

2nd Submittal

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ATTACHMENT (March 17, 1999 Letter)

PSD APPLICATION REPLACEMENT PAGES, TEXT, AND TABLES

4. Professional Engineer's Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [] if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [X] if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [] if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Thomas J. Kelly

Signature
(seal) *169*

March 16, 1999

Date

* Attach any exception to certification statement.

F. SEGMENT (PROCESS/FUEL) INFORMATION
(Regulated and Unregulated Emissions Units)

Segment Description and Rate: Segment 1 of 2

| | |
|--|--|
| 1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters): Distillate (No. 2) Fuel Oil | |
| 2. Source Classification Code (SCC): 20100101 | |
| 3. SCC Units: 1,000 gallons used | |
| 4. Maximum Hourly Rate: 14.6 | 5. Maximum Annual Rate: 14,563 |
| 6. Estimated Annual Activity Factor: | |
| 7. Maximum Percent Sulfur: 0.05 | 8. Maximum Percent Ash: |
| 9. Million Btu per SCC Unit: 132 | |
| 10. Segment Comment (limit to 200 characters): Million Btu per SCC Unit = 131.8 (rounded to 132). Based on 7.1 lb/gal; LHV of 18,560 Btu/lb, - ISO conditions, 1,000 hrs/yr operation. | |

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Pollutant Detail Information:

| | | |
|---|------------|----------------|
| 1. Pollutant Emitted: PM | | |
| 2. Total Percent Efficiency of Control: | | % |
| 3. Potential Emissions: | 17 lb/hour | 19.3 tons/year |
| 4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | |
| 5. Range of Estimated Fugitive/Other Emissions: | | |
| [] 1 [] 2 [] 3 _____ to _____ tons/yr | | |
| 6. Emission Factor: | | |
| Reference: GE, '98; Golder, '99 | | |
| 7. Emissions Method Code: | | |
| [] 0 [] 1 <input checked="" type="checkbox"/> 2 [] 3 [] 4 [] 5 | | |
| 8. Calculation of Emissions (limit to 600 characters): | | |
| See Attachment PSD-FCLASS; Section 2.0; Appendix A. | | |
| 9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters): | | |
| Lb/hr based on oil firing, all loads. Tons/year based on 2,390 hrs/yr gas firing and 1,000 hrs/yr oil firing; ISO conditions. | | |

Emissions Unit Information Section 1 of 6
Allowable Emissions (Pollutant identified on front page)

A.

| | | |
|---|-------------------|----------------------|
| 1. Basis for Allowable Emissions Code: OTHER | | |
| 2. Future Effective Date of Allowable Emissions: | | |
| 3. Requested Allowable Emissions and Units: 17 lb/hr | | |
| 4. Equivalent Allowable Emissions: | 17 lb/hour | 8.5 tons/year |
| 5. Method of Compliance (limit to 60 characters): Annual stack test; EPA Methods 5 or 17; if < 400 hours | | |
| 6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters): Oil firing - all loads; 1,000 hrs/yr. See Attachment PSD-FCLASS; Section 2.0; Appendix A. | | |

B.

| | | |
|---|------------------|-----------------------|
| 1. Basis for Allowable Emissions Code: OTHER | | |
| 2. Future Effective Date of Allowable Emissions: | | |
| 3. Requested Allowable Emissions and Units: 10 percent opacity | | |
| 4. Equivalent Allowable Emissions: | 9 lb/hour | 15.3 tons/year |
| 5. Method of Compliance (limit to 60 characters): VE Test < 10% opacity | | |
| 6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters): Gas firing - all loads; 3,390 hrs/yr. See Attachment PSD-FCLASS; Section 2.0; Appendix A. | | |

**H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)**

Pollutant Detail Information:

| | | |
|--|----------------------|-----------------------|
| 1. Pollutant Emitted: SO2 | | |
| 2. Total Percent Efficiency of Control: | | % |
| 3. Potential Emissions: | 103.8 lb/hour | 58.3 tons/year |
| 4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | |
| 5. Range of Estimated Fugitive/Other Emissions: | | |
| <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/yr | | |
| 6. Emission Factor: | | See Comment |
| Reference: Applicant | | |
| 7. Emissions Method Code: | | |
| <input type="checkbox"/> 0 <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 | | |
| 8. Calculation of Emissions (limit to 600 characters): | | |
| See Attachment PSD-FCLASS; Section 2.0; Appendix A. | | |
| 9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters): | | |
| Emission Factor: 1 grain S per 100 CF gas; 0.05% S oil. lb/hr based on oil firing, 100% load, 32 degrees F. Tons/yr based on 2,390 hrs/yr gas firing and 1,000 hrs/yr oil firing, ISO conditions. | | |

Emissions Unit Information Section 1 of 6
Allowable Emissions (Pollutant identified on front page)

A.

| | | |
|---|----------------------|-----------------------|
| 1. Basis for Allowable Emissions Code: OTHER | | |
| 2. Future Effective Date of Allowable Emissions: | | |
| 3. Requested Allowable Emissions and Units: 0.05 % Sulfur Oil | | |
| 4. Equivalent Allowable Emissions: | 103.8 lb/hour | 51.9 tons/year |
| 5. Method of Compliance (limit to 60 characters): Fuel Sampling | | |
| 6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters): Oil firing - 32 degrees F; 100% load; 1,000 hrs/yr. See Attachment PSD-FCLASS; Section 2.0; Appendix A. | | |

B.

| | | |
|---|--------------------|----------------------|
| 1. Basis for Allowable Emissions Code: OTHER | | |
| 2. Future Effective Date of Allowable Emissions: | | |
| 3. Requested Allowable Emissions and Units: See Comment | | |
| 4. Equivalent Allowable Emissions: | 5.5 lb/hour | 9.3 tons/year |
| 5. Method of Compliance (limit to 60 characters): Fuel Sampling | | |
| 6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters): Requested Allowable Emissions and Units: Pipeline Natural Gas. Gas firing, 1 gram/100 cf - 32 degrees F, 100% load; 3,390 hrs/yr. See Attachment PSD-FCLASS; Section 2.0; Appendix A. | | |

**H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)**

Pollutant Detail Information:

| | |
|---|---|
| 1. Pollutant Emitted: NOx | |
| 2. Total Percent Efficiency of Control: | % |
| 3. Potential Emissions: | 344 lb/hour 247.1 tons/year |
| 4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | |
| 5. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/yr | |
| 6. Emission Factor: Reference: Applicant | |
| 7. Emissions Method Code: <input type="checkbox"/> 0 <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 | |
| 8. Calculation of Emissions (limit to 600 characters): See Attachment PSD-FCLASS; Section 2.0; Appendix A. | |
| 9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters): Lb/hr based on oil firing, 100% load, 59 degrees F. Tons/yr based on 2,390 hrs/yr gas firing and 1,000 hrs/yr oil firing; ISO conditions. | |

Emissions Unit Information Section 1 _____ of _____ 6
Allowable Emissions (Pollutant identified on front page)

A.

| | | |
|---|--------------------|------------------------|
| 1. Basis for Allowable Emissions Code: OTHER | | |
| 2. Future Effective Date of Allowable Emissions: | | |
| 3. Requested Allowable Emissions and Units: 42 ppmvd | | |
| 4. Equivalent Allowable Emissions: | 344 lb/hour | 172.2 tons/year |
| 5. Method of Compliance (limit to 60 characters): CEM - 30 Day Rolling Average | | |
| 6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters): Requested Allowable Emissions is at 15% O2-100% load. Oil firing; 59 degrees F; 100% load; 1,000 hrs/yr. See Attachment PSD-FCLASS; Section 2.0; Appendix A. | | |

B.

| | | |
|---|---------------------|------------------------|
| 1. Basis for Allowable Emissions Code: OTHER | | |
| 2. Future Effective Date of Allowable Emissions: | | |
| 3. Requested Allowable Emissions and Units: 9 ppmvd | | |
| 4. Equivalent Allowable Emissions: | 64.9 lb/hour | 109.9 tons/year |
| 5. Method of Compliance (limit to 60 characters): CEM 30-Day Rolling Average | | |
| 6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters): Requested Allowable Emissions and Units is at 15% O2-100 percent load. Gas firing; 32 degrees F; 100 percent load, 3,390 hrs/yr; see Attachment PSD-FCLASS; Section 2.0; Appendix A. | | |

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Pollutant Detail Information:

| | | |
|--|---------------------|-----------------------|
| 1. Pollutant Emitted: CO | | |
| 2. Total Percent Efficiency of Control: | | % |
| 3. Potential Emissions: | 66.9 lb/hour | 82.5 tons/year |
| 4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | |
| 5. Range of Estimated Fugitive/Other Emissions: | | |
| <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/yr | | |
| 6. Emission Factor: | | |
| Reference: Applicant | | |
| 7. Emissions Method Code: | | |
| <input type="checkbox"/> 0 <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 | | |
| 8. Calculation of Emissions (limit to 600 characters): | | |
| See Attachment PSD-FCLASS; Section 2.0; Appendix A. | | |
| 9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters): | | |
| Lb/hr based on oil firing; 100% load; 59 degrees F. Tons/yr based on 2,390 hrs/yr gas firing and 1,000 hrs/yr oil firing; ISO conditions. | | |

Emissions Unit Information Section 1 of 6
Allowable Emissions (Pollutant identified on front page)

A.

| | | |
|--|---------------------|-----------------------|
| 1. Basis for Allowable Emissions Code: OTHER | | |
| 2. Future Effective Date of Allowable Emissions: | | |
| 3. Requested Allowable Emissions and Units: 20 ppmvd | | |
| 4. Equivalent Allowable Emissions: | 66.9 lb/hour | 33.5 tons/year |
| 5. Method of Compliance (limit to 60 characters): EPA Method 10; high load | | |
| 6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters): Oil firing; 59 degrees F; 100% load; 1,000 hrs/yr. See Attachment PSD-FCLASS; Section 2.0; Appendix A. | | |

B.

| | | |
|--|---------------------|-----------------------|
| 1. Basis for Allowable Emissions Code: OTHER | | |
| 2. Future Effective Date of Allowable Emissions: | | |
| 3. Requested Allowable Emissions and Units: 12 ppmvd | | |
| 4. Equivalent Allowable Emissions: | 41.9 lb/hour | 71.1 tons/year |
| 5. Method of Compliance (limit to 60 characters): EPA Method 10; high load | | |
| 6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters): Gas firing; 32 degrees F; 100% load; 3,390 hrs/yr. See Attachment PSD-FCLASS; Section 2.0; Appendix A. | | |

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Pollutant Detail Information:

| | | |
|--|---------------------|-----------------------|
| 1. Pollutant Emitted: VOC | | |
| 2. Total Percent Efficiency of Control: | | % |
| 3. Potential Emissions: | 11.5 lb/hour | 12.8 tons/year |
| 4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | |
| 5. Range of Estimated Fugitive/Other Emissions: | | |
| <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/yr | | |
| 6. Emission Factor: | | |
| Reference: Applicant | | |
| 7. Emissions Method Code: | | |
| <input type="checkbox"/> 0 <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 | | |
| 8. Calculation of Emissions (limit to 600 characters): | | |
| See Attachment PSD-FCLASS; Section 2.0; Appendix A. | | |
| 9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters): | | |
| Lb/hr based on oil firing, 100% load; 59 degrees F. Tons/yr based on 2,390 hrs/yr gas firing and 1,000 hrs/yr oil firing; ISO conditions. | | |

Emissions Unit Information Section 1 of 6
Allowable Emissions (Pollutant identified on front page)

A.

| | | |
|---|---------------------|----------------------|
| 1. Basis for Allowable Emissions Code: OTHER | | |
| 2. Future Effective Date of Allowable Emissions: | | |
| 3. Requested Allowable Emissions and Units: 6 ppmvd | | |
| 4. Equivalent Allowable Emissions: | 11.5 lb/hour | 5.7 tons/year |
| 5. Method of Compliance (limit to 60 characters): EPA Method 25A; high load | | |
| 6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters): Oil firing; 59 degrees F; 100% load; 1,000 hrs/yr. See Attachment PSD-FCLASS; Section 2.0; Appendix A. | | |

B.

| | | |
|---|------------------|-----------------------|
| 1. Basis for Allowable Emissions Code: OTHER | | |
| 2. Future Effective Date of Allowable Emissions: | | |
| 3. Requested Allowable Emissions and Units: 3 ppmvd | | |
| 4. Equivalent Allowable Emissions: | 6 lb/hour | 10.1 tons/year |
| 5. Method of Compliance (limit to 60 characters): EPA Method 25A; high load | | |
| 6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters): Gas firing; 32 degrees F; 100% load; 3,390 hrs/yr. See Attachment PSD-FCLASS; Section 2.0; Appendix A. | | |

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Pollutant Detail Information:

| | | |
|---|------------|----------------|
| 1. Pollutant Emitted: PM10 | | |
| 2. Total Percent Efficiency of Control: | | % |
| 3. Potential Emissions: | 17 lb/hour | 19.3 tons/year |
| 4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | |
| 5. Range of Estimated Fugitive/Other Emissions: | | |
| [] 1 [] 2 [] 3 _____ to _____ tons/yr | | |
| 6. Emission Factor: | | |
| Reference: Applicant | | |
| 7. Emissions Method Code: | | |
| [] 0 [] 1 <input checked="" type="checkbox"/> 2 [] 3 [] 4 [] 5 | | |
| 8. Calculation of Emissions (limit to 600 characters): | | |
| See Attachment PSD-FCLASS; Section 2.0; Appendix A. | | |
| 9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters): | | |
| Lb/hr based on oil firing, all loads. Tons/year based on 2,390 hrs/yr gas firing and 1,000 hrs/yr oil firing; ISO conditions. | | |

Emissions Unit Information Section 1 of 6
Allowable Emissions (Pollutant identified on front page)

A.

| | | |
|--|-------------------|----------------------|
| 1. Basis for Allowable Emissions Code: OTHER | | |
| 2. Future Effective Date of Allowable Emissions: | | |
| 3. Requested Allowable Emissions and Units: 17 lb/hr | | |
| 4. Equivalent Allowable Emissions: | 17 lb/hour | 8.5 tons/year |
| 5. Method of Compliance (limit to 60 characters): Annual stack test; EPA Methods 5 or 17; if < 400 hours | | |
| 6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters): Oil firing - all loads; 1,000 hrs/yr. See Attachment PSD-FCLASS; Section 2.0; Appendix A. | | |

B.

| | | |
|--|------------------|-----------------------|
| 1. Basis for Allowable Emissions Code: OTHER | | |
| 2. Future Effective Date of Allowable Emissions: | | |
| 3. Requested Allowable Emissions and Units: 9 lb/hr | | |
| 4. Equivalent Allowable Emissions: | 9 lb/hour | 15.3 tons/year |
| 5. Method of Compliance (limit to 60 characters): VE Test < 20% opacity | | |
| 6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters): Gas firing - all loads; 3,390 hrs/yr. See Attachment PSD-FCLASS; Section 2.0; Appendix A. | | |

2.0 PROJECT DESCRIPTION

2.1 SITE DESCRIPTION

The project site, shown in Figure 2-1, consists of 38 acres that is currently zoned for light industry which allows for the siting of an electric power plants. There is minimal industrial, commercial, and residential development within a 3-km radius of the site. The plant elevation will be approximately 25 feet above sea level. The terrain surrounding the site is flat.

Natural gas will be supplied by a lateral pipeline connected to the Florida Gas Transmission (FGT) natural gas pipeline located immediately to the west of the site. The site has access to transmission facilities from a 230 kV transmission line and electrical substation that is located to the north of the site. Water for the evaporative cooler, and NO_x control when firing oil, will be supplied by nearby groundwater or surface water sources, including reclaimed water and storm water, largely developed by the city of Cocoa. Potable water and additional fire protection supply water will be served from the potable water supply pipe near Townsend Road.

2.2 POWER PLANT

The proposed project will consist of five "F" class CTs and associated facilities. The annual capacity factor of the plant will be 39 percent which is equivalent to operating 3,390 hours/year at full load. Natural gas will be used as the primary fuel and fuel oil will be used as a backup fuel. Fuel oil usage will be limited to the equivalent of 1,000 hours/year at full load.

Plant performance with General Electric 7FA and Westinghouse 501F combustion turbines was developed for natural gas and oil; at 50, 75, and 100 percent load; and at 32°F, 59°F, and 95°F ambient dry bulb temperatures. Nominal part load percentages herein are relative to 100 percent load without evaporative cooling. Generic "F" class combustion turbine performance is based on a performance envelope and has been adjusted to reflect anticipated future performance improvements. In particular, the future "F" class combustion turbine performance assumes 7 percent higher power output and a 1 percent lower heat rate (see Appendix A).

| Pollutant | Natural Gas | Distillate Oil |
|--|--|--|
| NO _x , ppmvd @ 15% O ₂ | 9 | 42 |
| CO, ppmvd | 12 | 20 |
| VOC as CH ₄ , ppmvd | 3 | 6 |
| SO _x as SO ₂ | Calculated Based on Fuel (1.0 grains S/100 SCF) | Calculated Based on Fuel (0.05% sulfur) |
| PM ₁₀ lb/hr (dry filterable) | 9 | 17 |

The maximum short-term emission rates (lb/hr) generally occur at base load, 32°F operation, where the CT has the greatest output and greatest fuel consumption.

Based on an ambient temperature of 59°F, the emission rates used to calculate maximum potential annual emissions for the proposed facility for regulated air pollutants are presented in Table 2-7 for one and 5 CTs. To produce the maximum annual emissions, the CTs are assumed to operate at baseload for 3,390 hours (39 percent capacity factor) firing natural gas for 2,390 hours and fuel oil for 1,000 hours. The potential emissions are based on the 59°F ambient air condition since it represents a nominal average between the higher emission levels at the 32°F ambient condition (winter) and the infrequent 95°F ambient condition (summer).

Process flow diagrams of the facility operating at summer and winter base load conditions are presented in Figures 2-2 and 2-3, respectively for the "F" Class CT.

Based on a review of the emission rates for natural gas and fuel oil combustion, the highest emission rates for the regulated pollutants generally occur when firing fuel oil. Combustion of natural gas and fuel oil result in slightly different exhaust flow gas rates and stack exit temperatures; however, the differences are minor. As a result of the higher emissions when firing oil, the air modeling analyses were based on determining maximum ground-level impacts with fuel oil.

As discussed in Section 6.0, the air modeling analyses that addressed compliance with ambient standards were based on modeling the CTs for the operating load and ambient temperature which produced the maximum impacts from the load impact analysis that was performed. Although the highest emission rates occur with low ambient temperatures (i.e., 32°F) and baseload conditions, the lowest exhaust gas flow rates occur with an ambient temperature of 95°F and 50 percent operating

Table 2-1. Stack, Operating, and Emission Data for the Proposed "F" Class Combustion Turbine with Dry Low-NO_x Combustors firing Natural Gas-- Base Load for Simple Cycle Operation

| Parameter | Operating and Emission Data ^a for Ambient Temperature | | | |
|---|--|-------------------------------|-------------------------------|-------------------------------|
| | 32°F | 59°F | 95°F | |
| <u>Stack Data (ft)</u> | | | | |
| Height | 60 | 60 | 60 | |
| Diameter | 22 | 22 | 22 | |
| <u>Operating Data</u> | | | | |
| Temperature(°F) | 1,109 | 1,115 | 1,138 | |
| Velocity (ft/sec) | 113.9 | 112.5 | 107.6 | |
| <u>Maximum Hourly Emission per Unit^b</u> | | | | |
| SO ₂ | lb/hr | 5.5 | 5.5 | 5.0 |
| | Basis | 1.0 grain S/100CF | 1.0 grain S/100CF | 1.0 grain S/100CF |
| PM/PM10 | lb/hr | 9.0 | 9.0 | 9.0 |
| | Basis | Dry filterables | Dry filterables | Dry filterables |
| NO _x | lb/hr | 64.9 | 62.6 | 58.7 |
| | Basis | 9 ppmvd at 15% O ₂ | 9 ppmvd at 15% O ₂ | 9 ppmvd at 15% O ₂ |
| CO | lb/hr | 41.9 | 41.0 | 37.9 |
| | Basis | 12 ppmvd | 12 ppmvd | 12 ppmvd |
| VOC (as methane) | lb/hr | 6.0 | 5.9 | 5.5 |
| | Basis | 3 ppmvd | 3 ppmvd | 3 ppmvd |
| Sulfuric Acid Mist | lb/hr | 0.85 | 0.85 | 0.77 |
| | Basis | 10% SO ₂ | 10% SO ₂ | 10% SO ₂ |

Note: ppmvd = parts per million volume dry; O₂ = oxygen; S = sulfur; CF = cubic feet

^a Refer to Appendix A for detailed information.

^b Other regulated pollutants are assumed to have negligible emissions. These pollutants include lead, reduced sulfur compounds, hydrogen sulfide, fluorides, beryllium, mercury, arsenic, asbestos, vinyl chloride, and radionuclides.

Table 2-2. Stack, Operating, and Emission Data for the Proposed "F" Class Combustion Turbine with Dry Low-NO_x Combustors firing Natural Gas-- 75 Percent Load for Simple Cycle Operation

| Parameter | Operating and Emission Data ^a for Ambient Temperature | | | |
|---|--|-------------------------------|-------------------------------|-------------------------------|
| | 32°F | 59°F | 95°F | |
| Stack Data (ft) | | | | |
| Height | 60 | 60 | 60 | |
| Diameter | 22 | 22 | 22 | |
| Operating Data | | | | |
| Temperature(°F) | 1,173 | 1,186 | 1,190 | |
| Velocity (ft/sec) | 98.4 | 95.5 | 91.4 | |
| Maximum Hourly Emission per Unit^b | | | | |
| SO ₂ | lb/hr | 4.5 | 4.5 | 4.0 |
| | Basis | 1.0 grain S/ 100CF | 1.0 grain S/ 100CF | 1.0 grain S/ 100CF |
| PM/PM10 | lb/hr | 9.0 | 9.0 | 9.0 |
| | Basis | Dry filterables | Dry filterables | Dry filterables |
| NO _x | lb/hr | 53.9 | 50.9 | 48.2 |
| | Basis | 9 ppmvd at 15% O ₂ | 9 ppmvd at 15% O ₂ | 9 ppmvd at 15% O ₂ |
| CO | lb/hr | 34.8 | 33.4 | 31.2 |
| | Basis | 12 ppmvd | 12 ppmvd | 12 ppmvd |
| VOC (as methane) | lb/hr | 4.9 | 4.8 | 4.6 |
| | Basis | 3 ppmvd | 3 ppmvd | 3 ppmvd |
| Sulfuric Acid Mist | lb/hr | 0.69 | 0.69 | 0.61 |
| | Basis | 10% SO ₂ | 10% SO ₂ | 10% SO ₂ |

Note: ppmvd = parts per million volume dry; O₂ = oxygen; S = sulfur; CF = cubic feet

^a Refer to Appendix A for detailed information.

^b Other regulated pollutants are assumed to have negligible emissions. These pollutants include lead, reduced sulfur compounds, hydrogen sulfide, fluorides, beryllium, mercury, arsenic, asbestos, vinyl chloride, and radionuclides.

Table 2-3. Stack, Operating, and Emission Data for the Proposed "F" Class Combustion Turbine with Dry Low-NO_x Combustors firing Natural Gas-- 50 Percent Load for Simple Cycle Operation

| Parameter | Operating and Emission Data ^a for Ambient Temperature | | | |
|---|--|-------------------------------|-------------------------------|-------------------------------|
| | 32°F | 59°F | 95°F | |
| Stack Data (ft) | | | | |
| Height | 60 | 60 | 60 | |
| Diameter | 22 | 22 | 22 | |
| Operating Data | | | | |
| Temperature(°F) | 1,043 | 1,059 | 1,087 | |
| Velocity (ft/sec) | 82.1 | 80.1 | 77.3 | |
| Maximum Hourly Emission per Unit^b | | | | |
| SO ₂ | lb/hr | 3.5 | 3.5 | 3.0 |
| | Basis | 1.0 grain S/ 100CF | 1.0 grain S/ 100CF | 1.0 grain S/ 100CF |
| PM/PM10 | lb/hr | 9.0 | 9.0 | 9.0 |
| | Basis | Dry filterables | Dry filterables | Dry filterables |
| NO _x | lb/hr | 48.8 | 46.3 | 43.5 |
| | Basis | 9 ppmvd at 15% O ₂ | 9 ppmvd at 15% O ₂ | 9 ppmvd at 15% O ₂ |
| CO | lb/hr | 31.9 | 30.5 | 26.9 |
| | Basis | 12 ppmvd | 12 ppmvd | 12 ppmvd |
| VOC (as methane) | lb/hr | 4.5 | 4.4 | 4.0 |
| | Basis | 3 ppmvd | 3 ppmvd | 3 ppmvd |
| Sulfuric Acid Mist | lb/hr | 0.54 | 0.54 | 0.46 |
| | Basis | 10% SO ₂ | 10% SO ₂ | 10% SO ₂ |

Note: ppmvd = parts per million volume dry; O₂ = oxygen; S = sulfur; CF = cubic feet

^a Refer to Appendix A for detailed information.

^b Other regulated pollutants are assumed to have negligible emissions. These pollutants include lead, reduced sulfur compounds, hydrogen sulfide, fluorides, beryllium, mercury, arsenic, asbestos, vinyl chloride, and radionuclides.

Table 2-4. Stack, Operating, and Emission Data for the Proposed "F" Class Combustion Turbine with Water Injection firing Distillate Fuel Oil-- Base Load for Simple Cycle Operation

| Parameter | Operating and Emission Data ^a for Ambient Temperature | | | |
|---|--|--------------------------------|--------------------------------|--------------------------------|
| | 32°F | 59°F | 95°F | |
| <u>Stack Data (ft)</u> | | | | |
| Height | 60 | 60 | 60 | |
| Diameter | 22 | 22 | 22 | |
| <u>Operating Data</u> | | | | |
| Temperature(°F) | 1,114 | 1,109 | 1,123 | |
| Velocity (ft/sec) | 112.7 | 114.4 | 111.4 | |
| <u>Maximum Hourly Emission per Unit^b</u> | | | | |
| SO ₂ | lb/hr | 103.8 | 103.4 | 98.0 |
| | Basis | 0.05 % S | 0.05 % S | 0.05 % S |
| PM/PM10 | lb/hr | 17.0 | 17.0 | 17.0 |
| | Basis | Dry filterables | Dry filterables | Dry filterables |
| NO _x | lb/hr | 344.1 | 344.4 | 327.7 |
| | Basis | 42 ppmvd at 15% O ₂ | 42 ppmvd at 15% O ₂ | 42 ppmvd at 15% O ₂ |
| CO | lb/hr | 66.0 | 66.9 | 63.8 |
| | Basis | 20 ppmvd | 20 ppmvd | 20 ppmvd |
| VOC (as methane) | lb/hr | 11.3 | 11.5 | 11.0 |
| | Basis | 6 ppmvd | 6 ppmvd | 6 ppmvd |
| Sulfuric Acid Mist | lb/hr | 15.9 | 15.8 | 15.0 |
| | Basis | 10% SO ₂ | 10% SO ₂ | 10% SO ₂ |

Note: ppmvd = parts per million volume dry; O₂ = oxygen; S = sulfur; CF = cubic feet; ppmvw = parts per million volume wet

^a Refer to Appendix A for detailed information.

^b Other regulated pollutants are assumed to have negligible emissions. These pollutants include lead, reduced sulfur compounds, hydrogen sulfide, fluorides, beryllium, mercury, arsenic, asbestos, vinyl chloride, and radionuclides.

Table 2-5. Stack, Operating, and Emission Data for the Proposed "F" Class Combustion Turbine with Water Injection firing Distillate Fuel Oil-- 75 Percent Load for Simple Cycle Operation

| Parameter | Operating and Emission Data ^a for Ambient Temperature | | | |
|---|--|--------------------------------|--------------------------------|--------------------------------|
| | 32°F | 59°F | 95°F | |
| <u>Stack Data (ft)</u> | | | | |
| Height | 60 | 60 | 60 | |
| Diameter | 22 | 22 | 22 | |
| <u>Operating Data</u> | | | | |
| Temperature(°F) | 1,166 | 1,179 | 1,190 | |
| Velocity (ft/sec) | 100.6 | 97.5 | 93.3 | |
| <u>Maximum Hourly Emission per Unit^b</u> | | | | |
| SO ₂ | lb/hr | 90.1 | 84.8 | 78.0 |
| | Basis | 0.05 % S | 0.05 % S | 0.05 % S |
| PM/PM10 | lb/hr | 17.0 | 17.0 | 17.0 |
| | Basis | Dry filterables | Dry filterables | Dry filterables |
| NO _x | lb/hr | 297.4 | 281.0 | 263.5 |
| | Basis | 42 ppmvd at 15% O ₂ | 42 ppmvd at 15% O ₂ | 42 ppmvd at 15% O ₂ |
| CO | lb/hr | 57.1 | 54.7 | 51.3 |
| | Basis | 20 ppmvd | 20 ppmvd | 20 ppmvd |
| VOC (as methane) | lb/hr | 9.7 | 9.3 | 9.0 |
| | Basis | 6 ppmvd | 6 ppmvd | 6 ppmvd |
| Sulfuric Acid Mist | lb/hr | 13.8 | 13.0 | 11.9 |
| | Basis | 10% SO ₂ | 10% SO ₂ | 10% SO ₂ |

Note: ppmvd = parts per million volume dry; O₂ = oxygen; S = sulfur; CF = cubic feet; ppmvw = parts per million volume wet

^a Refer to Appendix A for detailed information.

^b Other regulated pollutants are assumed to have negligible emissions. These pollutants include lead, reduced sulfur compounds, hydrogen sulfide, fluorides, beryllium, mercury, arsenic, asbestos, vinyl chloride, and radionuclides.

Table 2-6. Stack, Operating, and Emission Data for the Proposed "F" Class Combustion Turbine with Water Injection firing Distillate Fuel Oil-- 50 Percent Load for Simple Cycle Operation

| Parameter | Operating and Emission Data ^a for Ambient Temperature | | | |
|---|--|--------------------------------|--------------------------------|--------------------------------|
| | 32°F | 59°F | 95°F | |
| <u>Stack Data (ft)</u> | | | | |
| Height | 60 | 60 | 60 | |
| Diameter | 22 | 22 | 22 | |
| <u>Operating Data</u> | | | | |
| Temperature(°F) | 998 | 1,014 | 1,043 | |
| Velocity (ft/sec) | 83.2 | 81.2 | 78.4 | |
| <u>Maximum Hourly Emission per Unit^b</u> | | | | |
| SO ₂ | lb/hr | 67.2 | 63.6 | 59.0 |
| | Basis | 0.05 % S | 0.05 % S | 0.05 % S |
| PM/PM10 | lb/hr | 17.0 | 17.0 | 17.0 |
| | Basis | Dry filterables | Dry filterables | Dry filterables |
| NO _x | lb/hr | 274.1 | 260.2 | 242.9 |
| | Basis | 42 ppmvd at 15% O ₂ | 42 ppmvd at 15% O ₂ | 42 ppmvd at 15% O ₂ |
| CO | lb/hr | 52.8 | 50.8 | 46.3 |
| | Basis | 20 ppmvd | 20 ppmvd | 20 ppmvd |
| VOC (as methane) | lb/hr | 9.0 | 8.6 | 8.2 |
| | Basis | 6 ppmvd | 6 ppmvd | 6 ppmvd |
| Sulfuric Acid Mist | lb/hr | 10.3 | 9.7 | 9.0 |
| | Basis | 10% SO ₂ | 10% SO ₂ | 10% SO ₂ |

Note: ppmvd = parts per million volume dry; O₂ = oxygen; S = sulfur; CF = cubic feet; ppmvw = parts per million volume wet

^a Refer to Appendix A for detailed information.

^b Other regulated pollutants are assumed to have negligible emissions. These pollutants include lead, reduced sulfur compounds, hydrogen sulfide, fluorides, beryllium, mercury, arsenic, asbestos, vinyl chloride, and radionuclides.

Table 2-7b. Summary of Pollutant Emissions for the Proposed Oleander Power Project (Revised 3/8/99; 1,000 hours oil; Revise CO, VOC, PM (oil); Proposed "F" Class Combustion Turbines, Simple-Cycle Mode

| Load (%) | Pollutant | Pollutant Emissions Proposed "F" Class Combustion Turbine | | | | | | | | |
|---|-----------------|--|-------|-------|-------|-------|-------|-------|-------|-------|
| | | 32 °F | | | 59 °F | | | 95 °F | | |
| | | ppmvd | lb/hr | TPY | ppmvd | lb/hr | TPY | ppmvd | lb/hr | TPY |
| ONE UNIT | | | | | | | | | | |
| Natural gas | | | | | | | | | | |
| 100 | NOx | 9.0 | 64.9 | 109.9 | 9.0 | 62.6 | 106.2 | 9.0 | 58.7 | 99.4 |
| | CO | 9.6 | 41.9 | 71.1 | 9.7 | 41.0 | 69.5 | 9.6 | 37.9 | 64.2 |
| | SO ₂ | 0.5 | 5.5 | 9.3 | 0.5 | 5.5 | 9.3 | 0.5 | 5.0 | 8.5 |
| | VOC | 2.4 | 6.0 | 10.1 | 2.4 | 5.9 | 10.0 | 2.4 | 5.5 | 9.2 |
| | PM/PM10 | NA | 9.0 | 15.3 | NA | 9.0 | 15.3 | NA | 9.0 | 15.3 |
| 75 | NOx | 9.0 | 53.9 | 91.3 | 9.0 | 50.9 | 86.3 | 9.0 | 48.2 | 81.8 |
| | CO | 9.6 | 34.8 | 58.9 | 9.7 | 33.4 | 56.6 | 9.6 | 31.2 | 52.9 |
| | SO ₂ | 0.5 | 4.5 | 7.6 | 0.5 | 4.5 | 7.6 | 0.5 | 4.0 | 6.8 |
| | VOC | 2.4 | 4.9 | 8.4 | 2.4 | 4.8 | 8.1 | 2.4 | 4.6 | 7.8 |
| | PM/PM10 | NA | 9.0 | 15.3 | NA | 9.0 | 15.3 | NA | 9.0 | 15.3 |
| 50 | NOx | 9.0 | 48.8 | 82.7 | 9.0 | 46.3 | 78.4 | 9.0 | 43.5 | 73.8 |
| | CO | 9.6 | 31.9 | 54.1 | 9.7 | 30.5 | 51.6 | 9.6 | 26.9 | 45.7 |
| | SO ₂ | 0.5 | 3.5 | 5.9 | 0.5 | 3.5 | 5.9 | 0.5 | 3.0 | 5.1 |
| | VOC | 2.4 | 4.5 | 7.6 | 2.4 | 4.4 | 7.4 | 2.4 | 4.0 | 6.8 |
| | PM/PM10 | NA | 9.0 | 15.3 | NA | 9.0 | 15.3 | NA | 9.0 | 15.3 |
| Distillate Oil | | | | | | | | | | |
| 100 | NOx | 42.0 | 344.1 | 172.1 | 42.0 | 344.4 | 172.2 | 42.0 | 327.7 | 163.9 |
| | CO | 13.3 | 66.0 | 33.0 | 13.4 | 66.9 | 33.5 | 13.4 | 63.8 | 31.9 |
| | SO ₂ | 9.1 | 103.8 | 51.9 | 9.0 | 103.4 | 51.7 | 9.0 | 98.0 | 49.0 |
| | VOC | 4.0 | 11.3 | 5.7 | 4.0 | 11.5 | 5.7 | 4.0 | 11.0 | 5.5 |
| | PM/PM10 | NA | 17.0 | 8.5 | NA | 17.0 | 8.5 | NA | 17.0 | 8.5 |
| 75 | NOx | 42.0 | 297.4 | 148.7 | 42.0 | 281.0 | 140.5 | 42.0 | 263.5 | 131.8 |
| | CO | 13.3 | 57.1 | 28.6 | 13.4 | 54.7 | 27.4 | 13.4 | 51.3 | 25.6 |
| | SO ₂ | 9.1 | 90.1 | 45.1 | 9.1 | 84.8 | 42.4 | 8.9 | 78.0 | 39.0 |
| | VOC | 4.0 | 9.7 | 4.8 | 4.0 | 9.3 | 4.7 | 4.0 | 9.0 | 4.5 |
| | PM/PM10 | NA | 17.0 | 8.5 | NA | 17.0 | 8.5 | NA | 17.0 | 8.5 |
| 50 | NOx | 42.0 | 274.1 | 137.1 | 42.0 | 260.2 | 130.1 | 42.0 | 242.9 | 121.5 |
| | CO | 13.3 | 52.8 | 26.4 | 13.4 | 50.8 | 25.4 | 13.4 | 46.3 | 23.2 |
| | SO ₂ | 7.4 | 67.2 | 33.6 | 7.4 | 63.6 | 31.8 | 7.3 | 59.0 | 29.5 |
| | VOC | 4.0 | 9.0 | 4.5 | 4.0 | 8.6 | 4.3 | 4.0 | 8.2 | 4.1 |
| | PM/PM10 | NA | 17.0 | 8.5 | NA | 17.0 | 8.5 | NA | 17.0 | 8.5 |
| Maximum Emissions (Maximum oil/ balance gas) (2) | | | | | | | | | | |
| | NOx | | | 249.6 | | | 247.1 | | | 233.9 |
| | CO | | | 83.1 | | | 82.5 | | | 77.2 |
| | SO ₂ | | | 58.5 | | | 58.3 | | | 55.0 |
| | VOC | | | 12.8 | | | 12.8 | | | 12.0 |
| | PM10 (1) | | | 19.3 | | | 19.3 | | | 19.3 |
| 5 UNITS | | | | | | | | | | |
| Maximum Emissions (Maximum oil/ balance gas) (2) | | | | | | | | | | |
| | NOx | | | 1,248 | | | 1,235 | | | 1,170 |
| | CO | | | 415 | | | 412 | | | 386 |
| | SO ₂ | | | 292 | | | 291 | | | 275 |
| | VOC | | | 64 | | | 64 | | | 60 |
| | PM10 (1) | | | 96 | | | 96 | | | 96 |

(1) Emission rates are ppmvd at 15 percent O₂. PM/PM10 are dry filterables only.

(2) Assumed hours firing oil and natural gas are 1,000 and 2,390, respectively.

Table 3-3b. Maximum Emissions Due to the Proposed Oleander Power Project Compared to the PSD Significant Emission Rates

| Pollutant | Pollutant Emissions (TPY) | | PSD Review |
|--------------------------------|---|---------------------------|------------|
| | Potential Emissions from Proposed Facility ^a | Significant Emission Rate | |
| Sulfur Dioxide | 291 | 40 | Yes |
| Particulate Matter [PM(TSP)] | 96 | 25 | Yes |
| Particulate Matter (PM10) | 96 | 15 | Yes |
| Nitrogen Dioxide | 1,235 | 40 | Yes |
| Carbon Monoxide | 412 | 100 | Yes |
| Volatile Organic Compounds | 64 | 40 | Yes |
| Lead | NEG | 0.6 | No |
| Sulfuric Acid Mist | 44.4 | 7 | Yes |
| Total Fluorides | NEG | 3 | No |
| Total Reduced Sulfur | NEG | 10 | No |
| Reduced Sulfur Compounds | NEG | 10 | No |
| Hydrogen Sulfide | NEG | 10 | No |
| Mercury | NEG | 0.1 | No |
| MWC Organics (as 2,3,7,8-TCDD) | < 8.8x10 ⁻⁸ | 3.5x10 ⁻⁶ | No |
| MWC Metals (as Be, Cd) | NEG | 15 | No |
| MWC Acid Gases (as HCl) | 11.3 | 40 | No |

Note: NEG = Negligible.

- ^a Based on emissions from operating at baseload at 59°F; firing natural gas and distillate fuel oil for 2,390 and 1,000 hours per year per turbine for a total of five CTs, respectively (Refer to Table 2-7).

Table 3-4b. Predicted Net Increase in Impacts Due To the Proposed Oleander Power Project
Compared to PSD *De Minimis* Monitoring Concentrations

| Pollutant | Concentration ($\mu\text{g}/\text{m}^3$) | |
|----------------------------|--|--|
| | Predicted Increase in Impacts ^a | <i>De Minimis</i> Monitoring Concentration |
| Sulfur Dioxide | 1.1 | 13, 24-hour |
| Particulate Matter (PM10) | 0.3 | 10, 24-hour |
| Nitrogen Dioxide | 0.3 | 14, annual |
| Carbon Monoxide | 2.4 | 575, 8-hour |
| Volatile Organic Compounds | 64 TPY | 100 TPY |

Note: NA = not applicable.
 NM = no ambient measurement method.
 TPY = tons per year.

^a See Section 6.0 for air dispersion modeling results.

Table 4-1. NO_x Emission Estimates (TPY) of BACT Alternative Technologies (per Unit)

| Alternative BACT Control Technologies | Operating Mode ^a | | Total |
|---------------------------------------|-----------------------------|-------|-------|
| | Oil | Gas | |
| <u>NO_x Emission (TPY)</u> | | | |
| Dry Low-NO _x (DLN) only | 172 | 75 | 247 |
| DLN with SCR ^b | 69 | 30 | 99 |
| Reduction | (103) | (45) | (148) |
| <u>Basis of Emissions (ppmvd)</u> | | | |
| DLN only | 42 | 9 | |
| DLN with SCR | 16.8 | 3.6 | |
| Hours of Operation | 1,000 | 2,390 | 3,390 |

Note: DLN = Dry low-NO_x.
 SCR = selective catalytic reduction.
 TPY = tons per year.

- ^a Emission rates were based on a "F" class combustion turbine operating at 100-percent capacity and firing natural gas for 2,390 hours and distillate fuel oil for 1,000 hours. Emission data are based on an ambient temperature of 59°F at maximum emission rates.
- ^b Based on primary emissions with SCR; no account is made for additional emissions (secondary) due to lost energy from heat rate penalty and electrical usage for SCR operation (see Table 4-3).

Table 4-2b. Comparison of Alternative BACT Control Technologies for NO_x (per Unit)

| | Alternative BACT Control Technologies | |
|---|---------------------------------------|------------------|
| | DLN Only | SCR |
| Technical Feasibility | Feasible | Feasible for gas |
| Economic Impact ^a | | |
| Capital Costs | included | \$7,507,200 |
| Annualized Costs | included | \$2,603,640 |
| Cost Effectiveness | | |
| NO _x Removed (per ton of NO _x) | NA | \$17,568 |
| NO _x Removed (per ton of total pollutants) | NA | \$44,813 |
| Environmental Impact ^b | | |
| Total NO _x (TPY) | 247 | 99 |
| NO _x Reduction (TPY) | NA | (148) |
| Ammonia Emissions (TPY) | 0 | 39.1 |
| PM Emissions (TPY) | 0 | 18.0 |
| Secondary Emissions (TPY) | 0 | 32.8 |
| Net Emission Reduction (TPY) | NA | (58.1) |
| Energy Impacts ^c | | |
| Energy Use (kWh/yr) | 0 | 4,200,210 |
| Energy Use (mmBtu/yr) at 10,000 Btu/kWh | 0 | 50,400 |
| Energy Use (mmcf/yr) at 1,000 Btu/cf for natural gas | 0 | 41 |

^a See Appendix B for detailed development of capital costs (including recurring costs) and annualized costs.

^b See emission data presented in Table 4-3.

^c Energy impacts are estimated due to the lost energy from heat rate penalty and electrical usage for the SCR operation at 3,390 hours per year. Lost energy is based on 0.5 percent of 192 MW. SCR electrical usage is based on 0.080 MWh per SCR system and 0.20 MWh for cooling fan.

Table 4-3b. Maximum Potential Incremental Emissions (TPY) with Selective Catalytic Reduction

| Pollutants | Incremental Emissions (TPY) of Project with SCR | | |
|-----------------------------|---|------------------------|---------------|
| | Primary | Secondary ^a | Total |
| Particulate | 15.9 ^b | 0.96 | 25.6 |
| Sulfur Dioxide | -- | 12.7 | 12.7 |
| Nitrogen Oxides | (148) ^c | 17.6 | (172.4) |
| Carbon Monoxide | -- | 1.21 | 1.21 |
| Volatile Organic Compounds | -- | 0.30 | 0.3 |
| Ammonia | 39.1 ^d | 0 | 39.1 |
| Total | (93.0) | 32.8 | (92.5) |
| Carbon Dioxide ^e | -- | 4,330 | 4,330 |

Note: Btu/kWh = British thermal units per kilowatt-hour
 CT = combustion turbine
 MW = megawatt
 % = percent
 SCR = selective catalytic reduction
 TPY = tons per year
 -- = no differences in the project's emissions with SCR and without SCR

- ^a Lost energy from heat rate penalty and electrical usage for 3,390 hours per year operation (0.5% of 192 MW per CT plus 0.080 MWh for SCR system and 0.2 MWh for dilution fan). Assumes baseloaded oil-fired unit would replace lost energy. EPA emission factors based on oil-fired peaking turbines used were (lb/10⁶ Btu): PM = 0.038; SO₂ = 0.505; NO_x = 0.698, CO = 0.048, and VOC = 0.017. Example calculation for PM is ((0.5% x 192 + 0.28) MW x 12,000 Btu/kWh x 1,000 kW/MW x 3,390 hr/yr x 0.038 lb pm/10⁶ Btu ÷ 2,000 lb/ton = 0.96 TPY.
- ^b Assume 5% SO₂ conversion in catalyst and SO₃ and the SO₃ formed in the combustion process reacts with ammonia to form ammonium sulfate; 58.3 TPY SO₂ x 0.05 = 2.92 TPY SO₂; 2.92 TPY SO₂ x 98 MW of H₂SO₄ ÷ 64 MW SO₂ = 4.46 TPY H₂SO₄; 8.88 TPY H₂SO₄ from combustion of oil and gas for total H₂SO₄ = 13.4 TPY SO₃ x 132 (MW of ammonia salt) ÷ 98 (MW of H₂ SO₄) = 18.0 TPY.
- ^c Based on the maximum difference between the project's emissions with SCR and without SCR (see Table 4-1).
- ^d 10 ppm ammonia slip (ideal gas law): 2,591,756 acfm x (10 ppm ÷ 10⁶) x 17 x 2,116.8 ÷ 1,545 ÷ (460 + 1,111) x 60 x 3,390 ÷ 2,000 = 39.1 TPY (flow average of gas and oil).
- ^e Reflects differential emissions due to lost energy efficiency with SCR (i.e., calculated from total heat input lost; 1.24 MW times 12,000 Btu/kWh; CO₂ calculated based on 85.7% carbon in fuel oil and 18,300 Btu/lb for 0.5% sulfur oil).

Table B-4b. Annualized Cost for Selective Catalytic Reduction for Frame "F" Simple Cycle Operation

| Cost Component | Costs | Basis of Cost Component |
|---|--------------------|---|
| Direct Annual Costs | | |
| Operating Personnel | \$24,960 | 24 hours/week at \$20/hr |
| Supervision | \$3,744 | 15% of Operating Personnel; OAQPS Cost Control Manual |
| Maintenance - Labor | \$13,104 | 0.5 hr per shift, \$24/hr; OAQPS Cost Manual |
| - Materials | \$13,104 | 100% of maintenance labor; OAQPS Cost Manual |
| Ammonia | \$64,552 | \$300 per ton NH ₃ Aqueous |
| PSM/RMP Update | \$5,000 | Engineering Estimate |
| Inventory Cost | \$93,044 | Capital Recovery (11.74%) for 1/3 catalyst |
| Catalyst Disposal Cost | \$35,793 | \$28/1,000 lb/hr mass flow over 3 years; developed from vendor quotes |
| Contingency | \$7,599 | 3% of Direct Annual Costs |
| Total Direct Annual Costs (TDAC) | \$260,900 | |
| Energy Costs | | |
| Electrical | \$47,460 | 80kW/h for SCR; 200 kW/h for cooling fan @ \$0.05/kWh times Capacity Factor |
| Heat Rate Penalty | \$162,551 | 0.5% of MW output; EPA, 1993 (Page 6-20) |
| MW Loss Penalty | \$230,160 | 3 days lost energy costs @ \$0.05 kWh each three period |
| Fuel Escalation | \$13,205 | Escalation of fuel over inflation; 3% of energy costs |
| Contingency | \$13,601 | 3% of Energy Costs |
| Total Energy Costs (TEC) | \$466,977 | |
| Indirect Annual Costs | | |
| Overhead | \$17,222 | 60% of Operating/Supervision Labor and Ammonia |
| Property Taxes, Insurance, Admin. | \$300,289 | 4% of Total Capital Costs |
| Annualized Total Direct Capital | \$602,665 | 11.75% Capital Recovery Factor of 10% over 20 years times sum of TDCC, TDIC, and TInC |
| Annualized Total Direct Recurring | \$955,587 | 40.21% Capital Recovery Factor of 10% over 3 years times RCC |
| Total Indirect Annual Costs (TIAC) | \$1,875,763 | |
| TOTAL ANNUALIZED COSTS | \$2,603,640 | Sum of TDAC, TEC and TIAC |
| COST EFFECTIVENESS | \$17,568 | |

Table B-7b. Annualized Cost for CO Catalyst for Frame "F" Simple Cycle Operation

| Cost Component | Cost | Basis of Cost Estimate |
|---|------------------|--|
| Direct Annual Costs | | |
| Operating Personnel | \$8,320 | 8 hours/week at \$20/hr |
| Supervision | \$1,248 | 15% of Operating Personnel; OAQPS Cost Control Manual |
| Maintenance - Labor | \$4,368 | 0.5 hr per shift, \$24/hr; OAQPS Cost Manual |
| - Materials | \$4,368 | 100% of maintenance labor; OAQPS Cost Manual |
| Inventory Cost | \$27,401 | Capital Recovery (11.74%) for 1/3 catalyst |
| Catalyst Disposal Cost | \$35,793 | \$28/1,000 lb/hr mass flow over 3 years; developed from vendor quotes |
| Contingency | \$2,445 | 3% of direct costs |
| Total Direct Annual Costs (TDAC) | \$83,943 | |
| Energy Costs | | |
| Heat Rate Penalty | \$66,105 | 0.2% of MW output; EPA, 1993 (Page 6-20) |
| MW Loss Penalty | \$46,800 | 2 days replacement energy costs @ \$0.01 kWh each three period |
| Fuel Escalation | \$3,387 | Escalation of fuel over inflation; 3% of energy costs |
| Contingency | \$11,629 | 10% of energy costs |
| Total Energy Costs (TEC) | \$127,921 | |
| Indirect Annual Costs | | |
| Overhead | \$0 | 60% of Operating/Supervision Labor and Ammonia |
| Property Taxes, insurance, admin. | \$0 | 4% of Total Capital Costs |
| Annualized Total Direct Capital | \$0 | 11.75% Capital Recovery Factor of 10% over 20 years times sum of TDCC, TDIC and TI |
| Annualized Total Direct Recurring | \$0 | 40.21% Capital Recovery Factor of 10% over 3 years times RCC |
| Total Indirect Annual Costs (TIAC) | \$0 | |
| TOTAL ANNUALIZED COSTS | \$211,864 | Sum of TDAC, TEC and TIAC |
| COST EFFECTIVENESS | \$3,424 | |

Table 6-2b. Maximum Predicted Pollutant Concentrations For One Simple-Cycle Combustion Turbine- Screening Analysis
Class F Combustion Turbine, Natural Gas- Fired

| Pollutant | Maximum Emission Rates (lb/hr) by Operating Load and Air Temperature | | | | | | Averaging Time | Maximum Predicted Concentrations (ug/m ³) by Operating Load and Air Temperature (1) | | | | | |
|---------------------|---|-------|----------|-------|----------|-------|-------------------|--|---------|----------|---------|----------|---------|
| | Base Load | | 75% Load | | 50% Load | | | Base Load | | 75% Load | | 50% Load | |
| | 32 °F | 95 °F | 32 °F | 95 °F | 32 °F | 95 °F | | 32 °F | 95 °F | 32 °F | 95 °F | 32 °F | 95 °F |
| Generic (10 g/s) | 79.37 | 79.37 | 79.37 | 79.37 | 79.37 | 79.37 | Annual | 0.012 | 0.013 | 0.013 | 0.015 | 0.018 | 0.019 |
| | | | | | | | 24-Hour | 0.153 | 0.155 | 0.169 | 0.178 | 0.241 | 0.314 |
| | | | | | | | 8-Hour | 0.365 | 0.385 | 0.435 | 0.455 | 0.654 | 0.875 |
| | | | | | | | 3-Hour | 0.885 | 0.908 | 1.124 | 1.143 | 1.669 | 2.258 |
| | | | | | | | 1-Hour | 1.760 | 1.893 | 2.074 | 2.543 | 5.008 | 6.774 |
| SO ₂ | 5.5 | 5.0 | 4.5 | 4.0 | 3.5 | 3.0 | Annual | 0.00086 | 0.00079 | 0.00076 | 0.00074 | 0.00078 | 0.00073 |
| | | | | | | | 24-Hour | 0.0106 | 0.0107 | 0.0096 | 0.0090 | 0.0106 | 0.0119 |
| | | | | | | | 3-Hour | 0.061 | 0.063 | 0.064 | 0.058 | 0.074 | 0.085 |
| NO _x | 64.9 | 58.7 | 53.9 | 48.2 | 48.8 | 43.5 | Annual | 0.010 | 0.009 | 0.009 | 0.009 | 0.011 | 0.011 |
| PM10 | 9.0 | 9.0 | 9.0 | 9.0 | 9.0 | 9.0 | Annual | 0.0014 | 0.0014 | 0.0015 | 0.0017 | 0.0020 | 0.0022 |
| | | | | | | | 24-Hour | 0.017 | 0.018 | 0.019 | 0.020 | 0.027 | 0.036 |
| CO | 41.9 | 37.9 | 34.8 | 31.2 | 31.9 | 26.9 | 8-Hour | 0.2 | 0.2 | 0.2 | 0.2 | 0.3 | 0.3 |
| | | | | | | | 1-Hour | 0.9 | 0.9 | 0.9 | 1.0 | 2.0 | 2.3 |

(1) Concentrations are based on highest predicted concentrations using five years of meteorological for 1987 to 1991 of surface and upper air data from the National Weather Service stations in Orlando and Ruskin, respectively.

Pollutant concentrations were based on a modeled or generic concentration predicted using a modeled emission rate of 79.37 lb/hr (10 g/s). Specific pollutant concentrations were estimated by multiplying the modeled concentration (at 10 g/s) by the ratio of the specific pollutant emission rate to the modeled emission rate of 10 g/s.

Table 6-3b. Maximum Pollutant Concentrations Predicted for 5 Simple-Cycle Combustion Turbines (Natural Gas-Fired) Compared to EPA Significant Impact and Dminimis Monitoring Levels- Screening Analysis

| Pollutant | Averaging Time | Maximum Predicted Concentrations (ug/m ³) by Operating Load and Air Temperature (1) | | | | | | EPA Significant Impact Levels (ug/m ³) | EPA Dminimis Levels (ug/m ³) |
|-----------------|----------------|--|---------|----------|---------|----------|---------|--|--|
| | | Base Load | | 75% Load | | 50% Load | | | |
| | | 32 °F | 95 °F | 32 °F | 95 °F | 32 °F | 95 °F | | |
| SO ₂ | Annual | 0.00430 | 0.00394 | 0.00380 | 0.00370 | 0.00392 | 0.00363 | 1 | NA |
| | 24-Hour | 0.053 | 0.054 | 0.048 | 0.045 | 0.053 | 0.059 | 5 | 13 |
| | 3-Hour | 0.307 | 0.314 | 0.319 | 0.288 | 0.368 | 0.427 | 25 | NA |
| NO _x | Annual | 0.051 | 0.046 | 0.046 | 0.045 | 0.055 | 0.053 | 1 | 14 |
| PM10 | Annual | 0.007 | 0.007 | 0.008 | 0.008 | 0.010 | 0.011 | 1 | NA |
| | 24-Hour | 0.087 | 0.088 | 0.096 | 0.101 | 0.136 | 0.178 | 5 | 10 |
| CO | 8-Hour | 1.0 | 0.9 | 1.0 | 0.9 | 1.3 | 1.5 | 500 | 575 |
| | 1-Hour | 5 | 5 | 5 | 5 | 10 | 11 | 2,000 | NA |

(1) Concentrations are based on highest predicted concentrations using five years of meteorological for 1987 to 1991 of surface and upper air data from the National Weather Service stations in Orlando and Ruskin, respectively.

Table 6-4b. Maximum Predicted Pollutant Concentrations For One Simple-Cycle Combustion Turbine- Screening Analysis
Class F Combustion Turbine, Distillate Fuel Oil- Fired

| Pollutant | Maximum Emission Rates (lb/hr) by Operating Load and Air Temperature | | | | | | Averaging Time | Maximum Predicted Concentrations (ug/m ³) by Operating Load and Air Temperature (1) | | | | | |
|---------------------|---|-------|----------|-------|----------|-------|-------------------|--|--------|----------|--------|----------|--------|
| | Base Load | | 75% Load | | 50% Load | | | Base Load | | 75% Load | | 50% Load | |
| | 32 °F | 95 °F | 32 °F | 95 °F | 32 °F | 95 °F | | 32 °F | 95 °F | 32 °F | 95 °F | 32 °F | 95 °F |
| Generic (10 g/s) | 79.37 | 79.37 | 79.37 | 79.37 | 79.37 | 79.37 | Annual | 0.013 | 0.013 | 0.013 | 0.014 | 0.018 | 0.019 |
| | | | | | | | 24-Hour | 0.154 | 0.154 | 0.167 | 0.174 | 0.227 | 0.297 |
| | | | | | | | 8-Hour | 0.369 | 0.372 | 0.431 | 0.445 | 0.612 | 0.823 |
| | | | | | | | 3-Hour | 0.889 | 0.894 | 1.120 | 1.137 | 1.557 | 2.121 |
| | | | | | | | 1-Hour | 1.762 | 1.770 | 2.038 | 2.197 | 4.671 | 6.362 |
| SO ₂ | 103.8 | 98 | 90.1 | 78 | 67.2 | 59 | Annual | 0.016 | 0.015 | 0.015 | 0.014 | 0.015 | 0.014 |
| | | | | | | | 24-Hour | 0.20 | 0.20 | 0.19 | 0.17 | 0.19 | 0.22 |
| | | | | | | | 3-Hour | 1.2 | 1.2 | 1.3 | 1.1 | 1.3 | 1.6 |
| NO _x | 344.1 | 327.7 | 297.4 | 263.5 | 274.1 | 242.9 | Annual | 0.054 | 0.052 | 0.049 | 0.047 | 0.061 | 0.059 |
| PM10 | 17 | 17 | 17 | 17 | 17 | 17 | Annual | 0.0027 | 0.0027 | 0.0028 | 0.0030 | 0.0038 | 0.0041 |
| | | | | | | | 24-Hour | 0.033 | 0.033 | 0.036 | 0.037 | 0.049 | 0.064 |
| CO | 66 | 63.8 | 57.1 | 51.3 | 52.8 | 46.3 | 8-Hour | 0.31 | 0.30 | 0.31 | 0.29 | 0.41 | 0.48 |
| | | | | | | | 1-Hour | 1.5 | 1.4 | 1.5 | 1.4 | 3.1 | 3.7 |

(1) Concentrations are based on highest predicted concentrations using five years of meteorological for 1987 to 1991 of surface and upper air data from the National Weather Service stations in Orlando and Ruskin, respectively.

Pollutant concentrations were based on a modeled or generic concentration predicted using a modeled emission rate of 79.37 lb/hr (10 g/s). Specific pollutant concentrations were estimated by multiplying the modeled concentration (at 10 g/s) by the ratio of the specific pollutant emission rate to the modeled emission rate of 10 g/s.

Table 6-5b. Maximum Pollutant Concentrations Predicted for 5 Simple-Cycle Combustion Turbines (Distillate Fuel Oil-Fired) Compared to EPA Significant Impact and Deminimis Monitoring Levels- Screening Analysis

| Pollutant | Averaging Time | Maximum Predicted Concentrations (ug/m ³) by Operating Load and Air Temperature (1) | | | | | | EPA Significant Impact Levels (ug/m ³) | EPA Deminimis Levels (ug/m ³) |
|-----------------|----------------|--|-------|----------|-------|----------|-------|--|---|
| | | Base Load | | 75% Load | | 50% Load | | | |
| | | 32 °F | 95 °F | 32 °F | 95 °F | 32 °F | 95 °F | | |
| SO ₂ | Annual | 0.082 | 0.077 | 0.074 | 0.070 | 0.075 | 0.071 | 1 | NA |
| | 24-Hour | 1.0 | 1.0 | 0.9 | 0.9 | 1.0 | 1.1 | 5 | 13 |
| | 3-Hour | 5.8 | 5.8 | 6.4 | 5.6 | 6.6 | 7.9 | 25 | NA |
| NO _x | Annual | 0.27 | 0.26 | 0.25 | 0.24 | 0.31 | 0.29 | 1 | 14 |
| PM10 | Annual | 0.013 | 0.013 | 0.014 | 0.015 | 0.019 | 0.021 | 1 | NA |
| | 24-Hour | 0.16 | 0.16 | 0.18 | 0.19 | 0.24 | 0.32 | 5 | 10 |
| CO | 8-Hour | 1.5 | 1.5 | 1.6 | 1.4 | 2.0 | 2.4 | 500 | 575 |
| | 1-Hour | 7 | 7 | 7 | 7 | 16 | 19 | 2,000 | NA |

(1) Concentrations are based on highest predicted concentrations using five years of meteorological for 1987 to 1991 of surface and upper air data from the Federal Aviation Administration and National Weather Service stations in Ft. Myers and Ruskin, respectively.

Table 6-6b. Summary of Maximum Pollutant Concentrations Predicted for 5 Simple-Cycle Combustion Turbines Compared to EPA Significant Impact and Deminimis Monitoring Levels- Refined Analysis

| Pollutant | Averaging Time | Maximum Predicted Concentrations (ug/m ³) | | EPA Significant Impact Levels (ug/m ³) | EPA Deminimis Levels (ug/m ³) |
|-----------------|----------------|---|-----------|--|---|
| | | Natural Gas-Fired | Oil-Fired | | |
| SO ₂ | Annual | 0.0043 (1) | 0.082 (1) | 1 | NA |
| | 24-Hour | 0.059 (2) | 1.10 (2) | 5 | 13 |
| | 3-Hour | 0.43 (2) | 7.9 (2) | 25 | NA |
| NO _x | Annual | 0.055 (3) | 0.31 (3) | 1 | 14 |
| PM10 | Annual | 0.011 (2) | 0.021 (2) | 1 | NA |
| | 24-Hour | 0.18 (2) | 0.32 (2) | 5 | 10 |
| CO | 8-Hour | 1.5 (2) | 2.4 (2) | 500 | 575 |
| | 1-Hour | 11.5 (2) | 18.6 (2) | 2,000 | NA |

(1) Based on operating conditions at base load and ambient temperature of 32 °F.

(2) Based on operating conditions at 50 percent load and ambient temperature of 95 °F.

(3) Based on operating conditions at 50 percent load and ambient temperature of 32 °F.