

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

May 1, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Richard Breitmoser, P.E.
Vice President
Environmental Health & Safety Group
St. Johns River Power Park
11201 New Berlin Road
Jacksonville, Florida 32226

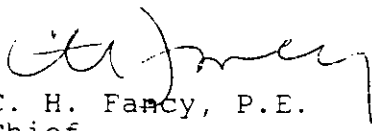
Dear Mr. Breitmoser:

Re: Permit Amendment - Petroleum Coke Cofiring
Jacksonville Electric Authority, St. Johns River Power Park
PA 81-13; PSD-FL-010(B); Duval County

Attached is one copy of the Proposed Permit Amendment, Intent to Issue, and Public Notice of Intent to Issue Permit Amendment (for publication by the applicant), and Preliminary Determination for the existing JEA/SJRPP Units 1 & 2 located in Jacksonville, Florida.

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

Sincerely,


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

CHF/sa/t

Enclosure

cc: J. Harper, EPA
J. Bunyak, NPS
B. Oven, DEP
C. Kirts, NED
J. Manning, RESD
K. Kosky, KBN

Z 127 633 202



Receipt for Certified Mail

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Richard Breitman	
SFJR PP	
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Special Delivery Fee	
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Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	5-1-96
PAE1-13 PSD-FI-010(B)	

PS Form 3800, March 1993

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SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
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- 2. Restricted Delivery

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3. Article Addressed to:
Richard Breitman, PE
St. Johns River P.P.
11201 New Berlin Rd
Jacksonville, FL 3226

4a. Article Number
Z 127 633 202

4b. Service Type

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<input type="checkbox"/> Express Mail	<input type="checkbox"/> Return Receipt for Merchandise

7. Date of Delivery
5/3/96

5. Signature (Addressee)
Jeri Nichols

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

6. Signature (Agent)

Thank you for using Return Receipt Service.

INTENT TO ISSUE

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

CERTIFIED MAIL

In the Matter of an
Application for Permit by:

DEP File No. PSD-FL-010(B)
PA 81-13
Duval County

Mr. Richard Breitmoser, P.E.
Vice President
Environmental Health & Safety Group
St. Johns River Power Park
11201 New Berlin Road
Jacksonville, Florida 32226

INTENT TO ISSUE

The Department of Environmental Protection (Department) gives notice of its intent to issue an amendment (copy attached) for the proposed changes as detailed in the application specified above and the Department's Preliminary Determination (copy attached), for the reasons stated below.

The applicant, Jacksonville Electric Authority/St. Johns River Power Park (SJRPP), applied on March 4, 1996 to the Department of Environmental Protection for an amendment of the Conditions of Approval related to fuel use contained in the Final Determination (PSD Permit) applicable to the SJRPP Units 1 & 2. The determination was originally issued by the United States Environmental Protection Agency (EPA) on March 12, 1982, pursuant to 40 CFR 52.21, "Prevention of Significant Deterioration of Air Quality" and was amended by the Department on March 30, 1995 with respect to conducting performance tests for pollutant emissions while firing a blend of petroleum coke and bituminous coal.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes, DEP Rule 62-4, F.A.C., and DEP Rule 62-212, F.A.C., "Stationary Source-Preconstruction Review," which incorporates the requirements of 40 CFR 52.21 as part of the EPA-approved Florida State Implementation Plan pursuant to the Clean Air Act. The above actions are not exempt from permitting procedures. The Department has determined that an amendment to the Final Determination is required.

Pursuant to Section 403.815, Florida Statutes and DEP Rule 62-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit Amendment. The notice shall be published one time only within 30 days in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department, at 2600 Blair Stone Road, Tallahassee, Florida 32399, within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the amendment.

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

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, 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 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, 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
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this intent. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this intent in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 60Q-2.010, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



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

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this **INTENT TO ISSUE** and all copies were mailed by certified mail before the close of business on May 1, 1996 to the listed persons.

Clerk Stamp

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

Keri Jobe 5/1/96

Clerk

Date

Copies furnished to:

J. Harper, EPA
J. Bunyak, NPS
H. Owen, DEP
C. Kirts, NED
J. Manning, RESD
K. Kosky, KBN

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF INTENT TO ISSUE PERMIT AMENDMENT

The Department of Environmental Protection (Department) gives notice of its intent to issue an amendment of Permit PSD-FL-010 to Jacksonville Electric Authority, 21 West Church Street, Jacksonville, Duval County, Florida 32202-3139 to allow firing of a 80% bituminous coal/20% petroleum coke blend (by weight) at the existing St. Johns River Power Park Units 1 & 2 located at 11201 New Berlin Road.

Each unit is a 660 megawatt coal-fired electrical power generating unit, equipped with a wet limestone sulfur dioxide scrubber as well as an electrostatic precipitator for particulate control. Preliminary testing was conducted in 1995 following public notice and shows that the existing air pollution control equipment is capable of controlling air emissions such that no increase from these sources takes place as a result of co-firing with blends of up to 20 percent petroleum coke. To insure that there is no increase in sulfur dioxide emissions, the Department will require the facility to increase the minimum sulfur dioxide removal efficiency from 70 to 76 percent and reduce the maximum sulfur dioxide emission rates from 0.76 to 0.676 pounds per million Btu heat input during the periods when petroleum coke and bituminous coal blends are burned.

The Department has also determined, or included provisions to insure that, there will be no increases in nitrogen oxides, carbon monoxide, particulate matter and sulfuric acid mist as a result of the above operational change. Since there will be no increase in pollutant emissions, the changes are not subject to review for Prevention of Significant Deterioration of Air Quality or a Best Available Control Technology Determination. This change will not cause or contribute to a violation of any ambient air quality standard or increment.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, 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 (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 60Q-2.010, F.A.C.

The application file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Tel: (904)488-1344

Department of Environmental Protection
Northeast District
7825 Baymeadows Way, Suite 200B
Jacksonville, Florida 32256-7577
Tel: (904)448-4310

Any person may send written comments on the proposed action to Administrator, New Source Review Section, at the Department of Environmental Protection, Division of Air Resources Management, 2600 Blair Stone Road - Mail Station 5505, Tallahassee, Florida 32399-2400. All comments received within 30 days of the publication of this notice will be considered in the Department's final determination.

Preliminary Determination

Jacksonville Electric Authority
St. Johns River Power Park
Units 1 & 2
Jacksonville, Florida
Duval County

Electric Utility Steam Generating Units
Solid and Liquid Fuel - Fired Boilers
660 MW/unit

Permit No. PSD-FL-010(B)

Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation

May 1, 1996

A. Applicant

Jacksonville Electric Authority
St. Johns River Power Park
11201 New Berlin Road
Jacksonville, Florida 32226

B. Source

St. Johns River Power Park
Units 1 & 2 - 660 MW each
Jacksonville, Duval County

C. Request

On March 4, 1996, Jacksonville Electric Authority (JEA) submitted a request (Attachment 1) for an amendment to Permit PSD-FL-010 originally issued by the United States Environmental Protection Agency (EPA) on March 12, 1982 and applicable to JEA's St. Johns River Power Park (SJRPP) Units 1 & 2 in Jacksonville, Florida. The requested amendment to EPA's Final Determination was:

- o Allow co-firing of petroleum coke (petcoke) with coal following a successful test burn.

Permit Amendment PSD-FL-010A (Attachment 2) was issued on March 30, 1995 following publication of the Department's Notice of Intent. The amendment authorized JEA to conduct performance tests while firing various blends of coal and petcoke. Following review of the test report submitted by JEA along with the present request and several meetings with JEA, the Department proposes the following revisions of permit PSD-FL-010.

Condition 2.A. (new)

i. When blends of petroleum coke and coal with a sulfur content of up to or equal to 2 percent are fired in Units 1 or 2, the SO₂ emissions shall not exceed 0.55 pound per million British thermal units (lb/MMBtu) and a minimum of 76 percent reduction shall be achieved in the flue gas desulfurization system.

ii. When co-firing petroleum coke with coals having a sulfur content between 2.00 and 3.63 percent, the emission limitation shall be based on the following formula:

$$\text{SO}_2 \text{ emission limit (lb/MMBtu)} = (0.2 \times C/100) + 4$$

where C = percent of coal fired on a heat input basis.

Please note that C is on a heat input basis and not weight input basis, so appropriate conversions should be used.

iii. When coals with a sulfur content greater than 3.63 percent are co-fired with petroleum coke, the SO₂ emissions shall not exceed the following formula:

$$\text{SO}_2 \text{ (lb/MMBtu)} = (0.1653 \times C \times S - 0.4 \times C + 40) \times 1/100$$

where: C = percent of coal co-fired on a heat input basis
S = weight percent sulfur in the coal

iv. The maximum SO₂ emission rate when firing petroleum coke and coal shall not exceed 0.676 lb/MMBtu.

v. Compliance with the SO₂ emissions limit shall be based on a 30-day rolling average for those days when petroleum coke is fired. Any use of petroleum coke during a 24-hour period shall be considered 1-day of the 30-day rolling average. The 30-day rolling average shall be calculated according to the New Source Performance Standards (NSPS) codified in 40 CFR 60 Subpart Da, except as noted above.

Condition 2.B. (new)

The petroleum coke-coal blends shall be limited to a maximum of 20 percent petroleum coke, by weight. The maximum weight of the petroleum coke burned shall not exceed 100,000 lb/hr. The maximum sulfur content of the petroleum coke-coal blend shall not exceed 4.00 percent, by weight.

Condition 3.A. (new)

The applicant shall maintain and submit to the Department on an annual basis for a period of five years from the date the unit is initially co-fired with petroleum coke, information demonstrating in accordance with 40 CFR 52.21 (b)(21)(v) and 40 CFR 52.21 (b)(33) that the operational changes did not result in emissions increases of nitrogen oxides and particulate matter.

Condition 3.B. (new)

The applicant shall maintain and submit to the Department on a semiannual basis for a period of two years from the date the unit is initially co-fired with petroleum coke, and then on an annual basis (if the first two years of data show no significant increase in carbon monoxide emissions) for an additional three years, information demonstrating that the operational changes did not result in a significant emissions increase of carbon monoxide. The carbon monoxide emissions shall be based on test results using EPA Method 10. Additionally, quarterly continuous emission monitoring data for carbon monoxide emissions shall be submitted to the Department for a period of two years to show the range of emissions experienced during each quarter.

Condition 3.C. (new)

The applicant shall maintain and submit to the Department on a

semiannual basis for a period of two years from the date the unit is initially co-fired with petroleum coke, information demonstrating that the operational changes did not result in significant emissions increases of sulfuric acid mist. The sulfuric acid mist emissions shall be based on test results using EPA Method 8.

D. Justification and Evaluation

The facility justifies its request to burn petcoke on its analysis indicating that it is possible to do so without increasing actual emissions of key regulated pollutants including carbon monoxide (CO), sulfur dioxide (SO₂), nitrogen oxides (NO_x), sulfuric acid mist (H₂SO₄) and particulate matter (PM). The analysis is included in the application and as Attachment 3 to this review.

To insure there are no increases in SO₂ from the higher sulfur petcoke, the applicant proposes to increase the sulfur dioxide removal efficiency and reduce the sulfur dioxide emission rates during the periods when petroleum coke and bituminous coal blends are being burned. The applicant proposes to accomplish this by increasing the minimum sulfur dioxide removal efficiency from 70 to 76 percent and reduce the maximum sulfur dioxide emission rates from 0.76 to 0.676 pound per million Btu heat input. The applicant believes there will be no increases in CO, H₂SO₄, NO_x, and PM due to firing of petcoke.

In the case of CO, the conclusion is based on "fine tuning" to optimize combustion of co-firing petroleum coke and coal. Additionally, a review of the last two years of CO data from the SJRPP indicates CO values still fall within the overall range of emissions observed when firing coal alone. Therefore it should be possible to optimize combustion so that CO emissions while burning petcoke are less than historical non-optimized CO emissions. The Department therefore, requires that the applicant do testing and submit CO emissions reports based on continuous emission monitoring on a regular basis.

In the case of H₂SO₄, the conclusion is based on the fact that the increase in sulfuric acid mist was a direct result of an associated increase in SO₂ emissions. If the proposed SO₂ emission limit was implemented during the test burn, the sulfuric acid mist emissions would have been lower as a direct result. The Department has ensured that significant increases (if any) in sulfuric acid mist will be reported to the Department by imposing a condition on the applicant, which requires testing of H₂SO₄ emissions on a regular basis.

The Department has further imposed on the applicant conditions in accordance with 40 CFR 52.21 to ensure that no significant increases in emissions for nitrogen oxides and particulate matter takes place.

E. Rule Applicability

The most important rules potentially applicable to this facility under this review are:

- o 40 CFR 60 - Standards of Performance for New Stationary Sources, Subpart Da - "Standards of Performance for Electric Utility Steam Generating Units for Which Construction Is Commenced After September 18, 1978," (NSPS Subpart Da) adopted in Chapter 62-296, Florida Administrative Code (F.A.C.).
- o 40 CFR 52.21 - "Prevention of Significant Deterioration of Air Quality," (PSD Rules) adopted in Chapter 62-212, F.A.C.
- o Chapter 62-297, F.A.C., related to emission monitoring at stationary sources.
- o Florida Electrical Power Plant Siting, Chapter 62-17, F.A.C. and Sections 403.501-519, Florida Statutes (F.S.).

The present request is a modification of the existing PSD permit and Site Certification. Here modification means a change in the permit and not necessarily an increase in emissions such that PSD rules are triggered. Matters related to Site Certification will be handled separately.

In 1992, EPA amended the PSD rules to account for several court decisions known as the Puerto Rican Cement and WEPCO decisions. Florida recently adopted these changes within Chapter 62-212, F.A.C. The key provisions applicable to this review relate to a new method for determining if a net emissions increase takes place following a physical or operational change. The PSD rules now require a comparison of past actual emissions with future actual emissions rather than with future potential emissions when determining PSD applicability for electric utility units.

The Department will use the most recent definitions in this permitting action as well as the reporting requirements as necessary to insure that PSD rules are not triggered by future actual operation of Units 1 & 2. These are:

Actual emissions - (such as "present actuals"). The average rate in tons per year, at which the emissions unit actually emitted the pollutant during a two year period which precedes the particular date and which is representative of the normal operation of the emissions unit. The Department may allow the use of a different time period upon a determination that it is more representative of the normal operation of the emissions unit's actual operating hours, production rates and types of materials processed, stored, or combusted during the selected time period.

Actual emissions - (such as "future actuals"). The **representative actual annual emissions** of the unit following the change provided the owner or operator maintains and submits to the Department on an annual basis for a period of five years from the date the unit resumes regular operation, information demonstrating that the physical or operational change did not result in an emissions increase, etc.

Representative actual annual emissions - (adopted from 40 CFR 52.21). The average rate, in tons per year, at which the source is projected to emit a pollutant for the two-year period after a physical change or change in method of operation of a unit, considering the effect any such change will have on increasing or decreasing the hourly emissions rate and on projected capacity utilization. In projecting future emissions the Administrator (in this case the Department) shall:

(i) Consider all relevant information, including but not limited to, historical operational data, the company's own representations, filings with the State or Federal regulatory authorities, and compliance plans under Title IV of the Clean Air Act; and

(ii) Exclude, in calculating any increase in emissions that results from the particular physical change or change in the method of operation at an electric utility steam generating unit, that portion of the unit's emissions following the change that could have been accommodated during the representative baseline period and is attributable to an increase in projected capacity utilization at the unit that is unrelated to the particular change, including any increased utilization due to the rate of utility demand growth for the utility system as a whole.

F. Conclusion

The changes in operation allowed by this permit amendment are not expected to cause an increase in emissions of air pollutants. The changes will not result in any increases in ambient concentrations of any air pollutants or cause or contribute to a violation of any ambient air quality standard or PSD increment.

DRAFT

June XX, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Richard Breitmoser, P.E.
Vice President
Environmental Health and Safety Group
St. Johns River Power Park
11201 New Berlin Road
Jacksonville, Florida 32226

Dear Mr. Breitmoser:

Re: Permit Amendment - Petroleum Coke Cofiring
Jacksonville Electric Authority, St. Johns River Power Park
PSD-FL-010(B); Duval County

The Department hereby amends the specific conditions related to sulfur dioxide (SO₂) emissions and fuel use in the subject Final Determination (dated March 12, 1982) pursuant to 40 CFR 52.21 - Prevention of Significant Deterioration (PSD Permit). The PSD Permit, previously amended on March 30, 1995 is amended as follows:

Condition 2.A. (new)

- i. When blends of petroleum coke and coal with a sulfur content of up to or equal to 2 percent are fired in Units 1 or 2, the SO₂ emissions shall not exceed 0.55 pound per million British thermal units (lb/MMBtu) and a minimum of 76 percent reduction shall be achieved in the flue gas desulfurization system.
- ii. When co-firing petroleum coke with coals having a sulfur content between 2.00 and 3.63 percent, the emission limitation shall be based on the following formula:

$$\text{SO}_2 \text{ emission limit (lb/MMBtu)} = (0.2 \times C/100) + 4$$

where: C = percent of coal co-fired on a heat input basis.

Please note that C is on a heat input basis and not weight input basis, so appropriate conversions should be used.

DRAFT

Mr. Richard Breitmoser
June XX, 1996
Page Two

iii. When coals with a sulfur content greater than 3.63 percent are co-fired with petroleum coke, the SO₂ emissions shall not exceed the following formula:

$$\text{SO}_2 \text{ (lb/MMBtu)} = (0.1653 \times C \times S - 0.4 \times C + 40) \times 1/100$$

where: C = percent of coal co-fired on a heat input basis
S = weight percent sulfur in the coal

iv. The maximum SO₂ emission rate when firing petroleum coke and coal shall not exceed 0.676 lb/MMBtu.

v. Compliance with the SO₂ emissions limit shall be based on a 30-day rolling average for those days when petroleum coke is fired. Any use of petroleum coke during a 24-hour period shall be considered 1 day of the 30-day rolling average. The 30-day rolling average shall be calculated according to the New Source Performance Standards (NSPS) codified in 40 CFR 60 Subpart Da, except as noted above.

Condition 2.B. (new)

The petroleum coke-coal blends shall be limited to a maximum of 20 percent petroleum coke, by weight. The maximum weight of the petroleum coke burned shall not exceed 100,000 lb/hr. The maximum sulfur content of the petroleum coke-coal blend shall not exceed 4.00 percent, by weight.

Condition 3. A. (new)

The applicant shall maintain and submit to the Department on an annual basis for a period of five years from the date the unit is initially co-fired with petroleum coke, information demonstrating in accordance with 40 CFR 52.21(b)(21)(v) and 40 CFR 52.21(b)(33) that the operational changes did not result in emissions increases of nitrogen oxides and particulate matter.

Condition 3. B. (new)

The applicant shall maintain and submit to the Department on a semiannual basis for a period of two years from the date the unit is initially co-fired with petroleum coke, and then on an annual basis (if the first two years of data show no significant increase in carbon monoxide emissions) for an additional three years, information demonstrating that the operational changes did not

Mr. Richard Breitmoser
June XX, 1996
Page Three

DRAFT

result in a significant emissions increase of carbon monoxide. The carbon monoxide emissions shall be based on test results using EPA Method 10. Additionally, quarterly continuous emission monitoring data for carbon monoxide emissions shall be submitted to the Department for a period of two years to show the range of emissions experienced during each quarter.

Condition 3. C. (new)

The applicant shall maintain and submit to the Department on a semiannual basis for a period of two years from the date the unit is initially co-fired with petroleum coke, information demonstrating that the operational changes did not result in significant emissions increases of sulfuric acid mist. The sulfuric acid mist emissions shall be based on test results using EPA Method 8.

A copy of this amendment letter shall be attached to and shall become a part of Permit PSD-FL-010.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Howard L. Rhodes, Director
Division Air Resources Management

Mr. Richard Breitmoser
June XX, 1996
Page Four

DRAFT

CERTIFICATE OF SERVICE

This is to certify that this **PERMIT AMENDMENT** and all copies were mailed to the listed persons before the close of business on

FILING AND ACKNOWLEDGMENT
FILED, on this date, pursuant to Chapter 120.52(9), Florida Statutes, with the designated Deputy Clerk, receipt of which is hereby acknowledged.

Clerk

Date

cc: J. Harper, EPA
J. Bunyak, NPS
B. Oven, DEP
C. Kirts, NED
J. Manning, RESD
K. Kosky, KBN