel oil.~~

RATIONALE: During certain operating conditions (e.g., startup, shutdown, fuel switching) it may be necessary to co-fire fuels. Co-firing is an essential aspect of the operation and has been inherent in the existing permits. Furthermore, co-firing does not affect the applicable emission limits. Therefore, there is no regulatory basis or rationale to eliminate this flexibility. GRU is submitting under cover of this letter a revised table (Doc. III.L.10 of the Title V Permit Application) specifically including co-firing as an alternative method of operation for Unit 6. This item was inadvertently omitted from the original application. With respect to firing of used oil during startup see Comment No. 38 regarding GRU’s used oil management practices.

COMMENT NO. 12: In **Specific Condition A.5.** delete the reference to the current permit AO01-195854.

RATIONALE: The current permit will be superceded by the Title V permit and reference to it may generate confusion.

COMMENT NO. 13: Revise **Specific Condition A.7.** as follows:

“**A.7. Particulate Matter.** Particulate matter emissions shall be controlled by the firing of natural gas ~~and/or low sulfur content~~ liquid fuel containing no more than 1.5% sulfur, by weight.”

RATIONALE: The term “low sulfur content” is undefined.

COMMENT NO. 14: Revise **Specific Condition A.9.** as follows:

“**A.9. Sulfur Dioxide.** Sulfur dioxide emissions shall be controlled by the firing of natural gas ~~and/or low sulfur content~~ liquid fuels containing no more than 1.5% sulfur, by weight.”

RATIONALE: The term “low sulfur content” is undefined.

COMMENT NO. 15: Revise **Specific Condition A.10.** as follows:

“**A10.** ...See Speeifie Common Condition C.5.”

RATIONALE: Correct citation.

COMMENT NO. 16: Revise **Specific Condition A.11.** as follows:

“**A.11. Sulfur Dioxide-Sulfur Content.** ...by the vendor or owner providing a fuel analysis upon each No. 6 fuel oil delivery.”

RATIONALE: The permittee should have the option of providing a fuel analysis, if desired.

COMMENT NO. 17: Add the following method to **Specific Condition A.12.:**

“ASTM D1552-90”

RATIONALE: This method (Standard Test Method for Sulfur in Petroleum Products (High Temperature Method)) is also allowed by 40 CFR 75, Appendix D for determining sulfur content in petroleum products.

COMMENT NO. 18: In **Specific Condition A.13.** delete the last paragraph as follows:

“**A.13...**~~Exceptions to these requirements are as follows:~~”

~~The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.”~~

RATIONALE: This language addresses requirements pertinent to Department employees or their agents and are not applicable to GRU. Therefore, it should not be included in the Title V permit.

COMMENT NO. 19: Replace **Specific Condition A.14.** with the following language:

“**A.14.** By this permit, annual emissions compliance testing for visible emissions is not required if the unit does not burn liquid fuel, other than startup, for more than 400 hours per calendar year.”

RATIONALE: The requested language incorporates regulatory language. GRU requests that the “calendar” year be used in lieu of the “fiscal” year cited in the rule because most recordkeeping and reporting requirements are based on the calendar year and this will minimize confusion.

COMMENT NO. 20: Delete **Specific Condition A.17.**

RATIONALE: This condition is redundant and already included in Canned Condition No. 18(2)(a)(3)(b)(ii).

PAGE 9 - SUBSECTION B.

COMMENT NO. 21: Revise the **emission unit descriptions** as follows:

“Fossil Fuel Fired Steam Generator Unit 7...The emissions unit...272 MMBTU/hr.—~~The standby fuel is new~~ or No. 6 fuel oil ... 249 MMBTU/hr.”

“Fossil Fuel Fired Steam Generator Unit 8...The emissions unit...584.5 MMBTU/hr.—~~The standby fuel is new~~ or No. 6 fuel oil...539.5 MMBTU/hr.”

“~~The new~~ No.6...common stack.”

RATIONALE: See Comment No. 4 and 5.

COMMENT NO. 22: The **permitting notes** on Page 9 for Units 7 and 8 should be revised as follows:

“[Permitting note(s): Unit 7 is regulated under Rule 62-296.406, F.A.C., Fossil Fuel Steam Generators with Less Than 250 Million Btu per Hour Heat Input and Best Available Control”

Technology (BACT) Determination, dated October 9, 1991.; Unit 8 is regulated under Rule 62-296.405, Fossil Fuel Steam Generators with More Than 250 Million Btu per hour Heat Input.; 40 CFR 279; Fossil Fuel Fired...

RATIONALE: Unit 7 was de-rated in 1983 (to less than 250 MMBTU/hr) and has been subject to Rule 62-296.406. Unit 8, on the other hand is regulated under Rule 62-296.405. The *units* are not regulated under 40 CFR 279 (Standards for Managing Used Oil) and therefore, this rule reference is not appropriate and should be deleted.

COMMENT NO. 23: Revise **Specific Condition B.1.** follows:

- Delete the word “new” in front of “No. 6 fuel oil.”
- Insert a semi-colon after “No. 6 fuel oil; (Unit 8)
- Specify that the heat input rate is based on the Higher Heating Value (“HHV”) of the fuel
- Clarify that the heat input rate for Unit 8 will *not* be based on the Continuous Emission Monitoring System
- Indicate that these conditions are “Not Federally Enforceable”

RATIONALE: Clarification; typographical correction; no federally enforceable basis for capacity limitations for these units.

COMMENT NO. 24: Revise **Specific Condition B.2.** as follows:

“**B.2.** ... See Specific Common Condition C.6.”

RATIONALE: Correct citation.

COMMENT NO. 25: Revise **Specific Condition B.3.** as follows:

“a. Startup: The only fuels allowed to be burned are natural gas and/or new No. 6 fuel oil which may be supplemented with on-specification used oil except as otherwise indicated in Condition B.24.d.”

“b. Normal: The only fuels allowed to be burned are natural gas and/or new No. 6 fuel oil which may be supplemented with on-specification used oil.”

~~Natural gas shall not be cofired with new No. 6 fuel oil or on-specification used oil.~~

RATIONALE: During certain operating conditions (e.g., startup, shutdown, fuel switching) it may be necessary to co-fire fuels. Co-firing is an essential aspect of the operation and has been inherent in the existing permits. Furthermore, co-firing and does not affect the applicable emission limits. Therefore, there is no regulatory basis or rationale to eliminate this flexibility. With respect to firing of used oil during startup see Comment No. 38 regarding GRU’s used oil management practices.

COMMENT NO. 26: Add the following to **Specific Condition B.6.:**

“B.6. ... shall be minimized. For Unit 8, visible emissions above 60% opacity shall be allowed for not more than four, six (6)-minute periods, during the three-hour period of excess emissions allowed by this condition for boiler cleaning and load change.”

RATIONALE: Condition applies to units, such as Unit 8, which are equipped with a Continuous Opacity Monitor.

COMMENT NO. 27: Revise **Specific Condition B.7.** as follows:

“B.7. Particulate Matter. Particulate matter emissions from Unit 7 shall be controlled by the firing of natural gas and/or liquid fuels containing no more than 1.5% sulfur, by weight. Particulate matter emissions from each unit Unit 8 shall not exceed 0.1 pound per million Btu heat input, as measured by applicable compliance methods. [Rules 62-296.405(1)(b) and 296.406(2), F.A.C. and BACT determination dated October 9, 1991]

RATIONALE: The term “low sulfur content” is undefined. In 1983 Unit 7 was de-rated (to less than 250 MMBTU/hr on fuel oil) and is regulated under Rule 62-296.406, F.A.C. Subsequent to the de-rating, GRU accepted a BACT fuel oil sulfur content limit of 1.5%, by weight.

COMMENT NO. 28 Revise **Specific Condition B.8.** as follows:

“B.8. Particulate Matter...Particulate matter emission from Unit 8 shall not...”

RATIONALE: This condition should apply to Unit 8 only since it has a numerical emission limitation whereas Unit 7 does not.

COMMENT NO. 29: Revise **Specific Condition B.9.** as follows:

“B.9. Sulfur Dioxide. Sulfur dioxide emissions from Unit 7 shall be controlled by firing of natural gas or ~~low-sulfur content~~ liquid fuel with a sulfur content no greater than 1.5%, by weight. Sulfur dioxide emissions from Unit 8 shall not exceed 2.75 lb/MMBTU. The sulfur content of liquid fuel fired in Unit 8 shall not exceed 2.5%, by weight. ~~The new No. 6 fuel oil sulfur content shall not exceed 1.5 percent, by weight.~~ [Rules 62-296.405(1)(c) and 296.406(3), F.A.C. and BACT Determination dated October 9, 1991]

RATIONALE: Condition B.9 of the draft permit states that the sulfur content of the No.6 fuel oil may not exceed 1.5% by weight, citing a BACT Determination dated October 9, 1991. While this is acceptable for Unit 7, GRU requests that this condition be revised for Unit 8 to be consistent with the Department’s Rule 62-296.405(1)(c)1.j., F.A.C.

GRU agrees with the Department's determination that Unit 8 is regulated under Rule 62-296.405, which applies to fossil fuel steam generator with a heat input greater than 250 MMBTU/hr. This unit has a heat input capacity greater than 250 MMBTU/hr, and therefore should be regulated under Rule 62-296.405. The BACT determination cited by the Department, however, does *not* apply. That determination was made for Unit 6, which has a maximum heat input rate of less than 250 MMBTU/hr, and which is therefore regulated under Rule 62-296.406, F.A.C. (requiring A BACT determination for sulfur dioxide and particulate matter). While a BACT determination was never made by the Department specifically for Unit 7, GRU has previously accepted a fuel oil sulfur content limit of 1.5% by weight and will again accept this limit for Unit 7 in its Title V permit. GRU has never requested and does not wish to accept a sulfur content limit of 1.5% for Unit 8.

While the "RATIONALE" included in the BACT determination for Unit 6 mentions that the applicant proposed to use fuel oil with a sulfur content no greater than 1.5% by weight in not only Unit 6 but in Units 7 and 8 as well, GRU never proposed a similar limit for Unit 8 and the Department has no authority to establish such a limit. Further, the 1991 BACT determination, appropriately, has never before been applied by the Department to Unit 8. The air operating permits issued by the Department in the past for Unit 8 have always included the appropriate limitation under Rule 62-297.405 of 2.75 lb/MMBTU and have never included a 1.5% sulfur content limit or a citation to the 1991 BACT determination for Unit 6.

GRU therefore requests that the Department clarify that the 1.5% sulfur content applies only to Unit 7. The appropriate sulfur dioxide emissions limit for Unit 8 is 2.75 lb/MMBTU consistent with Rule 62-296.405. GRU would agree to a 2.5% sulfur content limit on fuel oil to ensure compliance with this emissions limit.

COMMENT NO. 30: Revise **Specific Condition B.10.** as follows:

"B.10. Sulfur Dioxide. The permittee ~~elected to~~ may demonstrate compliance using fuel sampling and analysis with the liquid fuel sulfur limit by the vendor or owner providing a fuel analysis upon each fuel delivery. This protocol is allowed because the emissions units ~~does do~~ not have..."

RATIONALE: The permittee should be allowed the discretion to demonstrate compliance via compliance testing or fuel sampling and analysis.

COMMENT NO. 31: Revise **Specific Condition B.11.** as follows:

"B.11. Units 7 and 8...Due to the common stack, ~~one unit-Unit 8~~ Unit 8 must be shut down while the ~~other unit Unit 7~~ Unit 7 is being tested."

RATIONALE: The compliance testing facilities for Unit 8 are located in the ductwork prior to the common stack. Hence, Unit 8 can be tested while Unit 7 is on-line.

COMMENT NO. 32: Revise **Specific Condition B.12.** as follows:

“B.12. Visible emissions. The test method for visible emissions shall be EPA Method 9 or DEP Method 9... ~~A transmissometer may be used and calibrated according to Rule 62-297.520, F.A.C. in lieu of visible emissions testing.~~”

RATIONALE: The visible emission testing requirement applies to Unit 7 and 8. These units are regulated under different sections of Rule 62-296. Although Rule 62-296.405(1)(e) specifies DEP Method 9 for units regulated under Rule 62-296.405, Rule 62-297.401(9) allows both methods for visible emission determinations. Because visible emissions testing is required for both units and to avoid confusion regarding the application of different methods to different units, GRU requests that both methods be considered acceptable for either unit.

COMMENT NO. 33: Revise **Specific Condition B.13.** as follows:

“B.13. ...~~The owner or operator may use EPA Method 5 to demonstrate compliance... EPA Method 3...~~”

(Note: This sentence starts on line 5)

RATIONALE: This sentence requested to be deleted is redundant and potentially ambiguous (i.e., EPA Methods 17, 5B and 5F may also be used to demonstrate compliance as stated earlier in this same condition).

COMMENT NO. 34: Revise **Specific Condition B.14.** as indicated below and delete the reference to permits AO01-224271 and AO01-224218.

“B.14. Sulfur Dioxide. The test methods...Fuel sampling and analysis may be used as an alternate sampling procedure pursuant to Specific Conditions B.10 and B.15 ~~if such a procedure is incorporated into the operation permit for the emissions unit. If the unit obtains an alternate sampling procedure under the provisions of Rule 62-297.620, F.A.C., the procedure shall become a condition of the emission unit’s permit. The Department..., the permittee elected may elect to demonstrate...”~~ [...~~AO01-224217 and AO01-224218~~]

RATIONALE: The requested revision will remove any uncertainty regarding the use of fuel sampling and analysis as an acceptable SO2 compliance method. The deletion of the reference to the current permits is requested to avoid confusion after the Title V permit is issued.

COMMENT NO. 35: Revise **Specific Condition B.15.** as follows:

“**B.15.** For each emissions unit, the following fuel sampling and analysis ~~shall~~ may be used as an alternate sampling procedure authorized by this permit to demonstrate compliance with the sulfur dioxide standard for fuel oil.”

- a. Determine and record the ~~as-fired~~ sulfur content, percent by weight, for liquid fuels using either ASTM D2622-92, ASTM D4294-90, ASTM D1552-90, or both ASTM D4057-88 and ASTM D129-91 or the latest edition of the above ASTM methods ~~to analyze a representative sample of the blended fuel following each fuel delivery.~~
- b. Record daily the amount of each liquid fuel fired, ~~the density of each fuel, and the percent sulfur content by weight of each fuel oil fired.~~
- c. ~~Utilize the information in a. and b. above, to ensure compliance at all times.”~~

RATIONALE: The fuel sampling and analysis protocol should apply solely to *liquid* fuel because 1) only the liquid fuel fired in these units is subject to sulfur content limits and 2) the sulfur content (as well as density) of natural gas is irrelevant for compliance purposes. Further, rather than require fuel sampling and analysis on an “as-fired” basis or require an analysis of a representative sample of blended fuel following fuel oil deliveries, GRU requests that vendor or owner data be allowed to be used to demonstrate compliance with the sulfur content limits. The burden and expense of as-fired fuel sampling and analysis and of sampling and analyzing the bulk tanks following each fuel delivery are not justified.

COMMENT NO. 36: Replace **Specific Condition B.20.** with the following:

“**B.20.** By this permit, annual emissions compliance testing for visible emissions is not required for Units 7 and 8 if these emissions units individually do not burn liquid fuel, other than during startup, for more than 400 hours per calendar year.”

RATIONALE: The revision incorporates regulatory language. GRU requests that the “calendar” year be used in lieu of the “fiscal” year because most recordkeeping and reporting requirements are based on the calendar year and this will minimize confusion.

COMMENT NO. 37: Replace **Specific Condition B. 21** with the following:

“**B.21.** Annual and permit renewal compliance testing for particulate emissions matter is not required for Unit 7 and 8, if during any calendar year, these units individually do not burn liquid fuel(s) for more than 400 hours per calendar year.”

RATIONALE: See Comment No. 33.

COMMENT NO. 38: Revise **Specific Condition B.22** as follows:

“**B.22** For Unit 8, submit to the Department a written report of SO2 emissions in ... “

RATIONALE: The quarterly excess emission reporting provisions of Rule 62-296.405(1)(g) apply only to Unit 8 and only for SO2 because:

- Unit 8 is not required to install a Continuous Opacity Monitor pursuant to Rule 62-296.405(f)(1)(a),
- Unit 8 may monitor the sulfur content of the liquid fuels pursuant to Rule 62-296.405(1)(f)(b), and
- Unit 7 is regulated under Rule 62-296.406.

COMMENT NO. 39: Revise **Specific Condition B.24.b.** as follows:

“**b.** Quantity Limitation. These emission units are permitted to burn “on-specification” used oil ~~that is generated by the J.R.Kelly Generating Station in the production and distribution of electricity,~~ not to exceed ~~10,000~~ 1.5 million gallons per year.

RATIONALE: There is no regulatory basis for restricting the source or quantity of on-specification used oil burned in these emission units. Furthermore, it has been demonstrated that by restricting the quantities of on-specification used oil burned to 1.5 million gallons per year, there should be no concern about the PSD applicability threshold levels for lead.

COMMENT NO. 40: Revise **Specific Condition B.24.e.** as follows:

“**e.** Testing Requirements: The owner or operator...to be burned in these emission units...

(1) ...

(2) ...Physical/Chemical Methods).

Alternatively, the owner or operator may rely on generator knowledge or on previous analysis of similar oils from similar sources to characterize the oil as on-specification.”

RATIONALE: There is no regulatory basis for requiring expensive testing of each batch of used oil to determine whether it is on-specification used oil. The permittee should have the option of relying on generator knowledge or previous analysis to characterize the oil, consistent with 40 CFR 279.72(a).

COMMENT NO. 41: Revise **Specific Condition B.24.f.** as follows:

“**f.** Record Keeping Requirements: The owner or operator...

(1) The gallons of on-specification used oil ~~generated and burned~~ placed in inventory each month. ~~(This record shall be completed no later than the fifteenth day of the succeeding month.)~~

(2) The total gallons of on-specification used oil placed in inventory during the calendar year burned in the preceding consecutive 12-month period. (~~This record shall be completed no later than the fifteenth day of the succeeding month.~~)

(3) Results of the analyses required above.”

RATIONALE: Not all of the used oil generated by facilities covered under the Title V permit is burned at the J. R. Kelly Generating Station. For example, used oil generated by the fleet maintenance facility is sent off-site to a recycler. On the other hand, non-PCB mineral oil from the transformer shop and used lubricating oils from the power plant are blended with No. 6 fuel oil in the bulk tanks (i.e., the used oil is “placed in inventory”) prior to being burned. Therefore, GRU requests that the record keeping and reporting requirements be limited to the on-specification used oil that is “placed in inventory.” It should be noted, furthermore, the once the used oil has been shown to meet the specifications in 40 CFR 279.11, it is no longer regulated as used oil.

COMMENT NO. 42: Correct the rule references in **Specific Condition B.24.f**.

“**B.24.** ... [40 CFR.279.6172, 40 CFR 279.74 and 761.20(e)]

RATIONALE: This condition pertains to record keeping requirements associated with the use of on-specification used oil. 40 CFR 279.61 deals with restrictions on burning *off*-specification used oil not with record keeping. The correct rule references should be 40 CFR 279.72 and 40 CFR 279.74.

COMMENT NO. 43: Revise **Specific Condition B.24.g**. as follows:

“g. Reporting Requirements: ~~The owner or operator shall submit to the Northeast District Office and the Northeast District Branch Office, within thirty days of the end of each calendar quarter, the analytical results and the total amount of on-specification used oil generated and burned during the quarter.~~

The owner or operator shall submit, with the Annual Operation Report form, the analytical results and the total amount of on-specification used oil ~~burned~~ placed in inventory during the previous calendar year.”

RATIONALE: There is no regulatory basis for requiring quarterly reporting for compliance with an annual limit. Annual reporting, as currently required by the operating permits, should be sufficient to demonstrate compliance with an annual limit.

Page 18 - Subsection C. Common Conditions.

COMMENT NO. 44: In **Specific Condition C.7.(a)3**. delete the following starting on the 5th line:

“3. The owner...this provision. ~~In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C.,~~ The Department shall not...renewal.”

RATIONALE: Deletion of this wording will make this requirement consistent with Alternate Sampling Procedure ASP Number 97-B-01 including the Order Correcting the Scrivener’s Error dated July 9, 1997.

Page 22 - Section IV. Acid Rain Part

COMMENT NO. 45: Include the 60-day time limit for submitting compliance certifications contained in **Specific Condition A.4.** in Appendix TV-1, Title V Condition No. 51 (Statement of Compliance).

RATIONALE: To clarify the timeframe in Condition No. 51.

COMMENT NO. 46: Delete **Specific Condition A.5.**

RATIONALE: It does not appear to serve any purpose.

Appendix E-1 - Brief Description of Exempt Emission Units and/or Activities Appendix U-1, List of Unregulated Emissions Units and/or Activities

COMMENT NO. 47: Include in **Appendix E-1** the following language from Rule 62-213.430(6)(a):

“Emissions units or activities which are added to a Title V source after issuance of this permit shall be incorporated into the permit at its next renewal, provided such emissions units or activities have been exempted from the requirement to obtain an air construction permit and also qualify for exemption from permitting pursuant to Rule 62-213, F.A.C. [Rule 62-213.430(6)(a)]”

RATIONALE: To clarify that exempt emissions units or activities may be added any time during the term of the permit and identified in the permit upon permit renewal provided they meet the criteria set forth in the referenced rule.

COMMENT NO. 48: In **Appendix E-1** revise **item 7** as follows:

“7. One or more heating units and general purpose internal combustion engines located within a single facility provided:

a. None of the ~~emergency generators~~ heating units and general purpose internal combustion turbines is subject...

b. Total consumption by all such ~~emergency generators~~ heating units and general purpose internal combustion engines within...”

RATIONALE: Correction of typographical error.

COMMENT NO. 49: Transfer the following emissions units and activities from Appendix U-1 to this Appendix:

- Parts cleaning and degreasing stations ~~utilizing no HAPS~~
- Three 840,000 (nominal) gallon storage tanks for ~~new~~ No.6 fuel oil/on-specification used oil or ~~new~~ No. 2 fuel oil
- One 480,000 (nominal) gallon storage tank for ~~new~~ No.6 fuel oil/on-specification used oil or ~~new~~ No. 2 fuel oil
- One 240,000 (nominal) gallon storage tank for ~~new~~ No.6 fuel oil/on-specification used oil or ~~new~~ No. 2 fuel oil
- Two 210,000 (nominal) gallon storage tanks for ~~new~~ No.6 fuel oil/on-specification used oil or ~~new~~ No. 2 fuel oil
- Two 115,000 (nominal) gallon storage tanks for ~~new~~ No.2 fuel oil
- Two 54,000 (nominal) gallon storage tanks for ~~new~~ No.6 fuel oil/on-specification used oil
- Turbine vapor extractor
- Sand blasting and abrasive grit blasting using temporary enclosures
- Vehicle refueling operations
- Freshwater cooling towers
- Storage tanks less than 550 gallons
- Underground gasoline and diesel storage tanks greater than or equal to 550 gallons

RATIONALE: Professional judgment indicates that these emissions units and activities will meet the criteria specified by Rule 62-213.430(6)(b).

APPENDIX TV-1, TITLE V CONDITIONS (version dated 8/11/97)

COMMENT NO. 50: Designate the following TV-1 conditions as “not federally enforceable.”

TV-1 CONDITION	RULE TITLE	F.A.C. RULE NO.
1.	General Prohibition	62-4.030
3.	Standards for Issuing & Denying Permits	62-4.070(7)
4.	Modification of Permit Conditions	62-4.080
10.	Definition of “Immediately”	No regulatory basis for the definition.
12. (2), (4), (5), (6), (9), (11)	Permit Conditions	62-4.160
13.	Construction Permits	62-4.210
14.	Operation Permit for New Sources	62-4.220
17.	Asbestos	62-257
18. (intro), (1)	Permits Required	62-210.300
19.	Notification of Startup	62-210.300(5)
20.	Emission Unit Reclassification	62-210.300(6)
23.	Reports	62-210.370

RATIONALE: The rules underlying these conditions are not contained in Florida’s SIP and have no federally enforceable basis under the Clean Air Act.

COMMENT NO. 51: GRU understands that the Department is currently conducting additional research on these conditions/rules and the question of federal enforceability. GRU requests that any changes resulting from the Department’s research and future negotiations with FCG be reflected accordingly in the Title V permit.

Table 1-1, Summary of Air Pollutant Standards and Terms

COMMENT NO. 52: For **all units** change the “Hours/Year” for pollutants “**VE**” and “**PM** ” from “7665” to “8760.”

RATIONALE: The units are permitted to operate up to 8760 hours per year on natural gas or liquid fuel.

COMMENT NO. 53: For **all units**, delete the columns titled “Equivalent Emissions*” and the related footnote.

RATIONALE: This information has no practical value and could cause confusion.

COMMENT NO. 54: For Unit 8 revise the table as detailed below.

- change the SO2 Standards in the Allowable Emissions column as follows:
“~~1.5 % by weight~~” 2.75 lb/MMBTU or 2.5% sulfur, by weight
- change the Regulatory Citation as follows:
~~BACT determination dated 10/09/91~~ 62-296.405(1)(c), F.A.C.

RATIONALE: See Comment No. 29 pertaining to Specific Condition b.9.

Table 2-1, Summary of Compliance Requirements

COMMENT NO. 55: For all units, delete the column titled “Frequency Base Date*” and the related footnote.

RATIONALE: Frequency Base Date is not defined and it is not clear what use it serves.

COMMENT NO. 56: For all units, it is unclear whether the information in the “CMS” column is intended to indicate that a CMS is required or simply if a CMS has been installed on the unit.

RATIONALE: Unit 8 is equipped with a CMS that is required by 40 CFR 75 but not by Rule 62-296.405. Does Table 2-1 accurately reflect the Department’s intended purpose?

Tvpermit

Scott

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THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

SEP 04 1997

BUREAU OF
AIR REGULATION

In the Matter of an
Application for Permit by:

OGC No. _____

City of Gainesville, Gainesville
Regional Utilities
P.O. Box 147117 (A134)
Gainesville, FL 32614-7717

DRAFT Permit No.: 0010005-001-AV
J.R. Kelly Generating Station
Alachua County

REQUEST FOR EXTENSION OF TIME

By and through undersigned counsel, City of Gainesville, Gainesville Regional Utilities (GRU) hereby requests, pursuant to Florida Administrative Code Rules 28-106.111(3) and 62-103.050(1), an extension of time to and including October 10, 1997, in which to file a Petition for Administrative Proceedings in the above-styled matter. As good cause for granting this request, GRU states the following:

1. On or about August 27, 1997, GRU received from the Department of Environmental Protection (Department) an "Intent to Issue Title V Air Operation Permit" (Permit No. 0010005-001-AV) for the J.R. Kelly Generating Station in Alachua County, Florida. Along with the Intent to Issue, GRU received a draft Title V permit and "Public Notice of Intent to Issue Title V Air Operation Permit."
2. Based on GRU's preliminary review, the draft permit and associated documents contain several provisions that warrant clarification or correction.
3. GRU is in the process of developing a letter to the Department describing these issues and suggesting changes to the draft permit.
4. Representatives of GRU intend to discuss this matter with staff of the

Department's Bureau of Air Regulation in the near future in an effort to resolve all issues.


5. This request is filed simply as a protective measure to avoid waiver of GRU's right to challenge certain conditions contained in the draft Title V permit. Grant of this request will not prejudice either party, but will further their mutual interest and likely avoid the need to file a petition and proceed to a formal administrative hearing.

6. Scott Sheplak with the Department's Bureau of Air Regulation agreed to a 30-day extension on behalf of the Department. Counsel for GRU has attempted without success to contact W. Douglas Beason with the Department's Office of General Counsel regarding this request.

WHEREFORE, GRU respectfully requests that the time for filing of a Petition for Administrative Proceedings in regard to the Department's Intent to Issue Title V Air Operation Permit for Permit No. 0010005-001-AV be formally extended to and including October 10, 1997.

Respectfully submitted this 3rd day of September, 1997.

HOPPING GREEN SAMS & SMITH, P.A.


Angela R. Morrison, Fla. Bar No. 0855766
123 South Calhoun Street
Post Office Box 6526
Tallahassee, FL 32314
(904) 222-7500

Attorney for CITY OF GAINESVILLE,
GAINESVILLE REGIONAL UTILITIES

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following
by U.S. Mail on this 3rd day of September, 1997:

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

W. Douglas Beason
Office of General Counsel
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2600

A handwritten signature in cursive script, reading "Angela R. Morris", is written over a horizontal line.

98129

Date: 8/29/97 12:12:17 PM
From: Elizabeth Walker TAL
Subject: New posting
To: See Below

There are two new postings available on the Florida Website.

JOHN R KELLY

POWER PLANT 0010005001AV Draft

GANNON 0570040002AV Draft

The notification letters are encoded and attached. If you have any questions, please let me know.

Elizabeth



April 16, 2001

Mr. Scott Sheplak, Administrator
Title V Section
Florida Dept. of Environmental Protection
2600 Blair Stone Road, MS 5505
Tallahassee, FL 32399-2400

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APR 19 2001

BUREAU OF AIR REGULATION

RE: Gainesville Regional Utilities
J.R. Kelly Generating Station (Facility ID 0010005)
Change in Responsible Official

Dear Mr. Sheplak:

Notice is hereby provided that effective immediately I am the responsible official (RO) for the above-referenced facilities pursuant to Rule 62-210.200(247). Mr. Darrell DuBose will return to the office on April 24, 2001 and shall resume his responsibilities as RO at that time.

Please call me at (352) 334-3400 Ext. 1006 if you have any questions.

Sincerely,

Michael L. Kurtz
General Manager

xc: D. Beck
R. Casserleigh
R. Embry
Y. Jonynas
C. Kirts, FDEP – Jax.
R. Klemans
M. Kurtz
L. Lalwani
S. Manasco
K. Pierce, EPA – Region 4
E. Regan
G. Swanson
D. Thompson
CAA - DR
CAA – Title V JRK

JRKROdesignation401.y39

File/Barbara



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

October 19, 2000

Ms. Yolanta E. Jonynas
Sr. Environmental Engineer
Gainesville Regional Utilities
P.O. Box 147117
Station A136
Gainesville, Florida 32614-7117

Re: Acid Rain Phase II Permit Application – J. R. Kelly Repowered Unit “CC1”
Facility ID: 0010005; ORIS Code: 664

Dear Ms. Jonynas:

Thank you for your earlier submission of the revised Acid Rain Phase II Permit Application for the subject facility unit (with prior designation “JRK8”) on February 2, 1999. After an initial review, we requested that you provide us a copy of the U.S. EPA approved Certificate of Representation for the appropriate Designated Representative. This document was promptly received on March 4, 1999 via fax transmission. All was in order at that point, and your application was deemed complete. Please accept this letter as official documentation of that action by the Department.

If you have any questions, please contact Tom Cascio at 850/921-9526.

Sincerely,

Scott M. Sheplak, P.E.
Administrator
Title V Section

cc: Jenny Jachim, U.S. EPA Region 4



November 12, 1997

Via Fax & Mail

Mr. Scott Sheplak, P.E.
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road, MS 5505
Tallahassee, FL 32399-2400

RE: City of Gainesville/Gainesville Regional Utilities
J. R. Kelly Generating Station
Draft Title V Permit No. 0010005-001-AV
Modeling Results - Unit 6

Dear Mr. Sheplak:

Pursuant to the Department's request, enclosed is the assessment of ambient SO2 impacts for the J. R. Kelly Generating Station Unit 6 while combusting natural gas. The assessment demonstrates that the combined impacts of Unit 6 burning natural gas and Units 7 and 8 burning 2.5% sulfur fuel oil will not cause an exceedance of the ambient air quality standards for SO2.

Please call me at (352) 334-3400 Ext. 1284 if you have any questions.

Sincerely,

Yolanta E. Jonynas
Sr. Environmental Engineer

Attachments

xc: L. Anderson, FDEP
D. Beck
R. Manasco
A. Morrison, HGSS
G. Swanson
CAA Title V

November12jrktv

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NOV 14 1997

BUREAU OF
AIR REGULATION

**GAINESVILLE REGIONAL UTILITIES
J.R. KELLY GENERATING STATION
ASSESSMENT OF AMBIENT SO₂ IMPACTS**

An assessment of ambient SO₂ impacts due to the operation of Units 7 and 8 at the Gainesville Regional Utilities (GRU) J.R. Kelly Generating Station was previously conducted using EPA's SCREEN3 dispersion model and submitted to FDEP. At the request of FDEP, additional SCREEN3 modeling was conducted to assess the impact of Unit 6 at the J.R. Kelly Generating Station. Specific data used in the SCREEN3 modeling analysis and model results are summarized in the following sections.

A. SO₂ Emission Rates and Stack Parameters

Modeled SO₂ emission rate was based on Unit 6 being fired with natural gas. Maximum SO₂ emission rate was calculated using the AP-42 emission factor of 0.6 lb/MMft³ (equivalent to 0.0006 lb SO₂/MMBtu using a natural gas heat content of 1,000 Btu/ft³) and maximum heat input rate of 187 MMBtu/hr.

Stack parameters for Unit 6 were based on historical conditions since the physical stack for Unit 6 was recently demolished. A summary of Unit 6 stack parameters is included on revised Attachment I. Building structures which could result in downwash (i.e., greater than 2.5 times the common stack height and within five times the lessor of the building structure's height or projected width) were assessed and appropriate building dimensions used in the modeling assessment.

Modeled SO₂ emission rates, common stack parameters, and building dimensions are summarized in the following table:

Parameter	Units	Value
SO ₂ Emission Rate	g/s	0.014
Stack Height	m	36.6
Stack Diameter	m	1.8
Stack Temperature	K	449.8
Stack Velocity	m/s	9.7
Building Dimensions:		
Height	m	18.0
Minimum Horizontal Dimension	m	28.9
Maximum Horizontal Dimension	m	47.9

**GAINESVILLE REGIONAL UTILITIES
J.R. KELLY GENERATING STATION
ASSESSMENT OF AMBIENT SO₂ IMPACTS**

B. SCREEN3 Model Options

The SCREEN3 modeling assessment utilized the regulatory defaults for mixing heights and anemometer height, full meteorology, and rural dispersion coefficients. Use of rural dispersion coefficients is consistent with the EPA recommended Auer classification method. The area within a 3-km radius of the J.R. Kelly Generating Station is predominately single family residential dwellings with undeveloped land (i.e., the Paynes Prairie area) beginning approximately 2.0 km to the south of the plant. Based on this land use, the area within a 3-km radius would be characterized as rural using the Auer classification method. SCREEN3 model output is provided as Attachment II.

C. SCREEN3 Model Results

The SCREEN3 dispersion model is a single-source model which yields maximum one-hour impacts. The maximum one-hour SO₂ impacts were converted to 3-, 24-hour, and annual averaging periods using the EPA recommended multipliers of 0.9, 0.4, and 0.08, respectively.

SCREEN3 SO₂ model results for the GRU J.R. Kelly Generating Station are summarized in the following table:

Unit	Maximum One Hour Impact ($\mu\text{g}/\text{m}^3$)	Downwind Distance (m)	Maximum SO ₂ Impacts		
			3-Hr ($\mu\text{g}/\text{m}^3$)	24-Hr ($\mu\text{g}/\text{m}^3$)	Annual ($\mu\text{g}/\text{m}^3$)
6	0.14	180	0.13	0.06	0.01
7 & 8	633.5	299	570	253	51
Totals	633.6	N/A	570.1	253.1	51
	FDEP Standards ($\mu\text{g}/\text{m}^3$)		1,300	260	60

**GAINESVILLE REGIONAL UTILITIES
J.R. KELLY GENERATING STATION
ASSESSMENT OF AMBIENT SO₂ IMPACTS**

D. Conclusions

As summarized in the above, conservative modeling of Unit 6 SO₂ emissions using the SCREEN3 model demonstrates that maximum impacts will be insignificant. The SCREEN3 model assessment provides reasonable assurance that maximum ambient SO₂ impacts due to operation of the J.R. Kelly Generating Station Units 6, 7, and 8 will not exceed applicable FDEP ambient standards. As noted previously, the SCREEN3 model was formulated to provide conservative estimates of maximum impacts; i.e., to over-estimate actual maximum impacts.

11/10/97
14:54:46

*** SCREEN3 MODEL RUN ***
*** VERSION DATED 96043 ***

GRU; KELLY PLANT, UNIT 6

SIMPLE TERRAIN INPUTS:

SOURCE TYPE = POINT
EMISSION RATE (G/S) = .140000E-01
STACK HEIGHT (M) = 36.6000
STK INSIDE DIAM (M) = 1.8300
STK EXIT VELOCITY (M/S) = 9.7000
STK GAS EXIT TEMP (K) = 449.8000
AMBIENT AIR TEMP (K) = 293.0000
RECEPTOR HEIGHT (M) = .0000
URBAN/RURAL OPTION = RURAL
BUILDING HEIGHT (M) = 17.9800
MIN HORIZ BLDG DIM (M) = 28.9000
MAX HORIZ BLDG DIM (M) = 47.9000

THE REGULATORY (DEFAULT) MIXING HEIGHT OPTION WAS SELECTED.
THE REGULATORY (DEFAULT) ANEMOMETER HEIGHT OF 10.0 METERS WAS ENTERED).

BUOY. FLUX = 27.761 M**4/S**3; MOM. FLUX = 51.314 M**4/S**2.

*** FULL METEOROLOGY ***

*** SCREEN AUTOMATED DISTANCES ***

*** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***

DIST (M)	CONC (UG/M**3)	STAB	U10M (M/S)	USTK (M/S)	MIX HT (M)	PLUME HT (M)	SIGMA Y (M)	SIGMA Z (M)	DWASH
50.	.0000	1	1.0	1.1	320.0	273.22	22.39	18.62	NO
100.	.8994E-01	4	20.0	24.3	6400.0	36.87	8.29	15.72	HS
200.	.1165	4	15.0	18.2	4800.0	42.15	15.78	22.30	HS
300.	.8618E-01	4	15.0	18.2	4800.0	44.97	22.87	25.18	HS
400.	.7047E-01	4	15.0	18.2	4800.0	47.28	29.73	27.97	HS
500.	.6663E-01	4	15.0	18.2	4800.0	47.28	36.37	30.61	HS
600.	.6433E-01	3	8.0	9.1	2560.0	63.46	65.22	47.15	HS
700.	.8031E-01	1	1.0	1.1	320.0	273.22	166.64	223.78	NO
800.	.8388E-01	1	1.0	1.1	320.0	273.22	184.25	290.97	NO
900.	.7877E-01	1	1.0	1.1	320.0	273.22	201.84	369.37	NO
1000.	.7265E-01	1	1.0	1.1	320.0	273.22	219.38	458.86	NO
1100.	.6729E-01	1	1.0	1.1	320.0	273.22	236.85	559.40	NO
1200.	.6270E-01	1	1.0	1.1	320.0	273.22	254.22	671.00	NO
1300.	.5871E-01	1	1.0	1.1	320.0	273.22	271.49	793.72	NO
1400.	.5522E-01	1	1.0	1.1	320.0	273.22	288.66	927.61	NO
1500.	.5213E-01	1	1.0	1.1	320.0	273.22	305.72	1072.73	NO
1600.	.4939E-01	1	1.0	1.1	320.0	273.22	322.68	1229.17	NO
1700.	.4804E-01	2	1.0	1.1	320.0	273.22	256.45	206.99	NO
1800.	.4874E-01	2	1.0	1.1	320.0	273.22	268.91	218.99	NO
1900.	.4892E-01	2	1.0	1.1	320.0	273.22	281.32	231.13	NO
2000.	.4867E-01	2	1.0	1.1	320.0	273.22	293.69	243.40	NO
2100.	.4810E-01	2	1.0	1.1	320.0	273.22	306.00	255.77	NO
2200.	.4728E-01	2	1.0	1.1	320.0	273.22	318.27	268.25	NO
2300.	.4629E-01	2	1.0	1.1	320.0	273.22	330.50	280.83	NO
2400.	.4520E-01	2	1.0	1.1	320.0	273.22	342.67	293.49	NO

*** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***

DIST (M)	CONC (UG/M**3)	STAB	U10M (M/S)	USTK (M/S)	MIX HT (M)	PLUME HT (M)	SIGMA Y (M)	SIGMA Z (M)	DWASH
2500.	.4404E-01	2	1.0	1.1	320.0	273.22	354.80	306.23	NO
2600.	.4287E-01	2	1.0	1.1	320.0	273.22	366.88	319.05	NO
2700.	.4169E-01	2	1.0	1.1	320.0	273.22	378.92	331.95	NO
2800.	.4054E-01	2	1.0	1.1	320.0	273.22	390.91	344.91	NO
2900.	.3942E-01	2	1.0	1.1	320.0	273.22	402.86	357.94	NO
3000.	.3834E-01	2	1.0	1.1	320.0	273.22	414.76	371.02	NO
3500.	.3590E-01	3	1.0	1.1	320.0	264.19	327.09	202.99	NO
4000.	.3577E-01	3	1.0	1.1	320.0	264.19	367.27	226.80	NO
4500.	.3454E-01	3	1.0	1.1	320.0	264.19	407.03	250.57	NO
5000.	.3521E-01	5	1.0	1.6	10000.0	113.96	219.97	59.93	NO

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 50. M:
 180. .1397 6 4.0 8.2 10000.0 54.44 8.89 22.26 HS

DWASH= MEANS NO CALC MADE (CONC = 0.0)
 DWASH=NO MEANS NO BUILDING DOWNWASH USED
 DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED
 DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED
 DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3*LB

 *** REGULATORY (Default) ***
 PERFORMING CAVITY CALCULATIONS
 WITH ORIGINAL SCREEN CAVITY MODEL
 (BRODE, 1988)

*** CAVITY CALCULATION - 1 ***	*** CAVITY CALCULATION - 2 ***
CONC (UG/M**3) = .0000	CONC (UG/M**3) = .0000
CRIT WS @10M (M/S) = 99.99	CRIT WS @10M (M/S) = 99.99
CRIT WS @ HS (M/S) = 99.99	CRIT WS @ HS (M/S) = 99.99
DILUTION WS (M/S) = 99.99	DILUTION WS (M/S) = 99.99
CAVITY HT (M) = 21.54	CAVITY HT (M) = 18.88
CAVITY LENGTH (M) = 42.89	CAVITY LENGTH (M) = 36.08
ALONGWIND DIM (M) = 28.90	ALONGWIND DIM (M) = 47.90

CAVITY CONC NOT CALCULATED FOR CRIT WS > 20.0 M/S. CONC SET = 0.0

 END OF CAVITY CALCULATIONS

 *** SUMMARY OF SCREEN MODEL RESULTS ***

CALCULATION PROCEDURE	MAX CONC (UG/M**3)	DIST TO MAX (M)	TERRAIN HT (M)
SIMPLE TERRAIN	.1397	180.	0.

 ** REMEMBER TO INCLUDE BACKGROUND CONCENTRATIONS **

**Gainesville Regional Utilities
J.R. Kelly Generating Station
Attachment I**

A. Stack Parameters

Unit	Load (MW)	Temperature		Flow Rate		Velocity		Height		Diameter	
		(°F)	(K)	(acfm)	(acmm)	(ft/sec)	(m/s)	(ft)	(m)	(ft)	(m)
6	19.0	350.0	449.8	54,000.0	1,529.1	31.8	9.7	120.00	36.6	6.00	1.83
7	20.6	356.0	453.2	92,356.2 ¹	2,615.2	17.8	5.4	N/A	N/A	N/A	N/A
8 ²	40.0	252.3	395.5	159,173.7	4,507.3	30.6	9.3	N/A	N/A	N/A	N/A
7 & 8 Common	N/A	290.4	416.7	251,529.9	7,122.5	48.4	14.8	200.0	61.0	10.50	3.20

¹ Based on 9,190 dscf/10⁶ Btu °F factor, 5.94 % O₂, 12.1% moisture, and 249 x 10⁶ Btu/hr heat input.

² Based on 1997 RATA, average data for RA-79 through RA-87.

B. Stack Flow Rate Adjusted for Load

Unit	Load Ratio	Temperature		Flow Rate		Velocity		Height		Diameter	
		(°F)	(K)	(acfm)	(acmm)	(ft/sec)	(m/s)	(ft)	(m)	(ft)	(m)
6	1.000	350.0	449.8	54,000.0	1,529.1	31.8	9.7	120.00	36.6	6.00	1.83
7 ¹	1.000	356.0	453.2	92,356.2	2,615.2	17.8	5.4	N/A	N/A	N/A	N/A
8 ²	1.250	252.3	395.5	198,967.1	5,634.1	38.3	11.7	N/A	N/A	N/A	N/A
7 & 8 Common		285.2	413.8	291,323.3	8,249.4	56.1	17.1	200.0	61.0	10.50	3.20

¹ Load ratio based on derate to 249 MMBtu/hr (22.9 MW).

² Load ratio based on design rate of 50 MW divided by rate occurring during RATA testing.

Appendix H-1, Permit History/ID Number Changes

Gainesville Regional Utilities
J.R. Kelly

[DRAFT/PROPOSED/FINAL]Permit No.: 0010005-001-AV
Facility ID No.: 0010005

Permit History (for tracking purposes):

E.U.

<u>ID No</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date</u>	<u>Revised Date(s)</u>
-001	#1 Combustion Turbine	AO01-241346	12/14/93	03/01/99		12/29/93
-002	#2 Combustion Turbine	AO01-241346	12/14/93	03/01/99		12/29/93
-003	#3 Combustion Turbine	AO01-241346	12/14/93	03/01/99		12/29/93
-006	#6 Steam Generator	AO01-195854	07/19/91	07/18/96		
-007	#7 Unit, FFSG	AO01-224217	04/30/93	04/01/98		10/06/93 12/14/93 12/29/93
-008	#8 Unit	AO01-224218	04/30/93	06/01/98		12/14/93 12/29/93

(if applicable) ID Number Changes (for tracking purposes):

From: **Facility ID No.:** 31JAX010005

To: **Facility ID No.:** 0010005

Notes:

- 1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.
- 2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.
{Rule 62-213.420(1)(b)2., F.A.C., effective 03/20/96, allows Title V Sources to operate

Memorandum

Florida Department of *File*
Environmental Protection

TO: Chris Kirts, NED
FROM: Bruce Mitchell *BMM*
DATE: May 6, 1997
SUBJECT: Completeness Review of an Application Package for a Title V Operation Permit
Gainesville Regional Utilities, J.R. Kelly: 0010005-001-AV

Enclosed is an application package for a Title V operation permit that is being processed in Tallahassee. Please review the package for completeness and respond in writing by June 6, 1997, if you have any comments. Otherwise, no response is required.

It is very important to verify the compliance statement regarding the facility, since we do not have a readily effective means of determining compliance at the time the application was submitted. Please advise if you know of any emissions unit(s) that were not in compliance at that time and provide supporting information. You should have a copy on file of the original initial Title V permit application submittal. Also, please do not write on these documents.

If there are any questions, please call the project engineer, Lennon Anderson, at 904/488-1344 or SC: 278-1344.

RBM/bjb

Enclosure

cc: Bob Leech

5/6/97 *Lennon Anderson*
Reading File



Florida Department of Environmental Protection

Lawton Chiles
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7577

Virginia B. Wetherell
Secretary

CERTIFIED - RETURN RECEIPT

December 29, 1993

Mr. Larry McDaniel
Power Plant Manager
Gainesville Regional Utilities
Post Office Box 147117, Station JK33
Gainesville, Florida 32614-7117

Dear Mr. McDaniel:

Alachua County - AP
Gainesville Regional Utilities
Nos. 1,2,3 JRK Combustion Turbines
ID#31JAX01000501,02,03
A001-241346
Permit Revision

The permit revision request of 12-17-93 concerning visible emission test requirements is hereby approved.

Specific Condition 6, NOTE(1), has been revised to clarify that a visible emission test is required only when liquid and/or solid fuel is burned for a total of 400 hours or more per combustion turbine.

Attached is a revised page 6 of 6 of the referenced permit. Please replace page 6 of 6 (issued 12-14-93) with this attachment.

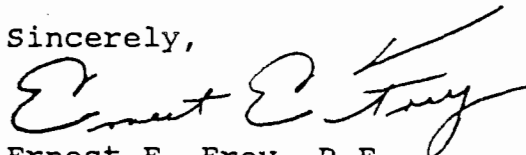
This letter and attachment shall become a part of the referenced permit.

Any party to this Order (permit modification) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by filing a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; 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 days from the date this Notice is filed with the Clerk of the Department.

Gainesville Regional Utilities
Page Two

If you have any questions concerning this matter, please contact
Rita Felton at (904) 448-4310, Ext. 370.

Sincerely,



Ernest E. Frey, P.E.
Director of District Management

^{RCF}
EEF:RJL:RF:bt

cc: Yolanta Jonynas, Sr., Electric Utility Environmental Engineer
Douglas Beck, P.E.
Alachua County Office Environmental Protection

PERMITTEE:
Gainesville Regional Utilities
Post Office Box 147117
Gainesville, Florida 32614-7117

I.D. Number: 31JAX01000501,02,03
Permit/Cert Number: A001-241346
Date of Issue:
Expiration Date: March 1, 1999
Revised: 12-29-93

SPECIFIC CONDITIONS:

6. Test the emission for the following pollutant(s) at the interval(s) indicated, notify the Department 15 days prior to testing [FAC Rule 17-297.340(1)(i)], and submit the test report documentation to the Department within 45 days after completion of the testing [FAC Rule 17-297.570(2)]:

POLLUTANT	INTERVAL	TEST METHOD
VISIBLE EMISSIONS NOTE(1)	Annually from 01-15-93	EPA 9

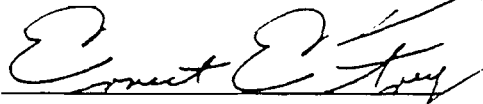
NOTE(1) Test is not required when liquid and/or solid fuel is burned for a total of no more than 400 hours for each combustion turbine.

Tests and test reports shall comply with the requirements of FAC Rules 17-297.330 and 17-297.570, respectively.

7. In each test report, submit the maximum input/production rate at which this source was operated since the most recent test.
8. Submit an annual operation report for this source on the form supplied by the Department for each calendar year on or before March 1.
9. Any revision(s) to a permit (and application) must be submitted and approved prior to implementing.
10. The completed Application For Renewal of Permit To Operate Air Pollution Source(s) form with the compliance report is due 90 days prior to 03-01-99.

Executed in Jacksonville, Florida

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION



Ernest E. Frey, P.E.
Director of District Management



Florida Department of Environmental Protection

Lawton Chiles
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7577

Virginia B. Wetherell
Secretary

NOTICE OF PERMIT ISSUANCE

CERTIFIED - RETURN RECEIPT

Mr. Larry McDaniel
Power Plant Manager
Gainesville Regional Utilities
Post Office Box 147117, Station JK 33
Gainesville, Florida 32614-7117

Dear Mr. McDaniel:

Alachua County - AP
Gainesville Regional Utilities
Nos. 1,2,3 JRK CTs

Enclosed is **Permit Number A001-241346** to operate the subject air pollution source, pursuant to Section 403.087, Florida Statutes (FS).

A person whose substantial interests are affected by this permit may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. 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, within 14 days of receipt of this Permit. 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, Florida Statutes.

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

Administration 448-4300
Air 448-4310
Waste Management 448-4390



Water Facilities 448-4330
Water Management 448-4340
FAX 448-4366

PERMITTEE:
Gainesville Regional Utilities
Page Two
A001-241346

(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.

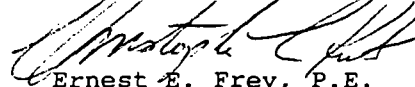
If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this permit. Persons whose substantial interests will be affected by any decision of the Department with regard to the application 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 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, F.A.C.

This permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, 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 Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; 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 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Ernest E. Frey, P.E.

For Director of District Management

FILING AND ACKNOWLEDGEMENT

FILED, on this date, pursuant to S120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Betty Allen
Clerk

12-14-93
Date

EEF:bt

cc: Gainesville Branch Office
Alachua County Office Environmental Protection
Yolanta Jonynas, Sr. Electric Utility Environmental Engineer
Douglas C. Beck, P.E.



Florida Department of Environmental Protection

Lawton Chiles
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7577

Virginia B. Wetherell
Secretary

PERMITTEE:

Gainesville Regional Utilities
Post Office Box 147117
Gainesville, Florida 32614-7117

I.D. Number: 31JAX01000501,02,03
Permit/Cert Number: A001-241346
Date of Issue: 12-14-93
Expiration Date: March 1, 1999
County: Alachua
Latitude/Longitude: 29°38'48"N; 82°19'19"W
Project: Nos. 1,2,3 JRK CTs
UTM: E-(17)372.0; N-3280.2

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-210, 17-212, 17-272, 17-296, 17-297 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 Nos. 1, 2 and 3 JRK Combustion Turbines.

Located at the John R. Kelly Generating Station, 605 S.E. 3rd St., Gainesville, Alachua County, Florida.

In accordance with:

Permit application dated 01-17-74
Renewal permit application dated 04-02-79
Renewal permit application dated 02-23-84
Renewal permit application dated 11-28-88
Additional Information received 01-31-89
Request received 03-20-89
Renewal permit application received 11-19-93

PERMITTEE:
Gainesville Regional Utilities
Post Office Box 147117
Gainesville, Florida 32614-7117

I.D. Number: 31JAX01008501,02,03
Permit/Cert: AO01-241346
Date of Issue:
Expiration Date: March 1, 1999

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
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. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver 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, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and 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 and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a. Have access to and copy any records that must be kept under the conditions of the permit;

PERMITTEE:
Gainesville Regional Utilities
Post Office Box 147117
Gainesville, Florida 32614-7117

I.D. Number: 31JAX01008501,02,03
Permit/Cert: A001-241346
Date of Issue:
Expiration Date: March 1, 1999

GENERAL CONDITIONS:

b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

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

a. a description of and cause of non-compliance; and

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

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

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

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 17-4.120 and 17-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

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

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards (NSPS)

PERMITTEE:
Gainesville Regional Utilities
Post Office Box 147117
Gainesville, Florida 32614-7117

I.D. Number: 31JAX01008501,02,03
Permit/Cert: A001-241346
Date of Issue:
Expiration Date: March 1, 1999

GENERAL CONDITIONS:

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the dates 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 time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

PERMITTEE:
 Gainesville Regional Utilities
 Post Office Box 147117
 Gainesville, Florida 32614-7117

I.D. Number: 31JAX01000501,02,03
 Permit/Cert Number: A001-241346
 Date of Issue:
 Expiration Date: March 1, 1999

SPECIFIC CONDITIONS:

- The ID Number and Project Name for this source shall be used on all correspondences.
- The maximum heat input (operating) rates are listed below and shall not be exceeded without prior Department approval:

Rate	Material	To
200 MMBTU/hr	Natural gas	#1 Combustion turbine
200 MMBTU/hr	Natural gas	#2 Combustion turbine
200 MMBTU/hr	Natural gas	#3 Combustion turbine
207 MMBTU/hr	#2 Fuel oil	#1 Combustion turbine
207 MMBTU/hr	#2 Fuel oil	#2 Combustion turbine
207 MMBTU/hr	#2 Fuel oil	#3 Combustion turbine

- Testing of emissions must be performed at an operating rate of at least 90% of the rate in Specific Condition No. 2, or Specific Condition No. 4 will become effective.
- The operating rate shall not exceed 110% of the rate of the most recently accepted test, except for additional testing purposes, and shall not exceed the rate in Specific Condition No. 2. After testing at a higher rate, the operating rate shall continue to not exceed 110% of the rate of the last accepted test until the test report at the higher rate is reviewed and accepted by the Department.
- The permitted maximum allowable emission rate for each pollutant is as follows:

POLLUTANT	SOURCE	EMISSION RATE	FAC RULE
VISIBLE EMISSIONS	#1 COMBUSTION TURBINE	< 20% OPACITY	17-296.310(2)
VISIBLE EMISSIONS	#2 COMBUSTION TURBINE	< 20% OPACITY	17-296.310(2)
VISIBLE EMISSIONS	#3 COMBUSTION TURBINE	< 20% OPACITY	17-296.310(2)

PERMITTEE:
 Gainesville Regional Utilities
 Post Office Box 147117
 Gainesville, Florida 32614-7117

I.D. Number: 31JAX01000501,02,03
 Permit/Cert Number: AO01-241346
 Date of Issue:
 Expiration Date: March 1, 1999

SPECIFIC CONDITIONS:

6. Test the emission for the following pollutant(s) at the interval(s) indicated, notify the Department 15 days prior to testing [FAC Rule 17-297.340(1)(i)], and submit the test report documentation to the Department within 45 days after completion of the testing [FAC Rule 17-297.570(2)]:

POLLUTANT	INTERVAL	TEST METHOD
VISIBLE EMISSIONS NOTE(1)	Annually from 01-15-93	EPA 9

NOTE(1) Test is not required when liquid and/or solid fuel is burned for a total of no more than 400 hours.

Tests and test reports shall comply with the requirements of FAC Rules 17-297.330 and 17-297.570, respectively.

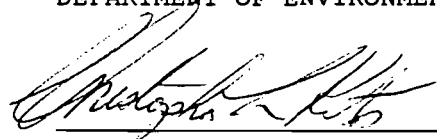
7. In each test report, submit the maximum input/production rate at which this source was operated since the most recent test.
8. Submit an annual operation report for this source on the form supplied by the Department for each calendar year on or before March 1.
9. Any revision(s) to a permit (and application) must be submitted and approved prior to implementing.
10. The completed Application For Renewal of Permit To Operate Air Pollution Source(s) form with the compliance report is due 90 days prior to 03-01-99.

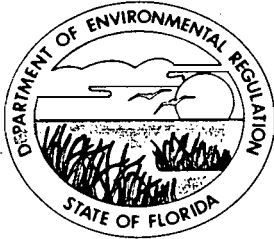
Executed in Jacksonville, Florida

STATE OF FLORIDA
 DEPARTMENT OF ENVIRONMENTAL PROTECTION

FILING AND ACKNOWLEDGEMENT
 FILED, on this date, pursuant to S120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Betty Adams Clerk 12-14-93 Date


 Ernest E. Frey, P.E.
 Director of District Management



Florida Department of Environmental Regulation

Northeast District • Suite B200, 7825 Baymeadows Way • Jacksonville, Florida 32256-7577

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

Gainesville Regional Utilities
Post Office Box 490
Gainesville, Florida 32602

I.D. Number: 31JAX01000506
Permit/Certification Number: A001-195854
Date of Issue: July 19, 1991
Revised: 11-14-91
Expiration Date: July 18, 1996
County: Alachua
Latitude/Longitude: 29°38'48"N; 82°19'19"W
Project: #6 JRK Unit
UTM: E-(17)372.1; N-3280.2

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized 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. 6 John R. Kelly (JRK) Unit, fossil fuel steam generator.

Located at the John R. Kelly Generating Station, 605 S.E. 3rd St., Gainesville, Alachua County, Florida

In accordance with:

Operation permit application dated 08-26-76
Permit renewal application dated 07-27-81
Permit renewal application dated 05-01-86
Letter from Robert L. Guyer dated 07-25-86
Letter from Robert L. Guyer dated 08-11-86
Letter from Robert L. Guyer dated 10-15-86
Letter from Robert L. Guyer dated 12-12-86
Letter from Robert L. Guyer dated 12-19-86
Letter from Robert L. Guyer dated 01-23-87
Renewal application received 04-22-91
BACT Determination received 07-23-91
Revision request received 09-03-91
Revision request received 09-17-91
Revised BACT Determination received 10-11-91



PERMITTEE:
Gainesville Regional Utilities
Post Office Box 490
Gainesville, Florida 32602

I.D. Number: 31JAX01000506
Permit/Cert: A001-195854
Date of Issue:
Expiration Date: July 18, 1996

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:
Gainesville Regional Utilities
Post Office Box 490
Gainesville, Florida 32602

I.D. Number: 31JAX01000506
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Date of Issue:
Expiration Date: July 18, 1996

GENERAL CONDITIONS

- 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:
Gainesville Regional Utilities
Post Office Box 490
Gainesville, Florida 32602

I.D. Number: 31JAX01000506
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Date of Issue:
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GENERAL CONDITIONS

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:
 Gainesville Regional Utilities
 Post Office Box 490
 Gainesville, Florida 32602

I.D. Number: 31JAX01000506
 Permit/Certification Number: A001-195854
 Date of Issue: July 19, 1991
 Revised:
 Expiration Date: July 18, 1996

SPECIFIC CONDITIONS:

1. The maximum heat input rates are below and shall not be exceeded without prior approval.

<u>Rate</u>	<u>Material</u>
187.3 MMBTU/hr	natural gas
187.3 MMBTU/hr	No. 6 fuel oil ¹

¹Sulfur content shall not exceed 1.5% by wt. per BACT Determination dated 10-09-91.

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 that 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:

<u>Pollutant</u>	<u>FAC Rule</u>	<u>lbs/hr</u>	<u>TPY</u>
PM ¹	17-2.600(6)(b)	22.53 ²	98.68 ³
SO ₂ ⁴	17-2.600(6)(c)	301.88 ⁵	1322.26 ³
VE(SS) ⁶	17-2.600(6)(a)	20% opacity, except 40% for 2 mins/hr	
VE(SB) ⁷	17-2.250(3)	60% Opacity ⁸	
VE(LC) ⁹	17-2.250(3)	60% Opacity ⁸	

¹PM - particulate matter

²Basis: 1251.6 gals/hr; 0.018 lbs PM/gal. (based on 1.5% S in fuel oil (FO))

³Hours of operation are limited to 24 H/D, 7 D/W, 52 W/Y (8760 H/Y) and shall be recorded.

⁴SO₂ - sulfur dioxide

⁵Basis: 1251.6 gals/hr; 8.04 lbs/gal; 1.5% S in FO.

⁶VE(SS) - visible emissions at steady-state

⁷VE(SB) - VE while soot blowing

⁸Up to 3 hr in 24 hrs

⁹VE(LC) - VE during load change

PERMITTEE:
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I.D. Number: 31JAX01000506
Permit/Certification Number: A001-195854
Date of Issue: July 19, 1991
Revised:
Expiration Date: July 18, 1996

SPECIFIC CONDITIONS:

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

<u>Pollutant</u>	<u>Interval</u>	<u>Test Method</u>
VE(SS)	12 months from 03-01-91 ¹	DER 9
VE(SB)	12 months from 03-01-91 ²	DER 9
SO ₂	12 months from 03-01-91 ¹	ASTM ³

¹Per FAC Rule 17-2.700(2)(a)3. and FAC Rule 17-2.700(2)(a)5.

²Per FAC Rule 17-2.700(2)(a)2.

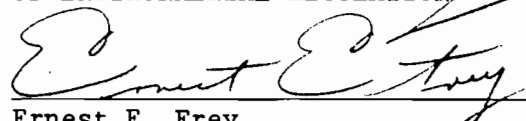
³Per FAC Rule 17-2.700(6)(c)1.b.

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

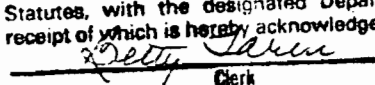
6. In each test report, submit the maximum input/production rate at which this source was operated since the most recent test.
7. Submit an annual operation report for this source on the form supplied by the Department for each calendar year on or before March 1.
8. Any revision(s) to a permit (and application) must be submitted and approved prior to implementing.
9. The ID No. for this source is to be used on all correspondence.
10. Forms for the renewal will be sent 5 months prior to 07-18-96 and the completed forms with test results are due 90 days prior to 07-18-96.

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


Ernest E. Frey
Director of District Management

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to S120.52, Florida
Statutes, with the designated Department Clerk,
receipt of which is hereby acknowledged.


Clerk
Date 11/14/91



Florida Department of
Environmental Protection

Lawton Chiles
 Governor

Northeast District
 7825 Baymeadows Way, Suite B200
 Jacksonville, Florida 32256-7577

Virginia B. Wetherell
 Secretary

CERTIFIED - RETURN RECEIPT

December 29, 1993

Mr. Larry McDaniel
 Power Plant Manager
 Gainesville Regional Utilities
 Post Office Box 147117, Station JK33
 Gainesville, Florida 32614-7117

Dear Mr. McDaniel:

Alachua County - AP
 Gainesville Regional Utilities
 No. 7 Unit at JRK Station
 ID#31JAX01000507
 AO01-224217
 Permit Revision

The permit revision request of 12-17-93 concerning excess emissions resulting from malfunction is hereby approved.

Specific Condition 7 has been revised to clarify that excess emissions resulting from malfunction shall be permitted in accordance with FAC Rule 17-210.700(1).

Attached is a revised page 6 of 7 of the referenced permit. Please replace page 6 of 7 (issued 12-14-93) with this attachment.

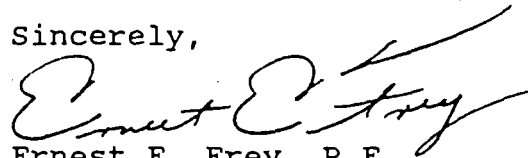
This letter and attachment shall become a part of the referenced permit.

Any party to this Order (permit modification) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by filing a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; 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 days from the date this Notice is filed with the Clerk of the Department.

Gainesville Regional Utilities
Page Two

If you have any questions concerning this matter, please contact
Rita Felton at (904) 448-4310, Ext. 370.

Sincerely,



Ernest E. Frey, P.E.
Director of District Management

EEF:RJM:RF:bt
RCF
all

cc: Yolanta Jonynas, Sr., Electric Utility Environmental Engineer
Douglas Beck, P.E.
Alachua County Office Environmental Protection

PERMITTEE:
Gainesville Regional Utilities
Post Office Box 147117
Gainesville, Florida 32614-7117

I.D. Number: 31JAX01000507
Permit/Cert Number: AO01-224217
Date of Issue: April 30, 1993
REVISED:
Expiration Date: April 1, 1998

SPECIFIC CONDITIONS:

SC No. 5 Cont'd.

- ¹Basis: AP-42, Table 1.3-1; 249 MMBTU/hr; 1.5 wt% sulfur; 0.151811 MMBTU/gallon from application dated 03-10-77
²Basis: 8760 H/Y
³Basis: BACT determination dated 10-11-91; 8.04 lb/gal; 1.5 wt% sulfur; 249 MMBTU/hr; 0.151811 MMBTU/gallon

6. The permitted maximum allowable emission rate for particulate matter and visible emissions during soot blowing and load change conditions are as follows:

POLLUTANT	MATERIAL	MAXIMUM ALLOWABLE EMISSION RATE	FAC RULE
PARTICULATE MATTER	FUEL OIL	0.3 lbs/MMBTU ¹	17-210.700(3)
VISIBLE EMISSIONS	FUEL OIL	60% Opacity ²	17-210.700(3)

¹Emission limit shall not exceed an average of 0.3 lbs/MMBTU heat input and not to exceed 3 hrs/24 hrs.

²Visible emissions above 60% opacity shall be allowed for not more than 4, six-minute periods, during the 3-hr period of excess emissions.

7. Excess emissions resulting from malfunction shall be permitted, in accordance with FAC Rule 17-210.700(1).
8. Excess emissions resulting from startup or shutdown shall be permitted, provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions minimized - 17-210.700(2).
9. Test the emission for the following pollutant(s) at the interval(s) indicated, notify the Department 15 days prior to testing pursuant to FAC Rule 17-297.340(1)(i), and submit the test report documentation to the Department within 45 days after completion of the testing pursuant to FAC Rule 17-297.570(2):



Florida Department of Environmental Protection

Lawton Chiles
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7577

Virginia B. Wetherell
Secretary

PERMITTEE:

Gainesville Regional Utilities
Post Office Box 147117
Gainesville, Florida 32614-7117

I.D. Number: 31JAX01000507
Permit/Cert Number: A001-224217
Date of Issue: April 30, 1993
REVISED: 12-14-93
Expiration Date: April 1, 1998
County: Alachua
Latitude/Longitude: 29°38'48"N; 82°19'19"W
Project: No. 7 Unit at JRK Station
UTM: E-(17)372.0; N-3280.2

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-210, 17-212, 17-272, 17-296, 17-297 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 John R. Kelly Station No. 7 Unit, a fossil fuel steam generator, fired with natural gas or No. 6 fuel oil.

Located at JRK Station, 605 S.E. 3rd St., Gainesville, Alachua County, Florida.

In accordance with:

- Operation permit application dated 03-10-77
- Renewal permit application dated 02-03-83
- Renewal permit application received 12-29-87
- Letter from Yolanta E. Jonynas received 03-25-88
- Renewal permit application received 01-11-93
- Additional Information received 02-02-93

PERMITTEE:
Gainesville Regional Utilities
Post Office Box 147117
Gainesville, Florida 32614-7117

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Permit/Cert: A001-224217
Date of Issue: April 30, 1993
Expiration Date: April 1, 1998
REVISED:

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
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. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver 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, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and 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 and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a. Have access to and copy any records that must be kept under the conditions of the permit;

PERMITTEE:
Gainesville Regional Utilities
Post Office Box 147117
Gainesville, Florida 32614-7117

I.D. Number: 31JAX01000507
Permit/Cert: AO01-224217
Date of Issue: April 30, 1993
Expiration Date: April 1, 1998
REVISED:

GENERAL CONDITIONS:

b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

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

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

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

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

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 17-4.120 and 17-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

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

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards (NSPS)

PERMITTEE:
Gainesville Regional Utilities
Post Office Box 147117
Gainesville, Florida 32614-7117

I.D. Number: 31JAX01000507
Permit/Cert: AO01-224217
Date of Issue: April 30, 1993
Expiration Date: April 1, 1998
REVISED:

GENERAL CONDITIONS:

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the dates 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 time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

PERMITTEE:
 Gainesville Regional Utilities
 Post Office Box 147117
 Gainesville, Florida 32614-7117

I.D. Number: 31JAX01000507
 Permit/Cert Number: A001-224217
 Date of Issue: April 30, 1993
 REVISED:
 Expiration Date: April 1, 1998

SPECIFIC CONDITIONS:

- The ID Number and Project Name for this source shall be used on all correspondences.
- The maximum heat input (operating) rates are listed below and shall not be exceeded without prior Department approval:

Rate	Fuel
272 MMBTU/hr ¹	Natural gas
249 MMBTU/hr ²	No. 6 Fuel oil
----- ³	GRU Generated used oil ⁴

¹Basis: .2624 MMBTU/hr. This basis is not to be construed as a permit limitation.
²Basis: 12287 lbs/hr. This basis is not to be construed as a permit limitation.
³Include an estimate of the total quantity of used oil generated during the applicable calendar year in the AOR (Annual Operation Report)
⁴Shall be burned in accordance with the applicable provisions of 40 CFR Part 266 Subpart E.

- Testing of emissions must be performed at an operating rate of at least 90% of the rate in Specific Condition No. 2, or Specific Condition No. 4 will become effective.
- The operating rate shall not exceed 110% of the rate of the most recently accepted test, except for additional testing purposes, and shall not exceed the rate in Specific Condition No. 2. After testing at a higher rate, the operating rate shall continue to not exceed 110% of the rate of the last accepted test until the test report at the higher rate is reviewed and accepted by the Department.
- The permitted maximum allowable emission rate for each pollutant is as follows:

POLLUTANT	MATERIAL	MAXIMUM ALLOWABLE EMISSION RATE		FAC RULE
		LBS/HR	TPY	
PARTICULATE MATTER	FUEL OIL	29.52 ¹	129.30 ²	17-296.406(2)
SULFUR DIOXIDE	FUEL OIL	395.6 ³	1732.73 ²	17-296.406(3)
VISIBLE EMISSIONS	FUEL OIL	20% Opacity except 40% for 2 min/hr		17-296.406(1)

APR:130,93
 -12/14

PM 27.51 10% / 120.16 TPY 232 MMBTU/HR
 SO2 388.6 10% / 1610.07 TPY 1.5% S

Oct 6, 93

PERMITTEE:
 Gainesville Regional Utilities
 Post Office Box 147117
 Gainesville, Florida 32614-7117

I.D. Number: 31JAX01000507
 Permit/Cert Number: A001-224217
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 Expiration Date: April 1, 1998

SPECIFIC CONDITIONS:

$$\frac{249 \text{ MMBTU/hr}}{0.151811 \text{ MMBTU/gal}} = 1640 \text{ gal/hr}$$

$$1640 \text{ gal/hr} \times 1.5 \text{ wt\% S} = 24.6 \text{ lbs/hr}$$

$$24.6 \text{ lbs/hr} \times (3.22) = 78.8 \text{ lbs/hr}$$

$$78.8 \text{ lbs/hr} = 10/1000 \text{ gal}$$

SC No. 5 Cont'd.

- ¹Basis: AP-42, Table 1.3-1; 249 MMBTU/hr; 1.5 wt% sulfur; 0.151811 MMBTU/gallon from application dated 03-10-77
- ²Basis: 8760 H/Y
- ³Basis: BACT determination dated 10-11-91; 8.04 lb/gal; 1.5 wt% sulfur; 249 MMBTU/hr; 0.151811 MMBTU/gallon

6. The permitted maximum allowable emission rate for particulate matter and visible emissions during soot blowing and load change conditions are as follows:

POLLUTANT	MATERIAL	MAXIMUM ALLOWABLE EMISSION RATE	FAC RULE
PARTICULATE MATTER	FUEL OIL	0.3 lbs/MMBTU ¹	17-210.700(3)
VISIBLE EMISSIONS	FUEL OIL	60% Opacity ²	17-210.700(3)

¹Emission limit shall not exceed an average of 0.3 lbs/MMBTU heat input and not to exceed 3 hrs/24 hrs.
²Visible emissions above 60% opacity shall be allowed for not more than 4, six-minute periods, during the 3-hr period of excess emissions.

- 7. Excess emissions resulting from malfunction shall be permitted, in accordance with FAC Rule 17-210.700(1).
- 8. Excess emissions resulting from startup or shutdown shall be permitted, provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions minimized - 17-210.700(2).
- 9. Test the emission for the following pollutant(s) at the interval(s) indicated, notify the Department 15 days prior to testing pursuant to FAC Rule 17-297.340(1)(i), and submit the test report documentation to the Department within 45 days after completion of the testing pursuant to FAC Rule 17-297.570(2):

PERMITTEE:
Gainesville Regional Utilities
Post Office Box 147117
Gainesville, Florida 32614-7117

I.D. Number: 31JAX01000507
Permit/Cert Number: A001-224217
Date of Issue: April 30, 1993
REVISED:
Expiration Date: April 1, 1998

SPECIFIC CONDITIONS:

SC No. 9 Cont'd.

POLLUTANT	TEST FREQUENCY	TEST METHOD ¹
SULFUR DIOXIDE	ANNUAL FROM 03-01-93	ASTM ¹
VISIBLE EMISSIONS ²	ANNUAL FROM 03-01-93	EPA 9

¹A Certified ASTM fuel oil analysis shall be conducted to determine the weight percent of sulfur and the fuel oil heat content. The owner or operator shall submit to the Department a copy of the Certified ASTM analysis and the sulfur dioxide emission calculations.

²Test not required when fuel oil is fired less than 400 hours per year.

10. Hours of operation shall be limited to 8760 H/Y and shall be recorded.
11. In each test report, submit the maximum input/production rate at which this source was operated since the most recent test.
12. Fuel oil analysis reports, including fuel oil heat content shall be submitted to the Department with each test report.
13. Submit an annual operation report for this source on the form supplied by the Department for each calendar year on or before March 1.
14. Any revision(s) to a permit (and application) must be submitted and approved prior to implementing.
15. The completed Application For Renewal of Permit To Operate Air Pollution Source(s) form with the compliance report is due 90 days prior to 04-01-98.

Executed in Jacksonville, Florida

FILING AND ACKNOWLEDGEMENT
FILED on this date, pursuant to S120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.
Patty J. [Signature] Clerk
Date 12-14-93

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

[Signature]
Ernest E. Frey, P.E.
Director of District Management



Florida Department of Environmental Protection

Lawton Chiles
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7577

Virginia B. Wetherell
Secretary

NOTICE OF PERMIT ISSUANCE

CERTIFIED - RETURN RECEIPT

Mr. Larry McDaniel
Plant Manager
Gainesville Regional Utilities
Post Office Box 147117
Gainesville, Florida 32614-7117

Dear Mr. McDaniel:

Alachua County - AP
Gainesville Regional Utilities
No. 7 Unit at JRK Station

Enclosed is **Permit Number A001-224217** (revised) to operate the subject air pollution source, pursuant to Section 403.087, Florida Statutes (FS).

A person whose substantial interests are affected by this permit may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. 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, within 14 days of receipt of this Permit. 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, Florida Statutes.

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

Administration 448-4300
Air 448-4310
Waste Management 448-4320



Water Facilities 448-4330
Water Management 448-4340
FAX 448-4366



Florida Department of Environmental Protection

Lawton Chiles
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7577

Virginia B. Wetherell
Secretary

PERMITTEE:

Gainesville Regional Utilities
Post Office Box 147117
Gainesville, Florida 32614-7117

I.D. Number: 31JAX01000507
Permit/Cert Number: A001-224217
Date of Issue: April 30, 1993
REVISED: 10-06-93
Expiration Date: April 1, 1998
County: Alachua
Latitude/Longitude: 29°38'48"N; 82°19'19"W
Project: No. 7 Unit at KRK Station
UTM: E-(17)372.0; N-3280.2

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-210, 17-212, 17-272, 17-296, 17-297 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 John R. Kelly Station No. 7 Unit, a fossil fuel steam generator, fired with natural gas or No. 6 fuel oil.

Located at JRK Station, 605 S.E. 3rd St., Gainesville, Alachua County, Florida.

In accordance with:

Operation permit application dated 03-10-77
Renewal permit application dated 02-03-83
Renewal permit application received 12-29-87
Letter from Yolanta E. Jonynas received 03-25-88
Renewal permit application received 01-11-93
Additional Information received 02-02-93

PERMITTEE:
Gainesville Regional Utilities
Post Office Box 147117
Gainesville, Florida 32614-7117

I.D. Number: 31GVL61000507
Permit/Cert: AO01-224217
Date of Issue: April 30, 1993
Expiration Date: April 1, 1998
REVISED:

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
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. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver 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, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a. Have access to and copy any records that must be kept under the conditions of the permit;

PERMITTEE:
Gainesville Regional Utilities
Post Office Box 147117
Gainesville, Florida 32614-7117

I.D. Number: 31GVL61000507
Permit/Cert: AO01-224217
Date of Issue: April 30, 1993
Expiration Date: April 1, 1998
REVISED:

GENERAL CONDITIONS:

b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

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

a. a description of and cause of non-compliance; and

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

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

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

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 17-4.120 and 17-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

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

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards (NSPS)

PERMITTEE:
Gainesville Regional Utilities
Post Office Box 147117
Gainesville, Florida 32614-7117

I.D. Number: 31GVL61000507
Permit/Cert: A001-224217
Date of Issue: April 30, 1993
Expiration Date: April 1, 1998
REVISED:

GENERAL CONDITIONS:

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the dates 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 time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

PERMITTEE:
 Gainesville Regional Utilities
 Post Office Box 147117
 Gainesville, Florida 32614-7117

I.D. Number: 31JAX01000507
 Permit/Cert Number: AO01-224217
 Date of Issue: April 30, 1993
 REVISED:
 Expiration Date: April 1, 1998

SPECIFIC CONDITIONS:

- The ID Number and Project Name for this source shall be used on all correspondences.
- The maximum heat input (operating) rates are listed below and shall not be exceeded without prior Department approval:

Rate	Fuel
272 MMBTU/hr ¹	Natural gas
249 MMBTU/hr ²	No. 6 Fuel oil
----- ³	GRU Generated used oil ⁴

¹Basis: .2624 MMBTU/hr

²Basis: 12287 lbs/hr

³Include an estimate of the total quantity of used oil generated during the applicable calendar year in the AOR (Annual Operation Report)

⁴In accordance with the Department's letter dated 06-12-89 and memorandum dated 01-05-87 (Attachment 1.)

- Testing of emissions must be performed at an operating rate of at least 90% of the rate in Specific Condition No. 2, or Specific Condition No. 4 will become effective.
- The operating rate shall not exceed 110% of the rate of the most recently accepted test, except for additional testing purposes, and shall not exceed the rate in Specific Condition No. 2. After testing at a higher rate, the operating rate shall continue to not exceed 110% of the rate of the last accepted test until the test report at the higher rate is reviewed and accepted by the Department.
- The permitted maximum allowable emission rate for each pollutant is as follows:

POLLUTANT	MATERIAL	MAXIMUM ALLOWABLE EMISSION RATE		FAC RULE
		LBS/HR	TPY	
PARTICULATE MATTER	FUEL OIL	29.52 ¹	129.30 ²	17-296.406(2)
SULFUR DIOXIDE	FUEL OIL	395.6 ³	1732.73 ²	17-296.406(3)
VISIBLE EMISSIONS	FUEL OIL	20% Opacity except 40% for 2 min/hr		17-296.406(1)

PERMITTEE:
 Gainesville Regional Utilities
 Post Office Box 147117
 Gainesville, Florida 32614-7117

I.D. Number: 31JAX01000507
 Permit/Cert Number: AO01-224217
 Date of Issue: April 30, 1993
 REVISED:
 Expiration Date: April 1, 1998

SPECIFIC CONDITIONS:

SC No. 5 Cont'd.

- ¹Basis: AP-42, Table 1.3-1; 249 MMBTU/hr; 1.5 wt% sulfur; 0.151811 MMBTU/gallon from application dated 03-10-77
- ²Basis: 24 H/D; 7 D/W; 52 W/Y (8760 H/Y)
- ³Basis: BACT determination dated 10-11-91; 8.04 lb/gal; 1.5 wt% sulfur; 249 MMBTU/hr; 0.151811 MMBTU/gallon

6. The permitted maximum allowable emission rate for particulate matter and visible emissions during soot blowing and load change conditions are as follows:

POLLUTANT	MATERIAL	MAXIMUM ALLOWABLE EMISSION RATE	FAC RULE
PARTICULATE MATTER	FUEL OIL	0.3 lbs/MMBTU ¹	17-210.700(3)
VISIBLE EMISSIONS	FUEL OIL	60% Opacity ²	17-210.700(3)

¹Emission limit shall not exceed an average of 0.3 lbs/MMBTU heat input and not to exceed 3 hrs/24 hrs.

²Visible emissions above 60% opacity shall be allowed for not more than 4, six-minute periods, during the 3-hr period of excess emissions.

- 7. The duration of excess emissions resulting from startup, shutdown or malfunction shall be minimized, but in no case shall exceed two (2) hours in any 24-hour period unless a longer duration is specifically authorized by the Department.
- 8. Excess emissions resulting from startup, shutdown or malfunction shall be minimized by applying best operational practices.
- 9. Test the emission for the following pollutant(s) at the interval(s) indicated, notify the Department 15 days prior to testing pursuant to FAC Rule 17-297.340(1)(i), and submit the test report documentation to the Department within 45 days after completion of the testing pursuant to FAC Rule 17-297.570(2):

PERMITTEE:
Gainesville Regional Utilities
Post Office Box 147117
Gainesville, Florida 32614-7117

I.D. Number: 31JAX01000507
Permit/Cert Number: AO01-224217
Date of Issue: April 30, 1993
REVISED:
Expiration Date: April 1, 1998

SPECIFIC CONDITIONS:

SC No. 9 Cont'd.

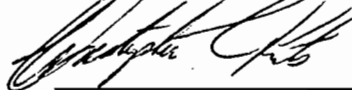
POLLUTANT	TEST FREQUENCY	TEST METHOD ¹
SULFUR DIOXIDE	ANNUAL FROM 03-01-93	ASTM ¹
VISIBLE EMISSIONS	ANNUAL FROM 03-01-93	EPA 9

¹A Certified ASTM fuel oil analysis shall be conducted to determine the weight percent of sulfur and the fuel oil heat content. The owner or operator shall submit to the Department a copy of the Certified ASTM analysis and the sulfur dioxide emission calculations.

- Hours of operation shall be limited to 24 H/D, 7 D/W and 52 W/Y and shall be recorded.
- In each test report, submit the maximum input/production rate at which this source was operated since the most recent test.
- Fuel oil analysis reports, including fuel oil heat content shall be submitted to the Department with each test report.
- 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.
- The completed Application For Renewal of Permit To Operate Air Pollution Source(s) form with the compliance report is due 90 days prior to 04-01-98.

Executed in Jacksonville, Florida

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION



FOR Ernest E. Frey, P.E.
Director of District Management

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk receipt of which is hereby acknowledged. *10/6/93*
Betty Adams
Clerk Date

PERMITTEE:
Gainesville Regional Utilities
Page two
A001-224217 (revised)

(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.

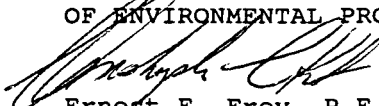
If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this permit. Persons whose substantial interests will be affected by any decision of the Department with regard to the application 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 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, F.A.C.

This permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, 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 Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; 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 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Jacksonville, Florida.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged: 10/6/93
Betty Brown Clerk Date

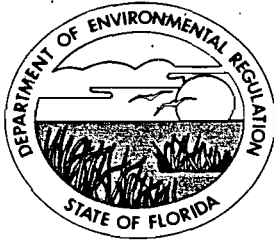
STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Ernest E. Frey, P.E.
FOR Director of District Management

EEF 

Copies furnished to: Douglas C. Beck, P.E.
Alachua Co. Office Environmental Protection
Yolanta Jonynas, Sr. Electric Utility Environmental Engineer

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on 10/6/93 to the listed persons.



Florida Department of Environmental Regulation

Northeast District • Suite B200, 7825 Baymeadows Way • Jacksonville, Florida 32256-7577

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

PERMITTEE:

Gainesville Regional Utilities
Post Office Box 490
Gainesville, Florida 32602

I.D. Number: 31JAX01000507
Permit/Cert Number: AO01-224217
Date of Issue: 04-30-93
Expiration Date: April 1, 1998
County: Alachua
Latitude/Longitude: 29°38'48"N; 82°19'19"W
Project: No. 7 Unit at JRK Station
UTM: E-(17)372.0; N-3280.2

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-210, 17-212, 17-272, 17-296, 17-297 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 John R. Kelly Station No. 7 Unit, a fossil fuel steam generator, fired with natural gas or No. 6 fuel oil.

Located at JRK Station, 605 S.E. 3rd St., Gainesville, Alachua County, Florida.

In accordance with:

Operation permit application dated 03-10-77
Renewal permit application dated 02-03-83
Renewal permit application received 12-29-87
Letter from Yolanta E. Jonynas received 03-25-88
Renewal permit application received 01-11-93
Additional Information received 02-02-93

PERMITTEE:
Gainesville Regional Utilities
Post Office Box 490
Gainesville, florida 32602

I.D. Number: 31JAX01000507
Permit/Cert: A001-224217
Date of Issue:
Expiration Date: April 1, 1998

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:
Gainesville Regional Utilities
Post Office Box 490
Gainesville, florida 32602

I.D. Number: 31JAX01000507
Permit/Cert: AO01-224217
Date of Issue:
Expiration Date: April 1, 1998

GENERAL CONDITIONS

- 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:
Gainesville Regional Utilities
Post Office Box 490
Gainesville, florida 32602

I.D. Number: 31JAX01000507
Permit/Cert: A001-224217
Date of Issue:
Expiration Date: April 1, 1998

GENERAL CONDITIONS:

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:
 Gainesville Regional Utilities
 Post Office Box 490
 Gainesville, Florida 32602

I.D. Number: 31JAX01000507
 Permit/Cert Number: A001-224217
 Date of Issue:
 Expiration Date: April 1, 1998

SPECIFIC CONDITIONS:

- The ID Number and Project Name for this source shall be used on all correspondences.
- The maximum operating rates are listed below and shall not be exceeded without prior Department approval:

Rate	Fuel
269 MMBTU ¹ / HR	Natural gas
232 MMBTU ²	No. 6 Fuel oil
----- ³	GRU Generated Oil ⁴

¹For input rate of 26.24 MMCF/hr ← .2624 mmcf/hr

²For input rate of 12287 lbs/hr ←

³Include the actual operating rate

⁴In accordance with GRU request dated 06-12-89 (Attachment 1) 1528.2 gal/hr department letter dated

- Testing of emissions must be performed at an operating rate of at least 90% of the rate in Specific Condition No. 2, or Specific Condition No. 4 will become effective.
- The operating rate shall not exceed 110% of the rate of the most recently accepted test, except for additional testing purposes, and shall not exceed the rate in SC No. 2. After testing at a higher rate, the operating rate shall continue to not exceed 110% of the rate of the last accepted test until the test report at the higher rate is reviewed and accepted by the Department.
- The permitted maximum allowable emission rate for each pollutant is as follows:

POLLUTANT	MATERIAL	MAXIMUM ALLOWABLE EMISSION RATE		FAC RULE
		LBS/HR	TPY	
PARTICULATE MATTER	FUEL OIL	27.51 ¹	120.16 ²	17-296.406(2)
SULFUR DIOXIDE	FUEL OIL	368.6 ³	1610.07 ²	17-296.406(3)
VISIBLE EMISSIONS		20% Opacity except 40% for 2 min/hr		17-296.406(1)

¹Basis: AP-42, Table 1.3-1; 232 MMBTU/hr; 1.5 wt% sulfur; 0.151811 MMBTU/gallon from 03-22-77 application
²Basis: 24 H/D; 7 D/W; 52 W/Y
³Basis: BACT determination dated 10-11-91; 8.04 lb/gal; 1.5 wt% sulfur; 232 MMBTU/hr; 0.151811 MMBTU/gallon

PERMITTEE:
Gainesville Regional Utilities
Post Office Box 490
Gainesville, Florida 32602

I.D. Number: 31JAX01000507
Permit/Cert Number: A001-224217
Date of Issue:
Expiration Date: April 1, 1998

SPECIFIC CONDITIONS:

6. The permitted maximum allowable emission rate for particulate matter and visible emissions during soot blowing conditions are as follows:

POLLUTANT	MATERIAL	MAXIMUM ALLOWABLE EMISSION RATE	FAC RULE
PARTICULATE MATTER	FUEL OIL	0.3 lbs/MMBTU ¹	17-210.700(3)
VISIBLE EMISSIONS	FUEL OIL	60% Opacity ²	17-210.700(3)

¹Emission limit shall not exceed an average of 0.3 lbs/MMBTU heat input and not to exceed 3 hrs/24 hrs.

²Visible emissions above 60% opacity shall be allowed for not more than 4, six-minute periods, during the 3-hr period of excess emissions.

7. Test the emission for the following pollutant(s) at the interval(s) indicated, notify the Department 15 days prior to testing pursuant to FAC Rule 17-297.340(1)(i), and submit the test report documentation to the Department within 45 days after completion of the testing pursuant to FAC Rule 17-297.570(2):

POLLUTANT	TEST FREQUENCY	TEST METHOD
VISIBLE EMISSIONS	ANNUAL FROM 03-01-93	EPA 9
SULFUR DIOXIDE	ANNUAL FROM 03-01-93	ASTM ¹

¹A certified ASTM D 396-76 fuel oil analysis shall be conducted to determine the weight percent of sulfur and the fuel oil heat content. The owner or operator shall submit to the Department a copy of the certified ASTM D 396-76 analysis and the sulfur dioxide emissions calculations.

8. Hours of operation shall be limited to 24 H/D, 7 D/W and 52 W/Y and shall be recorded.
9. In each test report, submit the maximum input/production rate at which this source was operated since the most recent test.
10. Fuel oil analysis reports, including fuel oil heat content shall be submitted to the Department with each test report.
11. Submit an annual operation report for this source on the form supplied by the Department for each calendar year on or before March 1.
12. Any revision(s) to a permit (and application) must be submitted and approved prior to implementing.

PERMITTEE:
Gainesville Regional Utilities
Post Office Box 490
Gainesville, Florida 32602

I.D. Number: 31JAX01000507
Permit/Cert Number: AO01-224217
Date of Issue:
Expiration Date: April 1, 1998

SPECIFIC CONDITIONS:

13. The completed Application For Renewal of Permit To Operate Air Pollution Source(s) form with the compliance report is due 90 days prior to 04-01-98.

Executed in Jacksonville, Florida

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION



Ernest E. Frey, P.E.
Director of District Management

FILING AND ACKNOWLEDGEMENT

FILED, on this date, pursuant to S120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged. 4/30/98

Betty Johnson Clerk 4/30/98 Date



Florida Department of Environmental Regulation

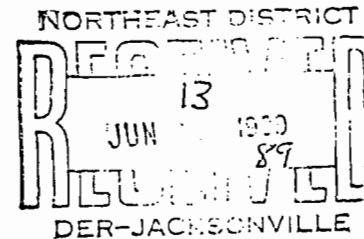
Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-24

Bob Martinez, Governor

Dale Twachmann, Secretary

John Shearer, Assistant Secretary

June 12, 1989



Ms. Yolanta Jonynas
Gainesville Regional Utilities
Post Office Box 490, Sta. 52
Gainesville, Florida 32602

Dear Ms. Jonynas:

In response to your question of May 12, 1989, regarding burning of GRU generated used oil, I am enclosing a copy of the latest DER memo on the subject dated January 5, 1987. Although an updated version is currently under consideration, your requested use would not be affected.

Your current permits should cover such use and hours of oil burning and therefore no amendments would be required.

Your other question regarding 40 CFR 266 Subpart E is addressed in the memo.

If you have any further questions, call me at (904)488-1344.

Sincerely,

William A. Thomas, P.E.
Bureau of Air Quality
Management

WAT/pa

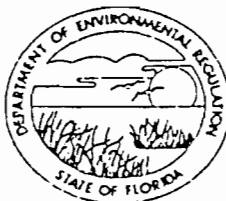
Enclosure

cc: Johnny Cole

- ATTACHMENT 1 -

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

MEMORANDUM

TO: Managers of Electric Utilities, Asphalt Plants, and Other Industrial Burners

FROM: Victoria J. Tschinkel *VJ*

DATE: January 5, 1987

RE: Used Oil as a Fuel

On April 28, 1986, I issued a memorandum to inform you of recently promulgated federal rules on the burning of used oil. Because some recipients of that memorandum have voiced concerns about the Department's interpretation of certain provisions of the regulations, this memorandum supersedes all previous communication on the subject of used oil as a fuel.

On November 29, 1985, the U.S. EPA promulgated final RCRA regulations on the burning of used oil fuel. The Department has adopted these regulations by reference. The EPA regulations establish specifications for used oil fuel that may be burned in nonindustrial boilers.

Used Oil Specifications

<u>Constituent/Property</u>	<u>Allowable Level</u>
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Total Halogens	4,000 ppm maximum
Flash Point	100 degrees Fahrenheit minimum

Burning of off-specification used oil and hazardous waste fuels in non-industrial boilers is prohibited by the RCRA rules. The April 28 memorandum may have left some readers with the impression that industrial burners were also restricted by these rules to burning fuel that met specifications; however,

Memorandum
Page Two
January 5, 1987

industrial boilers and furnaces may burn hazardous waste fuel and used oil fuel, regardless of whether the fuels meet specifications. It should be noted, however, that facilities that burn hazardous waste fuel and off-specification used oil fuel are still subject to administrative requirements such as notification, receipt of an identification number, compliance with the manifest or invoice systems, and, for hazardous waste fuels, compliance with hazardous waste storage standards for hazardous waste fuels.

No level for PCBs is included in the used oil specifications, since the use, including burning for energy recovery, of used oil containing any concentrations of PCBs is prohibited under current federal regulations. Some readers of the April 28 memorandum expressed concern about this statement, asserting that 40 CFR §761.1 makes federal PCB regulations applicable only to substances containing more than 50 ppm PCBs. I have conferred with EPA headquarters concerning the federal position on the issue of burning used oil contaminated with less than 50 ppm PCBs. It is EPA's position that the burning for energy recovery of used oils containing any concentration of PCBs was prohibited as of October 1, 1984. This conclusion is based on 40 CFR §761.20(a), which prohibits use of PCBs in any concentration unless it is specifically authorized under 40 CFR §761.30. Although EPA has authorized the processing and distribution in commerce of PCBs in concentrations of less than 50 PPM for purposes of disposal, 40 CFR §761.20(c)(4), that agency has taken the position that burning for energy recovery is "use" rather than "disposal" and is, therefore, prohibited. Note, however, that PCBs in concentrations of less than 50 ppm may be burned in a high efficiency boiler as an approved PCB disposal method pursuant to 40 CFR §761.60, provided that state air permitting requirements have also been satisfied.

Ms. Jane Kim of the Office of Toxic Substances at EPA headquarters (202/382-3991) has indicated to Department staff that EPA is considering amending federal PCB regulations to allow the burning for energy recovery of used oil containing less than 50 ppm PCBs. Until then, she suggests that companies wishing to burn these oils submit a request to EPA Region IV for authorization with respect to the federal rules. I suggest that interested parties direct any comments on the federal regulation or the anticipated amendment directly to EPA.*

* Since the state PCB rule, Rule 17-34, Florida Administrative Code, only regulates the storage for disposal of PCBs, the use of PCBs is not regulated by the Department. However, Department air rules 17-2, F.A.C., and the basic permitting requirement of Chapter 403 F.S. must be complied with.

Memorandum
Page Three
January 5, 1987

Although the specification for total halogens (chemicals containing chlorine, bromine, iodine, or fluorine) is 4,000 ppm, used oil containing over 1,000 ppm will be presumed to have been mixed with a halogenated hazardous waste. In the April 28 memorandum, I stated that used oil fuels with more than 1,000 ppm total halogens should not be burned in boilers unless the marketer can show that the used oil does not contain any halogenated hazardous wastes. To clarify any confusion that this statement may have caused, I would like to make the following points:

1. As noted above, hazardous waste fuel and off-specification used oil fuel may be burned for energy recovery in industrial boilers. We did not intend to suggest that such use is prohibited by the RCRA rule.
2. Also, as previously noted, persons may rebut the presumption that used oil containing more than 1,000 ppm total halogens has been mixed with hazardous waste (for example, by showing that the used oil does not contain significant concentrations of halogenated hazardous constituents). The use of the word "any" may have caused some confusion in our cautionary statement; however, since the management and storage standards for used oil and hazardous waste fuels differ, the Department felt that a strong caution was in order.

Finally, I would like to clarify the discussion in my April 28, 1986, memorandum regarding air permitting considerations for the burning of used oil. In that memorandum I stated that the authorization to burn used oil requires that air construction permits be modified to insure that any changes to permit conditions will be federally enforceable. Upon reconsideration on this point, I am now revising the guidance in the previous memorandum as follows:

1. If your current air pollution operation permit, construction permit, or BACT determination does not specifically prohibit the burning of used oil, then you may responsibly burn "on-specification" used oil without any permit modification until the Department notifies you that your permit needs to be revised.

Memorandum
Page Four
January 5, 1987

2. If your air permit or BACT determination specifically prohibits the burning of used oil, or if you are burning "off-specification" used oil, you will need to contact the appropriate Department district office within the next 90 days to discuss what type of authorization is needed.

In addition to the air permitting considerations, facilities that burn more than 10,000 gallons of used oil annually must register with the Department as use oil recyclers in accordance with Florida Administrative Code Rule 17-7, Part V, unless specifically exempted under the provisions of that rule.

By burning used oil in an approved manner, you will help Florida recycle a valuable resource, to cut down on its energy dependence, and to protect our fragile environment. You also will be saving money on your fuel bill. We will all benefit by efforts to properly recycle used oil through its use as a fuel.

If you have any questions or comments, please refer them to David Kelley at (904)488-0300 in the Bureau of Waste Management or Barry Andrews at (904)488-1344 in the Bureau of Air Quality Management.

VJT/ks

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:
Gainesville Regional Utilities
P.O. Box 490
Gainesville, FL 32602

I.D. Number: 31JAX01000507
Permit Number: A001-143846
Date of Issue: March 28, 1988
Expiration Date: April 1, 1993
County: Alachua
Latitude/Longitude: 29°38'48"N; 82°19'19"W
Project: No. 7 Unit at JRK Station
UTM: E-(17)372.0; N-3280.2

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 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 John R. Kelly Station No. 7 Unit, a fossil fuel steam generator, fired with natural gas or No. 6 fuel oil.

Located at JRK Station, 605 S.E. 3rd St., Gainesville, Alachua County, FL.

In accordance with:

operation permit application dated March 10, 1977
renewal permit application dated February 3, 1983
renewal permit application dated December 29, 1987
letter from Yolanta E. Jonynas received March 25, 1988

PERMITTEE:
Gainesville Regional Utilities
No. 7 Unit, John R. Kelly Sta.

Permit No.: A001-143846
Date of Issue: March 28, 1988
Expiration Date: April 1, 1993

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:
Gainesville Regional Utilities
No. 7 Unit, John R. Kelly Sta.

Permit No.: A001-143846
Date of Issue: March 28, 1988
Expiration Date: April 1, 1993

- 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 noncompliance; and
 - b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.
 - c. 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.
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, FL 92-500)
 - () Compliance with New Source Performance Standards

ERMITTEE:
Gainesville Regional Utilities
No. 7 Unit, John R. Kelly Sta.

Permit No.: AO01-143846
Date of Issue: March 28, 1988
Expiration Date: April 1, 1993

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:
 Gainesville Regional Utilities
 No. 7 Unit, John R. Kelly Sta.

Permit No.: A001-143846
 Date of Issue: March 28, 1988
 Expiration Date: April 1, 1993

SPECIFIC CONDITIONS:

1. The maximum heat input rate (operating rate) is SEE BELOW and shall not be exceeded without prior approval.

<u>Rate (MMBTU/hr)</u>	<u>Fuel</u>
272	natural gas
249	No. 6 fuel oil

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:

<u>Pollutant</u>	<u>Rule</u>	<u>Emission Rate</u>	
		<u>lbs/hr</u>	<u>TPY</u>
Visible Emissions (VE)	17-2.600(5)(a) ¹	20% opacity, except 40% for 2 mins/hr.	
VE	17-2.600(6)(a) ²	20% opacity, except 40% for 2 mins/hr.	

¹Note: For FFS generators with >250 MMBTU/hr. heat input

²Note: For FFS generators with <250 MMBTU/hr. heat input

5. The submitted proposal for a Best Available Control Technology determination to establish particulate matter and sulfur dioxide emission limitations for Unit No. 7 has been sent to BAQM. If the Department concurs with the proposed BACT determination, this permit shall be revised to incorporate the corresponding particulate matter and sulfur dioxide emission limitations. If the Department does not concur with the proposed BACT determination, it shall make its own BACT determination and propose to modify this permit accordingly, subject to the permittee's right to request an administrative proceeding on the proposed agency action pursuant to Section 120.57, Florida Statutes.

PERMITTEE:
Gainesville Regional Utilities
No. 7 Unit, John R. Kelly Sta.

Permit No.: A001-143846
Date of Issue: March 28, 1988
Expiration Date: April 1, 1993

SPECIFIC CONDITIONS:

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

CONDITIONAL VE BASED ON FUEL USED

<u>Pollutant</u>	<u>Interval from</u>
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.b., FAC - test not required when liquid and/or solid fuel is burned for a total of no more 400 hours.
- ³Basis: If this unit was fired only with natural gas during the previous calendar year, so state in the annual operation report.

*GBO (Gainesville Branch Office) located at 5700 S.W. 34th Street, Suite 1204, Gainesville, FL 32608; Phone 904/336-2095

7. In each test report, submit the maximum input/production rate at which this source was operated since the most recent test.
8. Submit an annual operation report for this source on the form supplied by the Department for each calendar year on or before March 1.
9. Any revision(s) to a permit (and application) must be submitted and approved prior to implementing.
10. Forms for renewal will be sent 5 months prior to April 1, 1993 and the completed forms with test results are due 90 days prior to April 1, 1993.

Issued this 28 day of March, 1988

STATE OF FLORIDA DEPARTMENT

for Michael J. Fitzsimmons
Ernest E. Frey, District Manager



Florida Department of Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7577

Lawton Chiles
Governor

Virginia B. Wetherell
Secretary

CERTIFIED - RETURN RECEIPT

December 29, 1993

Mr. Larry McDaniel
Power Plant Manager
Gainesville Regional Utilities
Post Office Box 147117, Station JK33
Gainesville, Florida 32614-7117

Dear Mr. McDaniel:

Alachua County - AP
Gainesville Regional Utilities
No. 8 Unit at JRK Station
ID#31JAX01000508
AO01-224218
Permit Revision

The permit revision request of 12-17-93 concerning excess emissions resulting from malfunction is hereby approved.

Specific Condition 2 has been revised to correct a typographical error (the interchanging of the words "used" with "generated" in the phrase "GRU Used Generated Oil").

In addition Specific Condition 7 has been revised to clarify that excess emissions resulting from malfunction shall be permitted in accordance with FAC Rule 17-210.700(1).

Attached is a revised page 5 of 8 and page 6 of 8 of the referenced permit. Please replace pages 5 of 8 and 6 of 8 (issued 12-14-93) with this attachment.

This letter and attachment shall become a part of the referenced permit.

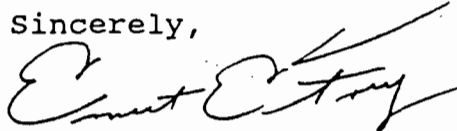
Any party to this Order (permit modification) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by filing a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the office of General Counsel, 2600 Blair Stone Road,

Gainesville Regional Utilities
Page Two


Tallahassee, Florida 32399-2400; 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 days from the date this Notice is filed with the Clerk of the Department.

If you have any questions concerning this matter, please contact Rita Felton at (904) 448-4310, Ext. 370.

Sincerely,



Ernest E. Frey, P.E.
Director of District Management

EEF:RF:RF:bt ^{RF} 

cc: Yolanta Jonynas, Sr., Electric Utility Environmental Engineer
Douglas Beck, P.E.
Alachua County Office Environmental Protection

PERMITTEE:
 Gainesville Regional Utilities
 Post Office Box 147117
 Gainesville, Florida 32614-7117

I.D. Number: 31JAX01000508
 Permit/Cert Number: A001-224218
 Date of Issue: April 30, 1993
 REVISED: 12-29-93
 Expiration Date: June 1, 1998

SPECIFIC CONDITIONS:

1. The ID Number and Project Name for this source shall be used on all correspondences.
2. The maximum heat input (operating) rates are listed below and shall not be exceeded without prior Department approval:

Rate	Fuel
584.5 MMBTU/hr ¹	Natural gas
539.5 MMBTU/hr ²	No. 6 Fuel oil
--- ³	GRU Generated Used Oil ⁴

- ¹Basis: 0.557 MMCF/hr. This basis is not to be construed as a permit limitation.
²Basis: 85 bbls/hr. This basis is not to be construed as a permit limitation.
³Include an estimate of the total quantity of used oil generated during the applicable calendar year in the AOR (Annual Operation Report)
⁴Shall be burned in accordance with the applicable provisions of 40 CFR Part 266 Subpart E.

3. Testing of emissions must be performed at an operating rate of at least 90% of the rate in Specific Condition No. 2, or Specific Condition No. 4 will become effective.
4. The operating rate shall not exceed 110% of the rate of the most recently accepted test, except for additional testing purposes, and shall not exceed the rate in Specific Condition No. 2. After testing at a higher rate, the operating rate shall continue to not exceed 110% of the rate of the last accepted test until the test report at the higher rate is reviewed and accepted by the Department.
5. The permitted maximum allowable emission rate for each pollutant is as follows:

POLLUTANT	MATERIAL	MAXIMUM ALLOWABLE EMISSION RATE		FAC RULE
		LBS/HR	TPY	
PARTICULATE MATTER	FUEL OIL	53.95 ¹	236.30 ²	17-296.405(1)(b)
SULFUR DIOXIDE	FUEL OIL	1483.63 ³	6498.30 ²	17-296.405(1)(c)1.j.
VISIBLE EMISSIONS	FUEL OIL	20% Opacity except 40% for 2 min/hr		17-296.405(1)(a)

- ¹Basis: 539.5 MMBTU/hr; 0.1 lb/MMBTU
²Basis: 8760 H/Y
³Basis: 539.5 MMBTU/hr; 2.75 lb/MMBTU

PERMITTEE:
 Gainesville Regional Utilities
 Post Office Box 147117
 Gainesville, Florida 32614-7117

I.D. Number: 31JAX01000508
 Permit/Cert Number: A001-224218
 Date of Issue: April 30, 1993
 REVISED: 12-29-93
 Expiration Date: June 1, 1998

SPECIFIC CONDITIONS:

6. The permitted maximum allowable emission rate for particulate matter and visible emissions during soot blowing and load change conditions are as follows:

POLLUTANT	MAXIMUM ALLOWABLE EMISSION RATE	FAC RULE
PARTICULATE MATTER	0.3 lbs/MMBTU ¹	17-210.700(3)
VISIBLE EMISSIONS	60% Opacity ²	17-210.700(3)

¹Emission limit shall not exceed an average of 0.3 lbs/MMBTU heat input and not to exceed 3 hrs/24 hrs.

²Visible emissions above 60% opacity shall be allowed for not more than 4, six-minute periods, during the 3-hr period of excess emissions.

7. Excess emissions resulting from malfunction shall be permitted in accordance with FAC Rule 17-210.700(1).
8. Excess emissions resulting from startup or shutdown shall be permitted, provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions minimized - 17-210.700(2).
9. Test the emission for the following pollutant(s) at the interval(s) indicated, notify the Department 15 days prior to testing pursuant to FAC Rule 17-297.340(1)(i), and submit the test report documentation to the Department within 45 days after completion of the testing pursuant to FAC Rule 17-297.570(2):

POLLUTANT	TEST FREQUENCY	TEST METHOD ¹
PARTICULATE MATTER SB ^{2,3}	ANNUAL FROM 01-31-93	EPA 5 or 5B or 5F or EPA 17
PARTICULATE MATTER SS ^{3,4}	ANNUAL FROM 01-31-93	EPA 5 or 5B or 5F or EPA 17
SULFUR DIOXIDE	ANNUAL FROM 01-31-93	EPA 6 or 6A or 6B or 6C ⁵
VISIBLE EMISSIONS SB ^{3,6}	ANNUAL FROM 01-31-93	EPA 9
VISIBLE EMISSIONS SS ^{3,4,6}	ANNUAL FROM 01-31-93	EPA 9



Florida Department of Environmental Protection

Lawton Chiles
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7577

Virginia B. Wetherell
Secretary

NOTICE OF PERMIT ISSUANCE

CERTIFIED - RETURN RECEIPT

Mr. Larry McDaniel
Plant Manager
Gainesville Regional Utilities
Post Office Box 147117
Gainesville, Florida 32614-7117

Dear Mr. McDaniel:

Alachua County - AP
Gainesville Regional Utilities
No. 8 Unit at JRK Station

Enclosed is **Permit Number A001-224218 (Revised)** to operate the subject air pollution source, pursuant to Section 403.087, Florida Statutes (FS).

A person whose substantial interests are affected by this permit may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. 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, within 14 days of receipt of this Permit. 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, Florida Statutes.

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

PERMITTEE:
Gainesville Regional Utilities
Page Two
A001-224218 (Revised)

(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 permit. Persons whose substantial interests will be affected by any decision of the Department with regard to the application 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 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, F.A.C.

This permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

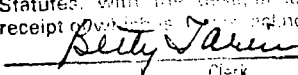
When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; 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 days from the date the Final Order is filed with the Clerk of the Department.


Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


Ernest E. Frey, P.E.
Director of District Management

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


Betty J. Allen
Clerk
Date 12-14-93

EEF:bt 

cc: Douglas C. Beck, P.E.
Yolanta Jonynas, Sr., Electric Utility Environmental Engineer
Alachua County Office Environmental Protection



Florida Department of Environmental Protection

Lawton Chiles
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7577

Virginia B. Wetherell
Secretary

PERMITTEE:

Gainesville Regional Utilities
Post Office Box 147117
Gainesville, Florida 32614-7117

I.D. Number: 31JAX01000508
Permit/Cert Number: A001-224218
Date of Issue: April 30, 1993
REVISED: 12-14-93
Expiration Date: June 1, 1998
County: Alachua
Latitude/Longitude: 29°38'48"N; 82°19'19"W
Project: No. 8 Unit at JRK Station
UTM: E-(17)372.0; N-3280.2

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-210, 17-212, 17-272, 17-296, 17-297 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 John R., Kelly Station, No. 8 Unit, a fossil fuel steam generator.

Located at JRK Station, 605 S.E. 3rd St., Gainesville, Alachua County, Florida.

In accordance with:

Operation permit application dated 06-02-78
Renewal permit application dated 05-17-83
Renewal permit application received 03-21-88
Renewal permit application received 01-11-93
Additional Information received 02-02-93

PERMITTEE:
Gainesville Regional Utilities
Post Office Box 147117
Gainesville, Florida 32614-7117

I.D. Number: 31JAX01000508
Permit/Cert: AO01-224218
Date of Issue: April 30, 1993
Expiration Date: June 1, 1998
REVISED:

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
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. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver 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, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and 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 and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a. Have access to and copy any records that must be kept under the conditions of the permit;

PERMITTEE:
Gainesville Regional Utilities
Post Office Box 147117
Gainesville, Florida 32614-7117

I.D. Number: 31JAX01000508
Permit/Cert: AO01-224218
Date of Issue: April 30, 1993
Expiration Date: June 1, 1998
REVISED:

GENERAL CONDITIONS:

b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

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

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

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

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

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 17-4.120 and 17-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

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

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards (NSPS)

PERMITTEE:
Gainesville Regional Utilities
Post Office Box 147117
Gainesville, Florida 32614-7117

I.D. Number: 31JAX01000508
Permit/Cert: A001-224218
Date of Issue: April 30, 1993
Expiration Date: June 1, 1998
REVISED:

GENERAL CONDITIONS:

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the dates 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 time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

PERMITTEE:
 Gainesville Regional Utilities
 Post Office Box 147117
 Gainesville, Florida 32614-7117

I.D. Number: 31JAX01000508
 Permit/Cert Number: AO01-224218
 Date of Issue: April 30, 1993
 REVISED:
 Expiration Date: June 1, 1998

SPECIFIC CONDITIONS:

1. The ID Number and Project Name for this source shall be used on all correspondences.
2. The maximum heat input (operating) rates are listed below and shall not be exceeded without prior Department approval:

Rate	Fuel
584.5 MMBTU/hr ¹	Natural gas
539.5 MMBTU/hr ²	No. 6 Fuel oil
--- ³	GRU Used Generated Oil ⁴

¹Basis: 0.557 MMCF/hr. This basis is not to be construed as a permit limitation.

²Basis: 85 bbls/hr. This basis is not to be construed as a permit limitation.

³Include an estimate of the total quantity of used oil generated during the applicable calendar year in the AOR (Annual Operation Report)

⁴Shall be burned in accordance with the applicable provisions of 40 CFR Part 266 Subpart E.

3. Testing of emissions must be performed at an operating rate of at least 90% of the rate in Specific Condition No. 2, or Specific Condition No. 4 will become effective.
4. The operating rate shall not exceed 110% of the rate of the most recently accepted test, except for additional testing purposes, and shall not exceed the rate in Specific Condition No. 2. After testing at a higher rate, the operating rate shall continue to not exceed 110% of the rate of the last accepted test until the test report at the higher rate is reviewed and accepted by the Department.
5. The permitted maximum allowable emission rate for each pollutant is as follows:

POLLUTANT	MATERIAL	MAXIMUM ALLOWABLE EMISSION RATE		FAC RULE
		LBS/HR	TPY	
PARTICULATE MATTER	FUEL OIL	53.95 ¹	236.30 ²	17-296.405(1)(b)
SULFUR DIOXIDE	FUEL OIL	1483.63 ³	6498.30 ²	17-296.405(1)(c)1.j.
VISIBLE EMISSIONS	FUEL OIL	20% Opacity except 40% for 2 min/hr		17-296.405(1)(a)

¹Basis: 539.5 MMBTU/hr; 0.1 lb/MMBTU

²Basis: 8760 H/Y

³Basis: 539.5 MMBTU/hr; 2.75 lb/MMBTU

PERMITTEE:
 Gainesville Regional Utilities
 Post Office Box 147117
 Gainesville, Florida 32614-7117

I.D. Number: 31JAX01000508
 Permit/Cert Number: AO01-224218
 Date of Issue: April 30, 1993
 REVISED:
 Expiration Date: June 1, 1998

SPECIFIC CONDITIONS:

6. The permitted maximum allowable emission rate for particulate matter and visible emissions during soot blowing and load change conditions are as follows:

POLLUTANT	MAXIMUM ALLOWABLE EMISSION RATE	FAC RULE
PARTICULATE MATTER	0.3 lbs/MMBTU ¹	17-210.700(3)
VISIBLE EMISSIONS	60% Opacity ²	17-210.700(3)

¹Emission limit shall not exceed an average of 0.3 lbs/MMBTU heat input and not to exceed 3 hrs/24 hrs.

²Visible emissions above 60% opacity shall be allowed for not more than 4, six-minute periods, during the 3-hr period of excess emissions.

7. Excess emissions resulting from startup, shutdown or malfunction shall be permitted, provided that best operational practices to minimize emissions are adhered to and that the duration of excess emissions be minimized, but in no case exceed two (2) hours in any 24 hour period unless a longer duration is specifically authorized by the Department - 17-210.700(1).
8. Excess emissions resulting from startup or shutdown shall be permitted, provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions minimized - 17-210.700(2).
9. Test the emission for the following pollutant(s) at the interval(s) indicated, notify the Department 15 days prior to testing pursuant to FAC Rule 17-297.340(1)(i), and submit the test report documentation to the Department within 45 days after completion of the testing pursuant to FAC Rule 17-297.570(2):

POLLUTANT	TEST FREQUENCY	TEST METHOD ¹
PARTICULATE MATTER SB ^{2,3}	ANNUAL FROM 01-31-93	EPA 5 or 5B or 5F or EPA 17
PARTICULATE MATTER SS ^{3,4}	ANNUAL FROM 01-31-93	EPA 5 or 5B or 5F or EPA 17
SULFUR DIOXIDE	ANNUAL FROM 01-31-93	EPA 6 or 6A or 6B or 6C ⁵
VISIBLE EMISSIONS SB ^{3,6}	ANNUAL FROM 01-31-93	EPA 9
VISIBLE EMISSIONS SS ^{3,4,6}	ANNUAL FROM 01-31-93	EPA 9

PERMITTEE:
Gainesville Regional Utilities
Post Office Box 147117
Gainesville, Florida 32614-7117

I.D. Number: 31JAX01000508
Permit/Cert Number: AO01-224218
Date of Issue: April 30, 1993
REVISED:
Expiration Date: June 1, 1998

SPECIFIC CONDITIONS:

SC No. 9 Cont'd.

- ¹From 17-297.330, FAC Table 297.330-1
 - ²SB (soot blowing test per FAC Rule 17-297.340(1)(b)).
 - ³Test is not required when liquid and/or solid fuel is burned for a total of no more than 400 hours per Federal Fiscal year (October 1, 199_ - September 30, 199_) - FAC Rule 17-297.340(1)(e).
 - ⁴SS (Steady State/Normal Operation Conditions).
 - ⁵In lieu of the sulfur dioxide emission test specified in Specific Condition No. 9, a Certified ASTM fuel oil analysis shall be conducted to determine the weight percent of sulfur and the fuel oil heat content. The owner or operator shall submit to the Department a copy of the Certified ASTM analysis and the sulfur dioxide emission calculations.
 - ⁶Visible emission test must be concurrent with one particulate matter test run.
10. Hours of operation shall be limited to 8760 H/Y and shall be recorded.
 11. Stack sampling facilities shall comply with FAC Rule 17-297.345.
 12. In each test report, submit the maximum input/production rate at which this source was operated since the most recent test.
 13. Fuel oil analysis reports, including fuel oil heat content shall be submitted to the Department with each test report.
 14. Submit an annual operation report for this source on the form supplied by the Department for each calendar year on or before March 1.
 15. Any revision(s) to a permit (and application) must be submitted and approved prior to implementing.

PERMITTEE:
Gainesville Regional Utilities
Post Office Box 147117
Gainesville, Florida 32614-7117

I.D. Number: 31JAX01000508
Permit/Cert Number: AO01-224218
Date of Issue: April 30, 1993
REVISED:
Expiration Date: June 1, 1998

SPECIFIC CONDITIONS:

16. The completed Application For Renewal of Permit To Operate Air Pollution Source(s) form with the compliance report is due 90 days prior to 06-01-98.

Executed in Jacksonville, Florida

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

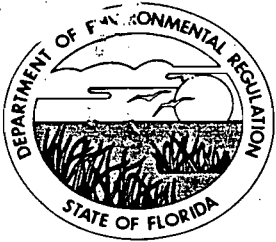


Ernest E. Frey, P.E.
Director of District Management

FILING AND ACKNOWLEDGEMENT

FILED, on this date, pursuant to S120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Betty Talen 12-14-93
Clerk Date



Florida Department of Environmental Regulation

Northeast District • Suite B200, 7825 Baymeadows Way • Jacksonville, Florida 32256-7577

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

NOTICE OF PERMIT ISSUANCE

CERTIFIED - RETURN RECEIPT

Mr. Randy C. Casserleigh
Power Plant Manager
Gainesville Regional Utilities
Post Office Box 490
Gainesville, Florida 32602

Dear Mr. Casserleigh:

Alachua County - AP
Gainesville Regional Utilities
No. 8 Unit at JRK Station

Enclosed is Permit Number A001-224218 to operate the subject air pollution source, pursuant to Section 403.087, Florida Statutes (FS).

A person whose substantial interests are affected by this permit may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. 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, within 14 days of receipt of this Permit. 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, Florida Statutes.

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

Administration 448-4300
Air 448-4310
Waste Management 448-4320

Water Facilities 448-4330
Water Management 448-4340
FAX 448-4366

PERMITTEE:
Gainesville Regional Utilities
Page two
A001-224218

(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 permit. Persons whose substantial interests will be affected by any decision of the Department with regard to the application 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 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, F.A.C.

This permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, 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 Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; 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 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



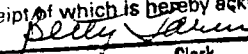
Ernest E. Frey, P.E.
Director of District Management

EEF:bt

Copies furnished to: Douglas C. Beck, P.E.
Alachua Co. Office Environmental Protection

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on 4/30/93 to the listed persons.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to §120.52
Statutes, with the designated Department
receipt of which is hereby acknowledged. 4/30/93

Clerk Date



Florida Department of Environmental Regulation

Northeast District • Suite B200, 7825 Baymeadows Way • Jacksonville, Florida 32256-7577

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

PERMITTEE:

Gainesville Regional Utilities
Post Office Box 490
Gainesville, Florida 32602

I.D. Number: 31JAX01000508
Permit/Cert Number: A001-224218
Date of Issue: 04-30-93
Expiration Date: June 1, 1998
County: Alachua
Latitude/Longitude: 29°38'48"N; 82°19'19"W
Project: No. 8 Unit at JRK Station
UTM: E-(17)372.0; N-3280.2

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-210, 17-212, 17-272, 17-296, 17-297 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 John R. Kelly Station No. 8 Unit, a fossil fuel steam generator.

Located at JRK Station, 605 S.E. 3rd St., Gainesville, Alachua County, Florida.

In accordance with:

Operation permit application dated 06-02-78
Renewal permit application dated 05-17-83
Renewal permit application received 03-21-88
Renewal permit application received 01-11-93
Additional information received 02-02-93

PERMITTEE:
Gainesville Regional Utilities
Post Office Box 490
Gainesville, Florida 32602

I.D. Number: 51JAX01000508
Permit/Cert: AO01-224218
Date of Issue:
Expiration Date: June 1, 1998

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:
Gainesville Regional Utilities
Post Office Box 490
Gainesville, Florida 32602

I.D. Number: 31JAX01000508
Permit/Cert: AO01-224218
Date of Issue:
Expiration Date: June 1, 1998

GENERAL CONDITIONS:

- 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:
Gainesville Regional Utilities
Post Office Box 490
Gainesville, Florida 32602

I.D. Number: 31JAX01000508
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GENERAL CONDITIONS:

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:
 Gainesville Regional Utilities
 Post Office Box 490
 Gainesville, Florida 32602

I.D. Number: 31JAX01000508
 Permit/Cert Number: AO01-224218
 Date of Issue:
 Expiration Date: June 1, 1998

SPECIFIC CONDITIONS:

1. The ID Number and Project Name for this source shall be used on all correspondences.
2. The maximum operating rates are listed below and shall not be exceeded without prior Department approval:

Rate	Fuel
584.5 MMBTU ¹ /HR	Natural gas
539.5 MMBTU ²	No. 6 Fuel oil
---- ³	GRU Generated Oil ⁴

¹For input rate of 0.557 MMCF/hr

²For input rate of 85 bbls/hr

³Include the actual operating rate in the AOR

⁴In accordance with GRU request dated 05-12-89 and the Department letter dated 06-12-89 (Attachment 1).

3. Testing of emissions must be performed at an operating rate of at least 90% of the rate in Specific Condition No. 2, or Specific Condition No. 4 will become effective.
4. The operating rate shall not exceed 110% of the rate of the most recently accepted test, except for additional testing purposes, and shall not exceed the rate in SC No. 2. After testing at a higher rate, the operating rate shall continue to not exceed 110% of the rate of the last accepted test until the test report at the higher rate is reviewed and accepted by the Department.
5. The permitted maximum allowable emission rate for each pollutant is as follows:

POLLUTANT	MATERIAL	MAXIMUM ALLOWABLE EMISSION RATE		FAC RULE
		LBS/HR	TPY	
PARTICULATE MATTER	FUEL OIL	53.95 ¹	235.65 ²	17-296.405(1)(b)
SULFUR DIOXIDE	FUEL OIL	860.01 ³	3756.52 ²	---
VISIBLE EMISSIONS	FUEL OIL	<20% Opacity except 40% for 2 min/hr		17-296.405(1)(a)
PARTICULATE MATTER ⁴	NATURAL GAS	2.78 ⁵	12.14 ²	---
SULFUR DIOXIDE ⁴	NATURAL GAS	0.33 ⁶	1.44 ²	---
NITROGEN OXIDE ⁴	NATURAL GAS	306.35 ⁷	1338.14 ²	---
CARBON MONOXIDE ⁴	NATURAL GAS	22.28 ⁸	97.32 ²	---
VOC ^{4,9}	NATURAL GAS	0.78 ¹⁰	3.41 ²	---

PERMITTEE:
 Gainesville Regional Utilities
 Post Office Box 490
 Gainesville, Florida 32602

I.D. Number: 31JAX01000508
 Permit/Cert Number: AO01-224218
 Date of Issue:
 Expiration Date: June 1, 1998

SPECIFIC CONDITIONS:

SC No. 5 Cont'd.

- ¹Basis: 539.5 MMBTU/hr; 0.1 lb/MMBTU
- ²Basis: 24 H/D; 7 D/W; 52 W/Y
- ³Basis: BACT determination dated 10-11-91, 8.03 lb/gal, 85 bbls/hr, 1.5 wt% sulfur
- ⁴For inventory purposes
- ⁵Basis: AP-42, Table 1.4-1; 5 lb/MMCF; 0.557 MMCF/hr
- ⁶Basis: AP-42, Table 1.4-2; 0.6 lb/MMCF; 0.557 MMCF/hr
- ⁷Basis: AP-42, Table 1.4-2; 550 lb/MMCF; 0.557 MMCF/hr
- ⁸Basis: AP-42, Table 1.4-2; 40 lb/MMCF; 0.557 MMCF/hr
- ⁹Excluding methane
- ¹⁰Basis: AP-42, Table 1.4-3; 1.7 lb/MMCF; 0.557 MMCF/hr; 17% Methane adjustment

6. The permitted maximum allowable emission rate for particulate matter and visible emissions during soot blowing conditions are as follows:

POLLUTANT	MATERIAL	MAXIMUM ALLOWABLE EMISSION RATE	FAC RULE
PARTICULATE MATTER	FUEL OIL	0.3 lbs/MMBTU ¹	17-210.700(3)
VISIBLE EMISSIONS	FUEL OIL	60% Opacity ²	17-210.700(3)

¹Emission limit shall not exceed an average of 0.3 lbs/MMBTU heat input and not to exceed 3 hrs/24 hrs.

²Visible emissions above 60% opacity shall be allowed for not more than 4, six-minute periods, during the 3-hr period of excess emissions.

7. Test the emission for the following pollutant(s) at the interval(s) indicated, notify the Department 15 days prior to testing pursuant to FAC Rule 17-297.340(1)(i), and submit the test report documentation to the Department within 45 days after completion of the testing pursuant to FAC Rule 17-297.570(2):

POLLUTANT	TEST FREQUENCY	TEST METHOD ¹
PARTICULATE MATTER ^{2,3}	ANNUAL FROM 01-15-93	EPA 5
SULFUR DIOXIDE	ANNUAL FROM 01-15-93	EPA 6 ⁴
VISIBLE EMISSIONS ^{3,5}	ANNUAL FROM 01-15-93	EPA 9

PERMITTEE:
Gainesville Regional Utilities
Post Office Box 490
Gainesville, Florida 32602

I.D. Number: 31JAX01000508
Permit/Cert Number: AO01-224218
Date of Issue:
Expiration Date: June 1, 1998

SPECIFIC CONDITIONS:

SC No. 7 Cont'd.

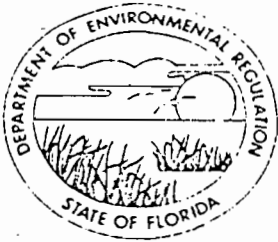
- 1 From 17-297.330, FAC Table 297.330-1
- 2 Per FAC Rule 17-297.340(1)(b), soot blowing test.
- 3 Test is not required when liquid and/or solid fuel is burned for a total of no more than 400 hours per Federal Fiscal year (October 1, 199_ - September 30, 199_) - 17-297.340(1)(e).
- 4 In lieu of EPA Test Method 6, a Certified ASTM D 396-76 fuel oil analysis shall be conducted to determine the weight percent of sulfur and the fuel oil heat content. The owner or operator shall submit to the Department a copy of the Certified ASTM D 396-76 analysis and the sulfur dioxide emission calculations.
- 5 Visible emission test must be concurrent with one particulate matter test run.
8. Soot blowing test for particulate matter and visible emissions shall be performed concurrently during the first soot blowing cycle following the compliance tests required by Specific Condition No. 7.
9. Hours of operation shall be limited to 24 H/D, 7 D/W and 52 W/Y and shall be recorded.
10. Stack sampling facilities shall comply with FAC Rule 17-297.345.
11. In each test report, submit the maximum input/production rate at which this source was operated since the most recent test.
12. Fuel oil analysis reports, including fuel oil heat content shall be submitted to the Department with each test report.
13. Submit an annual operation report for this source on the form supplied by the Department for each calendar year on or before March 1.
14. Any revision(s) to a permit (and application) must be submitted and approved prior to implementing.
15. The completed Application For Renewal of Permit To Operate Air Pollution Source(s) form with the compliance report is due 90 days prior to 06-01-98.

Executed in Jacksonville, Florida

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to S120.52, Florida Statutes, with the designated Department Clerk receipt of which is hereby acknowledged. 4/30/98
Debra J. Harris Clerk
Date

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

Ernest E. Frey
Ernest E. Frey, P.E.
Director of District Management



Florida Department of Environmental Regulation

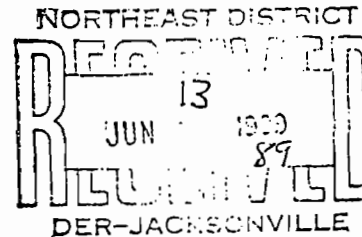
Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-24

Bob Martinez, Governor

Dale Twachmann, Secretary

John Shearer, Assistant Secretary

June 12, 1989



Ms. Yolanta Jonynas
Gainesville Regional Utilities
Post Office Box 490, Sta. 52
Gainesville, Florida 32602

Dear Ms. Jonynas:

In response to your question of May 12, 1989, regarding burning of GRU generated used oil, I am enclosing a copy of the latest DER memo on the subject dated January 5, 1987. Although an updated version is currently under consideration, your requested use would not be affected.

Your current permits should cover such use and hours of oil burning and therefore no amendments would be required.

Your other question regarding 40 CFR 266 Subpart E is addressed in the memo.

If you have any further questions, call me at (904)488-1344.

Sincerely,

William A. Thomas, P.E.
Bureau of Air Quality
Management

WAT/pa

Enclosure

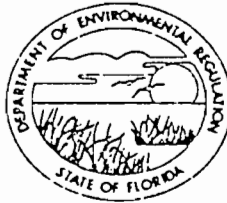
cc: Johnny Cole



- ATTACHMENT 1 -

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

MEMORANDUM

TO: Managers of Electric Utilities, Asphalt Plants, and Other
Industrial Burners

FROM: Victoria J. Tschinkel *VJ*

DATE: January 5, 1987

RE: Used Oil as a Fuel

On April 28, 1986, I issued a memorandum to inform you of recently promulgated federal rules on the burning of used oil. Because some recipients of that memorandum have voiced concerns about the Department's interpretation of certain provisions of the regulations, this memorandum supersedes all previous communication on the subject of used oil as a fuel.

On November 29, 1985, the U.S. EPA promulgated final RCRA regulations on the burning of used oil fuel. The Department has adopted these regulations by reference. The EPA regulations establish specifications for used oil fuel that may be burned in nonindustrial boilers.

Used Oil Specifications

<u>Constituent/Property</u>	<u>Allowable Level</u>
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Total Halogens	4,000 ppm maximum
Flash Point	100 degrees Fahrenheit minimum

Burning of off-specification used oil and hazardous waste fuels in non-industrial boilers is prohibited by the RCRA rules. The April 28 memorandum may have left some readers with the impression that industrial burners were also restricted by these rules to burning fuel that met specifications; however,

Memorandum
Page Two
January 5, 1987

industrial boilers and furnaces may burn hazardous waste fuel and used oil fuel, regardless of whether the fuels meet specifications. It should be noted, however, that facilities that burn hazardous waste fuel and off-specification used oil fuel are still subject to administrative requirements such as notification, receipt of an identification number, compliance with the manifest or invoice systems, and, for hazardous waste fuels, compliance with hazardous waste storage standards for hazardous waste fuels.

No level for PCBs is included in the used oil specifications, since the use, including burning for energy recovery, of used oil containing any concentrations of PCBs is prohibited under current federal regulations. Some readers of the April 28 memorandum expressed concern about this statement, asserting that 40 CFR §761.1 makes federal PCB regulations applicable only to substances containing more than 50 ppm PCBs. I have conferred with EPA headquarters concerning the federal position on the issue of burning used oil contaminated with less than 50 ppm PCBs. It is EPA's position that the burning for energy recovery of used oils containing any concentration of PCBs was prohibited as of October 1, 1984. This conclusion is based on 40 CFR §761.20(a), which prohibits use of PCBs in any concentration unless it is specifically authorized under 40 CFR §761.30. Although EPA has authorized the processing and distribution in commerce of PCBs in concentrations of less than 50 PPM for purposes of disposal, 40 CFR §761.20(c)(4), that agency has taken the position that burning for energy recovery is "use" rather than "disposal" and is, therefore, prohibited. Note, however, that PCBs in concentrations of less than 50 ppm may be burned in a high efficiency boiler as an approved PCB disposal method pursuant to 40 CFR §761.60, provided that state air permitting requirements have also been satisfied.

Ms. Jane Kim of the Office of Toxic Substances at EPA headquarters (202/382-3991) has indicated to Department staff that EPA is considering amending federal PCB regulations to allow the burning for energy recovery of used oil containing less than 50 ppm PCBs. Until then, she suggests that companies wishing to burn these oils submit a request to EPA Region IV for authorization with respect to the federal rules. I suggest that interested parties direct any comments on the federal regulation or the anticipated amendment directly to EPA.*

* Since the state PCB rule, Rule 17-34, Florida Administrative Code, only regulates the storage for disposal of PCBs, the use of PCBs is not regulated by the Department. However, Department air rules 17-2, F.A.C., and the basic permitting requirement of Chapter 403 F.S. must be complied with.

Memorandum
Page Three
January 5, 1987

Although the specification for total halogens (chemicals containing chlorine, bromine, iodine, or fluorine) is 4,000 ppm, used oil containing over 1,000 ppm will be presumed to have been mixed with a halogenated hazardous waste. In the April 28 memorandum, I stated that used oil fuels with more than 1,000 ppm total halogens should not be burned in boilers unless the marketer can show that the used oil does not contain any halogenated hazardous wastes. To clarify any confusion that this statement may have caused, I would like to make the following points:

1. As noted above, hazardous waste fuel and off-specification used oil fuel may be burned for energy recovery in industrial boilers. We did not intend to suggest that such use is prohibited by the RCRA rule.
2. Also, as previously noted, persons may rebut the presumption that used oil containing more than 1,000 ppm total halogens has been mixed with hazardous waste (for example, by showing that the used oil does not contain significant concentrations of halogenated hazardous constituents). The use of the word "any" may have caused some confusion in our cautionary statement; however, since the management and storage standards for used oil and hazardous waste fuels differ, the Department felt that a strong caution was in order.

Finally, I would like to clarify the discussion in my April 28, 1986, memorandum regarding air permitting considerations for the burning of used oil. In that memorandum I stated that the authorization to burn used oil requires that air construction permits be modified to insure that any changes to permit conditions will be federally enforceable. Upon reconsideration on this point, I am now revising the guidance in the previous memorandum as follows:

1. If your current air pollution operation permit, construction permit, or BACT determination does not specifically prohibit the burning of used oil, then you may responsibly burn "on-specification" used oil without any permit modification until the Department notifies you that your permit needs to be revised.

Memorandum
Page Four
January 5, 1987

2. If your air permit or BACT determination specifically prohibits the burning of used oil, or if you are burning "off-specification" used oil, you will need to contact the appropriate Department district office within the next 90 days to discuss what type of authorization is needed.

In addition to the air permitting considerations, facilities that burn more than 10,000 gallons of used oil annually must register with the Department as use oil recyclers in accordance with Florida Administrative Code Rule 17-7, Part V, unless specifically exempted under the provisions of that rule.

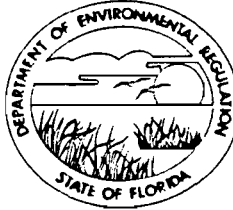
By burning used oil in an approved manner, you will help Florida recycle a valuable resource, to cut down on its energy dependence, and to protect our fragile environment. You also will be saving money on your fuel bill. We will all benefit by efforts to properly recycle used oil through its use as a fuel.

If you have any questions or comments, please refer them to David Kelley at (904)488-0300 in the Bureau of Waste Management or Barry Andrews at (904)488-1344 in the Bureau of Air Quality Management.

VJT/ks

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

NOTICE OF PERMIT

Mr. Glenn Kelley
Power Plant Manager
Gainesville Regional Utilities
Post Office Box 490
Gainesville, Florida 32602

File

Dear Mr. Kelley:

Alachua County - AP
Gainesville Regional Utilities
J.R. Kelly Generating Station
Unit No. 8

Enclosed is Permit Number A001-147240, dated June 2, 1988, to operate the subject air pollution source, issued pursuant to Section 403.087, Florida Statutes (F.S.).

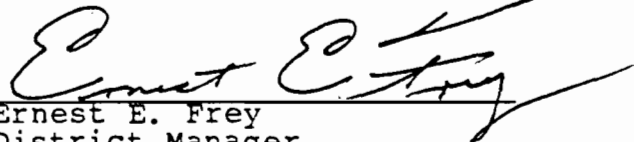
Persons whose substantial interests are affected by this permit have a right, pursuant to Section 120.57, F.S., to petition for an administrative determination (hearing) on it. The petition must conform to the requirements of Chapters 17-103 and 28-5.201, Florida Administrative Code (FAC), and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of receipt of this notice. Failure to file a petition within the fourteen (14) days constitutes a waiver of any right such person has to an administrative determination (hearing) pursuant to Section 120.57, F.S.. This permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with this paragraph or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, FAC. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order 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 Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 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 days from the date the Final Order is filed with the Clerk of the Department.

Mr. Glenn Kelley
GRU - JRK Generating Station
Unit #8
Permit No. AO01-147240

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


Ernest E. Frey
District Manager

WBJ EEF:jck

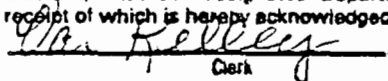
Copies furnished to:
Gainesville Branch Office

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on 6/16/88 to the listed persons.

FILING AND ACKNOWLEDGEMENT

FILED, on this date, pursuant to S120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

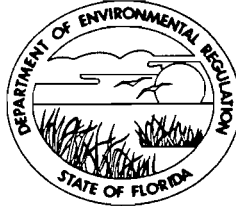

Clerk

6/16/88
Date

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:
Gainesville Regional Utilities
P.O. Box 490
Gainesville, FL 32602

I.D. Number: 31JAX01000508
Permit Number: A001-147240
Date of Issue: June 2, 1988
Expiration Date: June 1, 1993
County: Alachua
Latitude/Longitude: 29°38'48"N; 82°19'19"W
Project: No. 8 Unit at JRK Station
UTM: E-(17)372.0; N-3280.2

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 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 John R. Kelly Station No. 8 Unit, a fossil fuel steam generator.

Located at JRK Station, 605 S.E. 3rd St., Gainesville, Alachua County, FL.

In accordance with:

operation permit application dated June 2, 1978
renewal permit application dated May 17, 1983
renewal permit application dated March 21, 1988

PERMITTEE:
Gainesville Regional Utilities
No. 8 Unit, John R. Kelly Sta.

Permit No.: A001-147240
Date of Issue: June 2, 1988
Expiration Date: June 1, 1993

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 system 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:
Gainesville Regional Utilities
No. 8 Unit, John R. Kelly Sta.

Permit No.: A001-147240
Date of Issue: June 2, 1988
Expiration Date: June 1, 1993

- 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 noncompliance; and
 - b. the period of noncompliance, including exact dates and times; or, if not corrected the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.
 - c. 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 the 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.
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

PERMITTEE:
Gainesville Regional Utilities
No. 8 Unit, John R. Kelly Sta.

Permit No.: AO01-147240
Date of Issue: June 2, 1988
Expiration Date: June 1, 1993

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:
 Gainesville Regional Utilities
 No. 8 Unit, John R. Kelly Sta.

Permit No.: A001-147240
 Date of Issue: June 2, 1988
 Expiration Date: June 1, 1993

SPECIFIC CONDITIONS:

1. The maximum heat input rate (operating rate) is SEE BELOW and shall not be exceeded without prior approval.

<u>Rate (MMBTU/hr)</u>	<u>Fuel</u>
584.5	natural gas
539.5	No. 6 fuel oil

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:

<u>Pollutant</u>	<u>Rule</u>	<u>Emission Rate</u>	
		<u>lbs/hr</u>	<u>TPY</u>
PM ¹	17-2.600(5)(b)2.	53.95 ²	235.65 ³
SO ₂ ⁴	17-2.600(5)(b)3.a.(xi)	1483.62 ⁵	6480.47 ³
VE ⁶	17-2.600(5)(b)1.	20% opacity, except 40% for 2 mins/hr.	

- ¹PM - Particulate Matter
²Basis: 539.5 MMBTU/hr; 0.1 lb/MMBTU
³Basis: 24 H/D; 7 D/W; 52 W/Y
⁴SO₂ - Sulfur Dioxide
⁵Basis: 539.5 MMBTU/hr; 2.75 lbs/MMBTU
⁶VE - Visible Emissions

5. For inventory purposes, when firing natural gas, emissions rates, using AP-42 factors, are:

<u>Pollutant</u>	<u>Rule</u>	<u>Lbs/hr</u>	<u>TPY</u>
PM	---	2.78 ¹	12.14 ²
SO ₂	---	0.33 ³	1.44 ²
NO _x ⁴	---	306.35 ⁵	1338.14 ²
CO ⁶	---	22.28 ⁷	97.32 ²
VOC ⁸	---	0.78 ⁹	3.41 ²

PERMITTEE:
Gainesville Regional Utilities
No. 8 Unit, John R. Kelly Sta.

Permit No.: A001-147240
Date of Issue: June 2, 1988
Expiration Date: June 1, 1993

SPECIFIC CONDITIONS:

5. (continued)

- ¹Basis: 0.557 MMCF/hr; 5 lbs/MMCF
- ²Basis: 24 H/D; 7 D/w; 52 W/Y
- ³Basis: 0.557 MMCF/hr; 0.6 lb/MMCF
- ⁴NO_x - nitrogen oxide
- ⁵Basis: 0.557 MMCF/hr; 550 lbs/MMCF
- ⁶CO - carbon monoxide
- ⁷Basis: 0.557 MMCF/hr; 40 lbs/MMCF
- ⁸VOC - Volatile organic compounds (excluding methane)
- ⁹Basis: 0.557 MMCF/hr; 1.4 lb/MMCF

6. Test the emission for the following pollutant(s) at the interval(s) indicated, notify the Department 14 days prior to testing, and submit the test report documentation to the Department within 45 days after completion of the testing:

<u>Pollutant</u>	<u>Interval from January 15, 1988</u>
PM	12 months ^{1, 2}
SO ₂	12 months ^{1, 2, 3}
VE	12 months ^{1, 2, 4}

- ¹Basis: Rule 17-2.700(2)(a)4., FAC - test annually unless otherwise specified.
- ²Basis: Rule 17-2.700(2)(a)3.b., FAC - test not required when liquid and/or solid fuel is burned for a total of no more than 400 hours.
- ³Basis: In lieu of stack test, submit a certified ASTM fuel oil analysis
- ⁴VE test must be concurrent with one PM test run.

7. Soot blowing emission limits not to be exceeded are:

<u>Pollutant</u>	<u>Rule</u>	<u>Limit</u>
PM	17-2.250(3)	0.3 ¹
VE	17-2.250(3)	60% opacity ²

- ¹An average of 0.3 lbs/MMBTU heat input and not to exceed 3 hrs/24-hrs.
- ²Except for not more than 4, six-minute periods, during the 3-hr. period of excess emissions.

PERMITTEE:
Gainesville Regional Utilities
No. 8 Unit, John R. Kelly Sta.

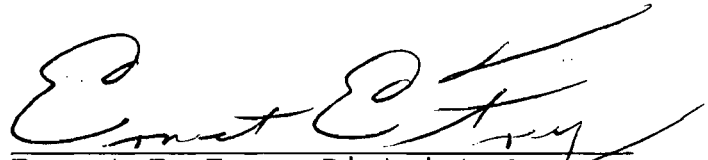
Permit No.: A001-147240
Date of Issue: June 2, 1988
Expiration Date: June 1, 1993

SPECIFIC CONDITIONS:

8. Soot blowing test for PM and VE shall be performed concurrently during the first soot blowing cycle following the compliance tests required by Specific Condition #6.
9. In each test report, submit the maximum input/production rate at which this source was operated since the most recent test.
10. Submit an annual operation report for this source on the form supplied by the Department for each calendar year on or before March 1.
11. Any revision(s) to a permit (and application) must be submitted and approved prior to implementing.
12. Forms for renewal will be sent 5 months prior to June 1, 1993 and the completed forms with test results are due 90 days prior to June 1, 1993.

Issued this 2 day of June, 1988

STATE OF FLORIDA DEPARTMENT


Ernest E. Frey, District Manager

WPS

City of Gainesville, GRU
J. R. Kelly Generating Station
Facility ID No.: 0010005
Alachua County

Initial Title V Air Operation Permit
PROPOSED Permit No.: 0010005-001-AV

Permitting Authority:

State of Florida
Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
Title V Section

Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Telephone: 850/488-1344
Fax: 850/922-6979

February 26, 1998

Compliance Authority:

Northeast District Office
7825 Baymeadows Way, Suite 200B
Jacksonville, FL 32256-7590
Telephone: 904/448-4300
Fax: 904/448-4363

and

Department of Environmental Protection
Northeast District Branch Office
101 NW 75 Street, Suite 3
Gainesville, FL 32607-1609
Telephone: 352/333-2850
Fax: 352/333-2856

Initial Title V Air Operation Permit
PROPOSED Permit No.: 0010005-001-AV

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Permittee:
City of Gainesville, GRU
P.O. Box 147117 (A134)
Gainesville, FL 32614-7117

PROPOSED Permit No.: 0010005-001-AV
Facility ID No.: 0010005
SIC Nos.: 49, 4911
Project: Initial Title V Air Operation Permit

This permit is for the operation of the J. R. Kelly Generating Station. This facility is located at 605 SE 3rd Street, Gainesville, Alachua County; UTM Coordinates: Zone 17, 372.00 km East and 3280.20 km North; Latitude: 29° 38' 48" North and Longitude: 82° 19' 19" West.

STATEMENT OF BASIS: This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. 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 permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

Appendix U-1, List of Unregulated Emissions Units and/or Activities

✓ Appendix I-1, List of Insignificant Emissions Units and/or Activities

APPENDIX TV-1, TITLE V CONDITIONS (version dated 12/02/97)

APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/07/96)

TABLE 297.310-1, CALIBRATION SCHEDULE (version dated 10/06/96)

Phase II Permit Application received January 2, 1996.

Alternate Sampling Procedure: ASP Number 97-B-01 (including the Order Correcting the Scrivener's Error dated July 2, 1997)

ORDER EXTENDING PERMIT EXPIRATION DATE dated xx/xx/xx

Effective Date: January 1, 1999

Renewal Application Due Date: July 5, 2003

Expiration Date: December 31, 2003

Howard L. Rhodes, Director
Division of Air Resources
Management

HLR/sms/a

Section I. Facility Information.

Subsection A. Facility Description.

This facility consists of 3 fossil fuel fired steam generators. The facility is fired with either natural gas or new residual fuel oils (Nos. 4, 5, or 6) which may be supplemented with on-specification used oil. Unit 6 is permitted to burn natural gas only.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Based on the initial Title V permit application received June 14, 1996, this facility is a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emissions Unit ID Nos. and Brief Descriptions.

E.U.

<u>ID No.</u>	<u>Brief Description</u>
-006	Fossil Fuel Fired Steam Generator Unit No. 6
-007	Fossil Fuel Fired Steam Generator Unit No. 7
-008	Fossil Fuel Fired Steam Generator Unit No. 8 [EPA ID#: JRK8]
-009	Unregulated Emissions Units and/or Activities (see Appendix U-1)

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

Table 1-1, Summary of Air Pollutant Standards and Terms

Table 2-1, Summary of Compliance Requirements

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

Appendix H-1, Permit History/ID Number Changes

This document is on file with the permitting authority:

Initial Title V Permit Application received June 14, 1996.

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-1, TITLE V CONDITIONS, is a part of this permit.
{Permitting note: APPENDIX TV-1, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided a copy when requested or otherwise appropriate.}
2. **Not federally enforceable.** General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.]
3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rule 62-296.320(4)(b)1. & 4, F.A.C.]
4. Prevention of Accidental Releases (Section 112(r) of CAA). If required by 40 CFR 68, the permittee shall submit to the implementing agency:
 - a. a risk management plan (RMP) when, and if, such requirement becomes applicable;
 - b. certification forms and/or RMPs according to the promulgated rule schedule.[40 CFR 68]
5. Unregulated Emissions Units and/or Activities. Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit.
[Rule 62-213.440(1), F.A.C.]
6. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.430(6), and 62-4.040(1)(b), F.A.C.]

7. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.

[Rule 62-296.320(1)(a), F.A.C.]

{Permitting note: The Department has not ordered any control devices or systems under Rule 62-296.320(1)(a), F.A.C. }

8. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one. [Rule 62-213.440, F.A.C.]

9. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Northeast District office and the Department's Gainesville Branch office:

Department of Environmental Protection
Northeast District Office
7825 Baymeadows Way, Suite 200B
Jacksonville, FL 32256-7590
Telephone: 904/448-4300
Fax: 904/448-4363

and

Department of Environmental Protection
Northeast District Branch Office
101 NW 75 Street, Suite 3
Gainesville, FL 32607-1609
Telephone: 352/333-2850
Fax: 352/333-2856

10. Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

[Rule 62-210.700(1), F.A.C.]

11. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3), F.A.C., shall be submitted within 60 (sixty) days after the end of the calendar year. {See condition 51., APPENDIX TV-1, TITLE V CONDITIONS}
[Rule 62-214.420(11), F.A.C.]

12. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency

Region 4

Air, Pesticides & Toxics Management Division

Operating Permits Section

61 Forsyth Street

Atlanta, Georgia 30303

Telephone: 404/562-9099

Fax: 404/562-9095

Section III. Emissions Units and Conditions.

Subsection A. This section addresses the following emissions unit.

E.U.

<u>ID No.</u>	<u>Brief Description</u>
-006	Fossil Fuel Fired Steam Generator Unit No. 6

Fossil Fuel Fired Steam Generator Unit 6 is a nominal 19 megawatt (electric) steam generator with no emissions control equipment. The emissions unit is fired on natural gas with a maximum heat input of 187.3 MMBtu per hour. Fossil Fuel Fired Steam Generator Unit No. 6 began commercial operation in March 1958 and has been on cold standby since August 1, 1989.

{Permitting note(s): The emissions unit is regulated under Rule 62-296.406, F.A.C., Fossil Fuel Steam Generators with Less than 250 million Btu per Hour Heat Input.}

The following specific conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The maximum operation heat input rate, based on the higher heating value (HHV) of the fuel, is as follows:

<u>Unit No.</u>	<u>MMBtu/hr Heat Input (HHV)</u>	<u>Fuel Type</u>
6	187.3	Natural Gas

[Rules 62-4.160(2), 62-210.200(PTE) and 62-296.406, F.A.C.]

A.2. Emissions Unit Operating Rate Limitation After Testing. See Specific Condition C.7.

[Rule 62-297.310(2), F.A.C.]

A.3. Methods of Operation. Fuels.

The only fuel allowed to be burned during startup and normal operations is natural gas.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

{Permitting note: The attached Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit. }

A.4. Visible Emissions. Visible emissions shall not exceed 20 percent opacity, except for one two-minute period per hour during which opacity shall not exceed 40 percent.
[Rule 62-296.406(1), F.A.C.]

A.5. Visible emissions - Soot Blowing and Load Change. Excess emissions from the existing fossil fuel steam generator resulting from boiler cleaning (soot blowing) and load change shall be permitted provided the duration of such excess emissions shall not exceed 3 hours in any 24-hour period and visible emissions shall not exceed 60 percent opacity, and providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized.

A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more.
[Rule 62-210.700(3), F.A.C.]

A.6. Particulate Matter. Particulate matter emissions shall be controlled by the firing of natural gas.
[Rule 62-296.406(2), F.A.C.]

A.7. Sulfur Dioxide. Sulfur dioxide emissions shall be controlled by the firing of natural gas.
[Rule 62-296.406(3), F.A.C.]

Test Methods and Procedures

{Permitting note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit. }

A.8. Visible emissions. The test method for visible emissions shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C. See **Specific Conditions C.6. and A.10.**
[Rules 62-213.440 and 62-297.401, F.A.C.]

A.9. Applicable Test Procedures.

(a) Required Sampling Time.

2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

[Rule 62-297.310(4)(a)2., F.A.C.]

A.10. By this permit, annual emissions compliance testing for visible emissions is not required for this emissions unit while burning only gaseous fuels.

[Rule 62-297.310(7)(a)4., F.A.C.]

Recordkeeping and Reporting Requirements

A.11. All recorded data shall be maintained on file by the source for a period of five years.

[Rule 62-213.440(1)(b)2.b., F.A.C.]

A.12. Test Reports.

(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.

(b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.

[Rule 62-297.310(8), F.A.C.]

Miscellaneous Condition

A.13. This emissions unit is also subject to conditions contained in **Subsection C.**

Subsection B. This section addresses the following emissions units.

E.U.

ID No. Brief Description

- | | |
|------|---------------------------------------------------------------|
| -007 | Fossil Fuel Fired Steam Generator Unit No. 7 |
| -008 | Fossil Fuel Fired Steam Generator Unit No. 8 [EPA ID#: JRK 8] |

Fossil Fuel Fired Steam Generator Unit No. 7 is a nominal 25 megawatt (electric) steam generator with no emissions control equipment. The emissions unit is fired on natural gas and/or new residual fuel oils (Nos. 4, 5, or 6). The maximum heat input for natural gas and new residual fuel oils (Nos. 4, 5, or 6) are 272 MMBtu per hour and 249 MMBtu per hour, respectively.

Fossil Fuel Fired Steam Generator Unit No. 8 is a nominal 50 megawatt (electric) steam generator with no emissions control equipment. However, as required under the Acid Rain Program, equipment is installed to continuously monitor opacity, carbon dioxide, sulfur dioxide and nitrous oxides. The emissions unit is fired on natural gas and/or new residual fuel oils (Nos. 4, 5, or 6). The maximum heat input for natural gas and new residual fuel oils (Nos. 4, 5, or 6) are 584.5 MMBtu per hour and 539.5 MMBtu per hour, respectively.

The new residual fuel oils (Nos. 4, 5, or 6) fired in Fossil Fuel Fired Steam Generator Unit Nos. 7 and 8 may be supplemented with a limited amount of on-specification used oil. The units are individually regulated, but share a common stack.

{Permitting note(s): The emissions units are regulated under Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators with More than 250 million Btu per Hour Heat Input. Fossil Fuel Fired Steam Generator Unit No. 7 began commercial operation in August 1961. Fossil Fuel Fired Steam Generator Unit No. 8 began commercial operation in April 1965. The term "new" is hereby defined as "nonused". }

The following specific conditions apply to the emissions units listed above:

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The maximum operation heat input rates, based on the higher heating value (HHV) of the fuel, are as follows:

<u>Unit No.</u>	<u>MMBtu/hr Heat Input (HHV)</u>	<u>Fuel Type</u>
7	272	Natural Gas
	249	New residual fuel oils (Nos. 4, 5, or 6); On-Specification Used Oil
8	584.5	Natural Gas
	539.5	New residual fuel oils (Nos. 4, 5, or 6); On-Specification Used Oil

[Rules 62-4.160(2), 62-210.200(PTE) and 62-296.405, F.A.C.]

{Permitting note: The maximum operation heat input rate for Unit 8 will not be based on the continuous monitoring system.}

B.2. Emissions Unit Operating Rate Limitation After Testing. See **Specific Condition C.7.**

[Rule 62-297.310(2), F.A.C.]

B.3. Methods of Operation. Fuels.

- a. Startup: The only fuels allowed to be burned are natural gas and/or new No. 6 fuel oil, which may be supplemented with on-specification used oil with a PCB concentration less than 2 ppm.
- b. Normal: The only fuels allowed to be burned are natural gas and/or new No. 6 fuel oil, which may be supplemented with on-specification used oil with a PCB concentration equal to or greater than 2 ppm and less than 50 ppm.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

{Permitting note: The attached Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.4. Visible Emissions. Visible emissions from each unit shall not exceed 20 percent opacity, except for one two-minute period per hour during which opacity shall not exceed 40 percent. Except as otherwise specified in **Specific Condition B.21.**, emissions units

governed by this visible emissions limit shall compliance test for particulate matter emissions annually and as otherwise required by Chapter 62-297, F.A.C.

[Rule 62-296.405(1)(a), F.A.C.]

B.5. Visible Emissions - Soot Blowing and Load Change. Excess emissions from each existing fossil fuel steam generator resulting from boiler cleaning (soot blowing) and load change shall be permitted provided the duration of such excess emissions shall not exceed 3 hours in any 24-hour period and visible emissions shall not exceed 60 percent opacity, and providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized.

For Unit 8, visible emissions above 60% opacity shall be allowed for not more than four, six (6) minute periods, during the three-hour period of excess emissions allowed by this condition for boiler cleaning and load change.

A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more.

[Rule 62-210.700(3), F.A.C.]

B.6. Particulate Matter. Particulate matter emissions from each unit shall not exceed 0.1 pound per million Btu heat input, as measured by applicable compliance methods. See **Specific Condition B.13.** for the applicable compliance methods.

[Rule 62-296.405(1)(b), F.A.C.]

B.7. Particulate Matter - Soot Blowing and Load Change. Particulate matter emissions shall not exceed an average of 0.3 pound per million Btu heat input during the 3 hours in any 24-hour period of excess emissions allowed for boiler cleaning (soot blowing) and load change.

A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more.

[Rule 62-210.700(3), F.A.C.]

B.8. Sulfur Dioxide. While combusting liquid fuels, sulfur dioxide emissions from each unit shall not exceed 2.75 pounds per MMBtu heat input, as measured by applicable compliance methods. See **Specific Conditions B.10. and B.14.** for the applicable compliance methods.

[Rule 62-296.405(1)(c)j., F.A.C.]

B.9. Sulfur Dioxide. The sulfur content of liquid fuels shall not exceed 2.5% sulfur, by weight. See **Specific Condition B.15.**

[Rule 62-296.405(1)(e)3., F.A.C., and requested by applicant in a letter dated October 30, 1997]

Monitoring of Operations

B.10. Sulfur Dioxide. The permittee elected to demonstrate compliance by accepting a liquid fuel sulfur limit that will be verified with a fuel analysis provided by the vendor or the permittee upon each fuel delivery. This protocol is allowed because the emission units do not have an operating flue gas desulfurization device.

[Rule 62-296.405(1)(f)1.b., F.A.C.]

B.11. Units 7 and 8 are regulated individually and must be tested individually. Due to the common stack, one unit must be shut down while the other unit is being tested.

[Rules 62-4.070(3) and 62-213.440(1), F.A.C.]

Test Methods and Procedures

{Permitting note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.12. Visible emissions. The test method for visible emissions shall be DEP Method 9, incorporated in Chapter 62-297, F.A.C. A transmissometer may be used and calibrated according to Rule 62-297.520, F.A.C.

[Rule 62-296.405(1)(e)1., F.A.C.]

B.13. Particulate Matter. The test methods for particulate emissions shall be EPA Methods 17, 5, 5B, or 5F, incorporated by reference in Chapter 62-297, F.A.C. The minimum sample volume shall be 30 dry standard cubic feet. EPA Method 5 may be used with filter temperature no more than 320 degrees Fahrenheit. For EPA Method 17, stack temperature shall be less than 375 degrees Fahrenheit. EPA Method 3 (with Orsat analysis) or 3A shall be used when the oxygen based F-factor, computed according to EPA Method 19, is used in lieu of heat input. Acetone wash shall be used with EPA Method 5 or 17.

[Rules 62-213.440, 62-296.405(1)(e)2., and 62-297.401, F.A.C.]

B.14. Sulfur Dioxide. The test methods for sulfur dioxide emissions shall be EPA Methods 6, 6A, 6B, or 6C, incorporated by reference in Chapter 62-297, F.A.C. Fuel sampling and analysis may be used as an alternate sampling procedure if such a procedure

is incorporated into the operation permit for the emissions unit. If the emissions unit obtains an alternate procedure under the provisions of Rule 62-297.620, F.A.C., the procedure shall become a condition of the emissions unit's permit. The Department will retain the authority to require EPA Method 6 or 6C if it has reason to believe that exceedences of the sulfur dioxide emissions limiting standard are occurring. Results of an approved fuel sampling and analysis program shall have the same effect as EPA Method 6 test results for purposes of demonstrating compliance or noncompliance with sulfur dioxide standards. **The permittee may use the EPA test methods, referenced above, to demonstrate compliance; however, as an alternate sampling procedure authorized by permit, the permittee may elect to demonstrate compliance by accepting a liquid fuel sulfur limit that will be verified with a fuel analysis provided by the vendor or the permittee upon each delivery.**

[Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b. and 62-297.401, F.A.C.]

B.15. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-92, ASTM D4294-90, ASTM D1552-90, ASTM D4177-82 or both ASTM D4057-88 and ASTM D129-91 or the latest edition of the above ASTM methods.

[Rules 62-213.440, 62-296.405(1)(e)3., 62-296.405(1)(f)1.b. and 62-297.440, F.A.C.]

B.16. Required Number of Test Runs. For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five day period allowed for the test, the Secretary or his or her designee may accept the results of the two complete runs as proof of compliance, provided that the arithmetic mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.

[Rule 62-297.310(1), F.A.C.]

B.17. Calculation of Emission Rate. The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the separate test runs unless otherwise specified in a particular test method or applicable rule.

[Rule 62-297.310(3), F.A.C.]

B.18. Applicable Test Procedures.

(a) Required Sampling Time.

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.

2. Opacity Compliance Tests. When DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur.

Exceptions to these requirements are as follows:

The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

(b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.

(c) Required Flow Rate Range. For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.

(d) Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, attached to this permit.

(e) Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube.

[Rule 62-297.310(4), F.A.C.]

B.19. Required Stack Sampling Facilities. When a mass emissions stack test is required, the permittee shall comply with the requirements contained in Appendix SS-1, Stack Sampling Facilities, attached to this permit.

[Rule 62-297.310(6), F.A.C.]

B.20. By this permit, annual emissions compliance testing for visible emissions is not required for these emissions units while burning:

- a. only gaseous fuels; or
- b. only liquid fuels, other than during startup, for no more than 400 hours per federal fiscal year; or
- c. gaseous fuels in combination with liquid fuels, other than during startup, for no more than 400 hours per federal fiscal year.

[Rule 62-297.310(7)(a)4., F.A.C.]

B.21. Annual and permit renewal compliance testing for particulate matter emissions is not required for these emissions units while burning:

- a. only gaseous fuels; or
- b. only liquid fuels, other than during startup, for no more than 400 hours per federal fiscal year; or
- c. gaseous fuels in combination with liquid fuels, other than during startup, for no more than 400 hours per federal fiscal year.

[Rules 62-297.310(7)(a)3. & 5., F.A.C.; and, ASP Number 97-B-01.]

Recordkeeping and Reporting Requirements

B.22. Submit to the Department a written report of emissions in excess of emission limiting standards as set forth in Rule 62-296.405(1), F.A.C., for each calendar quarter. The nature and cause of the excess emissions shall be explained. This report does not relieve the owner or operator of the legal liability for violations. All recorded data shall be maintained on file by the Source for a period of five years.

[Rules 62-213.440 and 62-296.405(1)(g), F.A.C.]

B.23. Test Reports.

- (a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department's Northeast District Office and the Northeast District Branch Office on the results of each such test.
- (b) The required test report shall be filed with the Department's Northeast District Office and the Northeast District Branch Office as soon as practical but no later than 45 days after the last sampling run of each test is completed.
- (c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:
 1. The type, location, and designation of the emissions unit tested.
 2. The facility at which the emissions unit is located.
 3. The owner or operator of the emissions unit.
 4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
 5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
 6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.

7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rules 62-213.440 and 62-297.310(8), F.A.C.]

Miscellaneous Conditions

B.24. These emissions units are also subject to conditions contained in **Subsections C. and D. Common Conditions.**

Subsection C. Common Conditions.

E.U.

<u>ID No.</u>	<u>Brief Description</u>
-006	Fossil Fuel Fired Steam Generator Unit No. 6
-007	Fossil Fuel Fired Steam Generator Unit No. 7
-008	Fossil Fuel Fired Steam Generator Unit No. 8

The following specific conditions apply to the emissions units listed above:

Essential Potential to Emit (PTE) Parameters

C.1. Hours of Operation. The emissions units may operate continuously, i.e., 8,760 hours/year.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Excess Emissions

C.2. Excess emissions resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.
[Rule 62-210.700(1), F.A.C.]

C.3. Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.
[Rule 62-210.700(2), F.A.C.]

C.4. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.
[Rule 62-210.700(4), F.A.C.]

Monitoring of Operations

C.5. Determination of Process Variables.

(a) **Required Equipment.** The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

Test Methods and Procedures

{Permitting note: The attached Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

C.6. DEP Method 9. The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:

1. EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.

2. EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g., 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g., 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:

- a. For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard.
- b. For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the appropriate subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value.

[Rule 62-297.401, F.A.C.]

C.7. Operating Rate During Testing. Testing of emissions shall be conducted with the emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rules 62-297.310(2) & (2)(b), F.A.C.]

C.8. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) **General Compliance Testing.**

1. (not applicable)
2. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid fuel for more than 400 hours other than during startup.
3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:
 - a. Did not operate; or
 - b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.
4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:
 - a. Visible emissions, if there is an applicable standard;
 - b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and

c. Each NESHAP pollutant, if there is an applicable emission standard.

5. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid fuel, other than during startup, for a total of no more than 400 hours and as otherwise specified in **Specific Condition B.21.**

6.-8. (not applicable)

9. See **Specific Condition C.10.**

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.
[Rule 62-297.310(7), F.A.C.; SIP approved]

Recordkeeping and Reporting Requirements

C.9. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department's Northeast District Office and the Northeast District Branch Office in accordance with Rule 62-4.130, F.A.C. (Appendix TV-1, Title V Condition No. 9). A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.
[Rule 62-210.700(6), F.A.C.]

C.10. The owner or operator shall notify the Northeast District Office of the Department and the Northeast District Branch Office, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.
[Rule 62-297.310(7)(a)9., F.A.C.]

Subsection D. Common Conditions.

E.U.

<u>ID No.</u>	<u>Brief Description</u>
-007	Fossil Fuel Fired Steam Generator Unit No. 7
-008	Fossil Fuel Fired Steam Generator Unit No. 8

The following specific conditions apply to the emissions units listed above:

- D.1. Used Oil.** Burning of on-specification used oil is allowed at these emissions units in accordance with all other conditions of this permit and the following conditions:
- On-specification Used Oil Emissions Limitations:** These emissions units are permitted to burn on-specification used oil, which contains a PCB concentration of less than 50 ppm. On-specification used oil is defined as used oil that meets the specifications of 40 CFR 279 - Standards for the Management of Used Oil, listed below. "Off-specification" used oil shall not be burned. Used oil which fails to comply with any of these specification levels is considered "off-specification" used oil.

CONSTITUENT/PROPERTY	ALLOWABLE LEVEL
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Total Halogens	1000 ppm maximum
Flash point	100 degrees F minimum

- Quantity Limitation:** These emissions units are permitted to burn "on-specification" used oil, not to exceed 1.5 million gallons during any consecutive 12 month period.
- PCB Limitation:** Used oil containing a PCB concentration of 50 or more ppm shall not be burned at this facility. Used oil shall not be blended to meet this requirement.
- Operational Requirements:** On-specification used oil with a PCB concentration equal to or greater than 2 ppm and less than 50 ppm shall be burned only at normal source operating temperatures. On-specification used oil with a PCB concentration equal to or greater than 2 ppm shall not be burned during periods of startup or shutdown.
- Testing Requirements:** The owner or operator shall sample and analyze each batch of used oil to be burned for the following parameters:
 - (1) Arsenic, cadmium, chromium, lead, total halogens, flash point and PCBs.
 - (2) Testing (sampling, extraction and analysis) shall be performed using

approved methods specified in EPA Publication SW-846 (Test Methods for Evaluating Solid Waste, Physical/Chemical Methods).

- (3) Alternatively, the owner or operator may rely on other analyses or other information to make the determination that the used oil meets the specifications of 40 CFR 279.11. Documentation used to make the determination shall be maintained at the facility.

f. Record Keeping Requirements: The owner or operator shall obtain, make, and keep the following records related to the use of used oil in a form suitable for inspection at the facility by the Department: [40 CFR 279.72, 40 CFR 279.74(b) and 761.20(e)]

- (1) The gallons of on-specification used oil placed in inventory each month. (This record shall be completed no later than the fifteenth day of the succeeding month.)
- (2) The total gallons of on-specification used oil placed in inventory in the preceding consecutive 12-month period. (This record shall be completed no later than the fifteenth day of the succeeding month.)
- (3) Results of the analyses required above.

g. Reporting Requirements: The owner or operator shall submit to the Northeast District office and the Northeast District Branch Office, within thirty days of the end of each calendar quarter, the analytical results and the total amount of on-specification used oil placed in inventory during the quarter.

The owner or operator shall submit, with the Annual Operation Report form, the analytical results and the total amount of on-specification used oil placed in inventory during the previous calendar year.

[Rule 62-4.070(3) and 62-213.440, F.A.C., 40 CFR 279 and 40 CFR 761, unless otherwise noted.]

Section IV. This section is the Acid Rain Part.

Operated by: Gainesville Regional Utilities-J. R. Kelly
ORIS code: 664

Subsection A. This subsection addresses Acid Rain, Phase II.

The emissions unit listed below is regulated under Acid Rain, Phase II.

E.U.

<u>ID No.</u>	<u>Brief Description</u>
-008	Fossil Fuel Fired Steam Generator Unit No. 8

A.1. The Phase II permit application submitted for this facility, as approved by the Department, is a part of this permit. The owners and operators of this Phase II acid rain unit must comply with the standard requirements and special provisions set forth in the application listed below:

- a. DEP Form No. 62-210.900(1)(a), effective 07/01/95; dated 12/22/95.
[Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

A.2. Sulfur dioxide (SO₂) allowance allocations requirements for each Acid Rain unit is as follows:

<u>E.U. ID No.</u>	<u>EPA ID</u>	<u>Year</u>	2000	2001	2002
-008	JRK8	SO₂ allowances, under Table 2 of 40 CFR Part 73	58*	58*	58*

*The number of allowances held by an Acid Rain source in a unit account may differ from the number allocated by the USEPA under Table 2 of 40 CFR 73.]

A.3. Emission Allowances. Emissions from sources subject to the Federal Acid Rain Program (Title IV) shall not exceed any allowances that the source lawfully holds under the Federal Acid Rain Program. Allowances shall not be used to demonstrate compliance with a non-Title IV applicable requirement of the Act.

1. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the Federal Acid Rain Program, provided that such increases do not require a permit revision pursuant to Rule 62-213.400(3), F.A.C.

2. No limit shall be placed on the number of allowances held by the source under the Federal Acid Rain Program.

3. Allowances shall be accounted for under the Federal Acid Rain Program.
[Rule 62-213.440(1)(c), F.A.C.]

A.4. Fast-Track Revisions of Acid Rain Parts. Those Acid Rain sources making a change described at Rule 62-214.370(4), F.A.C., may request such change as provided in Rule 62-213.413, Fast-Track Revisions of Acid Rain Parts.
[Rule 62-213.413, F.A.C.]

A.5. Comments, notes, and justifications: none

Appendix U-1, List of Unregulated Emissions Units and/or Activities.

City of Gainesville, GRU

PROPOSED Permit No.: 0010005-001-AV

J. R. Kelly Generating Station

Facility ID No.: 0010005

Unregulated Emissions Units and/or Activities. An emissions unit which emits no "emissions-limited pollutant" and which is subject to no unit-specific work practice standard, though it may be subject to regulations applied on a facility-wide basis (e.g., unconfined emissions, odor, general opacity) or to regulations that require only that it be able to prove exemption from unit-specific emissions or work practice standards.

The below listed emissions units and/or activities are neither 'regulated emissions units' nor 'insignificant emissions units'.

E.U.ID No.Brief Description of Emissions Units and/or Activity

-009

Combustion Turbine Unit Nos. 1, 2 and 3 using natural gas or new distillate fuel oils
(Nos. 1 or 2)

Appendix I-1, List of Insignificant Emissions Units and/or Activities.

City of Gainesville, GRU

Proposed Permit No.: 0010005-001-AV

J. R. Kelly Generating Station

Facility ID No.: 0010005

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining the potential emissions of the facility containing such emissions units. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if they are contained within a Title V source; however, such emissions units and activities shall be considered insignificant for Title V purposes provided they also meet the criteria of Rule 62-213.430(6)(b), F.A.C. No emissions unit shall be entitled to an exemption from permitting under Rule 62.210.300(3)(a), F.A.C., if its emissions, in combination with the emissions of other units and activities at the facility, would cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

The below listed emissions units and/or activities are considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

Brief Description of Emissions Units and/or Activities

1. Internal combustion engines - mobile sources
2. Vacuum pumps for labs
3. Steam cleaning equipment
4. Lab equipment used for chemical or physical analyses
5. Brazing, soldering or welding equipment
6. One or more emergency generators located within a single facility provided:
 - a. None of the emergency generators is subject to the Federal Acid Rain Program; and
 - b. Total fuel consumption by all such emergency generators within the facility is limited to 32,000 gallons per year of diesel fuel, 4,000 gallons per year of gasoline, 4.4 million standard cubic feet per year of natural gas or propane, or an equivalent prorated amount if multiple fuels are used.
7. One or more heating units and general purpose internal combustion engines located within a single facility provided:
 - a. None of the emergency generators is subject to the Federal Acid Rain Program; and
 - b. Total fuel consumption by all such emergency generators within the facility is limited to 32,000 gallons per year of diesel fuel, 4,000 gallons per year of gasoline, 4.4 million standard cubic feet per year of natural gas or propane, or an equivalent prorated amount if multiple fuels are used.
8. Fire and safety equipment

9. Surface coating operation within a single facility if the total quantity of coatings containing greater than 5.0 percent VOCs, by volume, used is 6.0 gallons per day or less, averaged monthly, provided:
 - a. Such operations are not subject to a volatile organic compound Reasonably Available Control Technology (RACT) requirement of Chapter 62-296, F.A.C.; and
 - b. The amount of coatings used shall include any solvents and thinners used in the process including those used for cleanup.
10. Surface coating operations utilizing only coatings containing 5.0 percent or less VOCs, by volume.
11. Space heating equipment (non-boilers)
12. Parts cleaning and degreasing stations not subject to 40 CFR 63, Subpart T.
13. Degreasing units using heavier-than air vapors exclusively, not subject to 40 CFR 63, Subpart T.
14. Three 840,000 (nominal) gallon storage tanks for new residual fuel oils (Nos. 4, 5, or 6)/on-specification used oil or new distillate fuel oils (Nos. 1 or 2)
15. One 480,000 (nominal) gallon storage tank for new residual fuel oils (Nos. 4, 5, or 6)/on-specification used oil or new distillate fuel oils (Nos. 1 or 2)
16. One 240,000 (nominal) gallon storage tank for new residual fuel oils (Nos. 4, 5, or 6)/on-specification used oil or new distillate fuel oils (Nos. 1 or 2)
17. Two 210,000 (nominal) gallon storage tanks for new residual fuel oils (Nos. 4, 5, or 6)/on-specification used oil or new distillate fuel oils (Nos. 1 or 2)
18. Two 115,000 (nominal) gallon storage tanks for new distillate fuel oils (Nos. 1 or 2) or new residual fuel oils (Nos. 4, 5, or 6)/on-specification used oil
19. Two 54,000 (nominal) gallon storage tanks for new residual fuel oils (Nos. 4, 5, or 6)/on-specification used oil or new distillate fuel oils (Nos. 1 or 2)
20. One 6,000 (nominal) gallon underground storage tank for gasoline
21. One 15,000 (nominal) gallon underground storage tank for gasoline
22. One 20,000 (nominal) gallon underground storage tank for diesel
23. Turbine vapor extractor
24. Sand blasting and abrasive grit blasting
25. Vehicle refueling operations
26. Freshwater cooling towers. The cooling towers do not use chromium-based treatment chemicals.
27. Storage tanks less than 550 gallons

Table 1-1, Summary of Air Pollutant Standards and Terms

City of Gainesville, GRU
J. R. Kelly Generating Station

PROPOSED Permit No.: 0010005-001-AV
Facility ID No.: 0010005

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No. **Brief Description**
-006 Fossil Fuel Fired Steam Generator Unit No. 6

Pollutant Name	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See permit condition(s)
			Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
VE	Nat. Gas	8760	20% opacity					62-296.406(1), F.A.C.	III.A.4.
VE(SB)**	Nat. gas	1095	60% opacity					62-210.700(3), F.A.C.	III.A.5.

Notes:
 * The "Equivalent Emissions" listed are for informational purposes only.
 ** SB refers to "soot blowing" and "load change".

Table 1-1, Summary of Air Pollutant Standards and Terms

City of Gainesville, GRU
J. R. Kelly Generating Station

PROPOSED Permit No.: 0010005-001-AV
Facility ID No.: 0010005

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No. **Brief Description**
-007 Fossil Fuel Fired Steam Generator Unit No. 7

Pollutant Name	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See permit condition(s)
			Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
VE	Nat. Gas or Nos. 4, 5, 6 F.O.	8760	20% opacity ***					62-296.405(1)(a), F.A.C.	III.B.4.
VE(SB)**		1095	60% opacity					62-210.700(3), F.A.C.	III.B.5.
PM	Nos. 4, 5, 6 F.O.	8760	0.1 lb/MMBtu			24.9	109.1	62-296.405(1)(b), F.A.C.	III.B.6.
PM(SB)**	Nos. 4, 5, 6 F.O.	1095	0.3 lb/MMBtu			74.7	40.89	62-210.700(3), F.A.C.	III.B.7.
SO2	Nos. 4, 5, 6 F.O.	8760	2.75 lb/MMBtu			684.75	2,999.20	62-296.405(1)(c)j., F.A.C.	III.B.8.
SO2	Nos. 4, 5, 6 F.O.	8760	2.5% by weight						III.B.9.

Notes:
 * The "Equivalent Emissions" listed are for informational purposes only.
 ** SB refers to "soot blowing" and "load change".
 *** Except for one two-minute period per hour up to 40%

[electronic file name: 00100051.xls]

Table 1-1, Summary of Air Pollutant Standards and Terms

City of Gainesville, GRU
J. R. Kelly Generating Station

PROPOSED Permit No.: 0010005-001-AV
Facility ID No.: 0010005

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No. **Brief Description**
-008 Fossil Fuel Fired Steam Generator Unit No. 8

Pollutant Name	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See permit condition(s)
			Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
VE	Nat. Gas or Nos. 4, 5, 6 F.O.	8760	20% opacity					62-296.405(1)(a), F.A.C.	III.B.4.
VE(SB)**		1095	60% opacity***					62-210.700(3), F.A.C.	III.B.5.
PM	Nos. 4, 5, 6 F.O.	8760	0.1 lb/MMBtu			53.95	236.3	62-296.405(1)(b), F.A.C.	III.B.6.
PM(SB)**	Nos. 4, 5, 6 F.O.	1095	0.3 lb/MMBtu			161.9	88.61	62-210.700(3), F.A.C.	III.B.7.
SO2	Nos. 4, 5, 6 F.O.	8760	2.75 lb/MMBtu			1,483.6	6,498.30	62-296.405(1)(c)j., F.A.C.	III.B.8.
SO2	Nos. 4, 5, 6 F.O.	8760	2.5% by weight						III.B.9.

Notes:
 * The "Equivalent Emissions" listed are for informational purposes only.
 ** SB refers to "soot blowing" and "load change"
 *** Except for four six-minute periods up to 100%

[electronic file name: 00100051.xls]

Table 2-1, Summary of Compliance Requirements

City of Gainesville, GRU
J. R. Kelly Generating Station

PROPOSED Permit No.: 0010005-001-AV
Facility ID No.: 0010005

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No. **Brief Description**
-006 Fossil Fuel Fired Steam Generator Unit No. 6

Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See permit condition(s)
VE	Nat. gas	DEP Method 9	before permit renewal	1-Mar	1 hour	no	III.A.8., A.10.

Notes:

* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.

**CMS [=] continuous monitoring system

[electronic file name: 00100052.xls]

Table 2-1, Summary of Compliance Requirements

City of Gainesville, GRU
J. R. Kelly Generating Station

PROPOSED Permit No.: 0010005-001-AV
Facility ID No.: 0010005

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No.	Brief Description
-007	Fossil Fuel Fired Steam Generator Unit No. 7
-008	Fossil Fuel Fired Steam Generator Unit No. 8

Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time	Frequency Base Date *	Min. Compliance Test Duration	CMS**	See permit condition(s)
			Frequency				
VE	Nos. 4, 5, 6 F.O. or nat. gas	DEP Method 9	annually		1 hour	yes for Unit 8 only	III.B.12., B.20.
PM	Nos. 4, 5, 6 F.O.	EPA Methods 17, 5, 5B or 5F	annually		1 hour	no	III.B.13., B21.
SO2	Nos. 4, 5, 6 F.O.	EPA Methods 6, 6A, 6B, or 6C or ASTM D 2622-92 D4294-90, D1552-90, D4177-82 or both ASTM D4057-88 and D129-91	annually		1 hour	yes for Unit 8 only	III.B.14.
			each fuel delivery		N/A		III.B.15.

Notes:
* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.
**CMS [=] continuous monitoring system

[electronic file name: 00100052.xls]

Appendix H-1, Permit History/ID Number Changes

Gainesville Regional Utilities
J.R. Kelly

Facility ID No.: 0010005

Permit History (for tracking purposes):

<u>E.U. ID No</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date</u>	<u>Revised Date(s)</u>
-001	#1 Combustion Turbine	AO01-241346	12/14/93	03/01/99		12/29/93
-002	#2 Combustion Turbine	AO01-241346	12/14/93	03/01/99		12/29/93
-003	#3 Combustion Turbine	AO01-241346	12/14/93	03/01/99		12/29/93
-006	#6 Fossil Fuel Fired Steam Generator	AO01-195854	07/19/91	07/18/96		
-007	#7 Fossil Fuel Fired Steam Generator	AO01-224217	04/30/93	04/01/98		10/06/93 12/14/93 12/29/93
-008	#8 Fossil Fuel Fired Steam Generator	AO01-224218	04/30/93	06/01/98		12/14/93 12/29/93
-009	Combustion Turbines 1, 2, and 3	001005-001-AV				

(if applicable) ID Number Changes (for tracking purposes):

From: Facility ID No.: 31JAX010005

To: Facility ID No.: 0010005

APPENDIX TV-1, TITLE V CONDITIONS (version dated 12/02/97)

[Note: This attachment includes "canned conditions" developed from the "Title V Core List."]

{Permitting note: APPENDIX TV-1, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or otherwise appropriate.}

Chapter 62-4. F.A.C.

1. **Not federally enforceable. General Prohibition.** Any stationary installation which will reasonably be expected to be a source of pollution shall not be operated, maintained, or modified without the appropriate and valid permits issued by the Department, unless the source is exempted by Department rule. The Department may issue a permit only after it receives reasonable assurance that the installation will not cause pollution in violation of any of the provisions of Chapter 403, F.S., or the rules promulgated thereunder. A permitted installation may only be operated, maintained, constructed, expanded or modified in a manner that is consistent with the terms of the permit.

[Rule 62-4.030, Florida Administrative Code (F.A.C.); Section 403.087, Florida Statute (F.S.)]

2. **Not federally enforceable. Procedure to Obtain Permits: Application.**

(1) Any person desiring to obtain a permit from the Department shall apply on forms prescribed by the Department and shall submit such additional information as the Department by law may require.

(2) All applications and supporting documents shall be filed in quadruplicate with the Department.

(3) To ensure protection of public health, safety, and welfare, any construction, modification, or operation of an installation which may be a source of pollution shall be in accordance with sound professional engineering practices pursuant to Chapter 471, F.S. All applications for a Department permit shall be certified by a professional engineer registered in the State of Florida except when the application is for renewal of an air pollution operation permit at a minor facility as defined in Rule 62-210.200, F.A.C., or where professional engineering is not required by Chapter 471, F.S. Where required by Chapter 471 or 492, F.S., applicable portions of permit applications and supporting documents which are submitted to the Department for public record shall be signed and sealed by the professional(s) who prepared or approved them.

(4) Processing fees for air construction permits shall be in accordance with Rule 62-4.050(4), F.A.C.

(5)(a) To be considered by the Department, each application must be accompanied by the proper processing fee. The fee shall be paid by check, payable to the Department of Environmental Protection. The fee is non-refundable except as provided in Section 120.60, F.S., and in this section.

(c) Upon receipt of the proper application fee, the permit processing time requirements of Sections 120.60(2) and 403.0876, F.S., shall begin.

(d) If the applicant does not submit the required fee within ten days of receipt of written notification, the Department shall either return the unprocessed application or arrange with the applicant for the pick up of the application.

(e) If an applicant submits an application fee in excess of the required fee, the permit processing time requirements of Sections 120.60(2) and 403.0876, F.S., shall begin upon receipt, and the Department shall refund to the applicant the amount received in excess of the required fee.

(6) Any substantial modification to a complete application shall require an additional processing fee determined pursuant to the schedule set forth in Rule 62-4.050, F.A.C., and shall restart the time requirements of Sections 120.60 and 403.0876, F.S. For purposes of this Subsection, the term "substantial modification" shall mean a modification which is reasonably expected to lead to substantially different environmental impacts which require a detailed review.

(7) Modifications to existing permits proposed by the permittee which require substantial changes in the existing permit or require substantial evaluation by the Department of potential impacts of the proposed modifications shall require the same fee as a new application.

[Rule 62-4.050, F.A.C.]

3. **Standards for Issuing or Denying Permits.** Except as provided at Rule 62-213.460, F.A.C., the issuance of a permit does not relieve any person from complying with the requirements of Chapter 403, F.S., or Department rules.

[Rule 62-4.070(7), F.A.C.]

4. Modification of Permit Conditions.

(1) For good cause and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions and on application of the permittee the Department may grant additional time. For the purpose of this section, good cause shall include, but not be limited to, any of the following:

- (a) A showing that an improvement in effluent or emission quality or quantity can be accomplished because of technological advances without unreasonable hardship.
- (b) A showing that a higher degree of treatment is necessary to effect the intent and purpose of Chapter 403, F.S.
- (c) A showing of any change in the environment or surrounding conditions that requires a modification to conform to applicable air or water quality standards.
- (e) Adoption or revision of Florida Statutes, rules, or standards which require the modification of a permit condition for compliance.

(2) A permittee may request a modification of a permit by applying to the Department.

(3) A permittee may request that a permit be extended as a modification of the permit. Such a request must be submitted to the Department in writing before the expiration of the permit. Upon timely submittal of a request for extension, unless the permit automatically expires by statute or rule, the permit will remain in effect until final agency action is taken on the request. For construction permits, an extension shall be granted if the applicant can demonstrate reasonable assurances that, upon completion, the extended permit will comply with the standards and conditions required by applicable regulation. For all other permits, an extension shall be granted if the applicant can demonstrate reasonable assurances that the extended permit will comply with the standards and conditions applicable to the original permit. A permit for which the permit application fee was prorated in accordance with Rule 62-4.050(4)(1), F.A.C., shall not be extended. In no event shall a permit be extended or remain in effect longer than the time limits established by statute or rule.

[Rule 62-4.080, F.A.C.]

5. Renewals. Prior to one hundred eighty (180) days before the expiration of a permit issued pursuant to Chapter 62-213, F.A.C., the permittee shall apply for a renewal of a permit using forms incorporated by reference in the specific rule chapter for that kind of permit. A renewal application shall be timely and sufficient. If the application is submitted prior to 180 days before expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the Department or, if there is court review of the Department's final agency action, until a later date is required by Section 120.60, F.S., provided that, for renewal of a permit issued pursuant to Chapter 62-213, F.A.C., the applicant complies with the requirements of Rules 62-213.420(1)(b)3. and 4., F.A.C.

[Rule 62-4.090(1), F.A.C.]

6. Suspension and Revocation.

(1) Permits shall be effective until suspended, revoked, surrendered, or expired and shall be subject to the provisions of Chapter 403, F.S., and rules of the Department.

(2) Failure to comply with pollution control laws and rules shall be grounds for suspension or revocation.

(3) A permit issued pursuant to Chapter 62-4, F.A.C., shall not become a vested property right in the permittee. The Department may revoke any permit issued by it if it finds that the permit holder or the permit holder's agent:

- (a) Submitted false or inaccurate information in application or operational reports.
- (b) Has violated law, Department orders, rules or permit conditions.
- (c) Has failed to submit operational reports or other information required by Department rules.
- (d) Has refused lawful inspection under Section 403.091, F.S.

[Rule 62-4.100, F.A.C.]

7. Not federally enforceable. Financial Responsibility. The Department may require an applicant to submit proof of financial responsibility and may require the applicant to post an appropriate bond to guarantee compliance with the law and Department rules.

[Rule 62-4.110, F.A.C.]

8. Transfer of Permits.

- (1) Within 30 days after the sale or legal transfer of a permitted facility, an "Application for Transfer of Permit" (DEP Form 62-1.201(1)) must be submitted to the Department. This form must be completed with the notarized signatures of both the permittee and the proposed new permittee.
- (2) The Department shall approve the transfer of a permit unless it determines that the proposed new permittee cannot provide reasonable assurances that conditions of the permit will be met. The determination shall be limited solely to the ability of the new permittee to comply with the conditions of the existing permit, and it shall not concern the adequacy of these permit conditions. If the Department proposes to deny the transfer, it shall provide both the permittee and the proposed new permittee a written objection to such transfer together with notice of a right to request a Chapter 120, F.S., proceeding on such determination.
- (3) Within 30 days of receiving a properly completed Application for Transfer of Permit form, the Department shall issue a final determination. The Department may toll the time for making a determination on the transfer by notifying both the permittee and the proposed new permittee that additional information is required to adequately review the transfer request. Such notification shall be served within 30 days of receipt of an Application for Transfer of Permit form, completed pursuant to Rule 62-4.120(1), F.A.C. If the Department fails to take action to approve or deny the transfer within 30 days of receipt of the completed Application for Transfer of Permit form, or within 30 days of receipt of the last item of timely requested additional information, the transfer shall be deemed approved.
- (4) The permittee is encouraged to apply for a permit transfer prior to the sale or legal transfer of a permitted facility. However, the transfer shall not be effective prior to the sale or legal transfer.
- (5) Until this transfer is approved by the Department, the permittee and any other person constructing, operating, or maintaining the permitted facility shall be liable for compliance with the terms of the permit. The permittee transferring the permit shall remain liable for corrective actions that may be required as a result of any violations occurring prior to the sale or legal transfer of the facility.

[Rule 62-4.120, F.A.C.]

9. Plant Operation-Problems. If the permittee is temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the permittee shall immediately notify the Department. Notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with Department rules.

[Rule 62-4.130, F.A.C.]

10. For purposes of notification to the Department pursuant to Rule 62-4.130, F.A.C., Plant Operation-Problems, "immediately" shall mean the same day, if during a workday (i.e., 8:00 a.m. - 5:00 p.m.), or the first business day after the incident, excluding weekends and holidays.

[40 CFR 70.6(a)(3)(iii)(B)]

- ✓ 11. Not federally enforceable. Review. Failure to request a hearing within 14 days of receipt of notice of proposed or final agency action on a permit application or as otherwise required in Chapter 62-103, F.A.C., shall be deemed a waiver of the right to an administrative hearing.

[Rule 62-4.150, F.A.C.]

12. Permit Conditions. All permits issued by the Department shall include the following general conditions:

- (1) The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- (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), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in this permit.

APPENDIX TV-1, TITLE V CONDITIONS (version dated 12/02/97) (continued)

- (4) This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- (5) This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of F.S. and Department rules, unless specifically authorized by an order from the Department.
- (6) The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and 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 and at reasonable times, access to the premises where the permitted activity is located or conducted to:
- (a) Have access to and copy any records that must be kept under conditions of the permit;
 - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
 - (c) Sample or monitor any substances or parameters at any location reasonable 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 provide the Department with the following information:
- (a) A description of and cause of noncompliance; and,
 - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.
- (9) In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the F.S. or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- (10) The permittee agrees to comply with changes in Department rules and F.S. after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by F.S. or Department rules.
- (11) This permit is transferable only upon Department approval in accordance with Rule 62-4.120, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- (12) This permit or a copy thereof shall be kept at the work site of the permitted activity.
- (14) The permittee shall comply with the following:
- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least five (5) years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - (c) Records of monitoring information shall include:
 - 1. the date, exact place, and time of sampling or measurements;
 - 2. the person responsible for performing the sampling or measurements;
 - 3. the dates analyses were performed;
 - 4. the person responsible for performing the analyses;
 - 5. the analytical techniques or methods used; and,
 - 6. the results of such analyses.
- (15) When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.
- [Rules 62-4.160 and 62-213.440(1)(b), F.A.C.]

APPENDIX TV-1, TITLE V CONDITIONS (version dated 12/02/97) (continued)

13. Construction Permits.

(1) No person shall construct any installation or facility which will reasonably be expected to be a source of air or water pollution without first applying for and receiving a construction permit from the Department unless exempted by statute or Department rule. In addition to the requirements of Chapter 62-4, F.A.C., applicants for a Department Construction Permit shall submit the following as applicable:

- (a) A completed application on forms furnished by the Department.
- (b) An engineering report covering:
 - 1. plant description and operations,
 - 2. types and quantities of all waste material to be generated whether liquid, gaseous or solid,
 - 3. proposed waste control facilities,
 - 4. the treatment objectives,
 - 5. the design criteria on which the control facilities are based, and,
 - 6. other information deemed relevant.

Design criteria submitted pursuant to Rule 62-4.210(1)(b)5., F.A.C., shall be based on the results of laboratory and pilot-plant scale studies whenever such studies are warranted. The design efficiencies of the proposed waste treatment facilities and the quantities and types of pollutants in the treated effluents or emissions shall be indicated. Work of this nature shall be subject to the requirements of Chapter 471, F.S. Where confidential records are involved, certain information may be kept confidential pursuant to Section 403.111, F.S.

(c) The owners' written guarantee to meet the design criteria as accepted by the Department and to abide by Chapter 403, F.S. and the rules of the Department as to the quantities and types of materials to be discharged from the installation. The owner may be required to post an appropriate bond or other equivalent evidence of financial responsibility to guarantee compliance with such conditions in instances where the owner's financial resources are inadequate or proposed control facilities are experimental in nature.

(2) The construction permit may contain conditions and an expiration date as determined by the Secretary or the Secretary's designee.

(3) When the Department issues a permit to construct, the permittee shall be allowed a period of time, specified in the permit, to construct, and to operate and test to determine compliance with Chapter 403, F.S., and the rules of the Department and, where applicable, to apply for and receive an operation permit. The Department may require tests and evaluations of the treatment facilities by the permittee at his/her expense.

[Rule 62-4.210, F.A.C.]

- ✓ 14. Not federally enforceable. Operation Permit for New Sources. To properly apply for an operation permit for new sources, the applicant shall submit certification that construction was completed noting any deviations from the conditions in the construction permit and test results where appropriate.

[Rule 62-4.220, F.A.C.]

Chapter 62-103, F.A.C.

15. Public Notice, Public Participation, and Proposed Agency Action. The permittee shall comply with all of the requirements for public notice, public participation, and proposed agency action pursuant to Rule 62-103.150 and Rule 62-210.350, F.A.C. [Rules 62-103.150, 62-210.350 and 62-213.430(1)(b), F.A.C.]

16. Administrative Hearing. The permittee shall comply with all of the requirements for a petition for administrative hearing or waiver of right to administrative proceeding pursuant to Rule 61-103.155, F.A.C.

[Rule 62-103.155, F.A.C.]

Chapter 62-204, F.A.C.

17. Asbestos. This permit does not authorize any demolition or renovation of the facility or its parts or components which involves asbestos removal. This permit does not constitute a waiver of any of the requirements of Chapter 62-257, F.A.C., and 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos, adopted and incorporated by reference in Rule 62-204.800, F.A.C. Compliance with Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, Section 61.145, is required for any asbestos demolition or renovation at the source.

[40 CFR 61; Rule 62-204.800, F.A.C.; and, Chapter 62-257, F.A.C.]

APPENDIX TV-1, TITLE V CONDITIONS (version dated 12/02/97) (continued)

Chapter 62-210. F.A.C.

18. Permits Required. The owner or operator of any emissions unit which emits or can reasonably be expected to emit any air pollutant shall obtain an appropriate permit from the Department prior to beginning construction, modification, or initial or continued operation of the emissions unit unless exempted pursuant to Department rule or statute. All emissions limitations, controls, and other requirements imposed by such permits shall be at least as stringent as any applicable limitations and requirements contained in or enforceable under the State Implementation Plan (SIP) or that are otherwise federally enforceable. Except as provided at Rule 62-213.460, F.A.C., issuance of a permit does not relieve the owner or operator of an emissions unit from complying with any applicable requirements, any emission limiting standards or other requirements of the air pollution rules of the Department or any other such requirements under federal, state, or local law.

(1) Air Construction Permits. An air construction permit shall be obtained by the owner or operator of any proposed new or modified facility or emissions unit prior to the beginning of construction or modification, in accordance with all applicable provisions of Chapters 62-210, 62-212 and 62-4, F.A.C. The construction permit shall be issued for a period of time sufficient to allow construction or modification of the facility or emissions unit and operation while the new or modified facility or emissions unit is conducting tests or otherwise demonstrating initial compliance with the conditions of the construction permit.

(2) Air Operation Permits. Upon expiration of the air operation permit for any existing facility or emissions unit, subsequent to construction or modification and demonstration of initial compliance with the conditions of the construction permit for any new or modified facility or emissions unit, or as otherwise provided in Chapter 62-210 or Chapter 62-213, the owner or operator of such facility or emissions unit shall obtain a renewal air operation permit, an initial air operation permit, or an administrative correction or revision of an existing air operation permit, whichever is appropriate, in accordance with all applicable provisions of Chapter 62-210, Chapter 62-213, and Chapter 62-4, F.A.C.

(a) Minimum Requirements for All Air Operation Permits. At a minimum, a permit issued pursuant to this subsection shall:

1. Specify the manner, nature, volume and frequency of the emissions permitted, and the applicable emission limiting standards or performance standards, if any;
2. Require proper operation and maintenance of any pollution control equipment by qualified personnel, where applicable in accordance with the provisions of any operation and maintenance plan required by the air pollution rules of the Department.
3. Contain an effective date stated in the permit which shall not be earlier than the date final action is taken on the application and be issued for a period, beginning on the effective date, as provided below.

a. The operation permit for an emissions unit which is in compliance with all applicable rules and in operational condition, and which the owner or operator intends to continue operating, shall be issued or renewed for a five-year period, except that, for Title V sources subject to Rule 62-213.420(1)(a)1., F.A.C., operation permits shall be extended until 60 days after the due date for submittal of the facility's Title V permit application as specified in Rule 62-213.420(1)(a)1., F.A.C.

b. Except as provided in Rule 62-210.300(2)(a)3.d., F.A.C., the operation permit for an emissions unit which has been shut down for six months or more prior to the expiration date of the current operation permit, shall be renewed for a period not to exceed five years from the date of shutdown, even if the emissions unit is not maintained in operational condition, provided:

- (i) the owner or operator of the emissions unit demonstrates to the Department that the emissions unit may need to be reactivated and used, or that it is the owner's or operator's intent to apply to the Department for a permit to construct a new emissions unit at the facility before the end of the extension period; and
- (ii) the owner or operator of the emissions unit agrees to and is legally prohibited from providing the allowable emission permitted by the renewed permit as an emissions offset to any other person under Rule 62-212.500, F.A.C.; and
- (iii) the emissions unit was operating in compliance with all applicable rules as of the time the source was shut down.

c. Except as provided in Rule 62-210.300(2)(a)3.d., F.A.C., the operation permit for an emissions unit which has been shut down for five years or more prior to the expiration date of the current operation permit shall be renewed for a maximum period not to exceed ten years from the date of shutdown, even if the emissions unit is not maintained in operational condition, provided the conditions given in Rule 62-210.300(2)(a)3.b., F.A.C., are met and the owner or operator demonstrates to the Department that failure to renew the permit would constitute a hardship, which may include economic hardship.

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d. The operation permit for an electric utility generating unit on cold standby or long-term reserve shutdown shall be renewed for a five-year period, and additional five-year periods, even if the unit is not maintained in operational condition, provided the conditions given in Rules 62-210.300(2)(a)3.b.(i) through (iii), F.A.C., are met.

4. In the case of an emissions unit permitted pursuant to Rules 62-210.300(2)(a)3.b., c., and d., F.A.C., include reasonable notification and compliance testing requirements for reactivation of such emissions unit and provide that the owner or operator demonstrate to the Department prior to reactivation that such reactivation would not constitute reconstruction pursuant to Rule 62-204.800(7), F.A.C.

[Rules 62-210.300(1) & (2), F.A.C.]

✓ 19. Not federally enforceable. Notification of Startup. The owner or operator of any emissions unit or facility which has a valid air operation permit and which has been shut down more than one (1) year, shall notify the Department in writing of the intent to start up such emissions unit or facility, a minimum of sixty (60) days prior to the intended startup date.

(a) The notification shall include the planned startup date, anticipated emission rates or pollutants released, changes to processes or control devices which will result in changes to emission rates, and any other conditions which may differ from the valid outstanding operation permit.

(b) If, due to an emergency, a startup date is not known 60 days prior thereto, the owner shall notify the Department as soon as possible after the date of such startup is ascertained.

[Rule 62-210.300(5), F.A.C.]

20. Emissions Unit Reclassification.

(a) Any emissions unit whose operation permit has been revoked as provided for in Chapter 62-4, F.A.C., shall be deemed permanently shut down for purposes of Rule 62-212.500, F.A.C. Any emissions unit whose permit to operate has expired without timely renewal or transfer may be deemed permanently shut down, provided, however, that no such emissions unit shall be deemed permanently shut down if, within 20 days after receipt of written notice from the Department, the emissions unit owner or operator demonstrates that the permit expiration resulted from inadvertent failure to comply with the requirements of Rule 62-4.090, F.A.C., and that the owner or operator intends to continue the emissions unit in operation, and either submits an application for an air operation permit or complies with permit transfer requirements, if applicable.

(b) If the owner or operator of an emissions unit which is so permanently shut down, applies to the Department for a permit to reactivate or operate such emissions unit, the emissions unit will be reviewed and permitted as a new emissions unit.

[Rule 62-210.300(6), F.A.C.]

21. Public Notice and Comment.

(1) Public Notice of Proposed Agency Action.

(a) Notwithstanding any discretionary public notice requirements contained in Rule 62-103.150(2)(a), F.A.C., a notice of proposed agency action on permit application, where the proposed agency action is to issue the permit, shall be published by any applicant for:

1. An air construction permit;
2. An air operation permit, permit renewal or permit revision subject to Rule 62-210.300(2)(b), F.A.C., (i.e., a FESOP), except as provided in Rule 62-210.300(2)(b)1.b., F.A.C.; or
3. An air operation permit, permit renewal, or permit revision subject to Chapter 62-213, F.A.C., except those permit revisions meeting the requirements of Rule 62-213.412(1), F.A.C.

(b) The notice required by Rule 62-210.350(1)(a), F.A.C., shall be published in accordance with all otherwise applicable provisions of Rule 62-103.150, F.A.C.

(2) Additional Public Notice Requirements for Emissions Units Subject to Prevention of Significant Deterioration or Nonattainment-Area Preconstruction Review.

(a) Before taking final agency action on a construction permit application for any proposed new or modified facility or emissions unit subject to the preconstruction review requirements of Rule 62-212.400 or 62-212.500, F.A.C., the Department shall comply with all applicable provisions of Rule 62-103.150, F.A.C., and provide an opportunity for public comment which shall include as a minimum the following:

1. A complete file available for public inspection in at least one location in the district affected which includes the information submitted by the owner or operator, exclusive of confidential records under Section 403.111, F.S., and the Department's analysis of the effect of the proposed construction or modification on ambient air quality, including the Department's preliminary determination of whether the permit should be approved or disapproved;
2. A 30-day period for submittal of public comments; and,

3. A notice, by advertisement in a newspaper of general circulation in the county affected, specifying the nature and location of the proposed facility or emissions unit, whether BACT or LAER has been determined, the degree of PSD increment consumption expected, if applicable, and the location of the information specified in paragraph 1. above; and notifying the public of the opportunity for submitting comments and requesting a public hearing.
- (b) The notice provided for in Rule 62-210.350(2)(a)3., F.A.C., shall be prepared by the Department and published by the applicant in accordance with all applicable provisions of Rule 62-103.150, F.A.C., except that the applicant shall cause the notice to be published no later than thirty (30) days prior to final agency action.
- (c) A copy of the notice provided for in Rule 62-210.350(2)(a)3., F.A.C., shall also be sent by the Department to the Regional Office of the U. S. Environmental Protection Agency and to all other state and local officials or agencies having cognizance over the location of such new or modified facility or emissions unit, including local air pollution control agencies, chief executives of city or county government, regional land use planning agencies, and any other state, Federal Land Manager, or Indian Governing Body whose lands may be affected by emissions from the new or modified facility or emissions unit.
- (d) A copy of the notice provided for in Rule 62-210.350(2)(a)3., F.A.C., shall be displayed in the appropriate district, branch and local program offices.
- (e) An opportunity for public hearing shall be provided in accordance with Chapter 120, F.S., and Rule 62-103.150, F.A.C.
- (f) Any public comments received shall be made available for public inspection in the location where the information specified in Rule 62-210.350(2)(a)1., F.A.C., is available and shall be considered by the Department in making a final determination to approve or deny the permit.
- (g) The final determination shall be made available for public inspection at the same location where the information specified in Rule 62-210.350(2)(a)1., F.A.C., was made available.
- (h) For a proposed new or modified emissions unit which would be located within 100 kilometers of any Federal Class I area or whose emissions may affect any Federal Class I area, and which would be subject to the preconstruction review requirements of Rule 62-212.400, F.A.C., or Rule 62-212.500, F.A.C.:
1. The Department shall mail or transmit to the Administrator a copy of the initial application for an air construction permit and notice of every action related to the consideration of the permit application.
 2. The Department shall mail or transmit to the Federal Land Manager of each affected Class I area a copy of any written notice of intent to apply for an air construction permit; the initial application for an air construction permit, including all required analyses and demonstrations; any subsequently submitted information related to the application; the preliminary determination and notice of proposed agency action on the permit application; and any petition for an administrative hearing regarding the application or the Department's proposed action. Each such document shall be mailed or transmitted to the Federal Land Manager within fourteen (14) days after its receipt by the Department.
- (3) Additional Public Notice Requirements for Facilities Subject to Operation Permits for Title V Sources.
- (a) Before taking final agency action to issue a new, renewed, or revised air operation permit subject to Chapter 62-213, F.A.C., the Department shall comply with all applicable provisions of Rule 62-103.150, F.A.C., and provide an opportunity for public comment which shall include as a minimum the following:
1. A complete file available for public inspection in at least one location in the district affected which includes the information submitted by the owner or operator, exclusive of confidential records under Section 403.111, F.S.; and,
 2. A 30-day period for submittal of public comments.
- (b) The notice provided for in Rule 62-210.350(3)(a), F.A.C., shall be prepared by the Department and published by the applicant in accordance with all applicable provisions of Rule 62-103.150, F.A.C., except that the applicant shall cause the notice to be published no later than thirty (30) days prior to final agency action.
- (c) The notice shall identify:
1. The facility;
 2. The name and address of the office at which processing of the permit occurs;
 3. The activity or activities involved in the permit action;
 4. The emissions change involved in any permit revision;
 5. The name, address, and telephone number of a Department representative from whom interested persons may obtain additional information, including copies of the permit draft, the application, and all relevant supporting materials, including any permit application, compliance plan, permit, monitoring report, and compliance statement required pursuant to Chapter 62-213, F.A.C. (except for information entitled to confidential treatment pursuant to Section 403.111, F.S.) and all other materials available to the Department that are relevant to the permit decision;
 6. A brief description of the comment procedures required by Rules 62-103.150 and 62-210.350(3), F.A.C.;
 7. The time and place of any hearing that may be held, including a statement of procedure to request a hearing (unless a hearing has already been scheduled); and,

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8. The procedures by which persons may petition the Administrator to object to the issuance of the proposed permit after expiration of the Administrator's 45-day review period.

[Rule 62-210.350, F.A.C.]

22. Administrative Permit Corrections.

(1) A facility owner shall notify the Department by letter of minor corrections to information contained in a permit. Such notifications shall include:

- (a) Typographical errors noted in the permit;
- (b) Name, address or phone number change from that in the permit;
- (c) Any other similar minor administrative change at the source; and,
- (d) A change requiring more frequent monitoring or reporting by the permittee.
- (e) Changes listed at 40 CFR 72.83(a)(1), (2), (6), (9) and (10), hereby adopted and incorporated by reference, to Title V sources subject to emissions limitations or reductions pursuant to 42 USC ss. 7651-7651o;
- (f) Changes listed at 40 CFR 72.83(a)(11), hereby adopted and incorporated by reference, to Title V sources subject to emissions limitations or reductions pursuant to 42 USC ss. 7651-7651o, provided the notification is accompanied by a copy of any EPA determination concerning the similarity of the change to those listed at Rule 17-210.360(1)(e).

(2) Upon receipt of such notifications the Department shall within 60 days correct the permit and provide a corrected copy to the owner.

(3) For facilities subject to Chapter 62-213, F.A.C., a copy shall be provided to EPA and any approved local air program in the county where the facility or any part of the facility is located.

(4) The Department shall incorporate requirements resulting from issuance of new or revised construction permits into existing operation permits issued pursuant to Chapter 62-213, F.A.C., if the construction permit revisions incorporate requirements of federally enforceable preconstruction review and if the applicant requests at the time of application that all of the requirements of Rule 62-213.430(1), F.A.C., be complied with in conjunction with the processing of the construction permit application.

[Rule 62-210.360, F.A.C.]

23. Reports.

(3) Annual Operating Report for Air Pollutant Emitting Facility.

(a) The Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be completed each year.

(c) The annual operating report shall be submitted to the appropriate Department District or Department approved local air pollution control program office by March 1 of the following year unless otherwise indicated by permit condition or Department request.

[Rule 62-210.370(3), F.A.C.]

24. Circumvention. No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly.

[Rule 62-210.650, F.A.C.]

25. Forms and Instructions. The forms used by the Department in the stationary source control program are adopted and incorporated by reference in this section. The forms are listed by rule number, which is also the form number, with the subject, title and effective date. Copies of forms may be obtained by writing to the Department of Environmental Protection, Division of Air Resources Management, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

(1) Application for Air Permit - Long Form, Form and Instructions.

- (a) Acid Rain Part (Phase II), Form and Instructions.
 - 1. Repowering Extension Plan, Form and Instructions.
 - 2. New Unit Exemption, Form and Instructions.
 - 3. Retired Unit Exemption, Form and Instructions.

(b) Reserved.

(5) Annual Operating Report (AOR) for Air Pollutant Emitting Facility, Form and Instructions.

[Rule 62-210.900, F.A.C.]

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Chapter 62-213, F.A.C.

26. Annual Emissions Fee. Each Title V source permitted to operate in Florida must pay between January 15 and March 1 of each year, upon written notice from the Department, an annual emissions fee in accordance with Rule 62-213.205, F.A.C., and the appropriate form and associated instructions.

[Rules 62-213.205 and 62-213.900(1), F.A.C.]

27. Annual Emissions Fee. Failure to pay timely any required annual emissions fee, penalty, or interest constitutes grounds for permit revocation pursuant to Rule 62-4.100, F.A.C.

[Rule 62-213.205(1)(g), F.A.C.]

28. Annual Emissions Fee. Any documentation of actual hours of operation, actual material or heat input, actual production amount, or actual emissions used to calculate the annual emissions fee shall be retained by the owner for a minimum of five (5) years and shall be made available to the Department upon request.

[Rule 62-213.205(1)(j), F.A.C.]

29. Annual Emissions Fee. DEP Form 62-213.900(1), F.A.C., "Major Air Pollution Source Annual Emissions Fee Form", must be completed by the permittee and submitted with the annual emissions fee.

[Rule 62-213.205(4), F.A.C.]

30. Air Operation Permit Fees. After December 31, 1992, no permit application processing fee, renewal fee, modification fee or amendment fee is required for an operation permit for a Title V source.

[Rule 62-213.205(5), F.A.C.]

31. Permits and Permit Revisions Required. All Title V sources are subject to the permit requirements of Chapter 62-213, F.A.C.

[Rule 62-213.400, F.A.C.]

32. No Title V source may operate except in compliance with Chapter 62-213, F.A.C.

[Rule 62-213.400(1), F.A.C.]

33. Changes Without Permit Revision. Title V sources having a valid permit issued pursuant to Chapter 62-213, F.A.C., may make the following changes without permit revision, provided that sources shall maintain source logs or records to verify periods of operation in each alternative method of operation:

(1) Permitted sources may change among those alternative methods of operation allowed by the source's permit as provided by the terms of the permit;

(2) Permitted sources may implement the terms or conditions of a new or revised construction permit if;

(a) The application for construction permit complied with the requirements of Rule 62-213.420(3) and (4), F.A.C.;

(b) The terms or conditions were subject to federally enforceable preconstruction review pursuant to Chapter 62-212, F.A.C.; and,

(c) The new or revised construction permit was issued after the Department and the applicant complied with all the requirements of Rule 62-213.430(1), F.A.C.;

(3) A permitted source may implement operating changes after the source submits any forms required by any applicable requirement and provides the Department and EPA with at least 7 days written notice prior to implementation. The source and the Department shall attach each notice to the relevant permit;

(a) The written notice shall include the date on which the change will occur, and a description of the change within the permitted source, the pollutants emitted and any change in emissions, and any term or condition becoming applicable or no longer applicable as a result of the change;

(b) The permit shield described in Rule 62-213.460, F.A.C., shall not apply to such changes;

(4) Permitted sources may implement changes involving modes of operation only in accordance with Rule 62-213.415, F.A.C.

[Rule 62-213.410, F.A.C.]

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34. Immediate Implementation Pending Revision Process.

(1) Those permitted Title V sources making any change that constitutes a modification pursuant to paragraph (a) of the definition of modification at Rule 62-210.200, F.A.C., but which would not constitute a modification pursuant to paragraph (b) of the same definition, may implement such change prior to final issuance of a permit revision in accordance with Rule 62-213.412, F.A.C., provided the change:

- (a) Does not violate any applicable requirement;
- (b) Does not contravene any permit term or condition for monitoring, testing, recordkeeping or reporting, or any compliance certification requirement;
- (c) Does not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis under the provisions of Chapter 62-212 or 62-296, F.A.C.;
- (d) Does not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject including any federally enforceable emissions cap or federally enforceable alternative emissions limit.

(2) A Title V source may immediately implement such changes after they have been incorporated into the terms and conditions of a new or revised construction permit issued pursuant to Chapter 62-212, F.A.C., and after the source provides to EPA, the Department, each affected state and any approved local air program having geographic jurisdiction over the source, a copy of the source's application for operation permit revision. The Title V source may conform its application for construction permit to include all information required by Rule 62-213.420, F.A.C., in lieu of submitting separate application forms.

(3) The Department shall process the application for operation permit revision in accordance with the provisions of Chapter 62-213, F.A.C., except that the Department shall issue a draft permit revision or a determination to deny the revision within 60 days of receipt of a complete application for operation permit revision or, if the Title V source has submitted a construction permit application conforming to the requirements of Rule 62-213.420, F.A.C., the Department shall issue a draft permit or a determination to deny the revision at the same time the Department issues its determination on issuance or denial of the construction permit application. The Department shall not take final action until all the requirements of Rule 62-213.430(1)(a), (c), (d), and (e), F.A.C., have been complied with.

(4) Pending final action on the operation permit revision application, the source shall implement the changes in accordance with the terms and conditions of the source's new or revised construction permit.

(5) The permit shield described in Rule 62-213.460, F.A.C., shall not apply to such changes until after the Department takes final action to issue the operation permit revision.

(6) If the Department denies the source's application for operation permit revision, the source shall cease implementation of the proposed changes.

[Rule 62-213.412, F.A.C.]

35. Permit Applications.

(1) Duty to Apply. For each Title V source, the owner or operator shall submit a timely and complete permit application in compliance with the requirements of Rules 62-213.420, 62-4.050(1) & (2), and 62-210.900, F.A.C.

(a) Timely Application.

3. For purposes of permit renewal, a timely application is one that is submitted in accordance with Rule 62-4.090, F.A.C.

(b) Complete Application.

1. Any applicant for a Title V permit, permit revision or permit renewal must submit an application on DEP Form No. 62-210.900(1), which must include all the information specified by Rule 62-213.420(3), F.A.C., except that an application for permit revision must contain only that information related to the proposed change. The applicant shall include information concerning fugitive emissions and stack emissions in the application. Each application for permit, permit revision or permit renewal shall be certified by a responsible official in accordance with Rule 62-213.420(4), F.A.C.

2. For those applicants submitting initial permit applications pursuant to Rule 62-213.420(1)(a)1., F.A.C., a complete application shall be an application that substantially addresses all the information required by the application form number 62-210.900(1), and such applications shall be deemed complete within sixty days of receipt of a signed and certified application unless the Department notifies the applicant of incompleteness within that time. For all other applicants, the applications shall be deemed complete sixty days after receipt, unless the Department, within sixty days after receipt of a signed application for permit, permit revision or permit renewal, requests additional documentation or information needed to process the application. An applicant making timely and complete application for permit, or timely application for permit renewal as described by Rule 62-4.090(1), F.A.C., shall continue to operate the source

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under the authority and provisions of any existing valid permit or Florida Electrical Power Plant Siting Certification, provided the applicant complies with all the provisions of Rules 62-213.420(1)(b)3. and 4. F.A.C. Failure of the Department to request additional information within sixty days of receipt of a properly signed application shall not impair the Department's ability to request additional information pursuant to Rules 62-213.420(1)(b)3. and 4., F.A.C.

3. For those permit applications submitted pursuant to the provisions of Rule 62-213.420(1)(a)1., F.A.C., the Department shall notify the applicant if the Department becomes aware at any time during processing of the application that the application contains incorrect or incomplete information. The applicant shall submit the corrected or supplementary information to the Department within ninety days unless the applicant has requested and been granted additional time to submit the information. Failure of an applicant to submit corrected or supplementary information requested by the Department within ninety days or such additional time as requested and granted shall render the application incomplete.

4. For all applications other than those addressed at Rule 62-213.420(1)(b)3., F.A.C., should the Department become aware, during processing of any application that the application contains incorrect information, or should the Department become aware, as a result of comment from an affected State, an approved local air program, EPA, or the public that additional information is needed to evaluate the application, the Department shall notify the applicant within 30 days. When an applicant becomes aware that an application contains incorrect or incomplete information, the applicant shall submit the corrected or supplementary information to the Department. If the Department notifies an applicant that corrected or supplementary information is necessary to process the permit, and requests a response, the applicant shall provide the information to the Department within ninety days of the Department request unless the applicant has requested and been granted additional time to submit the information or, the applicant shall, within ninety days, submit a written request that the Department process the application without the information. Failure of an applicant to submit corrected or supplementary information requested by the Department within ninety days, or such additional time as requested and granted, or to demand in writing within ninety days that the application be processed without the information shall render the application incomplete. Nothing in this section shall limit any other remedies available to the Department.

[Rules 62-213.420(1)(a)3. and 62-213.420(1)(b)1., 2., 3. & 4., F.A.C.]

36. Confidential Information. Whenever an applicant submits information under a claim of confidentiality pursuant to Section 405.111, F.S., the applicant shall also submit a copy of all such information and claim directly to EPA.

[Rule 62-213.420(2), F.A.C.]

37. Standard Application Form and Required Information. Applications shall be submitted under Chapter 62-213, F.A.C., on forms provided by the Department and adopted by reference in Rule 62-210.900(1), F.A.C. The information as described in Rule 62-210.900(1), F.A.C., shall be included for the Title V source and each emissions unit. An application must include information sufficient to determine all applicable requirements for the Title V source and each emissions unit and to evaluate a fee amount pursuant to Rule 62-213.205, F.A.C.

[Rule 62-213.420(3), F.A.C.]

38. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

[Rule 62-213.420(4), F.A.C.]

39. a. Permit Renewal and Expiration. Permits being renewed are subject to the same requirements that apply to permit issuance at the time of application for renewal. Permit renewal applications shall contain that information identified in Rules 62-210.900(1) and 62-213.420(3), F.A.C. Unless a Title V source submits a timely application for permit renewal in accordance with the requirements of Rule 62-4.090(1), F.A.C., the existing permit shall expire and the source's right to operate shall terminate.

b. Permit Revision Procedures. Permit revisions shall meet all requirements of Chapter 62-213, F.A.C., including those for content of applications, public participation, review by approved local programs and affected states, and review by EPA, as they apply to permit issuance and renewal, except that permit revisions for those activities implemented pursuant to Rule 62-213.412, F.A.C., need not meet the requirements of Rule 62-213.430(1)(b), F.A.C. The Department shall require permit revision in accordance with the provisions of Rule 62-4.080, F.A.C., and 40 CFR 70.7(f), whenever any source becomes

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subject to any condition listed at 40 CFR 70.7(f)(1), hereby adopted and incorporated by reference. The below requirements from 40 CFR 70.7(f) are adopted and incorporated by reference in Rule 62-213.430(4), F.A.C.:

o 40 CFR 70.7(f): Reopening for Cause.

(1) This section contains provisions from 40 CFR 70.7(f) that specify the conditions under which a Title V permit shall be reopened prior to the expiration of the permit. A Title V permit shall be reopened and revised under any of the following circumstances:

(i) Additional applicable requirements under the Act become applicable to a major Part 70 source with a remaining permit term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 40 CFR 70.4(b)(10)(i) or (ii).

(ii) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approved by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

(iii) The permitting authority or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

(iv) The Administrator or the permitting authority determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

(2) Proceedings to reopen and issue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.

(3) Reopenings under 40 CFR 70.7(f)(1) shall not be initiated before a notice of such intent is provided to the Part 70 source by the permitting authority at least 30 days in advance of the date that the permit is to be reopened, except that the permitting authority may provide a shorter time period in the case of an emergency.

[Rules 62-213.430(3) & (4), F.A.C.; and, 40 CFR 70.7(f)]

40. Insignificant Emissions Units or Pollutant-Emitting Activities.

(a) All requests for determination of insignificant emissions units or activities made pursuant to Rule 62-213.420(3)(m), F.A.C., shall be processed in conjunction with the permit, permit renewal or permit revision application submitted pursuant to Chapter 62-213, F.A.C. Insignificant emissions units or activities shall be approved by the Department consistent with the provisions of Rule 62-4.040(1)(b), F.A.C. Emissions units or activities which are added to a Title V source after issuance of a permit under Chapter 62-213, F.A.C., shall be incorporated into the permit at its next renewal, provided such emissions units or activities have been exempted from the requirement to obtain an air construction permit and also qualify as insignificant pursuant to Rule 62-213.430(6), F.A.C.

(b) An emissions unit or activity shall be considered insignificant if:

1. Such unit or activity would be subject to no unit-specific applicable requirement;
2. Such unit or activity, in combination with other units or activities proposed as insignificant, would not cause the facility to exceed any major source threshold(s) as defined in Rule 62-213.420(3)(c)1., F.A.C., unless it is acknowledged in the permit application that such units or activities would cause the facility to exceed such threshold(s); and
3. Such unit or activity would not emit or have the potential to emit:
 - a. 500 pounds per year or more of lead and lead compounds expressed as lead;
 - b. 1,000 pounds per year or more of any hazardous air pollutant;
 - c. 2,500 pounds per year or more of total hazardous air pollutants; or
 - d. 5.0 tons per year or more of any other regulated pollutant.

[Rule 62-213.430(6), F.A.C.]

41. Permit Duration. Operation permits for Title V sources may not be extended as provided in Rule 62-4.080(3), F.A.C., if such extension will result in a permit term greater than five (5) years.

[Rule 62-213.440(1)(a), F.A.C.]

42. Monitoring Information. All records of monitoring information shall specify the date, place, and time of sampling or measurement and the operating conditions at the time of sampling or measurement, the date(s) analyses were performed, the company or entity that performed the analyses, the analytical techniques or methods used, and the results of such analyses.

[Rule 62-213.440(1)(b)2.a., F.A.C.]

APPENDIX TV-1, TITLE V CONDITIONS (version dated 12/02/97) (continued)

43. Retention of Records. Retention of records of all monitoring data and support information shall be for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

[Rule 62-213.440(1)(b)2.b., F.A.C.]

44. Monitoring Reports. The permittee shall submit reports of any required monitoring at least every six (6) months. All instances of deviations from permit requirements must be clearly identified in such reports.

[Rule 62-213.440(1)(b)3.a., F.A.C.]

45. Deviation from Permit Requirements Reports. The permittee shall report in accordance with the requirements of Rules 62-210.700(6) and 62-4.130, F.A.C., any deviations from permit requirements, including those attributable to upset conditions as defined in the permit. Reports shall include the probable cause of such deviations, and any corrective actions or preventive measures taken.

[Rule 62-213.440(1)(b)3.b., F.A.C.]

46. Reports. All reports shall be accompanied by a certification by a responsible official, pursuant to Rule 62-213.420(4), F.A.C.

[Rule 62-213.440(1)(b)3.c., F.A.C.]

47. If any portion of the final permit is invalidated, the remainder of the permit shall remain in effect.

[Rule 62-213.440(1)(d)1., F.A.C.]

48. It shall not be a defense for a permittee in an enforcement action that maintaining compliance with any permit condition would necessitate halting of or reduction of the source activity.

[Rule 62-213.440(1)(d)3., F.A.C.]

49. A Title V source shall comply with all the terms and conditions of the existing permit until the Department has taken final action on any permit renewal or any requested permit revision, except as provided at Rule 62-213.412(2), F.A.C.

[Rule 62-213.440(1)(d)4., F.A.C.]

50. A situation arising from sudden and unforeseeable events beyond the control of the source which causes an exceedance of a technology-based emissions limitation because of unavoidable increases in emissions attributable to the situation and which requires immediate corrective action to restore normal operation, shall be an affirmative defense to an enforcement action in accordance with the provisions and requirements of 40 CFR 70.6(g)(2) and (3), hereby adopted and incorporated by reference.

[Rule 62-213.440(1)(d)5., F.A.C.]

51. Confidentiality Claims. Any permittee may claim confidentiality of any data or other information by complying with Rule 62-213.420(2), F.A.C.

[Rule 62-213.440(1)(d)6., F.A.C.]

52. Statement of Compliance. The permittee shall submit a statement of compliance with all terms and conditions of the permit. Such statement shall be submitted to the Department and EPA annually, or more frequently if specified by Rule 62-213.440(2), F.A.C., or by any other applicable requirement. The statement of compliance shall include the identity of each term or condition of the permit for which each unit has remained in compliance during the period covered by the statement. The statement shall include identification of all methods used to demonstrate compliance and identification of each term or condition of the permit for which any unit has not remained in compliance during the period covered by the statement. For each term or condition for which the source has not remained in compliance during the period covered by the statement, the statement shall also identify each unit not in compliance and each term and condition with which the unit was not in compliance and state the inclusive dates that the source was not in compliance, the actions taken to achieve compliance and the method used to demonstrate compliance. Such statement shall be accompanied by a certification by a responsible official, in accordance with Rule 62-213.420(4), F.A.C.

[Rule 62-213.440(3), F.A.C.]

APPENDIX TV-1, TITLE V CONDITIONS (version dated 12/02/97) (continued)

53. Permit Shield. Except as provided in Chapter 62-213, F.A.C., compliance with the terms and conditions of a permit issued pursuant to Chapter 62-213, F.A.C., shall be deemed compliance with any applicable requirements in effect as of the date of permit issuance, provided that the source included such applicable requirements in the permit application. Nothing in Rule 62-213.460, F.A.C., or in any permit shall alter or affect the ability of EPA or the Department to deal with an emergency, the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance, or the requirements of the Federal Acid Rain Program.

[Rule 62-213.460, F.A.C.]

54. Forms and Instructions. The forms used by the Department in the Title V source operation program are adopted and incorporated by reference in Rule 62-213.900, F.A.C. The form is listed by rule number, which is also the form number, and with the subject, title, and effective date. Copies of forms may be obtained by writing to the Department of Environmental Protection, Division of Air Resources Management, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, or by contacting the appropriate permitting authority.

(1) Major Air Pollution Source Annual Emissions Fee (AEF) Form.

[Rule 62-213.900(1), F.A.C.]

Chapter 62-256, F.A.C.

55. Not federally enforceable. Open Burning. This permit does not authorize any open burning nor does it constitute any waiver of the requirements of Chapter 62-256, F.A.C. Source shall comply with Chapter 62-256, F.A.C., for any open burning at the source.

[Chapter 62-256, F.A.C.]

Chapter 62-281, F.A.C.

56. Refrigerant Requirements. Any facility having refrigeration equipment, including air conditioning equipment, which uses a Class I or II substance (listed at 40 CFR 82, Subpart A, Appendices A and B), and any facility which maintains, services, or repairs motor vehicles using a Class I or Class II substance as refrigerant must comply with all requirements of 40 CFR 82, Subparts B and F, and with Rule 62-281.100, F.A.C. Those requirements include the following restrictions:

(1) Any facility having any refrigeration equipment normally containing 50 (fifty) pounds of refrigerant, or more, must keep servicing records documenting the date and type of all service and the quantity of any refrigerant added pursuant to 40 CFR 82.166;

(2) No person repairing or servicing a motor vehicle may perform any service on a motor vehicle air conditioner (MVAC) involving the refrigerant for such air conditioner unless the person has been properly trained and certified as provided at 40 CFR 82.34 and 40 CFR 82.40, and properly uses equipment approved pursuant to 40 CFR 82.36 and 40 CFR 82.38, and complies with 40 CFR 82.42;

(3) No person may sell or distribute, or offer for sale or distribution, any substance listed as a Class I or Class II substance at 40 CFR 82, Subpart A, Appendices A and B, except in compliance with Rule 62-281.100, F.A.C., and 40 CFR 82.34(b), 40 CFR 82.42, and/or 40 CFR 82.166;

(4) No person maintaining, servicing, repairing, or disposing of appliances may knowingly vent or otherwise release into the atmosphere any Class I or Class II substance used as a refrigerant in such equipment and no other person may open appliances (except MVACs as defined at 40 CFR 82.152) for service, maintenance or repair unless the person has been properly trained and certified pursuant to 40 CFR 82.161 and unless the person uses equipment certified for that type of appliance pursuant to 40 CFR 82.158 and unless the person observes the practices set forth at 40 CFR 82.156 and 40 CFR 82.166;

(5) No person may dispose of appliances (except small appliances, as defined at 40 CFR 82.152) without using equipment certified for that type of appliance pursuant to 40 CFR 82.158 and without observing the practices set forth at 40 CFR 82.156 and 40 CFR 82.166;

(6) No person may recover refrigerant from small appliances, MVACs and MVAC-like appliances (as defined at 40 CFR 82.152), except in compliance with the requirements of 40 CFR 82, Subpart F.

[40 CFR 82; and, Chapter 62-281, F.A.C. (Chapter 62-281, F.A.C., is not federally enforceable)]

Chapter 62-296, F.A.C.

57. Not federally enforceable until SIP approved. Industrial, Commercial, and Municipal Open Burning Prohibited. Open burning in connection with industrial, commercial, or municipal operations is prohibited, except when:

- (a) Open burning is determined by the Department to be the only feasible method of operation and is authorized by an air permit issued pursuant to Chapter 62-210 or 62-213, F.A.C.; or
- (b) An emergency exists which requires immediate action to protect human health and safety; or
- (c) A county or municipality would use a portable air curtain incinerator to burn yard trash generated by a hurricane, tornado, fire or other disaster and the air curtain incinerator would otherwise be operated in accordance with the permitting exemption criteria of Rule 62-210.300(3), F.A.C.

[Rule 62-296.320(3), F.A.C.]

58. Unconfined Emissions of Particulate Matter.

(4)(c)1. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any emissions unit whatsoever, including, but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrially related activities such as loading, unloading, storing or handling, without taking reasonable precautions to prevent such emission.

3. Reasonable precautions may include, but shall not be limited to the following:

- a. Paving and maintenance of roads, parking areas and yards.
- b. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
- c. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar emissions units.
- d. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the emissions unit to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
- e. Landscaping or planting of vegetation.
- f. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
- g. Confining abrasive blasting where possible.
- h. Enclosure or covering of conveyor systems.

4. In determining what constitutes reasonable precautions for a particular facility, the Department shall consider the cost of the control technique or work practice, the environmental impacts of the technique or practice, and the degree of reduction of emissions expected from a particular technique or practice.

[Rules 62-296.320(4)(c)1., 3., & 4. F.A.C.]

[electronic file name: tv-1.doc]

perm # 127

Florida Department of
Environmental Protection

Memorandum

TO: Carla E. Pierce, Chief
Operating Permits Section

FROM: Scott M. Sheplak, P.E. *zms*
Administrator, Title V Section

DATE: March 23, 1998

SUBJECT: Lakeland Electric and Water Utilities
ID Number: 1050004 and
City of Gainesville - J. R. Kelly
ID Number: 0010005

Please find enclosed the subject Title V applications for your review and information. Please return the applications when you are done.

If you have any questions or comments concerning this matter, please do not hesitate to call me at 850/921-9532.

SMS/sk

Enclosure

*Sent by Federal Express
03-23-98
Sgk*

BEST AVAILABLE COPY

FedEx USA Airbill

FedEx Tracking Number

801411344048

0200 Form I.D. No.

SOR11 Sender's Copy

From (please print and press hard) Date 3-23-98 Sender's FedEx Account Number 1043-1506-2

Sender's name DIV OF AIR RESOURCE MGT Phone (850) 921-9532

Company DEPT OF ENVIR PROTECTION-MS

Address 2600 BLAIR STONE RD Dept/Floor/Suite/Room

City TALLAHASSEE State FL ZIP 32399

Your Internal Billing Reference Information (Optional) (First 24 characters will appear on invoice)

To (please print and press hard) Recipient's Name Ms. Carla E. Pierce, Chief Phone (404) 562-9099

Company United States Environmental Protection Agency, Region 4

Address 61 Forsyth Street, Operating Permits Section (We Cannot Deliver to P.O. Boxes or P.O. ZIP Codes) Dept/Floor/Suite/Room

City Atlanta State GA ZIP 30303

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FedEx Account No. Credit Card No. Exp. Date

Total Packages Total Weight Total Declared Value* Total Charges \$.00 \$

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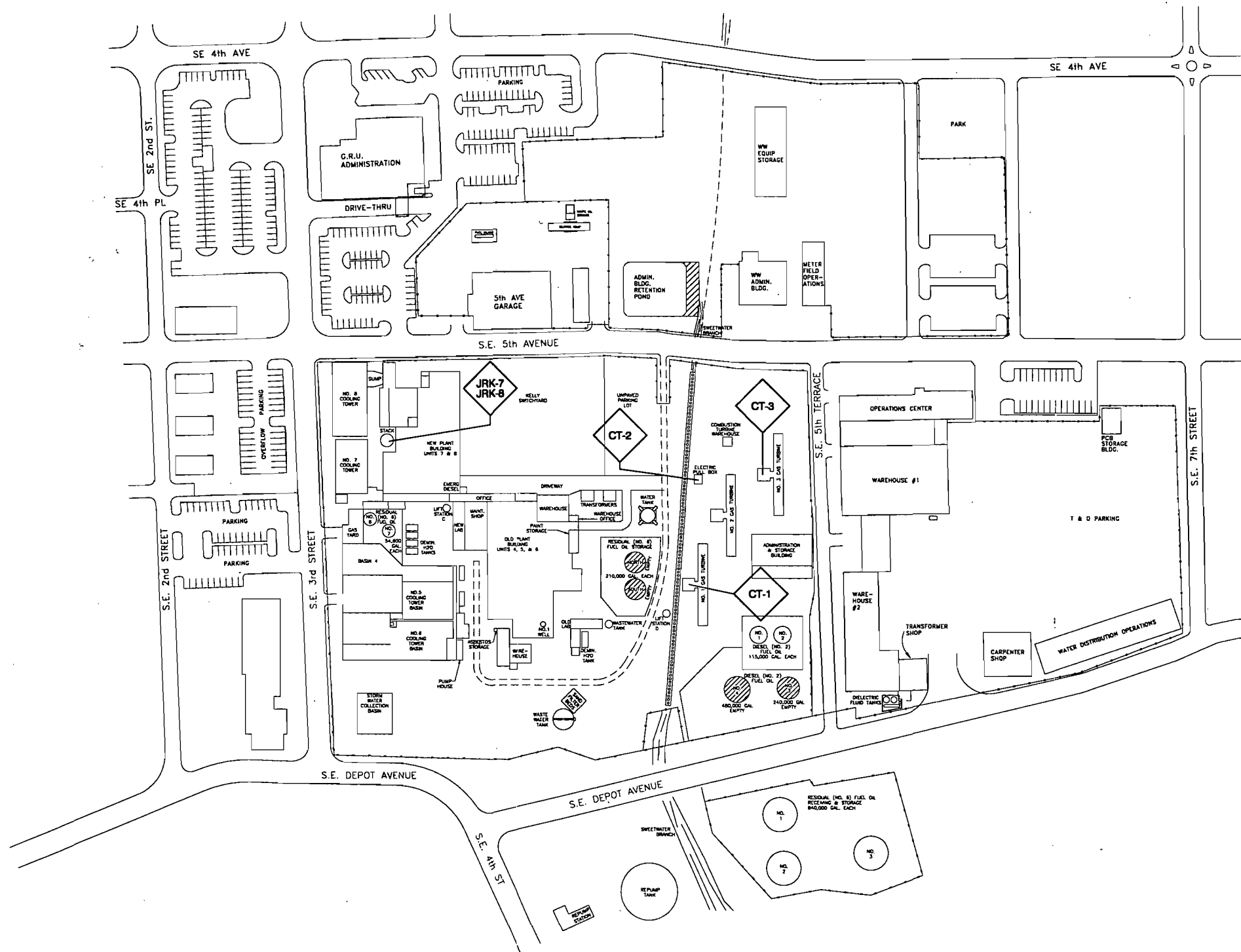
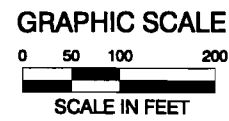
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LEGEND

 EMISSION POINT NUMBER AND LOCATION

(Portions based on original drawings by J.M.Reid)

**DOCUMENT II.E.2.
FACILITY PLOT PLAN**

\\JRKELLY\TITLE-V.DWG

REVISION	DATE
DELETE UNIT 6 STACK	9/15/97

