

Golder Associates Inc.

5100 West Lemon Street
Suite 114
Tampa, FL USA 33609
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Fax: (813) 287-1716



May 20, 2009

Our Ref.: 093-89508

Mr. Jon Holtom, P.E.
Title V Program Administrator
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road,
MS 5000
Tallahassee, Florida 32399-2400

RECEIVED
MAY 21 2009
BUREAU OF AIR REGULATION

Re: Application for Air Permit Revision and Renewal
Stanton Energy Center
Facility ID No. 0950137

Dear Mr. Holtom:

Project No.: 0950137-027-AV

Enclosed please find one original and three copies of an application for revision and renewal of the current Title V air permit for the Stanton Energy Center. (0950137-006-AV), located in Orlando, Orange County, Florida.

Orlando Utilities Commission looks forward to working with you on this permitting effort. If you would like to discuss any issues regarding this application, please contact Mr. David Baez in Orlando by telephone at (407) 658-6444 (x-3691) or me at (813) 287-1717 in Tampa.

GOLDER ASSOCIATES INC.

Sincerely,

A handwritten signature in black ink, appearing to read 'Scott Osbourn'.

Scott Osbourn, P.E.
Associate and Senior Consultant

Enclosure

Cc: Alan Zahm, DEP Central District
David Baez, OUC

TITLE V PERMIT RENEWAL AND REVISION APPLICATION OUC STANTON ENERGY CENTER

*Submitted to:
Florida Department of Environmental Protection*

*On Behalf of:
Orlando Utilities Commission*



Submitted by:





Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit:

- For any required purpose at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air operation permit;
- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment new source review, or maximum achievable control technology (MACT);
- To assume a restriction on the potential emissions of one or more pollutants to escape a requirement such as PSD review, nonattainment new source review, MACT, or Title V or
- To establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial, revised, or renewal Title V air operation permit.

RECEIVED

MAY 21 2009

BUREAU OF AIR REGULATION

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: Orlando Utilities Commission	
2. Site Name: Stanton Energy Center	
3. Facility Identification Number: 0950137	
4. Facility Location... Stanton Energy Center Street Address or Other Locator: 5100 South Alafaya Trail City: Orlando County: Orange Zip Code: 32193	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Application Contact – Stanton Energy Center

1. Application Contact Name: David R. Baez	
2. Application Contact Mailing Address... Organization/Firm: Orlando Utilities Commission Street Address: P.O. Box 3193 City: Orlando State: FL Zip Code: 32802	
3. Application Contact Telephone Numbers... Telephone: (407) 658 - 6444 ext. 3691 Fax: (407) 244 - 8794	
4. Application Contact E-mail Address: <u>dbaez@ouc.com</u>	

APPLICATION INFORMATION

Application Contact – Stanton A

1. Application Contact Name: G. Dwain Waters
2. Application Contact Mailing Address... Organization/Firm: Southern Company – Florida, LLC Street Address: One Energy Place City: Pensacola State: FL Zip Code: 32520-0328
3. Application Contact Telephone Numbers... Telephone: (850) 444- 6527 ext. Fax: (850) 444- 6080
4. Application Contact E-mail Address: <u>gdwaters@southernco.com</u>

Application Processing Information (DEP Use)

1. Date of Receipt of Application: 5-21-09	3. PSD Number (if applicable):
2. Project Number(s): 0950137-027-AV	4. Siting Number (if applicable):

APPLICATION INFORMATION

Purpose of Application

This application for air permit is being submitted to obtain: (Check one)

Air Construction Permit

- Air construction permit.
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

Air Operation Permit

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

Due to shared ownership of the site, OUC and Southern Company- Florida, LLC individuals have the following responsibilities: Jan Aspuru (OUC) is RO for the entire site; Joseph L. Miller (Southern Company-Florida, LLC) is the ARO for Stanton A (Units 25 & 26); Denise Stalls (OUC) is the DR for the site, except for Stanton A, which is the responsibility of Robert A. Schaffeld (Southern Company- Florida, LLC). Also, Dwain Waters (Southern Company- Florida, LLC) and Joseph L. Miller (Southern Company- Florida, LLC) are the application contact and facility contact, respectively for Stanton A, and David Baez (OUC) is the application and facility contact for the remainder of the Stanton Energy Center.

Minor revisions are requested to the TV unregulated activities list (see Attachment SEC-FI-C8).

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Processing Fee
1	Fossil Fuel Steam Generation Unit #1		
2	Fossil Fuel Steam Generation Unit #2		
3	Auxiliary Boiler		
4	Coal Transfer Baghouse		
5	Coal Crusher Building Baghouse		
6	Coal Plant Transfer & Silo Fill Area #1 Baghouse		
7	Coal Plant Transfer & Silo Fill Area #2 Baghouse		
8	Limestone Day Bin Baghouse		
9	Pebble Lime Receiving Hopper Baghouse		
10	Coal Reclaim Hopper Baghouse		
11	Flyash Exhaust Filter #1 Baghouse		
12	Flyash Exhaust Filter #2 Baghouse		
13	Flyash Exhaust Filter #3 Baghouse		
14	Flyash Exhaust Filter #4 Baghouse		
15	Flyash Silo Bin Vent Filter Baghouse		
16	Adipic Acid Storage Baghouse		
25	170 MW Comb Turbine w/Fired HRSG		
26	170 MW CT w/Fired HRSG		
28	Distillate Fuel Storage Tank		
29	Flyash Silo Bin Vent Filter Baghouse		

Application Processing Fee

Check one: Attached - Amount: \$ _____ Not Applicable

APPLICATION INFORMATION

Owner/Authorized Representative Statement

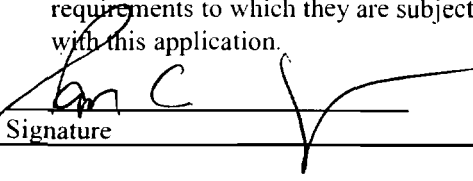
Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name :
2. Owner/Authorized Representative Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Owner/Authorized Representative Telephone Numbers... Telephone: () - ext. Fax: () -
4. Owner/Authorized Representative E-mail Address:
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.</i> _____ Signature _____ Date

APPLICATION INFORMATION

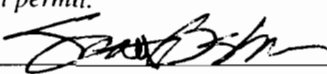
Application Responsible Official Certification

Complete if applying for an initial, revised, or renewal Title V air operation permit or concurrent processing of an air construction permit and revised or renewal Title V air operation permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: Jan C. Aspuru, Vice President of Power Resources
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input checked="" type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source, CAIR source, or Hg Budget source.
3. Application Responsible Official Mailing Address... P.O. Box 3193, Orlando FL 32802 Organization/Firm: Orlando Utilities Commission Street Address: Reliable Plaza, 100 West Anderson City: Orlando State: FL Zip Code: 32801
4. Application Responsible Official Telephone Numbers... Telephone: (407) 658 - 6444 ext. 3900 Fax: (407) 275 - 4120
5. Application Responsible Official E-mail Address: <u>jaspuru@ouc.com</u>
6. Application Responsible Official Certification: I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. 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 and all other applicable requirements identified in this application to which the Title V source is subject. 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 the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.  Signature _____ Date <u>5/19/09</u>

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: Scott H. Osbourn, Senior Consultant Registration Number: 57557
2. Professional Engineer Mailing Address... Organization/Firm: Golder Associates, Inc. Street Address: 5100 West Lemon Street, Suite 114 City: Tampa State: FL Zip Code: 33609
3. Professional Engineer Telephone Numbers... Telephone: (813) 287-1717 ext. Fax: (813) 287-1716
4. Professional Engineer E-mail Address: sosbourn@golder.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance 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</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, 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 plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/>, 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.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input checked="" type="checkbox"/>, 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.</i> Signature: <u></u> Date: <u>5/19/09</u> (seal)

* Attach any exception to certification statement.



II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates...		2. Facility Latitude/Longitude...	
Zone 17	East (km) 483.5 North (km) 3150.6	Latitude (DD/MM/SS) 28° 29' 1" N Longitude (DD/MM/SS) 81° 10' 7" W	
3. Governmental Facility Code: 4	4. Facility Status Code: Active	5. Facility Major Group SIC Code: 49	6. Facility SIC(s): 4911
7. Facility Comment :			

Facility Contact – Stanton Energy Center

1. Facility Contact Name: David R. Baez, Project Engineer, Environmental Affairs
2. Facility Contact Mailing Address... Organization/Firm: Orlando Utilities Commission Street Address: P.O. Box 3193 City: Orlando State: FL Zip Code: 32802
3. Facility Contact Telephone Numbers: Telephone: (407) 658 - 6444 ext. 3691 Fax: (407) 244 - 8794
4. Facility Contact E-mail Address: <u>dbaez@ouc.com</u>

Facility Contact – Stanton A

1. Facility Contact Name: Joseph L. Miller
2. Facility Contact Mailing Address... P.O. Box 781295 Organization/Firm: Southern Company – Florida, LLC Street Address: 500 Alafaya Trail City: Orlando State: FL Zip Code: 32878
3. Facility Contact Telephone Numbers: Telephone: (231) 235 - 2521 ext. Fax: (321) 235 – 2595
4. Facility Contact E-mail Address: <u>jlmiller@southernco.com</u>

FACILITY INFORMATION

Facility Primary Responsible Official

Complete if an “application responsible official” is identified in Section I that is not the facility “primary responsible official.”

1. Facility Primary Responsible Official Name:
2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Facility Primary Responsible Official Telephone Numbers... Telephone: () - ext. Fax: () -
4. Facility Primary Responsible Official E-mail Address:

FACILITY INFORMATION

Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a “major source” and a “synthetic minor source.”

1. <input type="checkbox"/> Small Business Stationary Source	<input type="checkbox"/> Unknown
2. <input type="checkbox"/> Synthetic Non-Title V Source	
3. <input checked="" type="checkbox"/> Title V Source	
4. <input checked="" type="checkbox"/> Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. <input type="checkbox"/> Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)	
7. <input type="checkbox"/> Synthetic Minor Source of HAPs	
8. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9. <input type="checkbox"/> One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10. <input type="checkbox"/> One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11. <input type="checkbox"/> Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment:	
<p>The Stanton Energy Center is a major source of HAPs. The cooling towers are not subject to a NESHAP because chromium-based chemical treatment is not used – the cooling towers are not a major source of HAPs.</p> <p>See PSD-FL-313 (PA81-14SA2) for alternative startup and shutdown emission limitations.</p>	

FACILITY INFORMATION

List of Pollutants Emitted by Facility

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
SO2	A	N
CO	A	N
NOX	A	N
PM	A	N
PM10	A	N
VOC	A	N
HAPs	A	N

FACILITY INFORMATION

B. EMISSIONS CAPS

Facility-Wide or Multi-Unit Emissions Caps

1. Pollutant Subject to Emissions Cap	2. Facility-Wide Cap [Y or N]? (all units)	3. Emissions Unit ID's Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap

7. Facility-Wide or Multi-Unit Emissions Cap Comment:

FACILITY INFORMATION

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1.	Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: SEC-FI-C1 <input type="checkbox"/> Previously Submitted, Date: _____
2.	Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: SEC-FI-C2 <input type="checkbox"/> Previously Submitted, Date: _____
3.	Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: SEC-FI-C3 <input type="checkbox"/> Previously Submitted, Date: _____

Additional Requirements for Air Construction Permit Applications

1.	Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable (existing permitted facility)
2.	Description of Proposed Construction, Modification, or Plantwide Applicability Limit (PAL): <input type="checkbox"/> Attached, Document ID: _____
3.	Rule Applicability Analysis: <input type="checkbox"/> Attached, Document ID: _____
4.	List of Exempt Emissions Units: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable (no exempt units at facility)
5.	Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
6.	Air Quality Analysis (Rule 62-212.400(7), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
7.	Source Impact Analysis (Rule 62-212.400(5), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
8.	Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
9.	Additional Impact Analyses (Rules 62-212.400(8) and 62-212.500(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
10.	Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable

FACILITY INFORMATION

C. FACILITY ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for FESOP Applications

1. List of Exempt Emissions Units: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable (no exempt units at facility)

Additional Requirements for Title V Air Operation Permit Applications

1. List of Insignificant Activities: (Required for initial/renewal applications only) <input checked="" type="checkbox"/> Attached, Document ID: SEC-FI-C4 <input type="checkbox"/> Not Applicable (revision application)

2. Identification of Applicable Requirements: (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: SEC-FI-C5 <input type="checkbox"/> Not Applicable (revision application with no change in applicable requirements)

3. Compliance Report and Plan: (Required for all initial/revision/renewal applications) <input checked="" type="checkbox"/> Attached, Document ID: SEC-FI-C6 Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.
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4. List of Equipment/Activities Regulated under Title VI: (If applicable, required for initial/renewal applications only) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Equipment/Activities Onsite but Not Required to be Individually Listed <input checked="" type="checkbox"/> Not Applicable

5. Verification of Risk Management Plan Submission to EPA: (If applicable, required for initial/renewal applications only) <input checked="" type="checkbox"/> Attached, Document ID: SEC-FI-C7 <input type="checkbox"/> Not Applicable

6. Requested Changes to Current Title V Air Operation Permit: <input checked="" type="checkbox"/> Attached, Document ID: SEC-FI-C8 <input type="checkbox"/> Not Applicable
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FACILITY INFORMATION

C. FACILITY ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for Facilities Subject to Acid Rain, CAIR, or Hg Budget Program

1. Acid Rain Program Forms: Acid Rain Part Application (DEP Form No. 62-210.900(1)(a)): <input checked="" type="checkbox"/> Attached, Document ID: SEC-FI-C9 <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Not Applicable (not an Acid Rain source) Phase II NO _x Averaging Plan (DEP Form No. 62-210.900(1)(a)1.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable New Unit Exemption (DEP Form No. 62-210.900(1)(a)2.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable
2. CAIR Part (DEP Form No. 62-210.900(1)(b)): <input checked="" type="checkbox"/> Attached, Document ID: SEC-FI-C10 <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Not Applicable (not a CAIR source)
3. Hg Budget Part (DEP Form No. 62-210.900(1)(c)): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable (not a Hg Budget unit)

Additional Requirements Comment

EMISSIONS UNIT INFORMATION

Section [1] of [20]
FFSG Unit #1

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for an initial, revised or renewal Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for an air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application - Where this application is used to apply for both an air construction permit and a revised or renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes, and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit addressed in this application that is subject to air construction permitting and for each such emissions unit that is a regulated or unregulated unit for purposes of Title V permitting. (An emissions unit may be exempt from air construction permitting but still be classified as an unregulated unit for Title V purposes.) Emissions units classified as insignificant for Title V purposes are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION

Section [1] of [20]
FFSG Unit #1

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

- The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.
- The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

- This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).
- This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.
- This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:

Fossil Fuel Steam Generation Unit #1

3. Emissions Unit Identification Number: **001**

4. Emissions Unit Status Code: A	5. Commence Construction Date:	6. Initial Startup Date: 01-JUL-85	7. Emissions Unit Major Group SIC Code: 49
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8. Federal Program Applicability: (Check all that apply)

- Acid Rain Unit
- CAIR Unit
- Hg Budget Unit

9. Package Unit:

Manufacturer:

Model Number:

10. Generator Nameplate Rating: **468 MW**

11. Emissions Unit Comment:

EMISSIONS UNIT INFORMATION

Section [1] of [20]

FFSG Unit #1

Emissions Unit Control Equipment/Method: Control 1 of 4

- | |
|--|
| 1. Control Equipment/Method Description:
Wet Scrubber High Efficiency (95.0-99.9%) |
| 2. Control Device or Method Code: 1 |

Emissions Unit Control Equipment/Method: Control 2 of 4

- | |
|--|
| 1. Control Equipment/Method Description:
Electrostatic Precipitator High Efficiency (95.0-99.9%) |
| 2. Control Device or Method Code: 10 |

Emissions Unit Control Equipment/Method: Control 3 of 4

- | |
|---|
| 1. Control Equipment/Method Description:
Modified Furnace/Burner Design |
| 2. Control Device or Method Code: 24 |

Emissions Unit Control Equipment/Method: Control 4 of 4

- | |
|--|
| 1. Control Equipment/Method Description:
Staged Combustion |
| 2. Control Device or Method Code: 25 |

EMISSIONS UNIT INFORMATION

Section [1] of [20]
FFSG Unit #1

B. EMISSIONS UNIT CAPACITY INFORMATION
(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate:		
2. Maximum Production Rate: 468 MW		
3. Maximum Heat Input Rate: 4286 million Btu/hr		
4. Maximum Incineration Rate: pounds/hr tons/day		
5. Requested Maximum Operating Schedule:		
24 hours/day		7 days/week
52 weeks/year		8,760 hours/year
6. Operating Capacity/Schedule Comment:		

EMISSIONS UNIT INFORMATION

Section [1] of [20]

FFSG Unit #1

C. EMISSION POINT (STACK/VENT) INFORMATION

(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram:		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code:	6. Stack Height: 550 feet	7. Exit Diameter: 19 feet	
8. Exit Temperature: 127 °F	9. Actual Volumetric Flow Rate: 1,420,000 acfm	10. Water Vapor: <i>%</i>	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates... Zone: 17 East (km): 483.05 North (km): 3,150.06		14. Emission Point Latitude/Longitude... Latitude: 28° 28' 43" N Longitude: 81° 10' 30" W	
15. Emission Point Comment:			

EMISSIONS UNIT INFORMATION

**Section [1] of [20]
FFSG Unit #1**

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 4

1. Segment Description (Process/Fuel Type): Coal Burned		
2. Source Classification Code (SCC): 1-01-002-02		3. SCC Units: Tons Bituminous Coal Burned
4. Maximum Hourly Rate: 164.8	5. Maximum Annual Rate: 1,444,052	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 3.5	8. Maximum % Ash: 10	9. Million Btu per SCC Unit: 26
10. Segment Comment:		

Segment Description and Rate: Segment 2 of 4

1. Segment Description (Process/Fuel Type): Residual Oil (No. 6) Burned		
2. Source Classification Code (SCC): 1-01-004-01		3. SCC Units: 1000 Gallons Residual Oil (No. 6) Burned
4. Maximum Hourly Rate: 28.6	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 2.5	8. Maximum % Ash: 0.1	9. Million Btu per SCC Unit: 150
10. Segment Comment:		

EMISSIONS UNIT INFORMATION

Section [1] of [20]

FFSG Unit #1

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

Segment Description and Rate: Segment 3 of 4

1. Segment Description (Process/Fuel Type): Process Gas Burned		
2. Source Classification Code (SCC): 1-01-007-01		3. SCC Units: Million Cubic Feet Process Gas Burned
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

Segment Description and Rate: Segment 4 of 4

1. Segment Description (Process/Fuel Type): Waste Oil Burned		
2. Source Classification Code (SCC): 1-01-013-02		3. SCC Units: 1000 Gallons Waste Oil Burned
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment: On-site generated lubricating oil and used fuel oil which meets the requirements of 40 CFR 266.40		

EMISSIONS UNIT INFORMATION

Section [1] of [20]
 FFSG Unit #1

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
CO			
NOX	Modified Furnace/Burner Design	Staged Combustion	
PM	Electrostatic Precipitator High Efficiency (95.0-99.9%)		
PM10			
SO2	Wet Scrubber High Efficiency (95.0-99.9%)		
VOC			

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
 POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: CO		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 771.5 lb/hour 3,379 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.18 lb/MMBtu Reference: Permit Condition		7. Emissions Method Code: 3	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: (0.18 lb/MMBtu) x (4,286 MMBtu/hr) = 771.5 lb/hr (771.5 lb/hr) x (8,760 hr/yr) x (ton/2,000 lb) = 3,379 TPY			
11. Potential, Fugitive, and Actual Emissions Comment:			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
 ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions ___ of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: 771.5 lb/hour 3,379 tons/year
5. Method of Compliance: NOx CEMS, annual RATA test.	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ___ of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ___ of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
 POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: NO_x		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 2,482 lb/hour 8,635 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.6 lb/MMBtu Reference: Permit Condition A.15		7. Emissions Method Code: 3	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: Hourly Rate = (0.60 lb/MMBtu) x (4,286 MMBtu/ ton/hr) = 2,572 lb/hr Annual Rate = (0.46 lb/MMBtu) x (4,286 MMBtu/ ton/hr) x (8,760 hr/yr) x (ton/2,000 lb) = 8,635 TPY			
11. Potential, Fugitive, and Actual Emissions Comment:			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
 ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.6 lb/MMBtu	4. Equivalent Allowable Emissions: 2,572 lb/hour tons/year
5. Method of Compliance: NOx CEMS, RATA Test	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.46 lb/MMBtu	4. Equivalent Allowable Emissions: lb/hour 8,635 tons/year
5. Method of Compliance: NOx CEMS, RATA Test	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions of

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: PM		2. Total Percent Efficiency of Control: >99 %	
3. Potential Emissions: 128.5 lb/hour 562.8 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.03 lb/MMBtu Reference: Permit Condition A.5		7. Emissions Method Code: 3	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: (0.03 lb/MMBtu) x (4,286 MMBtu/hr) = 128.5 lb/hr (128.5 lb/hr) x (8,760 hr/yr) x (ton/2,000 lb) = 562.8 TPY			
11. Potential, Fugitive, and Actual Emissions Comment:			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
 ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.03 lb/MMBtu	4. Equivalent Allowable Emissions: 128.5 lb/hour 562.8 tons/year
5. Method of Compliance: Annual Method 5 test.	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions of

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions of

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
 POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: PM10		2. Total Percent Efficiency of Control: >99 %	
3. Potential Emissions: 128.5 lb/hour 562.8 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.03 lb/MMBtu Reference: Permit Condition A.5		7. Emissions Method Code: 3	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: $(0.03 \text{ lb/MMBtu}) \times (4,286 \text{ MMBtu/hr}) = 128.5 \text{ lb/hr}$ $(128.5 \text{ lb/hr}) \times (8,760 \text{ hr/yr}) \times (\text{ton}/2,000 \text{ lb}) = 562.8 \text{ TPY}$			
11. Potential, Fugitive, and Actual Emissions Comment:			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
 ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.03 lb/MMBtu	4. Equivalent Allowable Emissions: 128.5 lb/hour 562.8 tons/year
5. Method of Compliance: Annual Method 5 test.	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: SO2		2. Total Percent Efficiency of Control: 97	
3. Potential Emissions: 5,143 lb/hour 22,527 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 1.2 lb/MMBtu Reference: Permit Condition A.9		7. Emissions Method Code: 3	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: (1.2 lb/MMBtu) x (4,286 MMBtu/hr) = 5,143 lb/hr (5,143 lb/hr) x (8,760 hr/yr) x (ton/2,000 lb) = 22,527 TPY			
11. Potential, Fugitive, and Actual Emissions Comment:			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions **1** of **1**

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 1.2 lb/MMBtu	4. Equivalent Allowable Emissions: 5,143 lb/hour 22,527 tons/year
5. Method of Compliance: SO₂ CEMS, annual RATA test.	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ___ of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ___ of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: VOC		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 9.9 lb/hour 43.3 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.06 lb/ton Reference: AP-42, Table 1.1-19		7. Emissions Method Code: 3	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: (0.06 lb/ton) x (164.8 ton/hr) = 9.9 lb/hr (9.9 lb/hr) x (8,760 hr/yr) x (ton/2,000 lb) = 43.3 TPY			
11. Potential, Fugitive, and Actual Emissions Comment:			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
 ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

Section [1] of [20]
 FFSG Unit #1

G. VISIBLE EMISSIONS INFORMATION

Complete Subsection G if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE20	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: 20 % Exceptional Conditions: 27 % Maximum Period of Excess Opacity Allowed: 6 min/hour	
4. Method of Compliance: VE may not exceed 20% opacity under normal operation except for one 6-minute period per hour of not more than 27% opacity.	
5. Visible Emissions Comment:	

Visible Emissions Limitation: Visible Emissions Limitation __ of ____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

EMISSIONS UNIT INFORMATION

Section [1] of [20]

FFSG Unit #1

H. CONTINUOUS MONITOR INFORMATION**Complete Subsection H if this emissions unit is or would be subject to continuous monitoring.****Continuous Monitoring System:** Continuous Monitor 1 of 5

1. Parameter Code: VE	2. Pollutant(s): opacity
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Teledyne Instruments Model Number: Lighthawk 560 Serial Number: 5600377; 5600378	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor 2 of 5

1. Parameter Code: EM	2. Pollutant(s): SO2
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Teledyne Instruments Model Number: ML9850 Serial Number: 363	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor 3 of 5

1. Parameter Code: CO2	2. Pollutant(s): Diluent
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: MONITOR LABS Model Number: ML9820 Serial Number: 76	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

EMISSIONS UNIT INFORMATION

Section [1] of [20]
FFSG Unit #1

H. CONTINUOUS MONITOR INFORMATION (CONTINUED)

Continuous Monitoring System: Continuous Monitor 4 of 5

1. Parameter Code: EM	2. Pollutant(s): NOx
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Teledyne Instruments Model Number: SensorE Serial Number: 131	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor 5 of 5

1. Parameter Code: FLOW	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: EMRC-DP7 Model Number: CM60 Serial Number: S/N 0461	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

EMISSIONS UNIT INFORMATION

Section [1] of [20]
FFSG Unit #1

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: SEC-FI-C2 <input type="checkbox"/> Previously Submitted, Date _____
2. Fuel Analysis or Specification: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: SEC-EU1-I2 <input type="checkbox"/> Previously Submitted, Date _____
3. Detailed Description of Control Equipment: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: SEC-EU1-I3 <input type="checkbox"/> Previously Submitted, Date _____
4. Procedures for Startup and Shutdown: (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable (construction application)
5. Operation and Maintenance Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable
6. Compliance Demonstration Reports/Records: <input checked="" type="checkbox"/> Attached, Document ID: SEC-EU1-I4 Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Previously Submitted, Date: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Not Applicable Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.
7. Other Information Required by Rule or Statute: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

Section [2] of [20]

FFSG Unit #2

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for an initial, revised or renewal Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for an air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application – Where this application is used to apply for both an air construction permit and a revised or renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes, and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit addressed in this application that is subject to air construction permitting and for each such emissions unit that is a regulated or unregulated unit for purposes of Title V permitting. (An emissions unit may be exempt from air construction permitting but still be classified as an unregulated unit for Title V purposes.) Emissions units classified as insignificant for Title V purposes are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION

Section [2] of [20]

FFSG Unit #2

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

- The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.
- The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

- This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).
- This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.
- This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:

Fossil Fuel Steam Generation Unit #2

3. Emissions Unit Identification Number: **002**

4. Emissions Unit Status Code: A	5. Commence Construction Date:	6. Initial Startup Date: 29-MAR-96	7. Emissions Unit Major Group SIC Code: 49
--	--------------------------------	--	--

8. Federal Program Applicability: (Check all that apply)

- Acid Rain Unit
- CAIR Unit
- Hg Budget Unit

9. Package Unit:

Manufacturer:

Model Number:

10. Generator Nameplate Rating: **468 MW**

11. Emissions Unit Comment:

Existing PSD permit was modified to issue a new construction commencement date as required by EPA.

EMISSIONS UNIT INFORMATION

Section [2] of [20]

Pulverized Coal Fired Unit No. 2

Emissions Unit Control Equipment/Method: Control 1 of 5

- | |
|--|
| 1. Control Equipment/Method Description:
Electrostatic Precipitator (high efficiency 95-99.9%) |
| 2. Control Device or Method Code: 10 |

Emissions Unit Control Equipment/Method: Control 2 of 5

- | |
|--|
| 1. Control Equipment/Method Description:
SCR (Selective Catalytic Reduction) |
| 2. Control Device or Method Code: 139 |

Emissions Unit Control Equipment/Method: Control 3 of 5

- | |
|---|
| 1. Control Equipment/Method Description:
Modified Furnace/Burner Design |
| 2. Control Device or Method Code: 24 |

Emissions Unit Control Equipment/Method: Control 4 of 5

- | |
|--|
| 1. Control Equipment/Method Description:
Staged Combustion |
| 2. Control Device or Method Code: 25 |

Emissions Unit Control Equipment/Method: Control 5 of 5

- | |
|--|
| 1. Control Equipment/Method Description:
Wet Scrubber High Efficiency (95.0-99.9%) |
| 2. Control Device or Method Code: 1 |

Emissions Unit Control Equipment/Method: Control of

- | |
|--|
| 1. Control Equipment/Method Description: |
| 2. Control Device or Method Code: |

EMISSIONS UNIT INFORMATION

Section [2] of [20]

Pulverized Coal Fired Unit No. 2

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate:
2. Maximum Production Rate: 468 MW
3. Maximum Heat Input Rate: 4286 million Btu/hr
4. Maximum Incineration Rate: pounds/hr tons/day
5. Requested Maximum Operating Schedule: 24 hours/day 7 days/week 52 weeks/year 8,760 hours/year
6. Operating Capacity/Schedule Comment:

EMISSIONS UNIT INFORMATION

Section **[2]** of **[20]**

Pulverized Coal Fired Unit No. 2

C. EMISSION POINT (STACK/VENT) INFORMATION

(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram:		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code:		6. Stack Height: 550 feet	7. Exit Diameter: 19 feet
8. Exit Temperature: 124 °F	9. Actual Volumetric Flow Rate: 1,310,120 acfm		10. Water Vapor: %
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates... Zone: 17 East (km): 484 North (km): 3,150.5		14. Emission Point Latitude/Longitude... Latitude: 28° 28' 57" N Longitude: 81° 9' 54" W	
15. Emission Point Comment:			

EMISSIONS UNIT INFORMATION

Section [2] of [20]

Pulverized Coal Fired Unit No. 2

D. SEGMENT (PROCESS/FUEL) INFORMATION**Segment Description and Rate: Segment 1 of 4**

1. Segment Description (Process/Fuel Type): Coal Burned		
2. Source Classification Code (SCC): 1-01-002-02		3. SCC Units: Tons Bituminous Coal Burned
4. Maximum Hourly Rate: 164.8	5. Maximum Annual Rate: 1,444,052	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 3.5	8. Maximum % Ash: 10	9. Million Btu per SCC Unit: 26
10. Segment Comment:		

Segment Description and Rate: Segment 2 of 4

1. Segment Description (Process/Fuel Type): Residual Oil (No. 6) Burned		
2. Source Classification Code (SCC): 1-01-004-01		3. SCC Units: 1000 Gallons Residual Oil (No. 6) Burned
4. Maximum Hourly Rate: 28.6	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 2.5	8. Maximum % Ash: 0.1	9. Million Btu per SCC Unit: 150
10. Segment Comment:		

EMISSIONS UNIT INFORMATION

Section [2] of [20]

Pulverized Coal Fired Unit No. 2

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

Segment Description and Rate: Segment 3 of 4

1. Segment Description (Process/Fuel Type): Process Gas Burned		
2. Source Classification Code (SCC): 1-01-007-01		3. SCC Units: Million Cubic Feet Process Gas Burned
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

Segment Description and Rate: Segment 4 of 4

1. Segment Description (Process/Fuel Type): Waste Oil Burned		
2. Source Classification Code (SCC): 1-01-013-02		3. SCC Units: 1000 Gallons Waste Oil Burned
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment: Used oil specification: Arsenic 5 PPM, Cadmium 2 PPM, Chromium 10 PPM, Lead 100 PPM, Total Halogens 1000 PPM, PCB 50 ppm.		

EMISSIONS UNIT INFORMATION

Section [2] of [20]

Pulverized Coal Fired Unit No. 2

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
CO			
NOX	SCR		
Pb			
PM	ESP		
PM10	ESp		
SO2	Wet Scrubber		
VOC			
SAM			
Be			
Hg			
Fl			

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
 POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: CO		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 643 lb/hour 2816 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.15 lb/MMBtu heat input Reference: Permit Condition A.18		7. Emissions Method Code: 3	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: The lb/hr and TPY potential emissions are specified in Permit Condition A.18.			
11. Potential, Fugitive, and Actual Emissions Comment:			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
 ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.15 lb/MMBtu	4. Equivalent Allowable Emissions: 643 lb/hour 2816 tons/year
5. Method of Compliance: Method 10 test.	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

Section [2] of [20]
Pulverized Coal Fired Unit No. 2

POLLUTANT DETAIL INFORMATION

Page [2] of [10]

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: NOx		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 728.6 lb/hour 3191.4 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.17 lb/MMBtu heat input Reference: Permit Condition A.15		7. Emissions Method Code: 3	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: (0.17 lb/MMBtu) x (4,286 MMBtu/hr) = 728.6 lb/hr (728.6 lb/hr) x (8,760 hr/yr) x (ton/2,000 lb) = 3,191.4 TPY			
11. Potential, Fugitive, and Actual Emissions Comment: NOx allowables are based on a 30 day rolling average.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.17 lb/MMBtu	4. Equivalent Allowable Emissions: 728.6 lb/hour 3191.4 tons/year
5. Method of Compliance: NOx CEMS, RATA test.	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ___ of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ___ of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
 POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: Pb		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 0.64 lb/hour 2.8 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.00015 lb/MMBtu Reference: Permit Condition A.23		7. Emissions Method Code: 3	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: Permit allowable are specified in Permit Condition A.23.			
11. Potential, Fugitive, and Actual Emissions Comment: Limited to 100 ppm as specification of used oil.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions **1** of **1**

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.00015 lb/MMBtu	4. Equivalent Allowable Emissions: 0.64 lb/hour 2.8 tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ___ of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ___ of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: PM/PM10		2. Total Percent Efficiency of Control: >99%	
3. Potential Emissions: 85.7 lb/hour 375.4 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.02 lb/MMBtu heat input Reference: Permit Condition A.5.		7. Emissions Method Code: 2	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: (0.02 lb/MMBtu) x (4,286 MMBtu/hr) = 85.7 lb/hr (85.7 lb/hr) x (8,760 hr/yr) x (ton/2,000 lb) = 375.4 TPY			
11. Potential, Fugitive, and Actual Emissions Comment:			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.02 lb/MMBtu	4. Equivalent Allowable Emissions: 85.7 lb/hour 375.4 tons/year
5. Method of Compliance: Annual Method 5 test.	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
 POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: SO2		2. Total Percent Efficiency of Control: 95	
3. Potential Emissions: 1071.5 lb/hour 4693.2 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.25 lb/MMBtu Reference: Permit Condition A.10.		7. Emissions Method Code: 3	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: $(0.25 \text{ lb/MMBtu}) \times (4,286 \text{ MMBtu/hr}) = 1,071.5 \text{ lb/hr}$ $(1,071.5 \text{ lb/hr}) \times (8,760 \text{ hr/yr}) \times (\text{ton}/2,000 \text{ lb}) = 4,693.2 \text{ TPY}$			
11. Potential, Fugitive, and Actual Emissions Comment: SO2 allowable is based on a 30 day rolling average.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.25 lb/MMBtu	4. Equivalent Allowable Emissions: 1071.5 lb/hour 4693.2 tons/year
5. Method of Compliance: Fuel sampling and analysis.	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
 POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: VOC		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 64.3 lb/hour 282 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.015 lb/MMBtu Reference: Permit Condition A.19.		7. Emissions Method Code: 3	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: $(0.015 \text{ lb/MMBtu}) \times (4,286 \text{ MMBtu/hr}) = 64.3 \text{ lb/hr}$ $(64.3 \text{ lb/hr}) \times (8,760 \text{ hr/yr}) \times (\text{ton}/2,000 \text{ lb}) = 282 \text{ TPY}$			
11. Potential, Fugitive, and Actual Emissions Comment:			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
 ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.015 lb/MMBtu	4. Equivalent Allowable Emissions: 64 lb/hour 282 tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
 POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: SAM – Sulfuric Acid Mist		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 140 lb/hour 613 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.033 lb/MMBtu Reference: Permit Condition A.20		7. Emissions Method Code: 3	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: Allowable limits are specified in Permit Condition A.20.			
11. Potential, Fugitive, and Actual Emissions Comment:			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.033 lb/MMBtu	4. Equivalent Allowable Emissions: 140 lb/hour 613 tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions of

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions of

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
 POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: Be - Beryllium		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 0.022 lb/hour 0.1 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 5.2E-6 lb/MMBtu Reference: Permit Condition A.21.		7. Emissions Method Code: 3	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: Allowable limits are specified in Permit Condition A.21.			
11. Potential, Fugitive, and Actual Emissions Comment:			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 5.2E-6 lb/MMBtu	4. Equivalent Allowable Emissions: 0.022 lb/hour 0.1 tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
 POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: Hg - Mercury		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 0.046 lb/hour 0.2 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 1.1E-5 lb/MMBtu Reference: Permit Condition A.22		7. Emissions Method Code: 3	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: Allowable limits are specified in Permit Condition A.22.			
11. Potential, Fugitive, and Actual Emissions Comment:			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
 ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 1.1E-5 lb/MMBtu	4. Equivalent Allowable Emissions: 0.046 lb/hour 0.2 tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
 POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: FL - Fluorides		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 1.8 lb/hour 7.9 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 4.2E-4 lb/MMBtu Reference: Permit Condition A.24.		7. Emissions Method Code: 3	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: Allowable limits are specified in Permit Condition A.24.			
11. Potential, Fugitive, and Actual Emissions Comment:			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
 ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 4.2E-4 lb/MMBtu	4. Equivalent Allowable Emissions: 1.8 lb/hour 7.9 tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

Section [2] of [20]

Pulverized Coal Fired Unit No. 2

G. VISIBLE EMISSIONS INFORMATION

Complete Subsection G if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation **1 of 1**

1. Visible Emissions Subtype: VE20	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: 20 % Exceptional Conditions: 27 % Maximum Period of Excess Opacity Allowed: 6 min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment: VE may not exceed 20 % opacity under normal operation except for one 6-minute period per hour of not more than 27 % opacity.	

Visible Emissions Limitation: Visible Emissions Limitation ___ of ___

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

EMISSIONS UNIT INFORMATION

Section [2] of [20]

Pulverized Coal Fired Unit No. 2

H. CONTINUOUS MONITOR INFORMATION

Complete Subsection H if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor 1 of 6

1. Parameter Code: EM	2. Pollutant(s): SO2
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: MONITOR LABS Model Number: 9850 Serial Number: 593/1665	
5. Installation Date:	6. Performance Specification Test Date: 29-JUL-96
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor 2 of 6

1. Parameter Code: EM	2. Pollutant(s): NOx
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Teledyne Instruments Model Number: Sensor E Serial Number:	
5. Installation Date:	6. Performance Specification Test Date: 9-MAY-2005
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor 3 of 6

1. Parameter Code: VE	2. Pollutant(s): opacity
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Teledyne Instruments Model Number: Lighthawk560 Serial Number:	
5. Installation Date:	6. Performance Specification Test Date: 2003
7. Continuous Monitor Comment:	

EMISSIONS UNIT INFORMATION

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Pulverized Coal Fired Unit No. 2

H. CONTINUOUS MONITOR INFORMATION (CONTINUED)**Continuous Monitoring System:** Continuous Monitor 4 of 6

1. Parameter Code: CO2	2. Pollutant(s): Diluent
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: MONITOR LABS Model Number: 9820 Serial Number: S/N/180/1799	
5. Installation Date:	6. Performance Specification Test Date: 29-JUL-96
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor 5 of 6

1. Parameter Code: FLOW	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: EMRC-DP1 Model Number: Serial Number: S/N2SAA-PT-406	
5. Installation Date:	6. Performance Specification Test Date: 29-JUL-96
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor 6 of 6

1. Parameter Code: EM	2. Pollutant(s): SO2
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: WESTERN RESEARCH Model Number: 721-AT Serial Number: S/N 90-721AT2	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment: s/n 90-721at2-7663-2 INLET MONITOR	

EMISSIONS UNIT INFORMATION

Section [2] of [20]
Pulverized Coal Fired Unit No. 2

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: SEC-FI-C2 <input type="checkbox"/> Previously Submitted, Date _____
2. Fuel Analysis or Specification: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: SEC-EU1-I2 <input type="checkbox"/> Previously Submitted, Date _____
3. Detailed Description of Control Equipment: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: SEC-EU1-I3 <input type="checkbox"/> Previously Submitted, Date _____
4. Procedures for Startup and Shutdown: (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable (construction application)
5. Operation and Maintenance Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable
6. Compliance Demonstration Reports/Records: <input checked="" type="checkbox"/> Attached, Document ID: SEC-EU2-I1 Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Previously Submitted, Date: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Not Applicable Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.
7. Other Information Required by Rule or Statute: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

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III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for an initial, revised or renewal Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for an air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application - Where this application is used to apply for both an air construction permit and a revised or renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes, and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit addressed in this application that is subject to air construction permitting and for each such emissions unit that is a regulated or unregulated unit for purposes of Title V permitting. (An emissions unit may be exempt from air construction permitting but still be classified as an unregulated unit for Title V purposes.) Emissions units classified as insignificant for Title V purposes are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION

Section [3] of [20]

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A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

- The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.
- The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

- This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).
- This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.
- This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:
Auxiliary Boiler

3. Emissions Unit Identification Number: **3**

4. Emissions Unit Status Code: A	5. Commence Construction Date:	6. Initial Startup Date: 01-JUL-85	7. Emissions Unit Major Group SIC Code: 49
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8. Federal Program Applicability: (Check all that apply)

- Acid Rain Unit
- CAIR Unit
- Hg Budget Unit

9. Package Unit: **BABCOCK & WILCOX**
Manufacturer:

Model Number: **FM -2919**

10. Generator Nameplate Rating: **MW**

11. Emissions Unit Comment:

Serves both Units 1 and 2.

EMISSIONS UNIT INFORMATION

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Emissions Unit Control Equipment/Method: Control 1 of 1

1. Control Equipment/Method Description: Miscellaneous control devices
2. Control Device or Method Code: 99

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:
2. Control Device or Method Code:

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:
2. Control Device or Method Code:

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:
2. Control Device or Method Code:

EMISSIONS UNIT INFORMATION

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B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate:
2. Maximum Production Rate:
3. Maximum Heat Input Rate: 83 million Btu/hr
4. Maximum Incineration Rate: pounds/hr tons/day
5. Requested Maximum Operating Schedule: 24 hours/day 7 days/week 52 weeks/year 150 hours/year
6. Operating Capacity/Schedule Comment:

EMISSIONS UNIT INFORMATION

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Aux Boiler

C. EMISSION POINT (STACK/VENT) INFORMATION

(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram:		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code:		6. Stack Height:	7. Exit Diameter:
8. Exit Temperature:		9. Actual Volumetric Flow Rate:	10. Water Vapor: %
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates... Zone: East (km): North (km):		14. Emission Point Latitude/Longitude... Latitude: Longitude:	
15. Emission Point Comment:			

EMISSIONS UNIT INFORMATION

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Aux Boiler

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): No. 2 Fuel Oil		
2. Source Classification Code (SCC): 2-01-001-01		3. SCC Units: 1000 Gallons Distillate Oil (No. 1 & 2) Burned
4. Maximum Hourly Rate: 0.59	5. Maximum Annual Rate: 88.9	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 0.5	8. Maximum % Ash:	9. Million Btu per SCC Unit: 140
10. Segment Comment: Max annual rate based on 150 hr/yr.		

Segment Description and Rate: Segment __ of ____

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

EMISSIONS UNIT INFORMATION

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

Segment Description and Rate: Segment __ of ____

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

Segment Description and Rate: Segment __ of ____

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

EMISSIONS UNIT INFORMATION

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E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM			EL
SO2			EL
NOX			EL

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
 POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: PM		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 1.245 lb/hour 0.09 tons/year		4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.015 lb/MMBtu Reference: Permit Condition B.4.		7. Emissions Method Code: 3	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: $(0.015 \text{ lb/MMBtu}) \times (83 \text{ MMBtu/hr}) = 1.245 \text{ lb/hr}$ $(1.245 \text{ lb/hr}) \times (150 \text{ hr/yr}) \times (\text{ton}/2,000 \text{ lb}) = 0.09 \text{ TPY}$			
11. Potential, Fugitive, and Actual Emissions Comment:			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
 ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions **1** of **1**

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.015 lb/MMBtu	4. Equivalent Allowable Emissions: 1.245 lb/hour 0.09 tons/year
5. Method of Compliance: Testing not required if unit operates for less than 400 hr/yr.	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ___ of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ___ of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
 POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: SO2		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 42.33 lb/hour 3.17 tons/year		4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.51 lb/MMBtu Reference: Permit Condition B.4.		7. Emissions Method Code: 3	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: (0.51 lb/MMBtu) x (83 MMBtu/hr) = 42.3 lb/hr (42.3 lb/hr) x (150 hr/yr) x (ton/2,000 lb) = 3.17 TPY			
11. Potential, Fugitive, and Actual Emissions Comment:			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
 ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions **1** of **1**

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.51 lb/MMBtu	4. Equivalent Allowable Emissions: 42.33 lb/hour 3.17 tons/year
5. Method of Compliance: Testing not required if unit operates for less than 400 hr/yr.	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: NOx		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 13.28 lb/hour 0.99 tons/year		4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.16 lb/MMBtu Reference: Permit Condition B.4.		7. Emissions Method Code: 3	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: (0.16 lb/MMBtu) x (83 MMBtu/hr) = 13.28 lb/hr (13.28 lb/hr) x (150 hr/yr) x (ton/2,000 lb) = 0.99 TPY			
11. Potential, Fugitive, and Actual Emissions Comment:			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.16 lb/MMBtu	4. Equivalent Allowable Emissions: 13.28 lb/hour 0.99 tons/year
5. Method of Compliance: Testing not required if unit operates for less than 400 hr/yr.	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

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G. VISIBLE EMISSIONS INFORMATION

Complete Subsection G if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE20	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: 20 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment: VE testing not required if unit operates for less than 400 hr/yr.	

Visible Emissions Limitation: Visible Emissions Limitation __ of ____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

EMISSIONS UNIT INFORMATION

Section [3] of [20]

Aux Boiler

H. CONTINUOUS MONITOR INFORMATION

Complete Subsection H if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

EMISSIONS UNIT INFORMATION

**Section [3] of [20]
Aux Boiler**

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: SEC-FI-C2 <input type="checkbox"/> Previously Submitted, Date _____
2. Fuel Analysis or Specification: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: SEC-EU1-I2 <input type="checkbox"/> Previously Submitted, Date _____
3. Detailed Description of Control Equipment: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: N/A <input type="checkbox"/> Previously Submitted, Date _____
4. Procedures for Startup and Shutdown: (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable (construction application)
5. Operation and Maintenance Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable
6. Compliance Demonstration Reports/Records: <input type="checkbox"/> Attached, Document ID: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Previously Submitted, Date: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input checked="" type="checkbox"/> Not Applicable Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.
7. Other Information Required by Rule or Statute: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

Section [3] of [20]

Aux Boiler

I. EMISSIONS UNIT ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for Air Construction Permit Applications

1. Control Technology Review and Analysis (Rules 62-212.400(10) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e)): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rules 62-212.400(4)(d) and 62-212.500(4)(f), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
3. Description of Stack Sampling Facilities: (Required for proposed new stack sampling facilities only) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1. Identification of Applicable Requirements: <input checked="" type="checkbox"/> Attached, Document ID: SEC-EU1-15
2. Compliance Assurance Monitoring: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
3. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
4. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

Additional Requirements Comment

EMISSIONS UNIT INFORMATION

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Coal Transfer Baghouse

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for an initial, revised or renewal Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for an air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application - Where this application is used to apply for both an air construction permit and a revised or renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes, and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit addressed in this application that is subject to air construction permitting and for each such emissions unit that is a regulated or unregulated unit for purposes of Title V permitting. (An emissions unit may be exempt from air construction permitting but still be classified as an unregulated unit for Title V purposes.) Emissions units classified as insignificant for Title V purposes are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION

Section [4] of [20]

Coal Transfer Baghouse

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:

Coal Transfer Baghouse

3. Emissions Unit Identification Number: **004**

4. Emissions Unit Status Code: A	5. Commence Construction Date:	6. Initial Startup Date: 01-JUL-85	7. Emissions Unit Major Group SIC Code: 49
--	--------------------------------	--	--

8. Federal Program Applicability: (Check all that apply)

Acid Rain Unit

CAIR Unit

Hg Budget Unit

9. Package Unit:

Manufacturer: Model Number:

10. Generator Nameplate Rating: MW

11. Emissions Unit Comment:

EMISSIONS UNIT INFORMATION

Section [4] of [20]

Coal Transfer Baghouse

Emissions Unit Control Equipment/Method: Control 1 of 1

1. Control Equipment/Method Description:
Fabric Filter Low Temperature (T<180f)

2. Control Device or Method Code: **18**

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:

2. Control Device or Method Code:

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:

2. Control Device or Method Code:

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:

2. Control Device or Method Code:

EMISSIONS UNIT INFORMATION

Section [4] of [20]

Coal Transfer Baghouse

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate:
2. Maximum Production Rate:
3. Maximum Heat Input Rate: million Btu/hr
4. Maximum Incineration Rate: pounds/hr tons/day
5. Requested Maximum Operating Schedule: 24 hours/day 7 days/week 52 weeks/year 8760 hours/year
6. Operating Capacity/Schedule Comment:

EMISSIONS UNIT INFORMATION

Section [4] of [20]

Coal Transfer Baghouse

C. EMISSION POINT (STACK/VENT) INFORMATION

(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram:		2. Emission Point Type Code: 2	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code:	6. Stack Height: 10 feet	7. Exit Diameter: 1 feet	
8. Exit Temperature:	9. Actual Volumetric Flow Rate:	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates... Zone: East (km): North (km):		14. Emission Point Latitude/Longitude... Latitude: Longitude:	
15. Emission Point Comment:			

EMISSIONS UNIT INFORMATION

Section [4] of [20]

Coal Transfer Baghouse

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): Material Processed		
2. Source Classification Code (SCC): 3-05-102-03		3. SCC Units: Tons Material Processed
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

Segment Description and Rate: Segment __ of ____

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

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: PM/PM10		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 8.25 lb/hour 36.2 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.02 gr/acf Reference: Permit Limit		7. Emissions Method Code: 3	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: $\text{Lb/hr} = 48,154 \text{ (acfm)} \times 0.02 \text{ (gr/acf)} \times 60 \text{ (min/hr)} / 7,000 \text{ (gr/lb)} = 8.25 \text{ lb/hr}$ $\text{TPY} = 48,154 \text{ (acfm)} \times 0.02 \text{ (gr/acf)} \times 60 \text{ (min/hr)} / 7,000 \text{ (gr/lb)} \times 8,760 \text{ (hr/yr)} / 2,000 \text{ lb/ton} = 36.156 \text{ ton/yr}$			
11. Potential, Fugitive, and Actual Emissions Comment: ACFM based on vendor design rate.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
 ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.02 gr/acf	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

Section [4] of [20]

Coal Transfer Baghouse

G. VISIBLE EMISSIONS INFORMATION

Complete Subsection G if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE05	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: 5 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

Visible Emissions Limitation: Visible Emissions Limitation __ of __

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

EMISSIONS UNIT INFORMATION

Section [4] of [20]

Coal Transfer Baghouse

H. CONTINUOUS MONITOR INFORMATION

Complete Subsection H if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

EMISSIONS UNIT INFORMATION

Section [4] of [20]

Coal Transfer Baghouse

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: SEC-FI-C2 <input type="checkbox"/> Previously Submitted, Date _____
2. Fuel Analysis or Specification: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: N/A <input type="checkbox"/> Previously Submitted, Date _____
3. Detailed Description of Control Equipment: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: N/A <input type="checkbox"/> Previously Submitted, Date _____
4. Procedures for Startup and Shutdown: (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable (construction application)
5. Operation and Maintenance Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input type="checkbox"/> Not Applicable
6. Compliance Demonstration Reports/Records: <input checked="" type="checkbox"/> Attached, Document ID: SEC-EU4-I1 Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Previously Submitted, Date: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Not Applicable Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.
7. Other Information Required by Rule or Statute: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

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Coal Crusher Building Baghouse

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for an initial, revised or renewal Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for an air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application - Where this application is used to apply for both an air construction permit and a revised or renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes, and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit addressed in this application that is subject to air construction permitting and for each such emissions unit that is a regulated or unregulated unit for purposes of Title V permitting. (An emissions unit may be exempt from air construction permitting but still be classified as an unregulated unit for Title V purposes.) Emissions units classified as insignificant for Title V purposes are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION

Section [5] of [20]

Coal Crusher Building Baghouse

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:

Coal Crusher Building Baghouse

3. Emissions Unit Identification Number: **005**

4. Emissions Unit Status Code:

A

5. Commence Construction Date:

6. Initial Startup Date:

01-JUL-85

7. Emissions Unit Major Group SIC Code:

49

8. Federal Program Applicability: (Check all that apply)

Acid Rain Unit

CAIR Unit

Hg Budget Unit

9. Package Unit:

Manufacturer: Model Number:

10. Generator Nameplate Rating: **MW**

11. Emissions Unit Comment:

EMISSIONS UNIT INFORMATION

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Coal Crusher Building Baghouse

Emissions Unit Control Equipment/Method: Control 1 of 1

1. Control Equipment/Method Description:
Fabric Filter Low Temperature (T<180F)

2. Control Device or Method Code: **18**

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:

2. Control Device or Method Code:

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:

2. Control Device or Method Code:

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:

2. Control Device or Method Code:

EMISSIONS UNIT INFORMATION

Section [5] of [20]

Coal Crusher Building Baghouse

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate:
2. Maximum Production Rate:
3. Maximum Heat Input Rate: million Btu/hr
4. Maximum Incineration Rate: pounds/hr tons/day
5. Requested Maximum Operating Schedule: 24 hours/day 7 days/week 52 weeks/year 8760 hours/year
6. Operating Capacity/Schedule Comment:

EMISSIONS UNIT INFORMATION

Section [5] of [20]

Coal Crusher Building Baghouse

C. EMISSION POINT (STACK/VENT) INFORMATION

(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram:		2. Emission Point Type Code: 2	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code:	6. Stack Height: 10 feet		7. Exit Diameter: 1 feet
8. Exit Temperature:	9. Actual Volumetric Flow Rate:	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates... Zone: East (km): North (km):		14. Emission Point Latitude/Longitude... Latitude: Longitude:	
15. Emission Point Comment:			

EMISSIONS UNIT INFORMATION

Section [5] of [20]

Coal Crusher Building Baghouse

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): Material Processed		
2. Source Classification Code (SCC): 3-05-102-03		3. SCC Units: Tons Material Processed
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

Segment Description and Rate: Segment __ of ____

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

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
 POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: PM/PM10		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 5.75 lb/hour 25.2 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.02 gr/acf Reference: Permit Limit		7. Emissions Method Code: 5	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: $\text{Lb/hr} = 33,557 \text{ (acfm)} \times 0.02 \text{ (gr/acf)} \times 60 \text{ (min/hr)} / 7,000 \text{ (gr/lb)} = 5.75 \text{ lb/hr}$ $\text{TPY} = 33,557 \text{ (acfm)} \times 0.02 \text{ (gr/acf)} \times 60 \text{ (min/hr)} / 7,000 \text{ (gr/lb)} \times 8,760 \text{ (hr/yr)} / 2,000 \text{ lb/ton} = 25.2 \text{ ton/yr}$			
11. Potential, Fugitive, and Actual Emissions Comment: ACFM based on vendor design rate.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
 ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.02 gr/acf	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions of

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions of

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

Section [5] of [20]
Coal Crusher Building Baghouse

G. VISIBLE EMISSIONS INFORMATION

Complete Subsection G if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE05	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: 5 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

Visible Emissions Limitation: Visible Emissions Limitation of

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

EMISSIONS UNIT INFORMATION

Section [5] of [20]
Coal Crusher Building Baghouse

H. CONTINUOUS MONITOR INFORMATION

Complete Subsection H if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

EMISSIONS UNIT INFORMATION

**Section [5] of [20]
Coal Crusher Building Baghouse**

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1.	Process Flow Diagram: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: SEC-FI-C2 <input type="checkbox"/> Previously Submitted, Date _____
2.	Fuel Analysis or Specification: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: N/A <input type="checkbox"/> Previously Submitted, Date _____
3.	Detailed Description of Control Equipment: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: N/A <input type="checkbox"/> Previously Submitted, Date _____
4.	Procedures for Startup and Shutdown: (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable (construction application)
5.	Operation and Maintenance Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable
6.	Compliance Demonstration Reports/Records: <input checked="" type="checkbox"/> Attached, Document ID: SEC-EU4-I1 Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Previously Submitted, Date: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Not Applicable Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.
7.	Other Information Required by Rule or Statute: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

Section [6] of [20]

Coal Plant Transfer and Silo Fill Area #1 Baghouse

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for an initial, revised or renewal Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for an air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application - Where this application is used to apply for both an air construction permit and a revised or renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes, and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit addressed in this application that is subject to air construction permitting and for each such emissions unit that is a regulated or unregulated unit for purposes of Title V permitting. (An emissions unit may be exempt from air construction permitting but still be classified as an unregulated unit for Title V purposes.) Emissions units classified as insignificant for Title V purposes are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION

Section [6] of [20]

Coal Plant Transfer and Silo Fill Area #1 Baghouse

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:

Coal Plant Transfer & Silo Fill Area #1 Baghouse

3. Emissions Unit Identification Number: **006**

4. Emissions Unit Status Code:

A

5. Commence Construction Date:

6. Initial Startup Date:

01-JUL-85

7. Emissions Unit Major Group SIC Code:

49

8. Federal Program Applicability: (Check all that apply)

Acid Rain Unit

CAIR Unit

Hg Budget Unit

9. Package Unit:

Manufacturer: Model Number:

10. Generator Nameplate Rating: **MW**

11. Emissions Unit Comment:

EMISSIONS UNIT INFORMATION

Section [6] of [20]

Coal Plant Transfer and Silo Fill Area #1 Baghouse

Emissions Unit Control Equipment/Method: Control 1 of 1

1. Control Equipment/Method Description:
Fabric Filter Low Temperature (T<180F)

2. Control Device or Method Code: **18**

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:

2. Control Device or Method Code:

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:

2. Control Device or Method Code:

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:

2. Control Device or Method Code:

EMISSIONS UNIT INFORMATION

Section [6] of [20]

Coal Plant Transfer and Silo Fill Area #1 Baghouse

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate:
2. Maximum Production Rate:
3. Maximum Heat Input Rate: million Btu/hr
4. Maximum Incineration Rate: pounds/hr tons/day
5. Requested Maximum Operating Schedule: 24 hours/day 7 days/week 52 weeks/year 8760 hours/year
6. Operating Capacity/Schedule Comment:

EMISSIONS UNIT INFORMATION

Section [6] of [20]

Coal Plant Transfer and Silo Fill Area #1 Baghouse

C. EMISSION POINT (STACK/VENT) INFORMATION

(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram:		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code:	6. Stack Height: 10 feet		7. Exit Diameter: 1 feet
8. Exit Temperature:	9. Actual Volumetric Flow Rate:	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates... Zone: East (km): North (km):		14. Emission Point Latitude/Longitude... Latitude: Longitude:	
15. Emission Point Comment:			

EMISSIONS UNIT INFORMATION

Section [6] of [20]

Coal Plant Transfer and Silo Fill Area #1 Baghouse

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): Material Processed		
2. Source Classification Code (SCC): 3-05-102-03		3. SCC Units: Tons Material Processed
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

Segment Description and Rate: Segment __ of ____

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

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
 POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: PM/PM10		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 13.5 lb/hour 59.3 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.02 gr/acf Reference: Permit Limit		7. Emissions Method Code: 3	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: $\text{Lb/hr} = 79,052 \text{ (acfm)} \times 0.02 \text{ (gr/acf)} \times 60 \text{ (min/hr)} / 7,000 \text{ (gr/lb)} = 13.5 \text{ lb/hr}$ $\text{TPY} = 79,052 \text{ (acfm)} \times 0.02 \text{ (gr/acf)} \times 60 \text{ (min/hr)} / 7,000 \text{ (gr/lb)} \times 8,760 \text{ (hr/yr)} / 2,000 \text{ lb/ton} = 59.3 \text{ ton/yr}$			
11. Potential, Fugitive, and Actual Emissions Comment: ACFM based on vendor design data.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
 ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.02 gr/acf	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

Section [6] of [20]

Coal Plant Transfer and Silo Fill Area #1 Baghouse

G. VISIBLE EMISSIONS INFORMATION

Complete Subsection G if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE05	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: 5 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

Visible Emissions Limitation: Visible Emissions Limitation ___ of ___

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

EMISSIONS UNIT INFORMATION

Section [6] of [20]
Coal Plant Transfer and Silo Fill Area #1 Baghouse

H. CONTINUOUS MONITOR INFORMATION

Complete Subsection H if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

EMISSIONS UNIT INFORMATION

Section [6] of [20]

Coal Plant Transfer and Silo Fill Area #1 Baghouse

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: SEC-FI-C2 <input type="checkbox"/> Previously Submitted, Date _____
2. Fuel Analysis or Specification: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: N/A <input type="checkbox"/> Previously Submitted, Date _____
3. Detailed Description of Control Equipment: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: N/A <input type="checkbox"/> Previously Submitted, Date _____
4. Procedures for Startup and Shutdown: (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable (construction application)
5. Operation and Maintenance Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable
6. Compliance Demonstration Reports/Records: <input checked="" type="checkbox"/> Attached, Document ID: SEC-EU4-I1 Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Previously Submitted, Date: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Not Applicable Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.
7. Other Information Required by Rule or Statute: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

Section [7] of [20]

Coal Plant Transfer and Silo Fill Area #2 Baghouse

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for an initial, revised or renewal Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for an air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application - Where this application is used to apply for both an air construction permit and a revised or renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes, and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit addressed in this application that is subject to air construction permitting and for each such emissions unit that is a regulated or unregulated unit for purposes of Title V permitting. (An emissions unit may be exempt from air construction permitting but still be classified as an unregulated unit for Title V purposes.) Emissions units classified as insignificant for Title V purposes are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION

Section [7] of [20]
Coal Plant Transfer and Silo Fill Area #2 Baghouse

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:
Coal Plant Transfer and Silo Fill Area #2 Baghouse

3. Emissions Unit Identification Number: **007**

4. Emissions Unit Status Code: A	5. Commence Construction Date:	6. Initial Startup Date: 01-JUL-85	7. Emissions Unit Major Group SIC Code: 49
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8. Federal Program Applicability: (Check all that apply)

Acid Rain Unit

CAIR Unit

Hg Budget Unit

9. Package Unit:
Manufacturer: Model Number:

10. Generator Nameplate Rating: **MW**

11. Emissions Unit Comment:

EMISSIONS UNIT INFORMATION

Section [7] of [20]

Coal Plant Transfer and Silo Fill Area #2 Baghouse

Emissions Unit Control Equipment/Method: Control 1 of 1

1. Control Equipment/Method Description:
Fabric Filter Low Temperature (T<180f)

2. Control Device or Method Code: **18**

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:

2. Control Device or Method Code:

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:

2. Control Device or Method Code:

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:

2. Control Device or Method Code:

EMISSIONS UNIT INFORMATION

Section [7] of [20]
Coal Plant Transfer and Silo Fill Area #2 Baghouse

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate:
2. Maximum Production Rate:
3. Maximum Heat Input Rate: million Btu/hr
4. Maximum Incineration Rate: pounds/hr tons/day
5. Requested Maximum Operating Schedule: 24 hours/day 7 days/week 52 weeks/year 8760 hours/year
6. Operating Capacity/Schedule Comment:

EMISSIONS UNIT INFORMATION

Section [7] of [20]

Coal Plant Transfer and Silo Fill Area #2 Baghouse

C. EMISSION POINT (STACK/VENT) INFORMATION

(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram:		2. Emission Point Type Code: 2	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code:	6. Stack Height: 10 feet	7. Exit Diameter: 1 feet	
8. Exit Temperature:	9. Actual Volumetric Flow Rate:	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates... Zone: East (km): North (km):		14. Emission Point Latitude/Longitude... Latitude: Longitude:	
15. Emission Point Comment:			

EMISSIONS UNIT INFORMATION

Section [7] of [20]

Coal Plant Transfer and Silo Fill Area #2 Baghouse

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): Material Processed		
2. Source Classification Code (SCC): 3-05-102-03		3. SCC Units: Tons Material Processed
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

Segment Description and Rate: Segment __ of ____

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

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
 POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: PM/PM10		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 13.55 lb/hour 59.3 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.02 gr/acf Reference: Permit Limit		7. Emissions Method Code: 3	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: $\text{Lb/hr} = 79,052 \text{ (acfm)} \times 0.02 \text{ (gr/acf)} \times 60 \text{ (min/hr)} / 7,000 \text{ (gr/lb)} = 13.55 \text{ lb/hr}$ $\text{TPY} = 79,052 \text{ (acfm)} \times 0.02 \text{ (gr/acf)} \times 60 \text{ (min/hr)} / 7,000 \text{ (gr/lb)} \times 8,760 \text{ (hr/yr)} / 2,000 \text{ lb/ton} = 59.3 \text{ ton/yr}$			
11. Potential, Fugitive, and Actual Emissions Comment: ACFM based on vendor design rate.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
 ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions **1** of **1**

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.02 gr/acf	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ___ of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ___ of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

Section [7] of [20]
Coal Plant Transfer and Silo Fill Area #2 Baghouse

G. VISIBLE EMISSIONS INFORMATION

Complete Subsection G if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE05	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: 5 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

Visible Emissions Limitation: Visible Emissions Limitation __ of __

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

EMISSIONS UNIT INFORMATION

Section [7] of [20]

Coal Plant Transfer and Silo Fill Area #2 Baghouse

H. CONTINUOUS MONITOR INFORMATION

Complete Subsection H if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

EMISSIONS UNIT INFORMATION

Section [7] of [20]

Coal Plant Transfer and Silo Fill Area #2 Baghouse

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: SEC-FI-C2 <input type="checkbox"/> Previously Submitted, Date _____
2. Fuel Analysis or Specification: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: N/A <input type="checkbox"/> Previously Submitted, Date _____
3. Detailed Description of Control Equipment: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: N/A <input type="checkbox"/> Previously Submitted, Date _____
4. Procedures for Startup and Shutdown: (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable (construction application)
5. Operation and Maintenance Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable
6. Compliance Demonstration Reports/Records: <input checked="" type="checkbox"/> Attached, Document ID: SEC-EU4-I1 Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Previously Submitted, Date: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Not Applicable Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.
7. Other Information Required by Rule or Statute: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

Section [8] of [20]

Limestone Day Bin Baghouse

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for an initial, revised or renewal Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for an air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application - Where this application is used to apply for both an air construction permit and a revised or renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes, and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit addressed in this application that is subject to air construction permitting and for each such emissions unit that is a regulated or unregulated unit for purposes of Title V permitting. (An emissions unit may be exempt from air construction permitting but still be classified as an unregulated unit for Title V purposes.) Emissions units classified as insignificant for Title V purposes are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION

Section [8] of [20]

Limestone Day Bin Baghouse

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:

Limestone Day Bin Baghouse

3. Emissions Unit Identification Number: **008**

4. Emissions Unit Status Code:

A

5. Commence Construction Date:

6. Initial Startup Date:

01-JUL-85

7. Emissions Unit Major Group SIC Code:

49

8. Federal Program Applicability: (Check all that apply)

Acid Rain Unit

CAIR Unit

Hg Budget Unit

9. Package Unit:

Manufacturer: Model Number:

10. Generator Nameplate Rating: **MW**

11. Emissions Unit Comment:

EMISSIONS UNIT INFORMATION

Section [8] of [20]

Limestone Day Bin Baghouse

Emissions Unit Control Equipment/Method: Control 1 of 1

1. Control Equipment/Method Description:
Fabric Filter Low Temperature (T>250F)

2. Control Device or Method Code: **18**

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:

2. Control Device or Method Code:

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:

2. Control Device or Method Code:

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:

2. Control Device or Method Code:

EMISSIONS UNIT INFORMATION

Section [8] of [20]

Limestone Day Bin Baghouse

C. EMISSION POINT (STACK/VENT) INFORMATION

(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram:		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code:		6. Stack Height: 10 feet	7. Exit Diameter: 1 feet
8. Exit Temperature:		9. Actual Volumetric Flow Rate:	10. Water Vapor: %
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates... Zone: East (km): North (km):		14. Emission Point Latitude/Longitude... Latitude: Longitude:	
15. Emission Point Comment:			

EMISSIONS UNIT INFORMATION

Section [8] of [20]

Limestone Day Bin Baghouse

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): Material Processed		
2. Source Classification Code (SCC): 3-05-102-05		3. SCC Units: Tons Material Processed
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

Segment Description and Rate: Segment __ of ____

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

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: PM/PM10		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 3.93 lb/hour 17.2 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.02 gr/acf Reference: Permit Limit		7. Emissions Method Code: 3	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: Lb/hr = 22,930 (acfm) x 0.02 (gr/acf) x 60 (min/hr) / 7,000 (gr/lb) = 3.93 lb/hr TPY = 79,052 (acfm) x 0.02 (gr/acf) x 60 (min/hr) / 7,000 (gr/lb) x 8,760 (hr/yr) / 2,000 lb/ton = 17.2 ton/yr			
11. Potential, Fugitive, and Actual Emissions Comment: ACFM based on vendor design rate.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.02 gr/acf	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

Section [8] of [20]
Limestone Day Bin Baghouse

G. VISIBLE EMISSIONS INFORMATION

Complete Subsection G if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE05	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: 5 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

Visible Emissions Limitation: Visible Emissions Limitation __ of __

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

EMISSIONS UNIT INFORMATION

Section [8] of [20]

Limestone Day Bin Baghouse

H. CONTINUOUS MONITOR INFORMATION

Complete Subsection H if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

EMISSIONS UNIT INFORMATION

Section [8] of [20]

Limestone Day Bin Baghouse

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: SEC-FI-C2 <input type="checkbox"/> Previously Submitted, Date _____
2. Fuel Analysis or Specification: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: N/A <input type="checkbox"/> Previously Submitted, Date _____
3. Detailed Description of Control Equipment: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: N/A <input type="checkbox"/> Previously Submitted, Date _____
4. Procedures for Startup and Shutdown: (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable (construction application)
5. Operation and Maintenance Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input type="checkbox"/> Not Applicable
6. Compliance Demonstration Reports/Records: <input checked="" type="checkbox"/> Attached, Document ID: SEC-EU4-I5 Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Previously Submitted, Date: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Not Applicable Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.
7. Other Information Required by Rule or Statute: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

Section [9] of [20]
Pebble Lime Receiving Hopper Baghouse

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for an initial, revised or renewal Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for an air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application - Where this application is used to apply for both an air construction permit and a revised or renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes, and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit addressed in this application that is subject to air construction permitting and for each such emissions unit that is a regulated or unregulated unit for purposes of Title V permitting. (An emissions unit may be exempt from air construction permitting but still be classified as an unregulated unit for Title V purposes.) Emissions units classified as insignificant for Title V purposes are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION
Section [9] of [20]
Pebble Lime Receiving Hopper Baghouse

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:
Pebble Lime Receiving Hopper Baghouse

3. Emissions Unit Identification Number: **009**

4. Emissions Unit Status Code: A	5. Commence Construction Date:	6. Initial Startup Date: 01-JUL-85	7. Emissions Unit Major Group SIC Code: 49
--	--------------------------------	--	--

8. Federal Program Applicability: (Check all that apply)

Acid Rain Unit

CAIR Unit

Hg Budget Unit

9. Package Unit:
 Manufacturer: Model Number:

10. Generator Nameplate Rating: **MW**

11. Emissions Unit Comment:

EMISSIONS UNIT INFORMATION
Section [9] of [20]
Pebble Lime Receiving Hopper Baghouse

Emissions Unit Control Equipment/Method: Control 1 of 1

- | |
|--|
| 1. Control Equipment/Method Description:
Fabric Filter Low Temperature (T<180F) |
| 2. Control Device or Method Code: 18 |

Emissions Unit Control Equipment/Method: Control ___ of ___

- | |
|--|
| 1. Control Equipment/Method Description: |
| 2. Control Device or Method Code: |

Emissions Unit Control Equipment/Method: Control ___ of ___

- | |
|--|
| 1. Control Equipment/Method Description: |
| 2. Control Device or Method Code: |

Emissions Unit Control Equipment/Method: Control ___ of ___

- | |
|--|
| 1. Control Equipment/Method Description: |
| 2. Control Device or Method Code: |

EMISSIONS UNIT INFORMATION

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Pebble Lime Receiving Hopper Baghouse

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate:
2. Maximum Production Rate:
3. Maximum Heat Input Rate: million Btu/hr
4. Maximum Incineration Rate: pounds/hr tons/day
5. Requested Maximum Operating Schedule: 24 hours/day 7 days/week 52 weeks/year 8760 hours/year
6. Operating Capacity/Schedule Comment:

EMISSIONS UNIT INFORMATION

Section [9] of [20]
Pebble Lime Receiving Hopper Baghouse

C. EMISSION POINT (STACK/VENT) INFORMATION

(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram:		2. Emission Point Type Code: 2	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code:		6. Stack Height: 10 feet	7. Exit Diameter: 1 feet
8. Exit Temperature:		9. Actual Volumetric Flow Rate:	10. Water Vapor: %
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates... Zone: East (km): North (km):		14. Emission Point Latitude/Longitude... Latitude: Longitude:	
15. Emission Point Comment:			

EMISSIONS UNIT INFORMATION

Section [9] of [20]
Pebble Lime Receiving Hopper Baghouse

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): Material Processed		
2. Source Classification Code (SCC): 3-05-102-03		3. SCC Units: Tons Material Processed
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

Segment Description and Rate: Segment __ of ____

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

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
 POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: PM/PM10		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 3.93 lb/hour 17.2 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.02 gr/acf Reference: Permit Limit		7. Emissions Method Code: 3	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: $\text{Lb/hr} = 22,930 \text{ (acfm)} \times 0.02 \text{ (gr/acf)} \times 60 \text{ (min/hr)} / 7,000 \text{ (gr/lb)} = 3.93 \text{ lb/hr}$ $\text{TPY} = 79,052 \text{ (acfm)} \times 0.02 \text{ (gr/acf)} \times 60 \text{ (min/hr)} / 7,000 \text{ (gr/lb)} \times 8,760 \text{ (hr/yr)} / 2,000 \text{ lb/ton} = 17.2 \text{ ton/yr}$			
11. Potential, Fugitive, and Actual Emissions Comment: ACFM based on vendor design rate.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
 ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.02 gr/acf	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION
Section [9] of [20]
Pebble Lime Receiving Hopper Baghouse

G. VISIBLE EMISSIONS INFORMATION

Complete Subsection G if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE05	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: 5 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

Visible Emissions Limitation: Visible Emissions Limitation __ of __

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

EMISSIONS UNIT INFORMATION
 Section [9] of [20]
 Pebble Lime Receiving Hopper Baghouse

H. CONTINUOUS MONITOR INFORMATION

Complete Subsection H if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor ___ of ___

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor ___ of ___

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor ___ of ___

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

EMISSIONS UNIT INFORMATION

**Section [9] of [20]
Pebble Lime Receiving Hopper Baghouse**

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: SEC-FI-C2 <input type="checkbox"/> Previously Submitted, Date _____
2. Fuel Analysis or Specification: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: N/A <input type="checkbox"/> Previously Submitted, Date _____
3. Detailed Description of Control Equipment: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: N/A <input type="checkbox"/> Previously Submitted, Date _____
4. Procedures for Startup and Shutdown: (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable (construction application)
5. Operation and Maintenance Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input type="checkbox"/> Not Applicable
6. Compliance Demonstration Reports/Records: <input checked="" type="checkbox"/> Attached, Document ID: SEC-EU4-I1 Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Previously Submitted, Date: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Not Applicable Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.
7. Other Information Required by Rule or Statute: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

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Coal Reclaim Hopper Baghouse

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for an initial, revised or renewal Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for an air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application - Where this application is used to apply for both an air construction permit and a revised or renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes, and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit addressed in this application that is subject to air construction permitting and for each such emissions unit that is a regulated or unregulated unit for purposes of Title V permitting. (An emissions unit may be exempt from air construction permitting but still be classified as an unregulated unit for Title V purposes.) Emissions units classified as insignificant for Title V purposes are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION

Section [10] of [20]
Coal Reclaim Hopper Baghouse

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:

Coal Reclaim Hopper Baghouse

3. Emissions Unit Identification Number: **010**

4. Emissions Unit Status Code:

A

5. Commence Construction Date:

6. Initial Startup Date:

01-JUL-85

7. Emissions Unit Major Group SIC Code:

49

8. Federal Program Applicability: (Check all that apply)

Acid Rain Unit

CAIR Unit

Hg Budget Unit

9. Package Unit:

Manufacturer: Model Number:

10. Generator Nameplate Rating: MW

11. Emissions Unit Comment:

EMISSIONS UNIT INFORMATION

Section [10] of [20]

Coal Reclaim Hopper Baghouse

Emissions Unit Control Equipment/Method: Control 1 of 1

- | |
|--|
| 1. Control Equipment/Method Description:
Fabric Filter Low Temperature (T<180F) |
| 2. Control Device or Method Code: 18 |

Emissions Unit Control Equipment/Method: Control ___ of ___

- | |
|--|
| 1. Control Equipment/Method Description: |
| 2. Control Device or Method Code: |

Emissions Unit Control Equipment/Method: Control ___ of ___

- | |
|--|
| 1. Control Equipment/Method Description: |
| 2. Control Device or Method Code: |

Emissions Unit Control Equipment/Method: Control ___ of ___

- | |
|--|
| 1. Control Equipment/Method Description: |
| 2. Control Device or Method Code: |

EMISSIONS UNIT INFORMATION

Section [10] of [20]

Coal Reclaim Hopper Baghouse

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate:
2. Maximum Production Rate:
3. Maximum Heat Input Rate: million Btu/hr
4. Maximum Incineration Rate: pounds/hr tons/day
5. Requested Maximum Operating Schedule: 24 hours/day 52 weeks/year 7 days/week 8760 hours/year
6. Operating Capacity/Schedule Comment:

EMISSIONS UNIT INFORMATION

Section [10] of [20]

Coal Reclaim Hopper Baghouse

C. EMISSION POINT (STACK/VENT) INFORMATION

(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram:		2. Emission Point Type Code: 2	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code:		6. Stack Height: 10 feet	7. Exit Diameter: 1 feet
8. Exit Temperature:		9. Actual Volumetric Flow Rate:	10. Water Vapor: %
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates... Zone: East (km): North (km):		14. Emission Point Latitude/Longitude... Latitude: Longitude:	
15. Emission Point Comment:			

EMISSIONS UNIT INFORMATION

Section [10] of [20]

Coal Reclaim Hopper Baghouse

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): Material Processed		
2. Source Classification Code (SCC): 3-05-102-03		3. SCC Units: Tons Material Processed
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

Segment Description and Rate: Segment __ of ____

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

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: PM/PM10		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 8.25 lb/hour 36.16 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.02 gr/acf Reference: Permit Limit		7. Emissions Method Code: 3	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: $\text{Lb/hr} = 48,154 \text{ (acfm)} \times 0.02 \text{ (gr/acf)} \times 60 \text{ (min/hr)} / 7,000 \text{ (gr/lb)} = 8.25 \text{ lb/hr}$ $\text{TPY} = 48,154 \text{ (acfm)} \times 0.02 \text{ (gr/acf)} \times 60 \text{ (min/hr)} / 7,000 \text{ (gr/lb)} \times 8,760 \text{ (hr/yr)} / 2,000 \text{ lb/ton} = 36.16 \text{ ton/yr}$			
11. Potential, Fugitive, and Actual Emissions Comment: ACFM based on vendor design rate.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.02 gr/acf	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

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Coal Reclaim Hopper Baghouse

G. VISIBLE EMISSIONS INFORMATION

Complete Subsection G if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE05	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: 5 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

Visible Emissions Limitation: Visible Emissions Limitation __ of ____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

EMISSIONS UNIT INFORMATION

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Coal Reclaim Hopper Baghouse

H. CONTINUOUS MONITOR INFORMATION

Complete Subsection H if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

EMISSIONS UNIT INFORMATION

Section [10] of [20]

Coal Reclaim Hopper Baghouse

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: SEC-FI-C2 <input type="checkbox"/> Previously Submitted, Date _____
2. Fuel Analysis or Specification: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: N/A <input type="checkbox"/> Previously Submitted, Date _____
3. Detailed Description of Control Equipment: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: N/A <input type="checkbox"/> Previously Submitted, Date _____
4. Procedures for Startup and Shutdown: (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable (construction application)
5. Operation and Maintenance Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable
6. Compliance Demonstration Reports/Records: <input checked="" type="checkbox"/> Attached, Document ID: SEC-EU4-11 Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Previously Submitted, Date: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Not Applicable Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.
7. Other Information Required by Rule or Statute: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

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Flyash Exhaust Filter #1 Baghouse

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for an initial, revised or renewal Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for an air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application - Where this application is used to apply for both an air construction permit and a revised or renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes, and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit addressed in this application that is subject to air construction permitting and for each such emissions unit that is a regulated or unregulated unit for purposes of Title V permitting. (An emissions unit may be exempt from air construction permitting but still be classified as an unregulated unit for Title V purposes.) Emissions units classified as insignificant for Title V purposes are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION

Section [11] of [20]
Flyash Exhaust Filter #1 Baghouse

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

- The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.
- The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

- This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).
- This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.
- This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:
Flyash Exhaust Filter #1 Baghouse

3. Emissions Unit Identification Number: **011**

4. Emissions Unit Status Code: A	5. Commence Construction Date:	6. Initial Startup Date: 01-JUL-85	7. Emissions Unit Major Group SIC Code: 49
--	--------------------------------	--	--

8. Federal Program Applicability: (Check all that apply)

- Acid Rain Unit
- CAIR Unit
- Hg Budget Unit

9. Package Unit:
Manufacturer: Model Number:

10. Generator Nameplate Rating: MW

11. Emissions Unit Comment:

EMISSIONS UNIT INFORMATION

Section [11] of [20]
Flyash Exhaust Filter #1 Baghouse

Emissions Unit Control Equipment/Method: Control 1 of 1

1. Control Equipment/Method Description: Fabric Filter Low Temperature (T<180F)
2. Control Device or Method Code: 18

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:
2. Control Device or Method Code:

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:
2. Control Device or Method Code:

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:
2. Control Device or Method Code:

EMISSIONS UNIT INFORMATION

Section [11] of [20]
Flyash Exhaust Filter #1 Baghouse

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate:
2. Maximum Production Rate:
3. Maximum Heat Input Rate: million Btu/hr
4. Maximum Incineration Rate: pounds/hr tons/day
5. Requested Maximum Operating Schedule: 24 hours/day 7 days/week 52 weeks/year 8760 hours/year
6. Operating Capacity/Schedule Comment:

EMISSIONS UNIT INFORMATION

Section [11] of [20]
Flyash Exhaust Filter #1 Baghouse

C. EMISSION POINT (STACK/VENT) INFORMATION

(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram:		2. Emission Point Type Code: 2
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:		
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:		
5. Discharge Type Code:	6. Stack Height: 10 feet	7. Exit Diameter: 1 feet
8. Exit Temperature:	9. Actual Volumetric Flow Rate:	10. Water Vapor: %
11. Maximum Dry Standard Flow Rate: dscfm	12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates... Zone: East (km): North (km):	14. Emission Point Latitude/Longitude... Latitude: Longitude:	
15. Emission Point Comment:		

EMISSIONS UNIT INFORMATION

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Flyash Exhaust Filter #1 Baghouse

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): Material Processed		
2. Source Classification Code (SCC): 3-05-102-03		3. SCC Units: Tons Material Processed
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

Segment Description and Rate: Segment __ of ____

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

EMISSIONS UNIT INFORMATION

POLLUTANT DETAIL INFORMATION

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Flyash Exhaust Filter #1 Baghouse

Page [1] of [1]

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: PM/PM10		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 0.35 lb/hour 1.6 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.02 gr/acf Reference: Permit Limit		7. Emissions Method Code: 3	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: $\text{Lb/hr} = 2,090 \text{ (acfm)} \times 0.02 \text{ (gr/acf)} \times 60 \text{ (min/hr)} / 7,000 \text{ (gr/lb)} = 0.358 \text{ lb/hr}$ $\text{TPY} = 48,154 \text{ (acfm)} \times 0.02 \text{ (gr/acf)} \times 60 \text{ (min/hr)} / 7,000 \text{ (gr/lb)} \times 8,760 \text{ (hr/yr)} / 2,000 \text{ lb/ton} = 1.569 \text{ ton/yr}$			
11. Potential, Fugitive, and Actual Emissions Comment: ACFM based on vendor design rate.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.02 gr/acf	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

Section [11] of [20]
Flyash Exhaust Filter #1 Baghouse

G. VISIBLE EMISSIONS INFORMATION

Complete Subsection G if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE05	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: 5 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

Visible Emissions Limitation: Visible Emissions Limitation of

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

EMISSIONS UNIT INFORMATION

Section [11] of [20]
Flyash Exhaust Filter #1 Baghouse

H. CONTINUOUS MONITOR INFORMATION

Complete Subsection H if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

EMISSIONS UNIT INFORMATION

Section [11] of [20]
Flyash Exhaust Filter #1 Baghouse

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: SEC-FI-C2 <input type="checkbox"/> Previously Submitted, Date _____
2. Fuel Analysis or Specification: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: N/A <input type="checkbox"/> Previously Submitted, Date _____
3. Detailed Description of Control Equipment: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: N/A <input type="checkbox"/> Previously Submitted, Date _____
4. Procedures for Startup and Shutdown: (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable (construction application)
5. Operation and Maintenance Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable
6. Compliance Demonstration Reports/Records: <input checked="" type="checkbox"/> Attached, Document ID: SEC-EU4-I1 Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Previously Submitted, Date: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Not Applicable Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.
7. Other Information Required by Rule or Statute: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

Section [12] of [20]
Flyash Exhaust Filter #2 Baghouse

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for an initial, revised or renewal Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for an air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application - Where this application is used to apply for both an air construction permit and a revised or renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes, and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit addressed in this application that is subject to air construction permitting and for each such emissions unit that is a regulated or unregulated unit for purposes of Title V permitting. (An emissions unit may be exempt from air construction permitting but still be classified as an unregulated unit for Title V purposes.) Emissions units classified as insignificant for Title V purposes are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION

Section [12] of [20]
Flyash Exhaust Filter #2 Baghouse

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:
Flyash Exhaust Filter #2 Baghouse

3. Emissions Unit Identification Number: **012**

4. Emissions Unit Status Code: A	5. Commence Construction Date:	6. Initial Startup Date: 01-JUL-85	7. Emissions Unit Major Group SIC Code: 49
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8. Federal Program Applicability: (Check all that apply)

Acid Rain Unit

CAIR Unit

Hg Budget Unit

9. Package Unit:
Manufacturer: Model Number:

10. Generator Nameplate Rating: **MW**

11. Emissions Unit Comment:

EMISSIONS UNIT INFORMATION

Section [12] of [20]
Flyash Exhaust Filter #2 Baghouse

Emissions Unit Control Equipment/Method: Control 1 of 1

1. Control Equipment/Method Description: Fabric Filter Low Temperature (T<180F)
2. Control Device or Method Code: 18

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:
2. Control Device or Method Code:

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:
2. Control Device or Method Code:

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:
2. Control Device or Method Code:

EMISSIONS UNIT INFORMATION

Section [12] of [20]
Flyash Exhaust Filter #2 Baghouse

B. EMISSIONS UNIT CAPACITY INFORMATION
(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate:
2. Maximum Production Rate:
3. Maximum Heat Input Rate: million Btu/hr
4. Maximum Incineration Rate: pounds/hr tons/day
5. Requested Maximum Operating Schedule: 24 hours/day 7 days/week 52 weeks/year 8760 hours/year
6. Operating Capacity/Schedule Comment:

EMISSIONS UNIT INFORMATION

Section [12] of [20]
 Flyash Exhaust Filter #2 Baghouse

C. EMISSION POINT (STACK/VENT) INFORMATION

(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram:		2. Emission Point Type Code: 2	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code:	6. Stack Height: 10 feet	7. Exit Diameter: 1 feet	
8. Exit Temperature:	9. Actual Volumetric Flow Rate:	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates... Zone: East (km): North (km):		14. Emission Point Latitude/Longitude... Latitude: Longitude:	
15. Emission Point Comment:			

EMISSIONS UNIT INFORMATION

Section [12] of [20]
Flyash Exhaust Filter #2 Baghouse

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): Material Processed		
2. Source Classification Code (SCC): 3-05-102-03		3. SCC Units: Tons Material Processed
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

Segment Description and Rate: Segment of

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

EMISSIONS UNIT INFORMATION

Section [12] of [20]
 Flyash Exhaust Filter #2 Baghouse

POLLUTANT DETAIL INFORMATION

Page [1] of [1]

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
 POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: PM/PM10		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 0.35 lb/hour 1.56 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.02 gr/acf Reference: Permit Limit		7. Emissions Method Code: 3	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: $L \text{ Lb/hr} = 2,090 \text{ (acfm)} \times 0.02 \text{ (gr/acf)} \times 60 \text{ (min/hr)} / 7,000 \text{ (gr/lb)} = 0.358 \text{ lb/hr}$ $TPY = 2,090 \text{ (acfm)} \times 0.02 \text{ (gr/acf)} \times 60 \text{ (min/hr)} / 7,000 \text{ (gr/lb)} \times 8,760 \text{ (hr/yr)} / 2,000 \text{ lb/ton} = 1.569 \text{ ton/yr}$			
11. Potential, Fugitive, and Actual Emissions Comment: ACFM based on vendor design rate.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.02 gr/acf	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

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Flyash Exhaust Filter #2 Baghouse

G. VISIBLE EMISSIONS INFORMATION

Complete Subsection G if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE05	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: 5 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

Visible Emissions Limitation: Visible Emissions Limitation ___ of ___

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

EMISSIONS UNIT INFORMATION

Section [12] of [20]
Flyash Exhaust Filter #2 Baghouse

H. CONTINUOUS MONITOR INFORMATION

Complete Subsection H if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

EMISSIONS UNIT INFORMATION
Section [12] of [20]
Flyash Exhaust Filter #2 Baghouse

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1.	Process Flow Diagram: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: SEC-FI-C2 <input type="checkbox"/> Previously Submitted, Date _____
2.	Fuel Analysis or Specification: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: N/A <input type="checkbox"/> Previously Submitted, Date _____
3.	Detailed Description of Control Equipment: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: N/A <input type="checkbox"/> Previously Submitted, Date _____
4.	Procedures for Startup and Shutdown: (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable (construction application)
5.	Operation and Maintenance Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable
6.	Compliance Demonstration Reports/Records: <input checked="" type="checkbox"/> Attached, Document ID: SEC-EU4-I1 Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Previously Submitted, Date: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Not Applicable Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.
7.	Other Information Required by Rule or Statute: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

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Flyash Exhaust Filter #3 Baghouse

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for an initial, revised or renewal Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for an air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application - Where this application is used to apply for both an air construction permit and a revised or renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes, and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit addressed in this application that is subject to air construction permitting and for each such emissions unit that is a regulated or unregulated unit for purposes of Title V permitting. (An emissions unit may be exempt from air construction permitting but still be classified as an unregulated unit for Title V purposes.) Emissions units classified as insignificant for Title V purposes are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION

Section [13] of [20]
Flyash Exhaust Filter #3 Baghouse

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

- The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.
- The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

- This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).
- This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.
- This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:
Flyash Exhaust Filter #3 Baghouse

3. Emissions Unit Identification Number: **013**

4. Emissions Unit Status Code: A	5. Commence Construction Date:	6. Initial Startup Date: 01-JUL-85	7. Emissions Unit Major Group SIC Code: 49
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8. Federal Program Applicability: (Check all that apply)

- Acid Rain Unit
- CAIR Unit
- Hg Budget Unit

9. Package Unit:
Manufacturer: Model Number:

10. Generator Nameplate Rating: **MW**

11. Emissions Unit Comment:

EMISSIONS UNIT INFORMATION

Section [13] of [20]
Flyash Exhaust Filter #3 Baghouse

Emissions Unit Control Equipment/Method: Control 1 of 1

- | |
|--|
| 1. Control Equipment/Method Description:
Fabric Filter Low Temperature (T<180F) |
| 2. Control Device or Method Code: 18 |

Emissions Unit Control Equipment/Method: Control ___ of ___

- | |
|--|
| 1. Control Equipment/Method Description: |
| 2. Control Device or Method Code: |

Emissions Unit Control Equipment/Method: Control ___ of ___

- | |
|--|
| 1. Control Equipment/Method Description: |
| 2. Control Device or Method Code: |

Emissions Unit Control Equipment/Method: Control ___ of ___

- | |
|--|
| 1. Control Equipment/Method Description: |
| 2. Control Device or Method Code: |

EMISSIONS UNIT INFORMATION**Section [13] of [20]
Flyash Exhaust Filter #3 Baghouse****C. EMISSION POINT (STACK/VENT) INFORMATION****(Optional for unregulated emissions units.)****Emission Point Description and Type**

1. Identification of Point on Plot Plan or Flow Diagram:		2. Emission Point Type Code: 2			
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:					
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:					
5. Discharge Type Code:		6. Stack Height: 10 feet		7. Exit Diameter: 1 feet	
8. Exit Temperature:		9. Actual Volumetric Flow Rate:		10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm			12. Nonstack Emission Point Height: feet		
13. Emission Point UTM Coordinates... Zone: East (km): North (km):			14. Emission Point Latitude/Longitude... Latitude: Longitude:		
15. Emission Point Comment:					

EMISSIONS UNIT INFORMATION

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Flyash Exhaust Filter #3 Baghouse

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): Material Processed		
2. Source Classification Code (SCC): 3-05-102-03		3. SCC Units: Tons Material Processed
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

Segment Description and Rate: Segment __ of ____

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

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: PM/PM10	2. Total Percent Efficiency of Control:
3. Potential Emissions: 0.35 lb/hour 1.56 tons/year	4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: 0.02 gr/acf Reference: Permit Limit	7. Emissions Method Code: 3
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-month Period: From: To:
9.a. Projected Actual Emissions (if required): tons/year	9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years
10. Calculation of Emissions: L Lb/hr = 2,090 (acfm) x 0.02 (gr/acf) x 60 (min/hr) / 7,000 (gr/lb) = 0.358 lb/hr TPY = 2,090 (acfm) x 0.02 (gr/acf) x 60 (min/hr) / 7,000 (gr/lb) x 8,760 (hr/yr) / 2,000 lb/ton = 1.569 ton/yr	
11. Potential, Fugitive, and Actual Emissions Comment: ACFM based on vendor design rate.	

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

Table with 6 rows: 1. Basis for Allowable Emissions Code: RULE; 2. Future Effective Date of Allowable Emissions; 3. Allowable Emissions and Units: 0.02 gr/acf; 4. Equivalent Allowable Emissions: lb/hour, tons/year; 5. Method of Compliance; 6. Allowable Emissions Comment (Description of Operating Method):

Allowable Emissions Allowable Emissions ___ of ___

Table with 6 rows: 1. Basis for Allowable Emissions Code; 2. Future Effective Date of Allowable Emissions; 3. Allowable Emissions and Units; 4. Equivalent Allowable Emissions: lb/hour, tons/year; 5. Method of Compliance; 6. Allowable Emissions Comment (Description of Operating Method):

Allowable Emissions Allowable Emissions ___ of ___

Table with 6 rows: 1. Basis for Allowable Emissions Code; 2. Future Effective Date of Allowable Emissions; 3. Allowable Emissions and Units; 4. Equivalent Allowable Emissions: lb/hour, tons/year; 5. Method of Compliance; 6. Allowable Emissions Comment (Description of Operating Method):

EMISSIONS UNIT INFORMATION

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Flyash Exhaust Filter #3 Baghouse

G. VISIBLE EMISSIONS INFORMATION

Complete Subsection G if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE05	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: 5 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

Visible Emissions Limitation: Visible Emissions Limitation __ of ____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

EMISSIONS UNIT INFORMATION

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Flyash Exhaust Filter #3 Baghouse

H. CONTINUOUS MONITOR INFORMATION

Complete Subsection H if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor ___ of ___

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor ___ of ___

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor ___ of ___

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

EMISSIONS UNIT INFORMATION

Section [13] of [20]
Flyash Exhaust Filter #3 Baghouse

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1.	Process Flow Diagram: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: SEC-FI-C2 <input type="checkbox"/> Previously Submitted, Date _____
2.	Fuel Analysis or Specification: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: N/A <input type="checkbox"/> Previously Submitted, Date _____
3.	Detailed Description of Control Equipment: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: N/A <input type="checkbox"/> Previously Submitted, Date _____
4.	Procedures for Startup and Shutdown: (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable (construction application)
5.	Operation and Maintenance Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input type="checkbox"/> Not Applicable
6.	Compliance Demonstration Reports/Records: <input checked="" type="checkbox"/> Attached, Document ID: SEC-EU4-I1 Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Previously Submitted, Date: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Not Applicable Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.
7.	Other Information Required by Rule or Statute: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

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Flyash Exhaust Filter #4 Baghouse

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for an initial, revised or renewal Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for an air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application - Where this application is used to apply for both an air construction permit and a revised or renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes, and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit addressed in this application that is subject to air construction permitting and for each such emissions unit that is a regulated or unregulated unit for purposes of Title V permitting. (An emissions unit may be exempt from air construction permitting but still be classified as an unregulated unit for Title V purposes.) Emissions units classified as insignificant for Title V purposes are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION

Section [14] of [20]
Flyash Exhaust Filter #4 Baghouse

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

- The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.
- The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

- This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).
- This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.
- This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:

Flyash Exhaust Filter #4 Baghouse

3. Emissions Unit Identification Number: **014**

4. Emissions Unit Status Code: A	5. Commence Construction Date:	6. Initial Startup Date: 01-JUL-85	7. Emissions Unit Major Group SIC Code: 49
--	--------------------------------	--	--

8. Federal Program Applicability: (Check all that apply)

- Acid Rain Unit
- CAIR Unit
- Hg Budget Unit

9. Package Unit:

Manufacturer: Model Number:

10. Generator Nameplate Rating: **MW**

11. Emissions Unit Comment:

EMISSIONS UNIT INFORMATION

Section [14] of [20]
Flyash Exhaust Filter #4 Baghouse

Emissions Unit Control Equipment/Method: Control 1 of 1

1. Control Equipment/Method Description:
Fabric Filter Low Temperature (T<180F)

2. Control Device or Method Code: **18**

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:

2. Control Device or Method Code:

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:

2. Control Device or Method Code:

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:

2. Control Device or Method Code:

EMISSIONS UNIT INFORMATIONSection [14] of [20]
Flyash Exhaust Filter #4 Baghouse**C. EMISSION POINT (STACK/VENT) INFORMATION**
(Optional for unregulated emissions units.)**Emission Point Description and Type**

1. Identification of Point on Plot Plan or Flow Diagram:		2. Emission Point Type Code: 2			
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:					
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:					
5. Discharge Type Code:		6. Stack Height: 10 feet		7. Exit Diameter: 1 feet	
8. Exit Temperature:		9. Actual Volumetric Flow Rate:		10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm			12. Nonstack Emission Point Height: feet		
13. Emission Point UTM Coordinates... Zone: East (km): North (km):			14. Emission Point Latitude/Longitude... Latitude: Longitude:		
15. Emission Point Comment:					

EMISSIONS UNIT INFORMATION

**Section [14] of [20]
Flyash Exhaust Filter #4 Baghouse**

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): Material Processed		
2. Source Classification Code (SCC): 3-05-102-03		3. SCC Units: Tons Material Processed
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

Segment Description and Rate: Segment of

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

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: PM/PM10		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 0.35 lb/hour 1.56 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.02 gr/acf Reference: Permit Limit		7. Emissions Method Code: 3	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: Lb/hr = 2,090 (acfm) x 0.02 (gr/acf) x 60 (min/hr) / 7,000 (gr/lb) = 0.358 lb/hr TPY = 2,090 (acfm) x 0.02 (gr/acf) x 60 (min/hr) / 7,000 (gr/lb) x 8,760 (hr/yr) / 2,000 lb/ton = 1.569 ton/yr			
11. Potential, Fugitive, and Actual Emissions Comment: ACFM based on vendor design rate.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.02 gr/acf	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

Section [14] of [20]
Flyash Exhaust Filter #4 Baghouse

G. VISIBLE EMISSIONS INFORMATION

Complete Subsection G if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE05	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: 5 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

Visible Emissions Limitation: Visible Emissions Limitation __ of __

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

EMISSIONS UNIT INFORMATION

**Section [14] of [20]
Flyash Exhaust Filter #4 Baghouse**

H. CONTINUOUS MONITOR INFORMATION

Complete Subsection H if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

EMISSIONS UNIT INFORMATION

**Section [14] of [20]
Flyash Exhaust Filter #4 Baghouse**

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: SEC-FI-C2 <input type="checkbox"/> Previously Submitted, Date _____
2. Fuel Analysis or Specification: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: N/A <input type="checkbox"/> Previously Submitted, Date _____
3. Detailed Description of Control Equipment: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: N/A <input type="checkbox"/> Previously Submitted, Date _____
4. Procedures for Startup and Shutdown: (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable (construction application)
5. Operation and Maintenance Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable
6. Compliance Demonstration Reports/Records: <input checked="" type="checkbox"/> Attached, Document ID: SEC-EU4-I1 Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Previously Submitted, Date: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Not Applicable Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.
7. Other Information Required by Rule or Statute: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

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Flyash Silo Bin Vent Filter Baghouse

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for an initial, revised or renewal Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for an air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application - Where this application is used to apply for both an air construction permit and a revised or renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes, and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit addressed in this application that is subject to air construction permitting and for each such emissions unit that is a regulated or unregulated unit for purposes of Title V permitting. (An emissions unit may be exempt from air construction permitting but still be classified as an unregulated unit for Title V purposes.) Emissions units classified as insignificant for Title V purposes are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION

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Flyash Silo Bin Vent Filter Baghouse

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:

Flyash Silo Bin Vent Filter Baghouse

3. Emissions Unit Identification Number: **015**

4. Emissions Unit Status Code:

A

5. Commence Construction Date:

6. Initial Startup Date:

01-JUL-85

7. Emissions Unit Major Group SIC Code:

49

8. Federal Program Applicability: (Check all that apply)

Acid Rain Unit

CAIR Unit

Hg Budget Unit

9. Package Unit:

Manufacturer: Model Number:

10. Generator Nameplate Rating: MW

11. Emissions Unit Comment:

EMISSIONS UNIT INFORMATION

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Flyash Silo Bin Vent Filter Baghouse

Emissions Unit Control Equipment/Method: Control 1 of 1

1. Control Equipment/Method Description:
Fabric Filter Low Temperature (T<180F)

2. Control Device or Method Code: **18**

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:

2. Control Device or Method Code:

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:

2. Control Device or Method Code:

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:

2. Control Device or Method Code:

EMISSIONS UNIT INFORMATION

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Flyash Silo Bin Vent Filter Baghouse

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate:
2. Maximum Production Rate:
3. Maximum Heat Input Rate: million Btu/hr
4. Maximum Incineration Rate: pounds/hr tons/day
5. Requested Maximum Operating Schedule: 24 hours/day 7 days/week 52 weeks/year 8760 hours/year
6. Operating Capacity/Schedule Comment:

EMISSIONS UNIT INFORMATION

Section [15] of [20]

Flyash Silo Bin Vent Filter Baghouse

C. EMISSION POINT (STACK/VENT) INFORMATION

(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram:		2. Emission Point Type Code: 2	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code:	6. Stack Height: 10 feet	7. Exit Diameter: 1 feet	
8. Exit Temperature:	9. Actual Volumetric Flow Rate:	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates... Zone: East (km): North (km):		14. Emission Point Latitude/Longitude... Latitude: Longitude:	
15. Emission Point Comment:			

EMISSIONS UNIT INFORMATION

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Flyash Silo Bin Vent Filter Baghouse

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): Material Processed		
2. Source Classification Code (SCC): 3-05-102-03		3. SCC Units: Tons Material Processed
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

Segment Description and Rate: Segment of

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

EMISSIONS UNIT INFORMATION

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 Flyash Silo Bin Vent Filter Baghouse

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM/PM10			EL

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
 POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: PM/PM10		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 0.93 lb/hour 4.11 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.02 gr/acf Reference: Permit Limit		7. Emissions Method Code: 3	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: $\text{Lb/hr} = 5,480 \text{ (acfm)} \times 0.02 \text{ (gr/acf)} \times 60 \text{ (min/hr)} / 7,000 \text{ (gr/lb)} = 0.93 \text{ lb/hr}$ $\text{TPY} = 5,480 \text{ (acfm)} \times 0.02 \text{ (gr/acf)} \times 60 \text{ (min/hr)} / 7,000 \text{ (gr/lb)} \times 8,760 \text{ (hr/yr)} / 2,000 \text{ lb/ton} = 4.11 \text{ ton/yr}$			
11. Potential, Fugitive, and Actual Emissions Comment: ACFM based on vendor design rate.			

EMISSIONS UNIT INFORMATION

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Flyash Silo Bin Vent Filter Baghouse

POLLUTANT DETAIL INFORMATION

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**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS****Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.****Allowable Emissions** Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.02 gr/acf	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

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Flyash Silo Bin Vent Filter Baghouse

G. VISIBLE EMISSIONS INFORMATION

Complete Subsection G if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE05	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: 5 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

Visible Emissions Limitation: Visible Emissions Limitation __ of ____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

EMISSIONS UNIT INFORMATION

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Flyash Silo Bin Vent Filter Baghouse

H. CONTINUOUS MONITOR INFORMATION

Complete Subsection H if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

EMISSIONS UNIT INFORMATION

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Flyash Silo Bin Vent Filter Baghouse

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1.	Process Flow Diagram: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: SEC-FI-C2 <input type="checkbox"/> Previously Submitted, Date _____
2.	Fuel Analysis or Specification: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: N/A <input type="checkbox"/> Previously Submitted, Date _____
3.	Detailed Description of Control Equipment: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: N/A <input type="checkbox"/> Previously Submitted, Date _____
4.	Procedures for Startup and Shutdown: (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable (construction application)
5.	Operation and Maintenance Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable
6.	Compliance Demonstration Reports/Records: <input checked="" type="checkbox"/> Attached, Document ID: SEC-EU4-11 Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Previously Submitted, Date: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Not Applicable Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.
7.	Other Information Required by Rule or Statute: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION
Section [15] of [20]
Flyash Silo Bin Vent Filter Baghouse

I. EMISSIONS UNIT ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for Air Construction Permit Applications

1. Control Technology Review and Analysis (Rules 62-212.400(10) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e)): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rules 62-212.400(4)(d) and 62-212.500(4)(f), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
3. Description of Stack Sampling Facilities: (Required for proposed new stack sampling facilities only) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1. Identification of Applicable Requirements: <input checked="" type="checkbox"/> Attached, Document ID: SEC-EU1-15
2. Compliance Assurance Monitoring: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
3. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
4. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

Additional Requirements Comment

EMISSIONS UNIT INFORMATION

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Adipic Acid Storage Baghouse

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for an initial, revised or renewal Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for an air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application - Where this application is used to apply for both an air construction permit and a revised or renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes, and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit addressed in this application that is subject to air construction permitting and for each such emissions unit that is a regulated or unregulated unit for purposes of Title V permitting. (An emissions unit may be exempt from air construction permitting but still be classified as an unregulated unit for Title V purposes.) Emissions units classified as insignificant for Title V purposes are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION

Section [16] of [20]

Adipic Acid Storage Baghouse

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:

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3. Emissions Unit Identification Number: **016**

4. Emissions Unit Status Code:

5. Commence Construction Date:

6. Initial Startup Date:

01-JUL-85

7. Emissions Unit Major Group SIC Code:

49

8. Federal Program Applicability: (Check all that apply)

Acid Rain Unit

CAIR Unit

Hg Budget Unit

9. Package Unit:

Manufacturer: Model Number:

10. Generator Nameplate Rating: MW

11. Emissions Unit Comment: **This emission unit is currently inactive.**

EMISSIONS UNIT INFORMATION

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Adipic Acid Storage Baghouse

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:

2. Control Device or Method Code:

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:

2. Control Device or Method Code:

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:

2. Control Device or Method Code:

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:

2. Control Device or Method Code:

EMISSIONS UNIT INFORMATION

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Adipic Acid Storage Baghouse

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate:
2. Maximum Production Rate:
3. Maximum Heat Input Rate: million Btu/hr
4. Maximum Incineration Rate: pounds/hr tons/day
5. Requested Maximum Operating Schedule: hours/day days/week weeks/year hours/year
6. Operating Capacity/Schedule Comment:

EMISSIONS UNIT INFORMATION

Section [16] of [20]

Adipic Acid Storage Baghouse

C. EMISSION POINT (STACK/VENT) INFORMATION

(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram:		2. Emission Point Type Code: 2	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code:	6. Stack Height:		7. Exit Diameter:
8. Exit Temperature:	9. Actual Volumetric Flow Rate:	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates... Zone: East (km): North (km):		14. Emission Point Latitude/Longitude... Latitude: Longitude:	
15. Emission Point Comment:			

EMISSIONS UNIT INFORMATION

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Adipic Acid Storage Baghouse

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment __ of ____

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

Segment Description and Rate: Segment __ of ____

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

EMISSIONS UNIT INFORMATION

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Adipic Acid Storage Baghouse

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code

EMISSIONS UNIT INFORMATION

POLLUTANT DETAIL INFORMATION

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 Adipic Acid Storage Baghouse

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**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
 POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted:		2. Total Percent Efficiency of Control:	
3. Potential Emissions: lb/hour tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: Reference:		7. Emissions Method Code:	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions:			
11. Potential, Fugitive, and Actual Emissions Comment:			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

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Adipic Acid Storage Baghouse

G. VISIBLE EMISSIONS INFORMATION

Complete Subsection G if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation ___ of ___

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: _____ % Exceptional Conditions: _____ % Maximum Period of Excess Opacity Allowed: _____ min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

Visible Emissions Limitation: Visible Emissions Limitation ___ of ___

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: _____ % Exceptional Conditions: _____ % Maximum Period of Excess Opacity Allowed: _____ min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

EMISSIONS UNIT INFORMATION

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Adipic Acid Storage Baghouse

H. CONTINUOUS MONITOR INFORMATION

Complete Subsection H if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor ___ of ___

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor ___ of ___

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor ___ of ___

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

EMISSIONS UNIT INFORMATION

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Adipic Acid Storage Baghouse

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: SEC-FI-C2 <input type="checkbox"/> Previously Submitted, Date _____
2. Fuel Analysis or Specification: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: N/A <input type="checkbox"/> Previously Submitted, Date _____
3. Detailed Description of Control Equipment: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: N/A <input type="checkbox"/> Previously Submitted, Date _____
4. Procedures for Startup and Shutdown: (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable (construction application)
5. Operation and Maintenance Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input type="checkbox"/> Not Applicable
6. Compliance Demonstration Reports/Records: <input type="checkbox"/> Attached, Document ID: <u>This unit is currently inactive.</u> Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Previously Submitted, Date: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input checked="" type="checkbox"/> Not Applicable Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.
7. Other Information Required by Rule or Statute: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

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Adipic Acid Storage Baghouse

I. EMISSIONS UNIT ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for Air Construction Permit Applications

1. Control Technology Review and Analysis (Rules 62-212.400(10) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e):
<input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rules 62-212.400(4)(d) and 62-212.500(4)(f), F.A.C.):
<input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
3. Description of Stack Sampling Facilities: (Required for proposed new stack sampling facilities only)
<input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1. Identification of Applicable Requirements:
<input checked="" type="checkbox"/> Attached, Document ID: <u>SEC-EU1-15</u>
2. Compliance Assurance Monitoring:
<input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
3. Alternative Methods of Operation:
<input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
4. Alternative Modes of Operation (Emissions Trading):
<input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

Additional Requirements Comment

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EMISSIONS UNIT INFORMATION

Section [17] of [20]
170 MW Comb Turbine w/Fired HRSG

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for an initial, revised or renewal Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for an air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application - Where this application is used to apply for both an air construction permit and a revised or renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes, and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit addressed in this application that is subject to air construction permitting and for each such emissions unit that is a regulated or unregulated unit for purposes of Title V permitting. (An emissions unit may be exempt from air construction permitting but still be classified as an unregulated unit for Title V purposes.) Emissions units classified as insignificant for Title V purposes are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION

Section [17] of [20]
170 MW Comb Turbine w/Fired HRSG

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

- The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.
- The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

- This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).
- This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.
- This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section: **One GE 7241 FA combustion turbine generator operating in combined cycle (CCCT) mode with one heat recovery steam generator (HRSG) @ nominal rating of 317 MW (includes 50% of steam turbine).**

3. Emissions Unit Identification Number: **025**

4. Emissions Unit Status Code: A	5. Commence Construction Date: 10/01/2001	6. Initial Startup Date: 4/28/2003	7. Emissions Unit Major Group SIC Code: 49
--	---	--	--

8. Federal Program Applicability: (Check all that apply)

- Acid Rain Unit
- CAIR Unit
- Hg Budget Unit

9. Package Unit: **Combined Cycle Combustion Turbine**

Manufacturer: **General Electric**

Model Number: **PG 7241 FA**

10. Generator Nameplate Rating: **317 MW**

11. Emissions Unit Comment: **The nominal 317 combined cycle combustion turbine is comprised of one combustion turbine, which exhausts through a heat recovery steam generator (HRSG) which, is used to power a steam turbine. Natural gas is the primary fuel; low sulfur distillate fuel oil is the backup fuel. Excess emissions resulting from startup, shutdown, fuel switching or malfunction shall be permitted provided best practices are employed.**

EMISSIONS UNIT INFORMATION

Section [17] of [20]
170 MW Comb Turbine w/Fired HRSG

Emissions Unit Control Equipment/Method: Control 1 of 3

- | |
|---|
| 1. Control Equipment/Method Description: Dry Low Nox (DLN) Combustor during Natural Gas firing – Burner technology to control NOx emissions. This technology uses a two-staged combustor that premixes a portion of the air and fuel in the first stage and the remaining air and fuel are injected into the second stage. |
| 2. Control Device or Method Code: 205 |

Emissions Unit Control Equipment/Method: Control 2 of 3

- | |
|--|
| 1. Control Equipment/Method Description: Water Injection during Fuel Oil Firing. This technology injects water into the primary combustion zone with the fuel. The water serves to reduce NOx formation by reducing the peak flame temperature. |
| 2. Control Device or Method Code: 028 |

Emissions Unit Control Equipment/Method: Control 3 of 3

- | |
|---|
| 1. Control Equipment/Method Description: Selective Catalytic Reduction (SCR) for both natural gas and fuel oil operations. The SCR process combines vaporized ammonia with NOx in the presence of a catalyst to form nitrogen and water. |
| 2. Control Device or Method Code: 139 |

Emissions Unit Control Equipment/Method: Control ___ of ___

- | |
|--|
| 1. Control Equipment/Method Description: |
| 2. Control Device or Method Code: |

EMISSIONS UNIT INFORMATION

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170 MW Comb Turbine w/Fired HRSG

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate:		
2. Maximum Production Rate:		
3. Maximum Heat Input Rate: 2402 million Btu/hr (natural gas); 2068 MMBtu/hr (fuel oil)		
4. Maximum Incineration Rate: pounds/hr Tons/day		
5. Requested Maximum Operating Schedule:		
For Natural Gas	24 hours/day	7 days/week
	52 weeks/year	8760 hours/year
For Fuel Oil	24 hours/day	7 days/week
	52 weeks/year	1000 hours/year
6. Operating Capacity/Schedule Comment: Maximum Heat Input Rate in Field 3 is based on: a) Natural Gas: 19 degrees F, base load, with duct burners on. Performance Data Case 4 in Attachment SEC-EU17-I9. b) Distillate Oil: 19 degrees F, base load, Performance Data Case 20 in Attachment SEC-EU17-I9. All cases of natural gas and oil firing were considered in these maximums. The maximum hours of operation on natural gas is 8760 hrs/yr and 1000 hrs on fuel oil.		

EMISSIONS UNIT INFORMATION

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170 MW Comb Turbine w/Fired HRSG

C. EMISSION POINT (STACK/VENT) INFORMATION**(Optional for unregulated emissions units.)****Emission Point Description and Type**

1. Identification of Point on Plot Plan or Flow Diagram: 004		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking: 160 foot vertical cylindrical exhaust stack associated with the combustion turbine and heat recovery steam generator.			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: N/A			
5. Discharge Type Code: V	6. Stack Height: 160 feet	7. Exit Diameter: 19 feet	
8. Exit Temperature: 287 °F	9. Actual Volumetric Flow Rate: 1,280,130 acfm	10. Water Vapor: N/A %	
11. Maximum Dry Standard Flow Rate: N/A Dscfm		12. Nonstack Emission Point Height: N/A feet	
13. Emission Point UTM Coordinates... Zone: 17 East (km): 483.61 North (km): 3151.12		14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) 28/29/17 Longitude (DD/MM/SS) 81/10/03	
15. Emission Point Comment: Field #8 based on distillate oil at 100% load @ 19 degrees F. Field #9 based on distillate oil at 100% load @ 19 degrees F. Stack temperature and flow rate will vary with fuel, load, ambient temperature, and use of optional evaporative cooling, duct burner firing and steam power augmentation.			

EMISSIONS UNIT INFORMATION

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 170 MW Comb Turbine w/Fired HRSG

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 2

1. Segment Description (Process/Fuel Type): Combustion turbine operating in combined cycle mode on natural gas. This unit is allowed to operate on natural gas for 8760 hours per year. The maximum heat input on natural gas for the CT/HRSG is 2402 MMBtu/hr (HHV). The maximum heat input for the duct burner is 533 MMBtu/hr (LHV) on natural gas.		
2. Source Classification Code (SCC): 2-01-002-01		3. SCC Units: Million Cubic Feet Burned
4. Maximum Hourly Rate: 2.35	5. Maximum Annual Rate: 20628.94	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 1.5 grains/100 scf	8. Maximum % Ash:	9. Million Btu per SCC Unit: 1020
10. Segment Comment: Maximum Hourly Rate = 2402 MMBtu/hr / 1020 MMBtu/MMscf = 2.35 MMscf/hr Maximum Annual Rate = 8760 hr/yr * 2402 MMBtu/hr / 1020 MMBtu/MMscf = 20628.94 MMscf/yr		

Segment Description and Rate: Segment 2 of 2

1. Segment Description (Process/Fuel Type): Combustion turbine operating in combined cycle mode on No 2 distillate fuel oil. This unit is allowed to operate on No. 2 distillate fuel oil for 1000 hours/yr. The maximum heat input on No. 2 distillate fuel oil is 2067.6 MMBtu/hr (HHV).		
2. Source Classification Code (SCC): 2-01-001-01		3. SCC Units: Thousand gallons burned
4. Maximum Hourly Rate: 14.87	5. Maximum Annual Rate: 14874.82	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: .05	8. Maximum % Ash: .01	9. Million Btu per SCC Unit: 139
10. Segment Comment: Maximum Hourly Rate = 2067.6 MMBtu/hr/ 139 MMBtu/thousand gallons = 14.87 thousand gallons/hr Maximum Annual Rate = 1000 hr/yr * 2067.6 MMBtu/hr / 139 MMBtu/thousand gallons = 14874.82 thousand gallons/yr		

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E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
NOx	205	139	EL
CO			EL
PM/PM10			NS
SO2			EL
VOC			EL
HAPS			NS

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**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS
(Optional for unregulated emissions units.)**

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: NOx		2. Total Percent Efficiency of Control:	
3. Potential Emissions: Natural Gas 30.38 lb/hr 132.58 tons/yr Fuel Oil 79.69 lb/hr 39.85 tons/yr Annual Operation 157.24 tons/yr		4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: Reference: Manufacturer		7. Emissions Method Code: O	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: CCCT Natural Gas and duct firing (with Power Augmentation): (30.38 lb/hr * 7760 hr/yr) + (29.42 lb/hr * 1000 hr/yr/2000 lb/ton) = 132.58 tons/yr Fuel Oil Firing: 79.69 lb/hr * 1000 hr/yr/2000 lb/ton = 39.85 tons/yr Annual Operation on Natural Gas and Duct Firing plus Oil Firing (with PA) : [(30.38 lb/hr * 6760 hr/yr) + (79.69 lb/hr * 1000 hr/yr) + (29.42 lb/hr * 1000 hr/yr)]/ 2000 lb/ton = 157.24 tons/yr			
11. Potential, Fugitive, and Actual Emissions Comment: Emission calculation based on manufacturer's guarantee.			

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**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 3

1. Basis for Allowable Emissions Code: Other	2. Future Effective Date of Allowable Emissions: N/A
3. Allowable Emissions and Units: 3.5 ppmvd @ 15% O2 for Natural Gas	4. Equivalent Allowable Emissions: 30.38 lb/hour 133.06 tons/year
5. Method of Compliance: CEMs on a 3 hour block average; Annual Stack Test Record Keeping – hrs of operation per fuel type per 12 months	
6. Allowable Emissions Comment (Description of Operating Method): During any 24 hour period in which an hour of startup or shutdown occurs, the following alternative emissions limits apply on a 24 hour rolling average: 127 lb/hr for natural gas, 370 lb/hr for fuel oil firing; Prorated if co-fired.	

Allowable Emissions Allowable Emissions 2 of 3

1. Basis for Allowable Emissions Code: Other	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 10 ppmvd @ 15% O2 for fuel oil	4. Equivalent Allowable Emissions: 79.69 lb/hour 39.85 tons/year
5. Method of Compliance: CEMs on a 3 hour block average; Stack Test (5 yr) Record Keeping – hrs of operation per fuel type per 12 months	
6. Allowable Emissions Comment (Description of Operating Method): A total of 1000 hours per year of fuel oil is allowed. An alternative startup and shutdown standard is applicable at 370 lb/hr on 24 hour rolling average basis. This is prorated if co-fired.	

Allowable Emissions Allowable Emissions 3 of 3

1. Basis for Allowable Emissions Code: PSD Permit	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.1 lb/MMBtu	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance: See above.	
6. Allowable Emissions Comment (Description of Operating Method): Standard for HRSG Duct Burners.	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: Other	2. Future Effective Date of Allowable Emissions: N/A
3. Allowable Emissions and Units: 17 ppmvd @ 15% O2 for Natural Gas	4. Equivalent Allowable Emissions: 142.51 lb/hour 448.12 tons/year
5. Method of Compliance: CEMs on a 24hour block average; Annual Stack Test Record Keeping – hrs of operation per fuel type per 12 months	
6. Allowable Emissions Comment (Description of Operating Method): During any 24 hour period in which an hour of startup or shutdown occurs, the following alternative emissions limit apply on a 24 hour rolling average: 155 lb/hr for natural gas or fuel oil.	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: Other	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 14 ppmvd @ 15% O2 for fuel oil	4. Equivalent Allowable Emissions: 71.00 lb/hour 35.5 tons/year
5. Method of Compliance: CEMs on a 24 hour block average; Stack Test (5 yr) Record Keeping – hrs of operation per fuel type per 12 months	
6. Allowable Emissions Comment (Description of Operating Method): A total of 1000 hours per year of fuel oil is allowed. An alternative startup and shutdown standard is applicable at 155 lb/hr on 24 hour rolling average basis.	

Allowable Emissions Allowable Emissions ___ of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

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**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: PM/PM10		2. Total Percent Efficiency of Control:	
3. Potential Emissions: Natural Gas 11.71 lb/hr 50.94 tons/yr Fuel Oil 17.00 lb/hr 8.50 tons/yr Annual Operation 53.63 tons/yr		4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): To tons/year			
6. Emission Factor: Reference: Manufacturer		7. Emissions Method Code: O	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: CCCT Natural Gas and duct firing (with Power Augmentation): $(11.62 \text{ lb/hr} * 7760 \text{ hr/yr}) + (11.71 \text{ lb/hr} * 1000 \text{ hr/yr}/2000 \text{ lb/ton}) = 50.94 \text{ tons/yr}$ Fuel Oil Firing: $17.00 \text{ lb/hr} * 1000 \text{ hr/yr}/2000 \text{ lb/ton} = 8.50 \text{ tons/yr}$ Annual Operation on Natural Gas and Duct Firing plus Oil Firing (with PA) : $[(11.62 \text{ lb/hr} * 6760 \text{ hr/yr}) + (17.00 \text{ lb/hr} * 1000 \text{ hr/yr}) + (17.71 \text{ lb/hr} * 1000 \text{ hr/yr})] / 2000 \text{ lb/ton} = 53.63 \text{ tons/yr}$			
11. Potential, Fugitive, and Actual Emissions Comment: Emission calculation based on manufacturer's guarantee.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: Other	2. Future Effective Date of Allowable Emissions: N/A
3. Allowable Emissions and Units: 10% Opacity VE Standard	4. Equivalent Allowable Emissions: 11.71 lb/hour 50.94 tons/year for gas firing
5. Method of Compliance: Fuel Monitoring Schedule; VE Annual Stack Test Record Keeping – hrs of operation per fuel type per 12 months	
6. Allowable Emissions Comment (Description of Operating Method): 7760 hours/yr of natural gas firing with Duct Burner and 1000 hours with Power Augmentation.	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: Other	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 10% Opacity VE Standard	4. Equivalent Allowable Emissions: 17.00 lb/hour 8.5 tons/year for fuel oil firing
5. Method of Compliance: Fuel Monitoring Schedule; VE Stack Test (5 Yr) Record Keeping – hrs of operation per fuel type per 12 months	
6. Allowable Emissions Comment (Description of Operating Method): A total of 1000 hours per year of fuel oil is allowed.	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

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**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: SO2		2. Total Percent Efficiency of Control:	
3. Potential Emissions: Natural Gas 3.5 lb/hr 15.28 tons/yr Fuel Oil 107.0 lb/hr 53.50 tons/yr Annual Operation 67.03 tons/yr		4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: Reference: Manufacturer		7. Emissions Method Code: O	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: CCCT Natural Gas and duct firing (with Power Augmentation): (3.5 lb/hr * 7760 hr/yr) + (3.39 lb/hr * 1000 hr/yr/2000 lb/ton) = 15.28 tons/yr Fuel Oil Firing: 107.00 lb/hr * 1000 hr/yr/2000 lb/ton = 53.50 tons/yr Annual Operation on Natural Gas and Duct Firing plus Oil Firing (with PA) : [(3.5 lb/hr * 6760 hr/yr) + (107.00 lb/hr * 1000 hr/yr) + (3.39 lb/hr * 1000 hr/yr)] / 2000 lb/ton = 67.03 tons/yr			
11. Potential, Fugitive, and Actual Emissions Comment: Emission calculation based on manufacturer's guarantee.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: Other	2. Future Effective Date of Allowable Emissions: N/A
3. Allowable Emissions and Units: 1.5 gr S/100scf fuel (gas)	4. Equivalent Allowable Emissions: 3.5 lb/hour 15.33 tons/year
5. Method of Compliance: Fuel Monitoring Schedule Record Keeping – hrs of operation per fuel type per 12 months	
6. Allowable Emissions Comment (Description of Operating Method): 8760 hour/yr of natural gas firing. Duct firing case is higher than power augmentation case therefore emissions assumed 8760 hours of CCCT operation with duct burner. PSD permit has not greater than 1.5 grains per 100 standard cubic foot.	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: Other	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.05 weight % S for fuel oil	4. Equivalent Allowable Emissions: 107.00 lb/hour 53.50 tons/year
5. Method of Compliance: Fuel Monitoring Schedule Record Keeping – hrs of operation per fuel type per 12 months	
6. Allowable Emissions Comment (Description of Operating Method): A total of 1000 hours per year of fuel oil is allowed.	

Allowable Emissions Allowable Emissions ___ of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

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**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
 POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS
 (Optional for unregulated emissions units.)**

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: VOC		2. Total Percent Efficiency of Control:	
3. Potential Emissions: Natural Gas 20.13 lb/hr 54.22 tons/yr Fuel Oil 8.00 lb/hr 4.00 tons/yr Annual Operation 52.53 tons/yr		4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: Reference: Manufacturer		7. Emissions Method Code: O	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: CCCT Natural Gas and duct firing (with Power Augmentation): (11.38 lb/hr * 7760 hr/yr) + (20.13 lb/hr * 1000 hr/yr/2000 lb/ton) = 54.22 tons/yr Fuel Oil Firing: 8.00 lb/hr * 1000 hr/yr/2000 lb/ton = 4.00 tons/yr Annual Operation on Natural Gas and Duct Firing plus Oil Firing (with PA) : [(11.38 lb/hr * 6760 hr/yr) + (8.00 lb/hr * 1000 hr/yr) + (20.13 lb/hr * 1000 hr/yr)]/ 2000 lb/ton = 52.53 tons/yr			
11. Potential, Fugitive, and Actual Emissions Comment: Emission potential to emit is 54.22 tons/yr as worst case scenario (all natural gas firing). Emission calculation based on manufacturer's guarantee.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: Other	2. Future Effective Date of Allowable Emissions: N/A
3. Allowable Emissions and Units: 6.3 ppmvd @ 15% O2 for Natural Gas	4. Equivalent Allowable Emissions: 20.13 lb/hour 54.22 tons/year
5. Method of Compliance: Initial Stack Test Only Record Keeping – hrs of operation per fuel type per 12 months	
6. Allowable Emissions Comment (Description of Operating Method): 8760 hours/yr of natural gas firing. PSD permit allowed 6.3 ppmvd @ 15% O2 with initial testing only.	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: Other	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 2.7 ppmvd @ 15% O2 for fuel oil	4. Equivalent Allowable Emissions: 8.00 lb/hour 4.0 tons/year
5. Method of Compliance: Initial Stack Test Only Record Keeping – hrs of operation per fuel type per 12 months	
6. Allowable Emissions Comment (Description of Operating Method): A total of 1000 hours per year of fuel oil is allowed. PSD permit allowed 2.7 ppmvd @ 15% O2 with initial testing only.	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

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**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
 POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS
 (Optional for unregulated emissions units.)**

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: HAPS		2. Total Percent Efficiency of Control:	
3. Potential Emissions: Natural Gas 1.76 lb/hr 7.73 tons/yr Fuel Oil 0.7 lb/hr 0.35 tons/yr Annual Operation 8.08 tons/yr		4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: Reference: Manufacturer		7. Emissions Method Code: 3	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: Potential annual emissions: Major for HAPS only due to facility total for the Stanton Energy Center Refer to Attachment SEC-EU17-16 for full calculations.			
11. Potential, Fugitive, and Actual Emissions Comment: Emission calculation based on manufacturer's heat input and AP-42 emission factors for individual HAPS.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: N/A	2. Future Effective Date of Allowable Emissions: N/A
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions:
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ___ of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions:
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ___ of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

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G. VISIBLE EMISSIONS INFORMATION

Complete Subsection G if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation **1 of 2**

1. Visible Emissions Subtype: VE	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: 10 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: 6 min/hour	
4. Method of Compliance: Stack Testing (USEPA Reference Method 9) Annually VE limit proposed in lieu of PM/PM10 lb/hr limit	
5. Visible Emissions Comment: PSD Permit Limit	

Visible Emissions Limitation: Visible Emissions Limitation **2 of 2**

1. Visible Emissions Subtype: VE	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: 20 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: 6 min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment: Florida Air Regulation Rule 62-296	

EMISSIONS UNIT INFORMATION

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170 MW Comb Turbine w/Fired HRSG

H. CONTINUOUS MONITOR INFORMATION

Complete Subsection H if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor 1 of 3

1. Parameter Code: EM	2. Pollutant(s): NOx
3. CMS Requirement:	<input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Thermo Environmental Model Number: 42C Serial Number: 42C-75965-381	
5. Installation Date: 07/22/2003	6. Performance Specification Test Date: 07/24/2003
7. Continuous Monitor Comment: NOx monitoring system is required under 40 CFR Part 75.	

Continuous Monitoring System: Continuous Monitor 2 of 3

1. Parameter Code: CO2	2. Pollutant(s): CO2
3. CMS Requirement:	<input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Siemens Model Number: Ultramat 6E Serial Number: N1-ND-0882	
5. Installation Date: 07/22/2003	6. Performance Specification Test Date: 07/24/2003
7. Continuous Monitor Comment: CO2 monitoring required under 40 CFR Part 75.	

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170 MW Comb Turbine w/Fired HRSG

H. CONTINUOUS MONITOR INFORMATION (CONTINUED)

Continuous Monitoring System: Continuous Monitor **3 of 3**

1. Parameter Code: EM	2. Pollutant(s): CO
3. CMS Requirement:	<input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
4. Monitor Information... Manufacturer: Siemens Model Number: Ultramat/Oxymat 6 Serial Number: N1-P7-0528	
5. Installation Date: 07/22/2003	6. Performance Specification Test Date: 07/24/2003
7. Continuous Monitor Comment: Permit requirement.	

Continuous Monitoring System: Continuous Monitor ___ of ___

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

EMISSIONS UNIT INFORMATION

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I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: SEC-FI-C2 <input type="checkbox"/> Previously Submitted, Date _____
2. Fuel Analysis or Specification: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: SEC-EU17-I2 <input type="checkbox"/> Previously Submitted, Date _____
3. Detailed Description of Control Equipment: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: SEC-EU17-I3 <input type="checkbox"/> Previously Submitted, Date _____
4. Procedures for Startup and Shutdown: (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: SEC-EU17-I4 <input type="checkbox"/> Previously Submitted, Date _____ <input type="checkbox"/> Not Applicable (construction application)
5. Operation and Maintenance Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable
6. Compliance Demonstration Reports/Records: <input checked="" type="checkbox"/> Attached, Document ID: SEC-EU17-I5 Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Previously Submitted, Date: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Not Applicable Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.
7. Other Information Required by Rule or Statute: PSD Permit <input checked="" type="checkbox"/> Attached, Document ID: SEC-EU17-I6 <input type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

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170 MW CT w/Fired HRSG

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for an initial, revised or renewal Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an “unregulated emissions unit” does not apply. If this is an application for an air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application – Where this application is used to apply for both an air construction permit and a revised or renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes, and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit addressed in this application that is subject to air construction permitting and for each such emissions unit that is a regulated or unregulated unit for purposes of Title V permitting. (An emissions unit may be exempt from air construction permitting but still be classified as an unregulated unit for Title V purposes.) Emissions units classified as insignificant for Title V purposes are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION

Section [18] of [20]

170 MW CT w/Fired HRSG

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section: **One GE 7241 FA combustion turbine generator operating in combined cycle (CCCT) mode with one heat recovery steam generator (HRSG) @ nominal rating of 317 MW (includes 50% of steam turbine).**

3. Emissions Unit Identification Number: **026**

4. Emissions Unit Status Code: A	5. Commence Construction Date: 10/01/2001	6. Initial Startup Date: 4/28/2003	7. Emissions Unit Major Group SIC Code: 49
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8. Federal Program Applicability: (Check all that apply)

Acid Rain Unit

CAIR Unit

Hg Budget Unit

9. Package Unit: **Combined Cycle Combustion Turbine**
 Manufacturer: **General Electric** Model Number: **PG 7241 FA**

10. Generator Nameplate Rating: **317 MW**

11. Emissions Unit Comment: **The nominal 317 combined cycle combustion turbine is comprised of one combustion turbine, which exhausts through a heat recovery steam generator (HRSG) which, is used to power a steam turbine. Natural gas is the primary fuel; low sulfur distillate fuel oil is the backup fuel. Excess emissions resulting from startup, shutdown, fuel switch or malfunction shall be permitted provided best practices are employed.**

EMISSIONS UNIT INFORMATION

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170 MW CT w/Fired HRSG

Emissions Unit Control Equipment/Method: Control 1 of 3

1. Control Equipment/Method Description: **Dry Low Nox (DLN) Combustor during Natural Gas firing – Burner technology to control NOx emissions. This technology uses a two-staged combustor that premixes a portion of the air and fuel in the first stage and the remaining air and fuel are injected into the second stage.**

2. Control Device or Method Code: **205**

Emissions Unit Control Equipment/Method: Control 2 of 3

1. Control Equipment/Method Description: **Water Injection during Fuel Oil Firing. This technology injects water into the primary combustion zone with the fuel. The water serves to reduce NOx formation by reducing the peak flame temperature.**

2. Control Device or Method Code: **028**

Emissions Unit Control Equipment/Method: Control 3 of 3

1. Control Equipment/Method Description: **Selective Catalytic Reduction (SCR) for both natural gas and fuel oil operations. The SCR process combines vaporized ammonia with NOx in the presence of a catalyst to form nitrogen and water.**

2. Control Device or Method Code: **139**

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:

2. Control Device or Method Code:

EMISSIONS UNIT INFORMATION

Section [18] of [20]

170 MW CT w/Fired HRSG

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate:		
2. Maximum Production Rate:		
3. Maximum Heat Input Rate: 2402 million Btu/hr (natural gas); 2068 MMBtu/hr (fuel oil)		
4. Maximum Incineration Rate: pounds/hr Tons/day		
5. Requested Maximum Operating Schedule:		
For Natural Gas	24 hours/day	7 days/week
	52 weeks/year	8760 hours/year
For Fuel Oil	24 hours/day	7 days/week
	52 weeks/year	1000 hours/year
6. Operating Capacity/Schedule Comment: Maximum Heat Input Rate in Field 3 is based on: a) Natural Gas: 19 degrees F, base load, with duct burners on. Performance Data Case 4 in Attachment SEC-EU17-19. b) Distillate Oil: 19 degrees F, base load, Performance Data Case 20 in Attachment SEC-EU17-19. All cases of natural gas and oil firing were considered in these maximums. The maximum hours of operation on natural gas is 8760 hrs/yr and 1000 hrs on fuel oil.		

EMISSIONS UNIT INFORMATION

Section [18] of [20]

170 MW CT w/Fired HRSG

C. EMISSION POINT (STACK/VENT) INFORMATION

(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: 005		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking: 160 foot vertical cylindrical exhaust stack associated with the combustion turbine and heat recovery steam generator.			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: N/A			
5. Discharge Type Code: V	6. Stack Height: 160 feet	7. Exit Diameter: 19 feet	
8. Exit Temperature: 287 °F	9. Actual Volumetric Flow Rate: 1,280,130 acfm	10. Water Vapor: N/A %	
11. Maximum Dry Standard Flow Rate: N/A Dscfm		12. Nonstack Emission Point Height: N/A feet	
13. Emission Point UTM Coordinates... Zone: 17 East (km): 483.61 North (km): 3151.12		14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) 28/29/17 Longitude (DD/MM/SS) 81/10/03	
15. Emission Point Comment: Field #8 based on distillate oil at 100% load @ 19 degrees F. Field #9 based on distillate oil at 100% load @ 19 degrees F. Stack temperature and flow rate will vary with fuel, load, ambient temperature, and use of optional evaporative cooling, duct burner firing and steam power augmentation.			

EMISSIONS UNIT INFORMATION

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170 MW CT w/Fired HRSG

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 2

<p>1. Segment Description (Process/Fuel Type): Combustion turbine operating in combined cycle mode on natural gas. This unit is allowed to operate on natural gas for 8760 hours per year. The maximum heat input on natural gas for the CT/HRSG is 2402 MMBtu/hr (HHV). The maximum heat input for the duct burner is 542 MMBtu/hr (HHV) on natural gas.</p>		
<p>2. Source Classification Code (SCC): 2-01-002-01</p>		<p>3. SCC Units: Million Cubic Feet Burned</p>
<p>4. Maximum Hourly Rate: 2.35</p>	<p>5. Maximum Annual Rate: 20628.94</p>	<p>6. Estimated Annual Activity Factor:</p>
<p>7. Maximum % Sulfur: 1.5 grains/100 scf</p>	<p>8. Maximum % Ash:</p>	<p>9. Million Btu per SCC Unit: 1020</p>
<p>10. Segment Comment: Maximum Hourly Rate = 2402 MMBtu/hr / 1020 MMBtu/MMscf = 2.35 MMscf/hr Maximum Annual Rate = 8760 hr/yr * 2402 MMBtu/hr / 1020 MMBtu/MMscf = 20628.94 MMscf/yr</p>		

Segment Description and Rate: Segment 2 of 2

<p>1. Segment Description (Process/Fuel Type): Combustion turbine operating in combined cycle mode on No 2 distillate fuel oil. This unit is allowed to operate on No. 2 distillate fuel oil for 1000 hours/yr. The maximum heat input on No. 2 distillate fuel oil is 2067.6 MMBtu/hr (HHV).</p>		
<p>2. Source Classification Code (SCC): 2-01-001-01</p>		<p>3. SCC Units: Thousand gallons burned</p>
<p>4. Maximum Hourly Rate: 14.87</p>	<p>5. Maximum Annual Rate: 14874.82</p>	<p>6. Estimated Annual Activity Factor:</p>
<p>7. Maximum % Sulfur: .05</p>	<p>8. Maximum % Ash: .01</p>	<p>9. Million Btu per SCC Unit: 139</p>
<p>10. Segment Comment: Maximum Hourly Rate = 2067.6 MMBtu/hr/ 139 MMBtu/thousand gallons = 14.87 thousand gallons/hr Maximum Annual Rate = 1000 hr/yr * 2067.6 MMBtu/hr /139 MMBtu/thousand gallons = 14874.82 thousand gallons/yr</p>		

EMISSIONS UNIT INFORMATION

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170 MW CT w/Fired HRSG

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
NOx	205	139	EL
CO			EL
PM/PM10			NS
SO2			EL
VOC			EL
HAPS			NS

EMISSIONS UNIT INFORMATION

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170 MW CT w/Fired HRSG

POLLUTANT DETAIL INFORMATION

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F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –

POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: NOx		2. Total Percent Efficiency of Control:	
3. Potential Emissions: Natural Gas 30.38 lb/hr 132.58 tons/yr Fuel Oil 79.69 lb/hr 39.85 tons/yr Annual Operation 157.24 tons/yr		4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: Reference: Manufacturer		7. Emissions Method Code: 0	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: CCCT Natural Gas and duct firing (with Power Augmentation): (30.38 lb/hr * 7760 hr/yr) + (29.42 lb/hr * 1000 hr/yr/2000 lb/ton) = 132.58 tons/yr Fuel Oil Firing: 79.69 lb/hr * 1000 hr/yr/2000 lb/ton = 39.85 tons/yr Annual Operation on Natural Gas and Duct Firing plus Oil Firing (with PA) : [(30.38 lb/hr * 6760 hr/yr) + (79.69 lb/hr * 1000 hr/yr) + (29.42 lb/hr * 1000 hr/yr)] / 2000 lb/ton = 157.24 tons/yr			
11. Potential, Fugitive, and Actual Emissions Comment: Emission calculation based on manufacturer's guarantee.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
 ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 3

1. Basis for Allowable Emissions Code: Other	2. Future Effective Date of Allowable Emissions: N/A
3. Allowable Emissions and Units: 3.5 ppmvd @ 15% O2 for Natural Gas	4. Equivalent Allowable Emissions: 30.38 lb/hour 133.06 tons/year
5. Method of Compliance: CEMs on a 3 hour block average; Annual Stack Test Record Keeping – hrs of operation per fuel type per 12 months	
6. Allowable Emissions Comment (Description of Operating Method): During any 24 hour period in which an hour of startup or shutdown occurs, the following alternative emissions limits apply on a 24 hour rolling average: 127 lb/hr for natural gas, 370 lb/hr for fuel oil firing; Prorated if co-fired.	

Allowable Emissions Allowable Emissions 2 of 3

1. Basis for Allowable Emissions Code: Other	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 10 ppmvd @ 15% O2 for fuel oil	4. Equivalent Allowable Emissions: 79.69 lb/hour 39.85 tons/year
5. Method of Compliance: CEMs on a 3 hour block average; Stack Test (5 yr) Record Keeping – hrs of operation per fuel type per 12 months	
6. Allowable Emissions Comment (Description of Operating Method): A total of 1000 hours per year of fuel oil is allowed. An alternative startup and shutdown standard is applicable at 370 lb/hr on 24 hour rolling average basis. This is prorated if co-fired.	

Allowable Emissions Allowable Emissions 3 of 3

1. Basis for Allowable Emissions Code: PSD Permit	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.1 lb/mmbtu	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance: See above.	
6. Allowable Emissions Comment (Description of Operating Method): Standard for HRSG Duct Burners.	

EMISSIONS UNIT INFORMATION

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POLLUTANT DETAIL INFORMATION

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**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: CO		2. Total Percent Efficiency of Control:	
3. Potential Emissions: Natural Gas 142.51 lb/hr 448.12 tons/yr Fuel Oil 71.00 lb/hr 35.50 tons/yr Annual Operation 435.05 tons/yr		4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: Reference: Manufacturer		7. Emissions Method Code: O	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: CCCT Natural Gas and duct firing (with Power Augmentation): $(97.13 \text{ lb/hr} * 7760 \text{ hr/yr}) + (142.51 \text{ lb/hr} * 1000 \text{ hr/yr}/2000 \text{ lb/ton}) = 448.12 \text{ tons/yr}$ Fuel Oil Firing: $71.00 \text{ lb/hr} * 1000 \text{ hr/yr}/2000 \text{ lb/ton} = 35.50 \text{ tons/yr}$ Annual Operation on Natural Gas and Duct Firing plus Oil Firing (with PA) : $[(97.13 \text{ lb/hr} * 6760 \text{ hr/yr}) + (71.00 \text{ lb/hr} * 1000 \text{ hr/yr}) + (142.51 \text{ lb/hr} * 1000 \text{ hr/yr})] / 2000 \text{ lb/ton}$ = 435.05 tons/yr			
11. Potential, Fugitive, and Actual Emissions Comment: Emission calculation based on manufacturer's guarantee.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
 ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: Other	2. Future Effective Date of Allowable Emissions: N/A
3. Allowable Emissions and Units: 17 ppmvd @ 15% O2 for Natural Gas	4. Equivalent Allowable Emissions: 142.51 lb/hour 448.12 tons/year
5. Method of Compliance: CEMs on a 24hour block average; Annual Stack Test Record Keeping – hrs of operation per fuel type per 12 months	
6. Allowable Emissions Comment (Description of Operating Method): During any 24 hour period in which an hour of startup or shutdown occurs, the following alternative emissions limit apply on a 24 hour rolling average: 155 lb/hr for natural gas or fuel oil.	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: Other	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 14 ppmvd @ 15% O2 for fuel oil	4. Equivalent Allowable Emissions: 71.00 lb/hour 35.5 tons/year
5. Method of Compliance: CEMs on a 24 hour block average; Stack Test (5 yr) Record Keeping – hrs of operation per fuel type per 12 months	
6. Allowable Emissions Comment (Description of Operating Method): A total of 1000 hours per year of fuel oil is allowed. An alternative startup and shutdown standard is applicable at 155 lb/hr on 24 hour rolling average basis.	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

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170 MW CT w/Fired HRSG

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –

POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: PM/PM10		2. Total Percent Efficiency of Control:	
3. Potential Emissions: Natural Gas 11.71 lb/hr 50.94 tons/yr Fuel Oil 17.00 lb/hr 8.50 tons/yr Annual Operation 53.63 tons/yr		4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: Reference: Manufacturer		7. Emissions Method Code: O	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: CCCT Natural Gas and duct firing (with Power Augmentation): $(11.62 \text{ lb/hr} * 7760 \text{ hr/yr}) + (11.71 \text{ lb/hr} * 1000 \text{ hr/yr}/2000 \text{ lb/ton}) = 50.94 \text{ tons/yr}$ Fuel Oil Firing: $17.00 \text{ lb/hr} * 1000 \text{ hr/yr}/2000 \text{ lb/ton} = 8.50 \text{ tons/yr}$ Annual Operation on Natural Gas and Duct Firing plus Oil Firing (with PA) : $[(11.62 \text{ lb/hr} * 6760 \text{ hr/yr}) + (17.00 \text{ lb/hr} * 1000 \text{ hr/yr}) + (17.71 \text{ lb/hr} * 1000 \text{ hr/yr})] / 2000 \text{ lb/ton} = 53.63 \text{ tons/yr}$			
11. Potential, Fugitive, and Actual Emissions Comment: Emission calculation based on manufacturer's guarantee.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
 ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: Other	2. Future Effective Date of Allowable Emissions: N/A
3. Allowable Emissions and Units: 10% Opacity VE Standard	4. Equivalent Allowable Emissions: 11.71 lb/hour 50.94 tons/year for gas firing
5. Method of Compliance: Fuel Monitoring Schedule; VE Annual Stack Test Record Keeping – hrs of operation per fuel type per 12 months	
6. Allowable Emissions Comment (Description of Operating Method): 7760 hours/yr of natural gas firing with Duct Burner and 1000 hours with Power Augmentation.	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: Other	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 10% Opacity VE Standard	4. Equivalent Allowable Emissions: 17.00 lb/hour 8.5 tons/year for fuel oil firing
5. Method of Compliance: Fuel Monitoring Schedule; VE Stack Test (5 Yr) Record Keeping – hrs of operation per fuel type per 12 months	
6. Allowable Emissions Comment (Description of Operating Method): A total of 1000 hours per year of fuel oil is allowed.	

Allowable Emissions Allowable Emissions ___ of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

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POLLUTANT DETAIL INFORMATION

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F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –

POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: SO2		2. Total Percent Efficiency of Control:	
3. Potential Emissions: Natural Gas 3.5 lb/hr 15.28 tons/yr Fuel Oil 107.0 lb/hr 53.50 tons/yr Annual Operation 67.03 tons/yr		4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: Reference: Manufacturer		7. Emissions Method Code: 0	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: CCCT Natural Gas and duct firing (with Power Augmentation): (3.5 lb/hr * 7760 hr/yr) + (3.39 lb/hr * 1000 hr/yr/2000 lb/ton) = 15.28 tons/yr Fuel Oil Firing: 107.00 lb/hr * 1000 hr/yr/2000 lb/ton = 53.50 tons/yr Annual Operation on Natural Gas and Duct Firing plus Oil Firing (with PA) : [(3.5 lb/hr * 6760 hr/yr) + (107.00 lb/hr * 1000 hr/yr) + (3.39 lb/hr * 1000 hr/yr)] / 2000 lb/ton = 67.03 tons/yr			
11. Potential, Fugitive, and Actual Emissions Comment: Emission calculation based on manufacturer's guarantee.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: Other	2. Future Effective Date of Allowable Emissions: N/A
3. Allowable Emissions and Units: 1.5 gr S/100scf fuel (gas)	4. Equivalent Allowable Emissions: 3.5 lb/hour 15.33 tons/year
5. Method of Compliance: Fuel Monitoring Schedule Record Keeping – hrs of operation per fuel type per 12 months	
6. Allowable Emissions Comment (Description of Operating Method): 8760 hour/yr of natural gas firing. Duct firing case is higher than power augmentation case therefore emissions assumed 8760 hours of CCCT operation with duct burner. PSD permit has not greater than 1.5 grains per 100 standard cubic foot..	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: Other	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.05 weight % S for fuel oil	4. Equivalent Allowable Emissions: 107.00 lb/hour 53.50 tons/year
5. Method of Compliance: Fuel Monitoring Schedule Record Keeping – hrs of operation per fuel type per 12 months	
6. Allowable Emissions Comment (Description of Operating Method): A total of 1000 hours per year of fuel oil is allowed.	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

POLLUTANT DETAIL INFORMATION

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170 MW CT w/Fired HRSG

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –

POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: VOC		2. Total Percent Efficiency of Control:	
3. Potential Emissions: Natural Gas 20.13 lb/hr 54.22 tons/yr Fuel Oil 8.00 lb/hr 4.00 tons/yr Annual Operation 52.53 tons/yr		4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: Reference: Manufacturer		7. Emissions Method Code: O	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: CCCT Natural Gas and duct firing (with Power Augmentation): (11.38 lb/hr * 7760 hr/yr) + (20.13 lb/hr * 1000 hr/yr/2000 lb/ton) = 54.22 tons/yr Fuel Oil Firing: 8.00 lb/hr * 1000 hr/yr/2000 lb/ton = 4.00 tons/yr Annual Operation on Natural Gas and Duct Firing plus Oil Firing (with PA) : [(11.38 lb/hr * 6760 hr/yr) + (8.00 lb/hr * 1000 hr/yr) + (20.13 lb/hr * 1000 hr/yr)] / 2000 lb/ton = 52.53 tons/yr			
11. Potential, Fugitive, and Actual Emissions Comment: Emission potential to emit is 54.22 tons/yr as worst case scenario (all natural gas firing) Emission calculation based on manufacturer's guarantee.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
 ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 2

1. Basis for Allowable Emissions Code: Other	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 6.3 ppmvd @ 15% O2 for Natural Gas	4. Equivalent Allowable Emissions: 20.13 lb/hour 54.22 tons/year
5. Method of Compliance: Initial Stack Test Only Record Keeping – hrs of operation per fuel type per 12 months	
6. Allowable Emissions Comment (Description of Operating Method): 8760 hours/yr of natural gas firing. PSD permit allowed 6.3 ppmvd @ 15% O2 with initial testing only.	

Allowable Emissions Allowable Emissions 2 of 2

1. Basis for Allowable Emissions Code: Other	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 2.7 ppmvd @ 15% O2 for fuel oil	4. Equivalent Allowable Emissions: 8.00 lb/hour 4.0 tons/year
5. Method of Compliance: Initial Stack Test Only Record Keeping – hrs of operation per fuel type per 12 months	
6. Allowable Emissions Comment (Description of Operating Method): A total of 1000 hours per year of fuel oil is allowed. PSD permit allowed 2.7 ppmvd @ 15% O2 with initial testing only.	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

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170 MW CT w/Fired HRSG

POLLUTANT DETAIL INFORMATION

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F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –

POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: HAPS		2. Total Percent Efficiency of Control:	
3. Potential Emissions: Natural Gas 1.76 lb/hr 7.73 tons/yr Fuel Oil 0.7 lb/hr 0.35 tons/yr Annual Operation 8.08 tons/yr		4. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: Reference: Manufacturer		7. Emissions Method Code: 3	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: Potential annual emissions: Major for HAPS only due to facility total for the Stanton Energy Center Refer to Attachment SEC-EU17-I6 for full calculations.			
11. Potential, Fugitive, and Actual Emissions Comment: Emission calculation based on manufacturer's heat input and AP-42 emission factors for individual HAPS.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
 ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions:
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions:
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

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170 MW CT w/Fired HRSG

G. VISIBLE EMISSIONS INFORMATION

Complete Subsection G if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation **1 of 2**

1. Visible Emissions Subtype: VE	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: 10 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: 6 min/hour	
4. Method of Compliance: Stack Testing (USEPA Reference Method 9) Annually VE limit proposed in lieu of PM/PM10 lb/hr limit	
5. Visible Emissions Comment: PSD Permit Limit	

Visible Emissions Limitation: Visible Emissions Limitation **2 of 2**

1. Visible Emissions Subtype: VE	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: 20 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: 6 min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment: Florida Air Regulation Rule 62-296	

EMISSIONS UNIT INFORMATION

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170 MW CT w/Fired HRSG

H. CONTINUOUS MONITOR INFORMATION

Complete Subsection H if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor 1 of 3

1. Parameter Code: EM	2. Pollutant(s): NOx
3. CMS Requirement:	<input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Thermo Environmental Model Number: 42C Serial Number: 42C-73000-372	
5. Installation Date: 07/29/2003	6. Performance Specification Test Date: 07/31/2003
7. Continuous Monitor Comment: NOx monitoring system is required under 40 CFR Part 75.	

Continuous Monitoring System: Continuous Monitor 2 of 3

1. Parameter Code: CO2	2. Pollutant(s): CO2
3. CMS Requirement:	<input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Siemens Model Number: Ultramat 6E Serial Number: N1-ND-0871	
5. Installation Date: 07/29/2003	6. Performance Specification Test Date: 07/31/2003
7. Continuous Monitor Comment: CO2 monitoring required under 40 CFR Part 75.	

EMISSIONS UNIT INFORMATION

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170 MW CT w/Fired HRSG

H. CONTINUOUS MONITOR INFORMATION (CONTINUED)

Continuous Monitoring System: Continuous Monitor **3 of 3**

1. Parameter Code: EM	2. Pollutant(s): CO
3. CMS Requirement: <input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other	
4. Monitor Information... Manufacturer: Siemens Model Number: Ultramat/Oxymat 6 Serial Number: N1-P7-0529	
5. Installation Date: 07/29/2003	6. Performance Specification Test Date: 07/31/2003
7. Continuous Monitor Comment: Permit requirement.	

Continuous Monitoring System: Continuous Monitor ___ of ___

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement: <input type="checkbox"/> Rule <input type="checkbox"/> Other	
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

EMISSIONS UNIT INFORMATION

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I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: SEC-FI-C2 <input type="checkbox"/> Previously Submitted, Date _____
2. Fuel Analysis or Specification: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: SEC-EU17-I2 <input type="checkbox"/> Previously Submitted, Date _____
3. Detailed Description of Control Equipment: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: SEC-EU17-I3 <input type="checkbox"/> Previously Submitted, Date _____
4. Procedures for Startup and Shutdown: (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: SEC-EU17-I4 <input type="checkbox"/> Previously Submitted, Date _____ <input type="checkbox"/> Not Applicable (construction application)
5. Operation and Maintenance Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable
6. Compliance Demonstration Reports/Records: <input checked="" type="checkbox"/> Attached, Document ID: SEC-EU17-I5 Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Previously Submitted, Date: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Not Applicable Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.
7. Other Information Required by Rule or Statute: PSD Permit <input checked="" type="checkbox"/> Attached, Document ID: SEC-EU17-I6 <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

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Distillate Fuel Storage Tank

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for an initial, revised or renewal Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for an air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application - Where this application is used to apply for both an air construction permit and a revised or renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes, and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit addressed in this application that is subject to air construction permitting and for each such emissions unit that is a regulated or unregulated unit for purposes of Title V permitting. (An emissions unit may be exempt from air construction permitting but still be classified as an unregulated unit for Title V purposes.) Emissions units classified as insignificant for Title V purposes are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION

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Distillate Fuel Storage Tank

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:

No. 2 Distillate Fuel Oil Storage Tank (1,860,000 gallons)

3. Emissions Unit Identification Number: 028

4. Emissions Unit Status Code:
A

5. Commence Construction Date:
10/01/2001

6. Initial Startup Date:
04/28/2003

7. Emissions Unit Major Group SIC Code:
49

8. Acid Rain Unit?
 Yes
 No

9. Package Unit:

Manufacturer:

Model Number:

10. Generator Nameplate Rating: MW

11. Emissions Unit Comment: **The Stanton A distillate fuel oil storage tank (1,860,000 gallons) is reported as an emission unit because it is subject to regulations based on the emissions guidelines of the New Source Performance Standards 40 CFR 60, Subpart Kb. The tank is a vertical fixed roof design.**

EMISSIONS UNIT INFORMATION

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Distillate Fuel Storage Tank

Emissions Unit Control Equipment

1. Control Equipment/Method(s) Description:

2. Control Device or Method Code(s):

EMISSIONS UNIT INFORMATION

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B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate: 29,749.64 kgallons
2. Maximum Production Rate:
3. Maximum Heat Input Rate: million Btu/hr
4. Maximum Incineration Rate: pounds/hr tons/day
5. Requested Maximum Operating Schedule: 24 hours/day 52 weeks/year 7 days/week 8760 hours/year
6. Operating Capacity/Schedule Comment: The maximum throughput rate corresponds to the use of No.2 distillate fuel oil for 1000 hours of operation per year.

EMISSIONS UNIT INFORMATION

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Distillate Fuel Storage Tank

C. EMISSION POINT (STACK/VENT) INFORMATION

(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: 007		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking: The emission point for a vertical fixed roof storage tank is the breather valve on the dome roof.			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: There are two types of emissions associated with the breather valve: Storage Loss and Working Loss.			
5. Discharge Type Code:	6. Stack Height: 0 feet	7. Exit Diameter: 0 feet	
8. Exit Temperature: 70 °F	9. Actual Volumetric Flow Rate: 0 acfm	10. Water Vapor: N/A %	
11. Maximum Dry Standard Flow Rate: N/A dscfm		12. Nonstack Emission Point Height: 40 feet	
13. Emission Point UTM Coordinates... Zone: East (km): North (km):		14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
15. Emission Point Comment: Additional information in reference to comments in Field # 4: Storage Loss: Emissions resulting from the expulsion of vapor from a tank through vapor expansion and contraction which are the result of changes in ambient temperature and barometric pressure. (Also known as standing loss) Working Loss: Emissions resulting from the filling and emptying of the storage tank which are associated with the change in liquid level within the tank.			

EMISSIONS UNIT INFORMATION

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Distillate Fuel Storage Tank

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 2

1. Segment Description (Process/Fuel Type): Storage Loss: Emissions resulting from the expulsion of vapor from a tank through vapor expansion and contraction which are the result of changes in ambient temperature and barometric pressure. (Also known as standing loss)		
2. Source Classification Code (SCC): 4-03-010-19		3. SCC Units: Thousand Gallon Stored
4. Maximum Hourly Rate: .	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor: 1860
7. Maximum % Sulfur: .05	8. Maximum % Ash: .01	9. Million Btu per SCC Unit: 139
10. Segment Comment: (1,860,000 gallons stored)/1000 gallons = 1860 capacity		

Segment Description and Rate: Segment 2 of 2

1. Segment Description (Process/Fuel Type): Working Loss: Emissions resulting from the filling and emptying of the storage tank which are associated with the change in liquid level within the tank.		
2. Source Classification Code (SCC): 4-03-010-21		3. SCC Units: Thousand Gallons Throughput
4. Maximum Hourly Rate:	5. Maximum Annual Rate: 29,749	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: .05	8. Maximum % Ash: .01	9. Million Btu per SCC Unit: 139
10. Segment Comment: (29,749,000 gallons consumed by turbines per yr) /1000 gallons = 29,749 kgal/year Throughput based on maximum of 1000 hours of oil usage for each unit (25,26)		

EMISSIONS UNIT INFORMATION

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Distillate Fuel Storage Tank

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
VOC			NS

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
 POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: VOC	2. Total Percent Efficiency of Control:
3. Potential Emissions: lb/hour tons/year	4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year	
6. Emission Factor: Reference: EPA Tanks Program – AP-42	7. Emissions Method Code: EPA Tanks Program
8.a. Baseline Actual Emissions (if required): tons/year	8.b. Baseline 24-month Period: From: To:
9.a. Projected Actual Emissions (if required): tons/year	9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years
10. Calculation of Emissions: A detail emission estimate using EPA's Tanks Program is attached as Attachment SEC-EU19-I1.	
11. Potential, Fugitive, and Actual Emissions Comment:	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
 ALLOWABLE EMISSIONS**

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions **1** of **1**

1. Basis for Allowable Emissions Code: Rule	2. Future Effective Date of Allowable Emissions: N/A
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance: As specified in 40 CFR 60.11(a) and (b), Subpart Kb.	
6. Allowable Emissions Comment (Description of Operating Method): Rule: 40 CFR 60.11 (b) Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels for which construction, reconstruction or modification commenced after July 23, 1994.	

Allowable Emissions Allowable Emissions ___ of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions ___ of ___

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

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Distillate Fuel Storage Tank

G. VISIBLE EMISSIONS INFORMATION

Complete if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation __ of __

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

Visible Emissions Limitation: Visible Emissions Limitation __ of __

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

EMISSIONS UNIT INFORMATION

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Distillate Fuel Storage Tank

H. CONTINUOUS MONITOR INFORMATION

Complete if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor ___ of ___

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor ___ of ___

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

EMISSIONS UNIT INFORMATION

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Distillate Fuel Storage Tank

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: SEC-FI-C2 <input type="checkbox"/> Previously Submitted, Date _____
2. Fuel Analysis or Specification (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: SEC-EU17-I2 <input type="checkbox"/> Previously Submitted, Date _____
3. Detailed Description of Control Equipment (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: NA <input type="checkbox"/> Previously Submitted, Date _____
4. Procedures for Startup and Shutdown (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: NA <input type="checkbox"/> Previously Submitted, Date _____ <input type="checkbox"/> Not Applicable (construction application)
5. Operation and Maintenance Plan (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable
6. Compliance Demonstration Reports/Records <input type="checkbox"/> Attached, Document ID: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Previously Submitted, Date: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input checked="" type="checkbox"/> Not Applicable Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.
7. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: SEC-EU19-I1 <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

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Distillate Fuel Storage Tank

Additional Requirements for Air Construction Permit Applications

- | |
|--|
| 1. Control Technology Review and Analysis (Rules 62-212.400(10) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e))
<input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable |
| 2. Good Engineering Practice Stack Height Analysis (Rule 62-212.400(4)(d), F.A.C., and Rule 62-212.500(4)(f), F.A.C.)
<input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable |
| 3. Description of Stack Sampling Facilities (Required for proposed new stack sampling facilities only)
<input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable |

Additional Requirements for Title V Air Operation Permit Applications

- | |
|---|
| 1. Identification of Applicable Requirements
<input checked="" type="checkbox"/> Attached, Document ID: <u>SEC-EU17-17</u> |
| 2. Compliance Assurance Monitoring
<input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable |
| 3. Alternative Methods of Operation
<input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable |
| 4. Alternative Modes of Operation (Emissions Trading)
<input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable |

Additional Requirements Comment

EMISSIONS UNIT INFORMATION

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Flyash Silo Bin Vent Filter Baghouse

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for an initial, revised or renewal Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for an air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application - Where this application is used to apply for both an air construction permit and a revised or renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes, and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit addressed in this application that is subject to air construction permitting and for each such emissions unit that is a regulated or unregulated unit for purposes of Title V permitting. (An emissions unit may be exempt from air construction permitting but still be classified as an unregulated unit for Title V purposes.) Emissions units classified as insignificant for Title V purposes are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION

Section [20] of [20]

Flyash Silo Bin Vent Filter Baghouse

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for an initial, revised or renewal Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for an air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application - Where this application is used to apply for both an air construction permit and a revised or renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes, and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit addressed in this application that is subject to air construction permitting and for each such emissions unit that is a regulated or unregulated unit for purposes of Title V permitting. (An emissions unit may be exempt from air construction permitting but still be classified as an unregulated unit for Title V purposes.) Emissions units classified as insignificant for Title V purposes are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION

Section [20] of [20]
Flyash Silo Bin Vent Filter Baghouse

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:

Flyash Silo Bin Vent Filter Baghouse

3. Emissions Unit Identification Number: **029**

4. Emissions Unit Status Code: A	5. Commence Construction Date:	6. Initial Startup Date: 01-JUL-85	7. Emissions Unit Major Group SIC Code: 49
--	--------------------------------	--	--

8. Federal Program Applicability: (Check all that apply)

Acid Rain Unit

CAIR Unit

Hg Budget Unit

9. Package Unit:
Manufacturer: Model Number:

10. Generator Nameplate Rating: **MW**

11. Emissions Unit Comment:

EMISSIONS UNIT INFORMATION

Section [20] of [20]

Flyash Silo Bin Vent Filter Baghouse

Emissions Unit Control Equipment/Method: Control 1 of 1

1. Control Equipment/Method Description:
Fabric filter Low Temperature (T<180F)

2. Control Device or Method Code: **18**

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:

2. Control Device or Method Code:

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:

2. Control Device or Method Code:

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:

2. Control Device or Method Code:

EMISSIONS UNIT INFORMATION

Section [20] of [20]

Flyash Silo Bin Vent Filter Baghouse

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate:
2. Maximum Production Rate:
3. Maximum Heat Input Rate: million Btu/hr
4. Maximum Incineration Rate: pounds/hr tons/day
5. Requested Maximum Operating Schedule: hours/day days/week weeks/year hours/year
6. Operating Capacity/Schedule Comment:

EMISSIONS UNIT INFORMATION

Section [20] of [20]

Flyash Silo Bin Vent Filter Baghouse

C. EMISSION POINT (STACK/VENT) INFORMATION

(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram:		2. Emission Point Type Code: 2			
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:					
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:					
5. Discharge Type Code:		6. Stack Height: 10 feet		7. Exit Diameter: 1 foot	
8. Exit Temperature:		9. Actual Volumetric Flow Rate:		10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm			12. Nonstack Emission Point Height: feet		
13. Emission Point UTM Coordinates... Zone: East (km): North (km):			14. Emission Point Latitude/Longitude... Latitude: Longitude:		
15. Emission Point Comment:					

EMISSIONS UNIT INFORMATION

Section [20] of [20]

Flyash Silo Bin Vent Filter Baghouse

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type): Material Processed		
2. Source Classification Code (SCC): 3-05-102-03		3. SCC Units: Tons Material Processed
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

Segment Description and Rate: Segment of

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

EMISSIONS UNIT INFORMATION

Section [20] of [20]

Flyash Silo Bin Vent Filter Baghouse

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM/PM10			EL

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
 POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: PM/PM10		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 0.93 lb/hour 4.11 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.02 gr/acf Reference: Permit Limit		7. Emissions Method Code:	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: $\text{Lb/hr} = 5,480 \text{ (acfm)} \times 0.02 \text{ (gr/acf)} \times 60 \text{ (min/hr)} / 7,000 \text{ (gr/lb)} = 0.93 \text{ lb/hr}$ $\text{TPY} = 5,480 \text{ (acfm)} \times 0.02 \text{ (gr/acf)} \times 60 \text{ (min/hr)} / 7,000 \text{ (gr/lb)} \times 8,760 \text{ (hr/yr)} / 2,000 \text{ lb/ton} = 4.11 \text{ ton/yr}$			
11. Potential, Fugitive, and Actual Emissions Comment:			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
 ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 0.02 gr/acf	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions __ of __

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

Section [20] of [20]
Flyash Silo Bin Vent Filter Baghouse

G. VISIBLE EMISSIONS INFORMATION

Complete Subsection G if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE05	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: 5 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

Visible Emissions Limitation: Visible Emissions Limitation of

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

EMISSIONS UNIT INFORMATION

Section [20] of [20]
Flyash Silo Bin Vent Filter Baghouse

H. CONTINUOUS MONITOR INFORMATION

Complete Subsection H if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

Continuous Monitoring System: Continuous Monitor __ of __

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

EMISSIONS UNIT INFORMATION

Section [20] of [20]

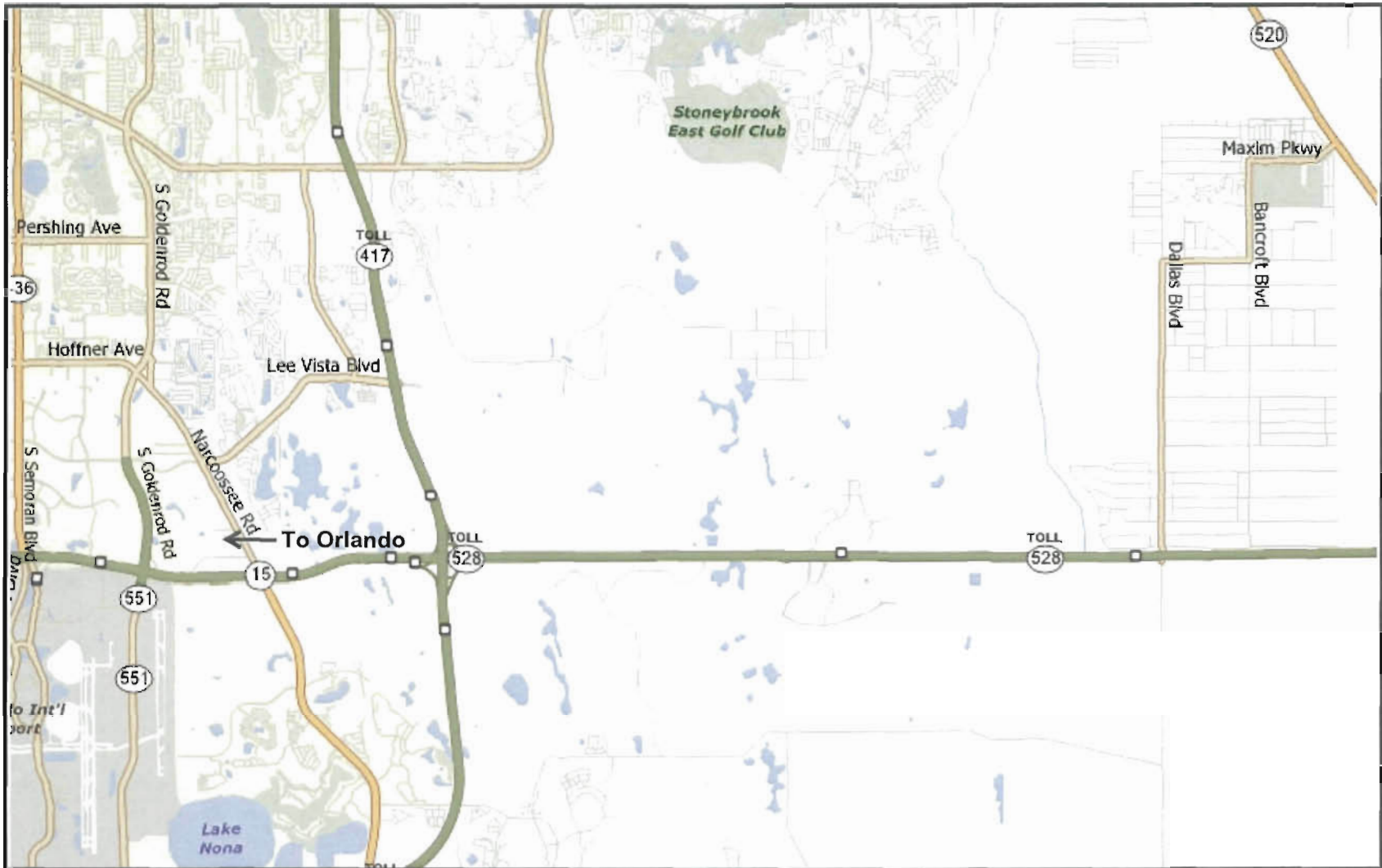
Flyash Silo Bin Vent Filter Baghouse

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: SEC-FI-C2 <input type="checkbox"/> Previously Submitted, Date _____
2. Fuel Analysis or Specification: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: N/A <input type="checkbox"/> Previously Submitted, Date _____
3. Detailed Description of Control Equipment: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: N/A <input type="checkbox"/> Previously Submitted, Date _____
4. Procedures for Startup and Shutdown: (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable (construction application)
5. Operation and Maintenance Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable
6. Compliance Demonstration Reports/Records: <input type="checkbox"/> Attached, Document ID: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Previously Submitted, Date: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input checked="" type="checkbox"/> Not Applicable Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.
7. Other Information Required by Rule or Statute: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

ATTACHMENT SEC-FI-C1
Facility Plot Plan



CLIENT/PROJECT
Orlando Utilities Commission



TAMPA, FLORIDA

TITLE

Facility Plot Plan
Stanton Energy Center
Orange County, Florida

DRAWN

CHECKED

REVIEWED

DATE

5/5/2009

NOT TO
SCALE

FILE NO.

Job No.

093-89508-0200

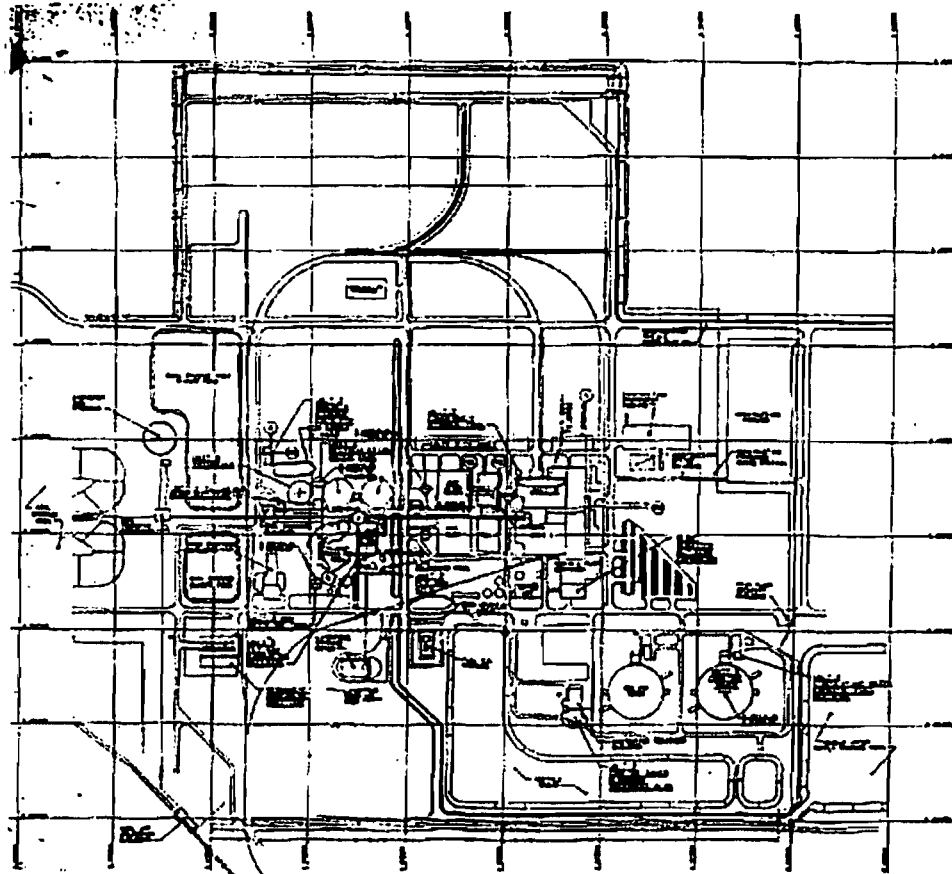
DWG NO.

SUBTITLE

REV. NO.

SEC-FI-C1

ATTACHMENT SEC-FI-C2
Process Flow Diagram



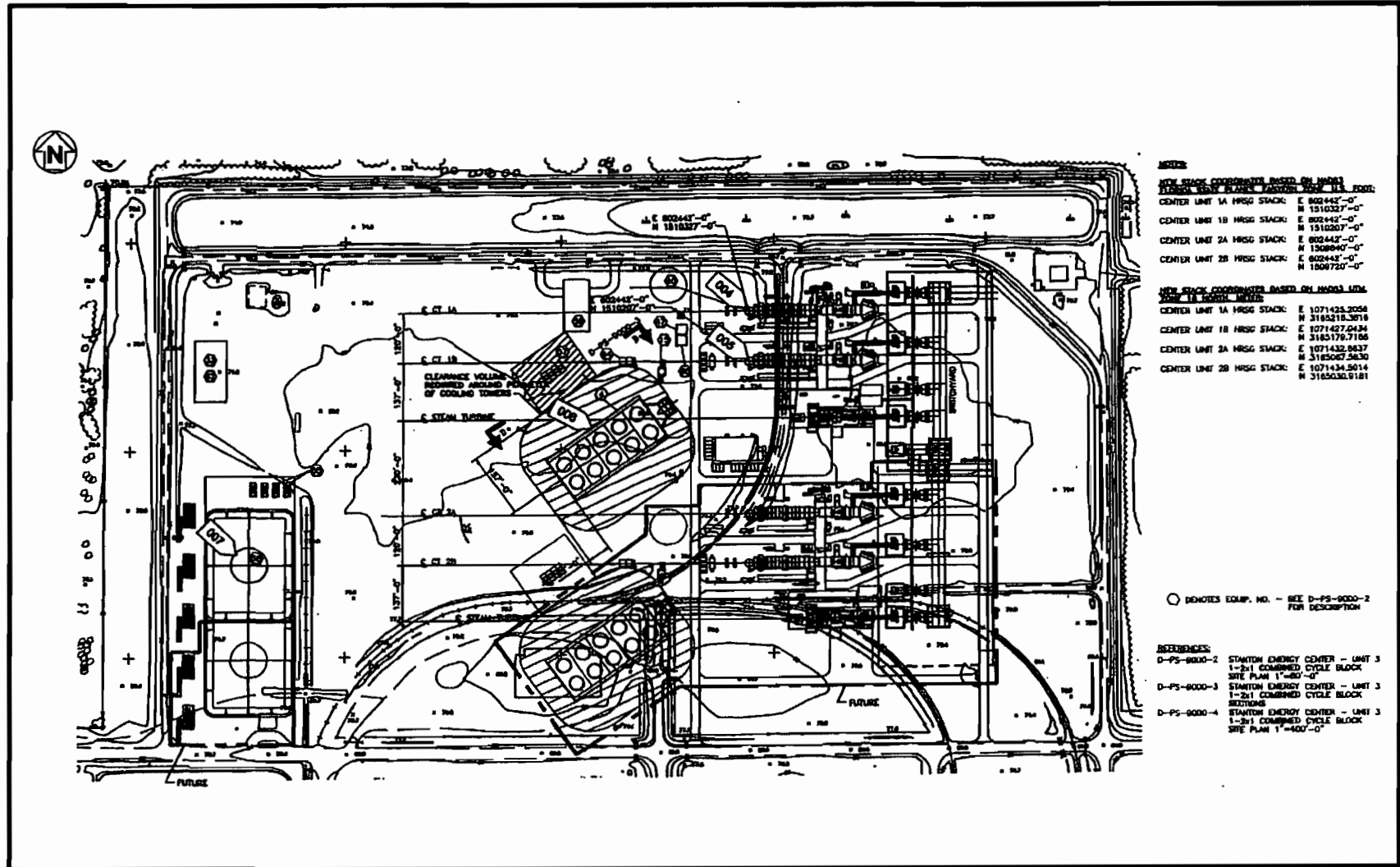
CLIENT/PROJECT
Orlando Utilities Commission

TAMPA, FLORIDA



TITLE
Process Flow Diagram
Stanton Energy Center
Orange County, Florida

DRAWN	CHECKED	REVIEWED	DATE 5/5/2009	NOT TO SCALE	FILE NO.	Job No. 093-89508-0200	DWG NO.	SUBTITLE	REV. NO.	SEC-FI-C2
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NOTES:

NEW STACK COORDINATES BASED ON MDD03 UNIT 18 NORTH - 114' FOOT:

CENTER UNIT 1A HRSG STACK: E 802442'-0" N 1510327'-0"
 CENTER UNIT 1B HRSG STACK: E 802442'-0" N 1510207'-0"
 CENTER UNIT 2A HRSG STACK: E 802442'-0" N 1508940'-0"
 CENTER UNIT 2B HRSG STACK: E 802442'-0" N 1508720'-0"

NEW STACK COORDINATES BASED ON MDD03 UNIT 18 NORTH - 114' FOOT:

CENTER UNIT 1A HRSG STACK: E 1071423.2056 N 3185218.3618
 CENTER UNIT 1B HRSG STACK: E 1071427.0434 N 3185179.7155
 CENTER UNIT 2A HRSG STACK: E 1071432.8637 N 3185087.5630
 CENTER UNIT 2B HRSG STACK: E 1071434.5614 N 3185030.9181

○ DENOTES EQUIP. NO. - SEE D-PS-9000-2 FOR DESCRIPTION

REFERENCES:

D-PS-9000-2 STANTON ENERGY CENTER - UNIT 3 1-2x1 COMBINED CYCLE BLOCK SITE PLAN 1'-00'-0"

D-PS-9000-3 STANTON ENERGY CENTER - UNIT 3 1-2x1 COMBINED CYCLE BLOCK SETTINGS

D-PS-9000-4 STANTON ENERGY CENTER - UNIT 3 1-2x1 COMBINED CYCLE BLOCK SITE PLAN 1'-00'-0"

CLIENT/PROJECT
 Orlando Utilities Commission

SOURCE: Southern-Florida, LLC

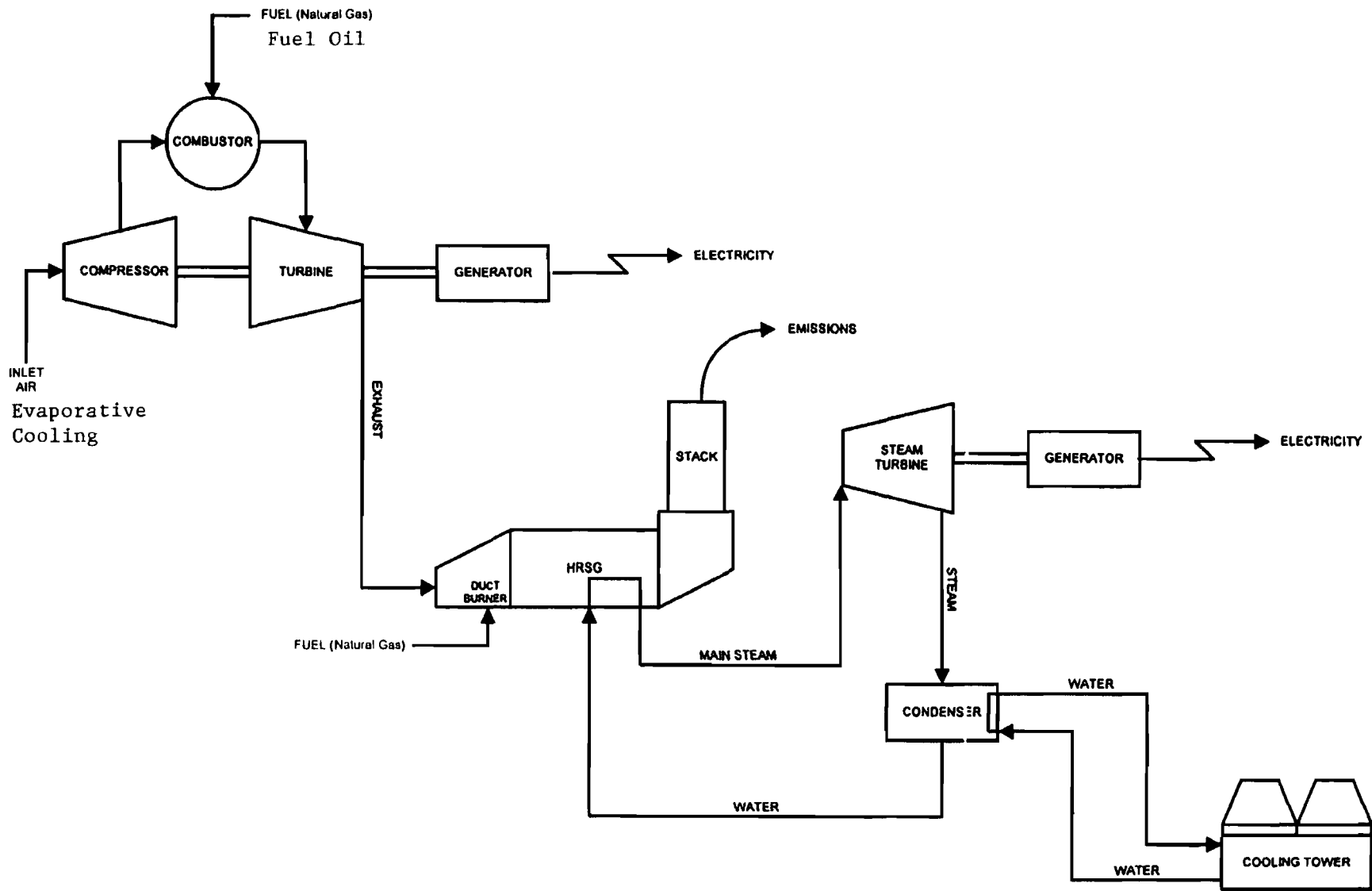
TAMPA, FLORIDA



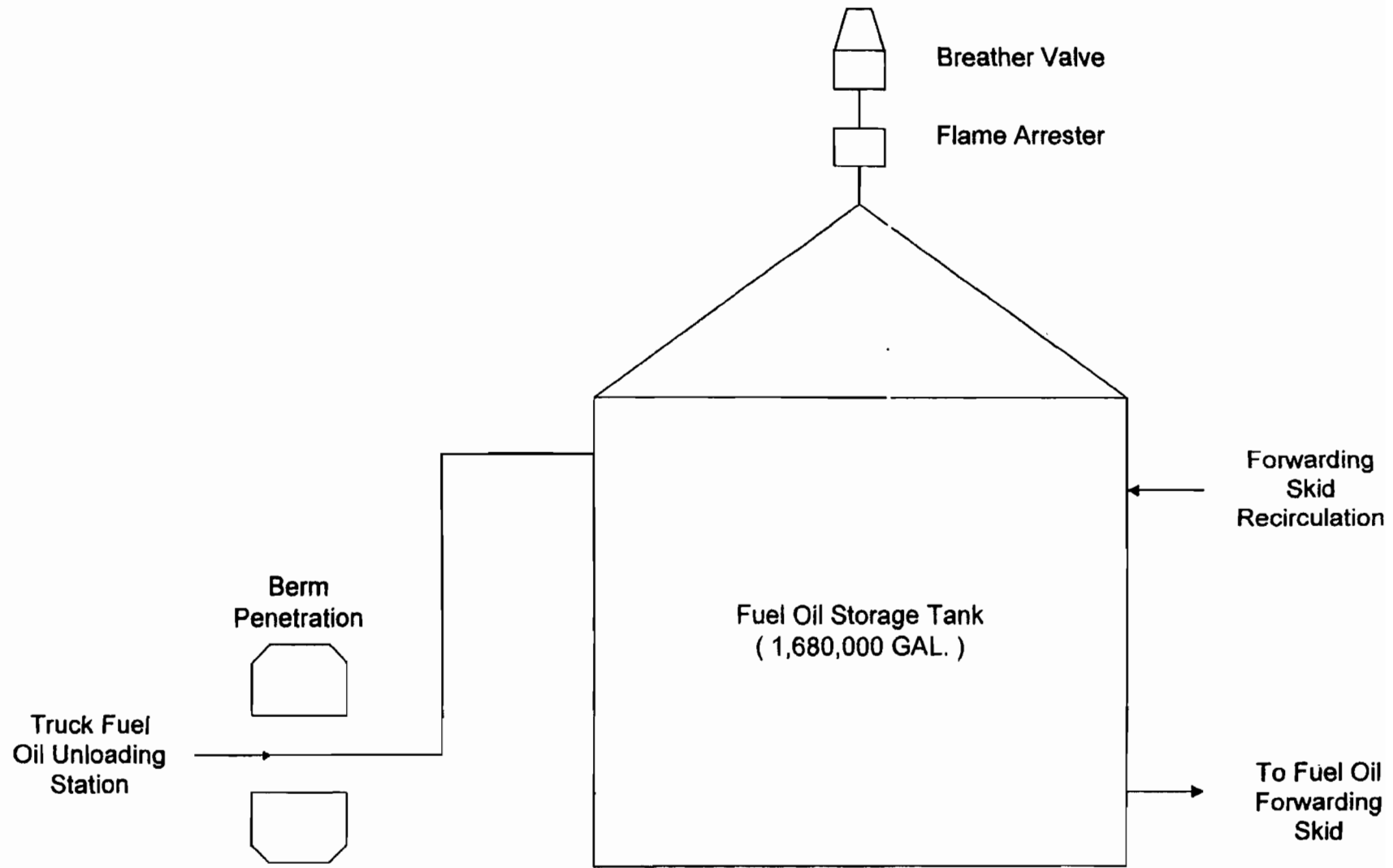
Golder Associates

TITLE
**Process Flow Diagram
 Stanton A
 Orange County, Florida**

DRAWN	CHECKED	REVIEWED	DATE 5/5/2009	NOT TO SCALE	FILE NO.	Job No. 093-89508-0200	DWG NO.	SUBTITLE	REV. NO.	SEC-FI-C2
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Combined Cycle Combustion Turbine
Process Flow Diagram



ATTACHMENT SEC-FI-C3
Precautions to Prevent Emissions of Unconfined Particulate Matter

“Unconfined particulate matter (PM) emissions that may result from operations at the Stanton A Combined Cycle Unit include:

- Vehicular traffic on paved and unpaved roads;
- Wind-blown dust from yard areas; and.
- Periodic abrasive blasting

The following techniques may be used to control unconfined PM emissions on an as-needed basis:

- Paving and maintenance of roads, parking areas, and yards. ✓
- Chemical (dust suppressants) or water application to:
 - Unpaved roads.
 - Unpaved yard areas.
- Removal of PM from roads and other paved areas to prevent reentrainment ✓
and from buildings or work areas to prevent airborne particulate.
- Landscaping or planting of vegetation. ✓
- Confining abrasive blasting where possible. ✓
- Other techniques, as necessary” ✓

Table 4.5-1
Available Fugitive Dust Control Methods for
Disturbed Surface Areas

Control Method	Description/Remarks
Work Practice Controls	Paving identified roads and access points early in the construction process, phasing of earth moving activities to reduce disturbed surface extent, compaction and/or stabilization of disturbed surfaces as quickly as practical. Onsite traffic control program to direct, control, and restrict unnecessary traffic.
Watering	Use of water or water plus a wetting agent to suppress fugitive dust over disturbed areas. Typically applied with spray nozzles attached to a special truck adapted for this purpose. Temporary in nature, but cost-effective even with frequent reapplication.
Graveling	Graveling of high volume traffic areas within the disturbed area of the construction site provides a physical stabilization of the exposed surface and covers the surface with a material having a lower silt content.
Wind Fencing	Wind fencing provides a sheltered region behind the fence line which reduces the mechanical turbulence generated by the ambient winds. The sheltered area of dust control is proportional to the physical height of the fence around the disturbed surface.
Physical Stabilization	Physical stabilization methods involve the application of materials such as rock, bark, wood chips, straw, or other suitable materials to cover the exposed surface, thus preventing the wind from disturbing the surface particles. Graveling is one example of physical stabilization.
Vegetative Stabilization	Vegetative cover provides a physical stabilization and wind shelter of the disturbed surface. However, it is effective only on inactive areas of the disturbed surfaces where frequent mechanical (i.e., earth moving) activities are not anticipated. As such, it is typically not implemented during short-term construction activities.
Chemical Stabilization	Chemical stabilization is a dust suppressant method that uses binding agents that, upon application, bind the surface particles to form a protective crust over the disturbed surface. Typically, the temporary nature of construction activities do not warrant their use as they are not cost-effective over such a small scale of application and reapplication.

Table 4.5-2
Available Fugitive Dust Control Methods for
Storage Piles

Control Method	Description/Remarks
Work Practice Controls	Minimize temporary material storage pile(s) size and number by utilizing phased earth moving activities. Minimized drop height when adding material to the pile(s), and perform loading and unloading operations on the leeward (down wind) side of the pile. Cleanup spillage and maintain material to the confines of the pile.
Watering	Use of water or water plus a wetting agent to suppress fugitive dust from the storage pile. Temporary in nature, but cost-effective even with frequent reapplication.
Wind Fencing/Barriers	Wind fencing or partial temporary barriers or enclosures provides a sheltered region in the vicinity of the storage pile which reduces the mechanical turbulence generated by the ambient winds. The sheltered area of dust control is proportional to the physical height of the fence or barrier.
Chemical Stabilization	Chemical stabilization is a dust suppressant method that uses binding agents that, upon application, bind the surface particles to form a protective crust over the disturbed surface. Typically, the temporary nature of construction activities do not warrant their use as they are not cost-effective over such a small scale of application and reapplication.

Table 4.5-3
Available Fugitive Dust Control Methods for
Earth Moving

Control Method	Description/Remarks
Work Practice Controls	Onsite traffic control program to direct, control speed, and restrict unnecessary traffic. Reduce offsite hauling with balanced cut and fill operations and construction management. Cover truck beds during material hauling operations.
Watering	Preapplication of water or water plus a wetting agent to suppress fugitive dust prior to, and to the extent possible, during earth moving operations. Temporary in nature, but cost-effective even with frequent reapplication.
Wheel Washing	Water washing of heavy construction equipment wheels and undercarriages at construction site egress points to prevent material trackout and deposition outside of the construction site. System may include automatic or manual sprayers, and/or drive-through wheel washing basins.
Wind Fencing/Barriers	Wind fencing or partial temporary barriers or enclosures provides a sheltered region in the vicinity of the storage pile which reduces the mechanical turbulence generated by the ambient winds. The sheltered area of dust control is proportional to the physical height of the fence or barrier.
Chemical Stabilization	Chemical stabilization is a dust suppressant method that uses binding agents that, upon application, bind the surface particles to form a protective crust over the disturbed surface. Typically, the temporary nature of construction activities do not warrant their use as they are not cost-effective over such a small scale of application and reapplication.

Table 4.5-4
Available Fugitive Dust Control Methods for
Vehicular Traffic

Control Method	Description/Remarks
Work Practice Controls	Onsite traffic control program to direct, control speed, and restrict unnecessary traffic. Reduce offsite hauling with balanced cut and fill operations and construction management. Cover truck beds during material hauling operations.
Watering	UNPAVED ROADS Application of water or water plus a wetting agent to suppress fugitive dust prior to, and to the extent possible, during earth moving operations. Temporary in nature, but cost-effective even with frequent reapplication.
Graveling	Graveling of high volume unpaved traffic areas provides a physical stabilization of the exposed surface and covers the surface with a material having a lower silt content.
Chemical Stabilization	Chemical stabilization is a dust suppressant method that uses binding agents that, upon application, bind the surface particles to form a protective crust over the disturbed surface. Typically, the temporary nature of construction activities do not warrant their use as they are not cost-effective over such a small scale of application and reapplication.

ATTACHMENT SEC-FI-C4
List of Insignificant Activities

Stanton Energy Center

Appendix I-1, List of Insignificant Emissions Units and/or Activities.

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, or that meet the criteria specified in Rule 62-210.300(3)(b)1., F.A.C., Generic Emissions Unit Exemption, are exempt from the permitting requirements of Chapters 62-210, 62-212 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 Rules 62-210.300(3)(a) and (b)1., 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 Rules 62-210.300(3)(a) and (b)1., 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 activities are considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

Brief Description of Emissions Units and Activities

1. Internal combustion engines in boats, aircraft and vehicles used for transportation of passengers or freight.
2. Cold storage refrigeration equipment, except for any such equipment located at a Title V source using an ozone-depleting substance regulated under 40 CFR Part 82.
3. Vacuum pumps in laboratory operations.
4. Equipment used for steam cleaning.
5. Belt or drum sanders having a total sanding surface of five square feet or less and other equipment used exclusively on wood or plastics or their products having a density of 20 pounds per cubic foot or more.
6. Equipment used exclusively for space heating, other than boilers.
7. Laboratory equipment used exclusively for chemical or physical analyses.
8. Brazing, soldering or welding equipment.
9. 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.
10. One or more heating units and general purpose internal combustion engines located within a single facility provided:
 - a. None of the heating units or general purpose internal combustion engines is subject to the Federal Acid Rain Program; and
 - b. Total fuel consumption by all such heating units and general purpose internal combustion engines 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.

11. Fire and safety equipment.
12. Surface coating operations 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.
13. Surface coating operations utilizing only coatings containing 5.0 percent or less VOCs, by volume.
14. Degreasing units using heavier-than-air vapors exclusively, except any such unit using or emitting any substance classified as a hazardous air pollutant.

Note: No exemption shall be granted to any emissions unit or activity if:

1. Such unit or activity would be subject to any unit-specific applicable requirement;
2. Such unit or activity, in combination with other units and activities proposed for exemption, would 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); or
3. Such unit or activity would 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.]

The below listed emissions units and/or activities are also considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

1	Lube Oil System Vents
2	Lube Oil Reservoir Tank
3	Oil Water Separators
4	Fixated Ash Disposal
5	Parts Washers/Degreasers
6	Waste Oil Storage Tanks
7	Lube Oil Storage Building
8	Portable Unleaded Gasoline Tank
9	Evaporation of non-hazardous boiler cleaning chemical
10	Sulfuric Acid Tanks

**Insignificant Activities List
Stanton A Combined Cycle Units**

Sulfuric Acid Tank – 5,750 gallon tank for ph control in cooling tower

Battery bank – 5,808 pounds containing sulfuric acid

Anhydrous Ammonia Tank - 18,000 gallon pressurized tanking system

Aqueous Ammonia – 350 gallon totes (500 gallons on site at all times)

Chlorine cylinders – 6 each at 12,000 pounds

Used Oil drums – (55 gallon drums)

Generic type insignificant activities include the following:

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, or other combustion devices, all of which are located within a single facility are not listed elsewhere in Rule 62-210.300(3)(a), F.A.C., and are not pollution control devices, provided:
 - a. None of the heating units, general purpose internal combustion engines, or other combustion devices that would be exempted is subject to the Federal Acid Rain Program; and
 - b. Total fuel consumption by all such heating units, general purpose internal combustion engines, and other combustion devices that would be exempted 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. Sand blasting and abrasive grit blasting
13. Vehicle refueling operations
14. Storage tanks less than 550 gallons
15. *Architectural (equipment) maintenance painting*
16. Diesel fuel oil truck unloading
17. Petroleum lubrication systems
18. Any other emissions unit or activity that:
 - a. Is not subject to a unit-specific applicable requirement.
 - b. In combination with other units and activities proposed as insignificant, would not cause the Stanton Energy Center to exceed any major source threshold(s) as defined by Rule 62-213.420(3)(c)1., F.A.C. unless acknowledged in a permit application.
 - c. Would neither emit nor have the potential to emit:
 - i. 500 pounds per year of lead and lead compounds expressed as lead;
 - ii. 1,000 pounds per year or more of any hazardous air pollutant;
 - iii. 2,500 pounds per year or more of total hazardous air pollutants; or
 - iv. 5.0 tons per year or more of any other regulated pollutant.

ATTACHMENT SEC-FI-C5
Identification of Applicable Requirements

Title V Core List

Effective: 03/01/02

[**Note:** The Title V Core List is meant to simplify the completion of the "List of Applicable Regulations" for DEP Form No. 62-210.900(1), Application for Air Permit - Long Form. The Title V Core List is a list of rules to which all Title V Sources are presumptively subject. The Title V Core List may be referenced in its entirety, or with specific exceptions. The Department may periodically update the Title V Core List.]

Federal: (description)

40 CFR 61, Subpart M: NESHAP for Asbestos.

40 CFR 82: Protection of Stratospheric Ozone.

40 CFR 82, Subpart B: Servicing of Motor Vehicle Air Conditioners (MVAC).

40 CFR 82, Subpart F: Recycling and Emissions Reduction.

State: (description)

CHAPTER 62-4, F.A.C.: PERMITS, effective 06-01-01

62-4.030, F.A.C.: General Prohibition.

62-4.040, F.A.C.: Exemptions.

62-4.050, F.A.C.: Procedure to Obtain Permits; Application.

62-4.060, F.A.C.: Consultation.

62-4.070, F.A.C.: Standards for Issuing or Denying Permits; Issuance; Denial.

62-4.080, F.A.C.: Modification of Permit Conditions.

62-4.090, F.A.C.: Renewals.

62-4.100, F.A.C.: Suspension and Revocation.

62-4.110, F.A.C.: Financial Responsibility.

62-4.120, F.A.C.: Transfer of Permits.

62-4.130, F.A.C.: Plant Operation - Problems.

62-4.150, F.A.C.: Review.

62-4.160, F.A.C.: Permit Conditions.

62-4.210, F.A.C.: Construction Permits.

62-4.220, F.A.C.: Operation Permit for New Sources.

CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS, effective 06-21-01

62-210.300, F.A.C.: Permits Required.

62-210.300(1), F.A.C.: Air Construction Permits.

62-210.300(2), F.A.C.: Air Operation Permits.

62-210.300(3), F.A.C.: Exemptions.

62-210.300(5), F.A.C.: Notification of Startup.

62-210.300(6), F.A.C.: Emissions Unit Reclassification.

62-210.300(7), F.A.C.: Transfer of Air Permits.

Title V Core List

Effective: 03/01/02

62-210.350, F.A.C.: Public Notice and Comment.
62-210.350(1), F.A.C.: Public Notice of Proposed Agency Action.
62-210.350(2), F.A.C.: Additional Public Notice Requirements for Emissions Units Subject to Prevention of Significant Deterioration or Nonattainment-Area Preconstruction Review.
62-210.350(3), F.A.C.: Additional Public Notice Requirements for Sources Subject to Operation Permits for Title V Sources.

62-210.360, F.A.C.: Administrative Permit Corrections.
62-210.370(3), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility.
62-210.400, F.A.C.: Emission Estimates.
62-210.650, F.A.C.: Circumvention.
62-210.700, F.A.C.: Excess Emissions.

62-210.900, F.A.C.: Forms and Instructions.
62-210.900(1), F.A.C.: Application for Air Permit – Title V Source, Form and Instructions.
62-210.900(5), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions.
62-210.900(7), F.A.C.: Application for Transfer of Air Permit – Title V and Non-Title V Source.

CHAPTER 62-212, F.A.C.: STATIONARY SOURCES - PRECONSTRUCTION REVIEW, effective 08-17-00

CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR POLLUTION, effective 04-16-01

62-213.205, F.A.C.: Annual Emissions Fee.
62-213.400, F.A.C.: Permits and Permit Revisions Required.
62-213.410, F.A.C.: Changes Without Permit Revision.
62-213.412, F.A.C.: Immediate Implementation Pending Revision Process.
62-213.415, F.A.C.: Trading of Emissions Within a Source.
62-213.420, F.A.C.: Permit Applications.
62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.
62-213.440, F.A.C.: Permit Content.
62-213.450, F.A.C.: Permit Review by EPA and Affected States
62-213.460, F.A.C.: Permit Shield.

62-213.900, F.A.C.: Forms and Instructions.
62-213.900(1), F.A.C.: Major Air Pollution Source Annual Emissions Fee Form.
62-213.900(7), F.A.C.: Statement of Compliance Form.

Title V Core List

Effective: 03/01/02

CHAPTER 62-296, F.A.C.: STATIONARY SOURCES - EMISSION STANDARDS, effective 03-02-99

62-296.320(4)(c), F.A.C.: Unconfined Emissions of Particulate Matter.

62-296.320(2), F.A.C.: Objectionable Odor Prohibited.

CHAPTER 62-297, F.A.C.: STATIONARY SOURCES - EMISSIONS MONITORING, effective 03-02-99

62-297.310, F.A.C.: General Test Requirements.

62-297.330, F.A.C.: Applicable Test Procedures.

62-297.340, F.A.C.: Frequency of Compliance Tests.

62-297.345, F.A.C.: Stack Sampling Facilities Provided by the Owner of an Emissions Unit.

62-297.350, F.A.C.: Determination of Process Variables.

62-297.570, F.A.C.: Test Report.

62-297.620, F.A.C.: Exceptions and Approval of Alternate Procedures and Requirements.

Miscellaneous:

CHAPTER 28-106, F.A.C.: Decisions Determining Substantial Interests

CHAPTER 62-110, F.A.C.: Exception to the Uniform Rules of Procedure, effective
07-01-98

CHAPTER 62-256, F.A.C.: Open Burning and Frost Protection Fires, effective 11-30-94

CHAPTER 62-257, F.A.C.: Asbestos Notification and Fee, effective 02-09-99

CHAPTER 62-281, F.A.C.: Motor Vehicle Air Conditioning Refrigerant Recovery and
Recycling, effective 09-10-96

FDEP Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) ¹ FDEP Title	Applicable Requirement		Comments/ Discussion	Unit/ Facility Potential Applicability
		Yes	No/ NA		
Chapter 62-4 Permits					
62.4.030	General Prohibition	✓		State only	Facility
62.4.040 (1)	Exemptions	✓		State only	Facility
62-4.050	Procedures to Obtain Permits	✓		State only	Facility
62-4.052	Surveillance Fees		-		
62-4.055	Permit Processing		-		
62-4.060	Consultation		-		
62-4.070	Standards for Issuing or Denying Permits; Issuance; Denial		-		
62-4.080	Modification of Permit Conditions		-		
62-4.090	Renewals		-	State only	
62-4.100	Suspension and Revocation	✓		State only	Facility
62-4.110	Financial Responsibility	✓		May apply in the future	Facility
62-4.120	Transfer of Permits	✓		May apply in the future	Facility
62-4.130	Plant Operation – Problems	✓		State only	Facility
62-4.150	Review	✓			Facility
62-4.160	Permit Conditions		-		
62-4.200	Scope of Part II		-		
62-4.210	Construction Permits	✓		May apply in the future	
62-4.220	Operation Permits for New Sources		-		
Chapter 62-17 Electrical Power Plant Siting					
62-204.800	(8) Title 40, Code of Federal Regulations, Part 60, Standards of Performance for New Stationary Sources				
	(8)(b) The following Standards of Performance for New Stationary Sources contained in 40 CFR 60, revised as of July 1, 2001, or later as specifically indicated				
	1. 40 CFR 60.40 Subpart D, Fossil-fuel-fired Steam Generators for which Construction is Commenced after August 17, 1971		-	State only	

¹ This Stanton (Units 025, 026, 027, and 028) specific applicability list overrides the general Title V Core list.

FDEP Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) ¹ FDEP Title	Applicable Requirement		Comments/ Discussion	Unit/ Facility Potential Applicability
		Yes	No/ NA		
	2. 40 CFR 60.40a Subpart Da, Electric Utility Steam Generators for which Construction is Commenced after September 18, 1978	✓		State only	
	3. 40 CFR 60.40b Subpart Db, Industrial-Commercial-Institutional Steam Generating Units		-	State only	
	4. 40 CFR 60.40c Subpart Dc, Small Industrial-Commercial-Institutional Steam Generating Units		-	State only	
	14. 40 CFR 60.110 Subpart K, Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced after June 11, 1973, and prior to May 19, 1978		-	State only	
	15. 40 CFR 60.110a Subpart Ka, Storage Vessels for Petroleum Liquids for Which Construction, reconstruction, or Modification Commenced after May 18, 1978, and prior to July 23, 1984		-	State only	
	16. 40 CFR 60.110b Subpart Kb, Volatile Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984	✓		State only	
	31. 40 CFR 60.250 Subpart Y, Coal Preparation Plants		-	State only	
	39. 40 CFR 60.330 Subpart GG, Stationary Gas Turbines	✓		State only	
	66. 40 CFR 60.670 Subpart OOO, Non-Metallic Mineral Processing Plants		-	State only	
	78. 40 CFR 60.4201 Subpart IIII, Stationary Compression Ignition Internal Combustion Engines		-	State only	
	79. 40 CFR 60.4231 Subpart JJJJ, Stationary Spark Ignition Internal Combustion Engines		-	State only	
	80. 40 CFR 60 Subpart KKKK, Stationary Combustion Turbines		-	State only	
	(8)(c) The Standards of Performance for New Stationary Sources adopted by reference in this rule shall be controlling over other standards the air pollution rules of the Department except that any emissions limiting standard contained in or determined pursuant to the air pollution rules of the Department which is more stringent than one contained in a Standard of Performance, or which regulates emissions of pollutants or emissions units not regulated by an applicable Standard of Performance, shall apply.		-	State only	
	(8)(d) General Provisions Adopted	✓		State only	
	(8)(e) Appendices Adopted. The following appendices of 40 CFR Part 60, revised as of July 1, 1994, or later as specifically indicated, are adopted and incorporated by reference.				
	1. 40 CFR 60 Appendix A, Test Methods, are adopted by reference	✓		State only	
	2. 40 CFR 60 Appendix B, Performance Specifications	✓		State only	
	3. 40 CFR 60 Appendix C, Determination of Emission Rate Change	✓		State only	
	5. 40 CFR 60 Appendix F, Quality Assurance Procedures	✓		State only	

FDEP Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) ¹ FDEP Title	Applicable Requirement		Comments/ Discussion	Unit/ Facility Potential Applicability
		Yes	No/ NA		
	(9) 40 CFR 60, Emission Guidelines and Compliance Times				
	(9)(a) General Applicability and Definitions		-	State only	
	(9)(h) 40 CFR 60 Subpart HHHH, Coal-Fired Electric Steam Generating Units		-	State only	
	(10) 40 CFR Part 61, National Emission Standards for Hazardous Air Pollutants (NESHAPS)				
	(10)(b)8. 40 CFR Part 61 Subpart M, Asbestos	✓		State only	Facility
	(10)(d) General provisions Adopted. The general provisions of 40 CFR Part 61 Subpart A, revised July 1, 2001, are adopted and incorporated by reference except 40 CFR 61.04, 40 CFR 61.08, 40 CFR 61.11, and 40 CFR 61.18	✓		State only	Facility
	(11) 40 CFR Part 63 National Emissions Standards for Hazardous Air Pollutants (NESHAPS)				
	(11)(b) Standards Adopted				
	(11)(b)10. 40 CFR 63 Subpart Q, Chromium Emissions from Industrial Process Cooling Towers		-	State only	
	(11)(b)13. 40 CFR 63 Subpart T, Halogenated Solvent Cleaning		-	State only	
	(11)(d) General Subparts Adopted				
	1. 40 CFR 63 Subpart A, General Provisions		-	State only	
	2. 40 CFR 63 Subpart B, Equivalent Emissions Limitations by Permit (112(j))		-	State only	
	4. 40 CFR 63 Subpart D, Compliance Extensions for Early Reductions		-	State only	
	82. 40 CFR Subpart ZZZZ, Stationary Reciprocating Internal Combustion Engines		-	State only	
	(12) Adoption of 40 CFR 64, Compliance Assurance Monitoring		-	State only	
	(13) Adoption of 40 CFR 65, Consolidated Federal Air Rule		-	State only	
	(15) Adoption of 40 CFR 70, Federal Title V Rule	✓		State only	Facility
	(16) Adoption of 40 CFR 72, Federal Acid Rain Program	✓		State only	
	(17) Adoption of 40 CFR 73, SO ₂ Allowance System	✓		State only	
	(19) Adoption of 40 CFR 75, CEMS	✓		State only	
	(20) Adoption of 40 CFR 76, Acid Rain NO _x Requirement		-	State only	
	(21) Adoption of 40 CFR 77, Acid Rain Excess Emissions	✓		State only	
	(22) Adoption of 40 CFR 78, Appeal Procedures for the Acid Rain Program	✓		State only	
	(26) Adoption of 40 CFR 96, CAIR SO ₂ and NO _x Trading Program	✓		State only	
	(24) Adoption of 40 CFR 82, Stratospheric Ozone		-	State only	Facility
Chapter 62-210 Stationary Sources – General Requirements					
62-210.100	Purpose and Scope		-		

FDEP Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) ¹ FDEP Title	Applicable Requirement		Comments/ Discussion	Unit/ Facility Potential Applicability
		Yes	No/ NA		
62-210.200	Definitions		-		
62-210.220	Small Business Assistance Program		-		
62-210.300	Permits Required				
	(1) Air Construction Permits	✓			Facility
	(2) Air Operation Permits, except (b)	✓			Facility
	(3)(a) categorized and Conditional Exemptions - #1-37	✓			Facility
	(3)(b) Generic and Temporary Exemptions	✓			Facility
	(4) Authorization by Air General Permits		-		
	(5) Notification of Startup. The owners of operator of any emissions unit or facility which has a valid air operation permit which has been shut down more than one year, shall notify the Department in writing of the intent to start up such emissions unit or facility, a minimum of 60 days prior to the intended startup date.	✓		May apply in future	
	(a) The notification shall include information as to the startup date, anticipated emission rates or pollutants releases, 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.	✓		May apply in future	
	(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	✓		May apply in future	
	(6) Emissions Unit Reclassification	✓		May apply in the future	
	(7) Transfer of Air Permit	✓		May apply in future	Facility
62-210.310	Air General Permits		-		
62-210.350	(1) Public Notice and Comment - Public Notice of Proposed Agency Action	✓			Facility
	(2) Additional Notice Requirements for Sources Subject to Prevention of Significant Deterioration or Nonattainment Area new Source Review	✓			Facility
	(3) Additional Public Notice Requirements for Sources Subject to Operation Permits for Title V Sources	✓			Facility
62-210.360	Administrative Permit Corrections	✓			Facility
62-210.370	Emissions Computation and Reporting	✓			Facility
62-210.550	Stack Height Policy	✓			
62-210.650	Circumvention	✓			

FDEP Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) ¹ FDEP Title	Applicable Requirement		Comments/ Discussion	Unit/ Facility Potential Applicability
		Yes	No/ NA		
62-210.700	(1) Excess Emissions	✓			
	(2) Excess Emissions		-		
	(3) Excess Emissions		-		
	(4) Excess Emissions	✓			
	(5) Excess Emissions	✓			
	(6) Excess Emissions	✓			
62-210.900	Forms and Instructions				
	(5) Annual Operating Reports	✓			Facility
62-210.920	Notification Forms of Air General Permits		-		
Chapter 62-213 Operation Permits for Major Sources of Air Pollution					
62.213.100	Purpose and Scope		-		
62-213.205	Annual Emissions Fee	✓			Facility
62-213.300	Title V Air General Permits		-		
62-213.400	Permits and Permit Revisions Required	✓			Facility
62-213.410	Changes Without Permit Revision	✓		May apply in the future	Facility
62-213.412	Immediate Implementation Pending Revision Process	✓		May apply in the future	Facility
62-213.413	Fast-Track Revisions of Acid Rain Parts	✓		May apply in the future	
62-213.415	Trading of Emissions Within a Source	✓		May apply in the future	Facility
62-213.420(1)(a)2. and (1)(b), (2), (3), and (4)	Permit Applications	✓			Facility
62-213.430	(1) Permit Issuance, Renewal, and Revision – Action on Application		-		
	(2) Permit Denial		-		
	(3) Permit Renewal	✓			Facility
	(4) Permit Revision	✓			Facility
	(5) EPA Recommended Actions		-		
	(6) Insignificant Emission Units	✓			Facility

FDEP Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) ¹ FDEP Title	Applicable Requirement		Comments/ Discussion	Unit/ Facility Potential Applicability
		Yes	No/ NA		
62-213.460	Permit Shield	✓			Facility
62-213.900	(1), (7), and (8) Forms and Instructions	✓			Facility
Chapter 62-214 Requirements for Sources Subject to the Federal Acid Rain Program					
62-214.100	Purpose and Scope		-		
62-214.300	Applicability	✓			Facility
62-214.320	Applications	✓			
62-214.330	(1)(a) Acid Rain Compliance Plan and Compliance Options	✓			
62-214.340	Exemptions	✓			Facility
62-214.350	Certification	✓			
62-214.360	Department Action on Applications		-		
62-214.370	Revisions and Administrative Corrections	✓			
62-214.420	Acid Rain Part Content		-		
62-214.430	Implementation and Termination of Compliance Options. Procedures for Activation and Termination of Compliance Options.	✓			
Chapter 62-242	Motor Vehicle Standards and Test Procedures		-		
Chapter 62-243	Tampering with Motor Vehicle Air Pollution Control Equipment		-		
Chapter 62-252 Gasoline Vapor Control					
62-252.300	Gasoline Dispensing Facilities – Stage I Vapor Recovery				
	(2) Prohibition		-	State Only	Facility
	(3) Control Technology Requirements		-	State Only	Facility
	(4) Compliance Schedule		-	State Only	Facility
62-252.400	Gasoline Dispensing Facilities – Stage II Vapor Recovery				
	(2) Prohibition		-	State Only	Facility
	(3) Control Technology Requirements		-	State Only	Facility
	(4) Compliance Schedules		-	State Only	Facility
	(5) Testing		-	State Only	Facility
	(6) Recordkeeping		-	State Only	Facility
	(7) System Maintenance		-	State Only	Facility
	(8) Training		-	State Only	Facility
62-252.500	Gasoline Tanker Trucks				

FDEP Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) ¹ FDEP Title	Applicable Requirement		Comments/ Discussion	Unit/ Facility Potential Applicability
		Yes	No/ NA		
	(2) Prohibitions		-	State Only	Facility
	(3) Leak testing		-	State Only	Facility
Chapter 62-256 Open Burning and Frost Protection Fires					
62-256.300	Prohibitions	✓		State Only	Facility
62-256.700	Open Burning Allowed	✓		State Only	Facility
Chapter 62-257 Asbestos Removal					
62-257.301	Notification Procedure and Fee	✓		State Only	Facility
62-257.400	Fee Schedule	✓		State Only	Facility
62-257.900	Form	✓		State Only	Facility
Chapter 62-281 Motor Vehicle Air Conditioning Refrigerant Recovery and Recycling					
62-281.100	Purpose, Scope, and Compliance Requirements		-	State Only	Facility
Chapter 62-296 Stationary Sources – Emission Standards					
62-296.320	General Pollutant Emission Limiting Standards				
	(1) Volatile organic compounds emissions or organic solvents emissions	✓			Facility
	(2) Objectionable Odor Prohibited	✓		State Only	Facility
	(3) Open Burning	✓		State Only	Facility
	(4)(a) Process Weight Table		-		
	(4)(b) General Visible Emissions Standard	✓			Facility
	(4)(c) Unconfined Emissions of Particulate Matter	✓			Facility
62-296.340	Best Available Retrofit Technology		-		
62-296.341	Regional Haze – Reasonable Progress		-		
62-296.405	Fossil Fuel Steam generators with More than 250 Million Btu per Hour Heat Input				
	(1) Existing Emissions Units				
	(a) Visible Emissions		-		
	(b) Particulate Matter – 0.1 pound per million Btu heat input, as measured by applicable compliance methods		-		
	(c) Sulfur Dioxide, as measured by applicable compliance methods		-		
	(d) Nitrogen Oxides (expressed as NO _x)		-		
	(e) Test methods and Procedures		-		
	(f) Continuous Emissions Monitoring Requirements		-		

FDEP Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) ¹ FDEP Title	Applicable Requirement		Comments/ Discussion	Unit/ Facility Potential Applicability
		Yes	No/ NA		
	(g) Quarterly Reporting Requirements		-		
	(2) New Emissions Units				
	(a) Visible Emissions – See Rule 62-204.800(7) and 40 CFR 60.42 and 60.42a	✓			
	(b) Particulate Matter – See Rule 62-204.800(7) and 40 CFR 60.42 and 60.42a	✓			
	(c) Sulfur Dioxide – See Rule 62-204.800(7) and 40 CFR 60.43 and 60.43a	✓			
	(d) Nitrogen Oxides – See Rule 62-204.800(7) and 40 CFR 60.44 and 60.44a	✓			
62-296.406	Fossil Fuel Steam Generators with Less than 250 million Btu per Hour Heat Input, New and Existing Emissions Units				
	(1) Visible Emissions		-		
	(2) Particulate Matter – Best available control technology in accordance with Rule 62-210.400(40)		-		
	(3) Sulfur Dioxide – Best available control technology in accordance with Rule 62-210.200(40)		-		
62-296.411	Sulfur Storage and Handling Facilities		-		
62-296.470	Implementation of Federal Clean Air Interstate Rule	✓			
62-296.480	Implementation of Federal Clean Air Mercury Rule		-		
62-296.500	Reasonably Available Control Technology (RACT) – Volatile Organic Compounds (VOC) and Nitrogen Oxides (NO _x) Emitting Facilities				
	(1) Applicability		-		
	(2) Permit, Recordkeeping, and Compliance Reporting Requirements		-		
	(a) Permits – Special Considerations		-		
	(b) Recordkeeping		-		
	(c) Reporting		-		
	(3) Exceptions		-		
	(4) Consideration of Exempt Solvents		-		
	(5) Compliances may be demonstrated for surface coating and graphic arts facilities on a 24-hr weighted average basis for a single source point with a single emission limit		-		
	(6) Specific Emission Limitations		-		
62-296.508	Petroleum Liquid Storage				
	(1) Applicability		-		
	(2) Control Technology		-		
	(3) Test Methods		-		
62-296.511	Solvent Metal Cleaning				
	(1) Applicability		-		

FDEP Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) ¹ FDEP Title	Applicable Requirement		Comments/ Discussion	Unit/ Facility Potential Applicability
		Yes	No/ NA		
	(2) Cold Cleaning Control Technology		-		
	(3) Open Top Vapor Degreaser Control Technology		-		
	(4) Conveyorized Degreaser Control Technology		-		
	(5) Test Methods and Procedures		-	* 8-hr test requirement not in SIP	
62-296.516	Petroleum Liquid Storage Tanks with External Floating Roofs				
	(1) Applicability		-		
	(2) Control Technology		-		
	(3) Test Methods and Procedures		-		
62-296.570	Reasonably Available Control Technology (RACT) – Requirements for Major VOC – and NO _x Emitting Facilities				
	(1) Applicability		-		
	(2) Compliance Requirements		-		
	(3) Operation Permit Requirements		-		
	(4) RACT Emissions Limiting Standards		-		
	(a) Compliance Dates and Monitoring		-		
	(b) Emission Limiting Standards		-		
	(c) Exception for Startup, Shutdown, or Malfunction		-		
62-296.700	Reasonably Available Control Technology (RACT) Particulate Matter				
	(1) Applicability		-		
	(2) Exemptions		-		
	(3) Specific RACT Emission Limiting Standards for Stationary Emissions Units		-		
	(4) Maximum Allowable Emission Rates		-		
	(a) Emissions Unit Data		-		
	(b) Maximum Emission Rates		-		
	(5) Circumvention		-		
	(6) Operation and Maintenance Plan		-		
	(a) Air Pollution Control Devices and Collection Systems		-		
	(b) Control Equipment Data		-		
	(c) Processing or Materials Handling Systems		-		

FDEP Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) ¹ FDEP Title	Applicable Requirement		Comments/ Discussion	Unit/ Facility Potential Applicability
		Yes	No/ NA		
	(d) Fossil Fuel Steam Generators		-		
62-296.702	Fossil Fuel Steam Generators				
	(1) Applicability		-		
	(2) Emission Limitations		-		
	(a) Particulate Matter – 1.10 lb/mmBtu		-		
	(b) Visible Emissions – 20% opacity		-		
	(3) Test Methods and Procedures		-		
62-296.711	Materials Handling, Sizing, Screening, Crushing and Grinding Operations				
	(1) Applicability		-		
	(2) Emission Limitations		-		
	(3) Test Methods and Procedures		-		
Chapter 62-297 Stationary Sources – Emission Monitoring					
62-297.310	General Test Requirements				
	(1) Required Number of Test Runs	✓			
	(2) Operating Rate During testing	✓			
	(3) Calculation of Emission Rate	✓			
	(4) 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	✓			
	(b) Minimum Sample Volume	✓			
	(c) Required Flow Rate Range	✓			
	(d) Calibration	✓			
	(e) EPA Method 5	✓			
	(5) Determination of Process Variables	✓			
	(6) Required Stack Sampling Facilities				
	(a) Permanent Test Facilities	✓			
	(b) Temporary Test Facilities		-		

FDEP Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) ¹ FDEP Title	Applicable Requirement		Comments/ Discussion	Unit/ Facility Potential Applicability
		Yes	No/ NA		
	(c) Sampling Ports	✓			
	(d) Work Platform	✓			
	(e) Access	✓			
	(f) Electrical Power	✓			
	(g) Sampling Equipment Support	✓			
	(7) Frequency of Compliance Tests				
	(a) General Compliance testing	✓			
	1. Compliance test requirement prior to obtaining operating permit		-		
	2. Annual test requirement for excess PM emissions	✓			
	3. Annual test requirement prior to obtaining renewal permit	✓			
	4.a. Annual VE Test	✓			
	4.b. Annual test for lead, acrylonitride, and other regulated pollutants		-		
	4.c. Annual test for each NESHAP pollutant		-		
	5. No annual PM test required if burn no liquid and/or solid fuel for greater than 400 hrs/year	✓			
	6. Exemption from semi-annual PM test for steam generators	✓			
	7. Exemption from quarterly PM test for units not utilizing liquid and/or solid fuel for more than 100 hrs.	✓			
	8. Five year VE test requirement for units that operate no more than 400 hrs/year	✓			
	9. Fifteen day advance notification requirement prior to test	✓			
	10. Compliance test exemption for exempt units and units utilizing a general permit		-		
	(b) Special Compliance Tests	✓		Applicable upon any complaint	
	(c) Waiver of Compliance Test Requirement	✓			
	(8) Test Reports	✓			
62-297.401	Compliance Test Methods	✓			
62-297.440	Supplementary Test Procedures	✓			
62-297.450	EPA VOC Capture Efficiency Test Procedures		-		
62-297.520	CEMS Performance Specifications	✓			
62-297.620	Exceptions and Approval of Alternate Procedures and Requirements	✓			

Please Note: This Stanton (Units 025, 026, 027, and 028) specific applicability list overrides the general Title V Corc list. .

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EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) ¹ EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
40 CFR Part 60 – Standards of Performance for New Stationary Sources: Subparts B, C, Cb, Ce, Cc, Cd, Ce, D, Db, Dc, E, Ea, Eb, Ec, F, G, H, I, J, K, Ka, Kb, L, M, N, Na, O, P, Q, R, S, T, U, V, W, X, Y, Z, AA, AAa, BB, CC, DD, EE, HH, KK, LL, MM, NN, PP, QQ, RR, SS, TT, UU, VV, WW, XX, AAA, BBB, DDD, FFF, GG, HHH, III, JJJ, KKK, LLL, NNN, OOO, PPP, QQQ, RRR, SSS, TTT, UUU, VVV, WWW, AAAA, BBBB, CCCC, DDDD, EEEE, FFFF, GGGG, HHHH, IIII, JJJJ, KKKK					
40 CFR Part 60 – Standards for Performance for New Stationary Sources					
<i>Subpart A – General Provisions</i>					
60.7	Notification and record keeping	✓			
60.8	Performance tests	✓			
60.11	Compliance with standards and maintenance requirements	✓			
60.12	Circumvention	✓			
60.13	Monitoring requirements	✓			
60.19	General notifications and reporting requirements	✓			
<i>Subpart D – Standards of Performance for Fossil-Fuel Fired Steam Generators for Which Construction is Commenced After August 17, 1971</i>					
60.40	Applicability and designation of affected facility		-		
60.41	Definitions		-		
60.42	Standard for particulate matter		-		
60.43	Standard for sulfur dioxide (SO ₂)		-		
60.44	Standard for nitrogen oxides (NO)		-		
60.45	Emissions and fuel monitoring		-		
60.46	Test methods and procedures		-		
<i>Subpart Da – Standard of Performance for Electric Utility Steam Generating Units for Which Construction Commenced After September 18, 1978</i>					
60.40Da	Applicability and designation of affected facility	✓			
60.42Da(a)(1) and (b)	Standard for particulate matter	✓			
60.42Da(a)(2)(3), (c), and (d)	Standard for particulate matter		-		

¹ This Stanton (Units 025, 026, 027, and 028) specific applicability list overrides the general Title V Core list.

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) ¹ EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
60.43Da(b)(2)	Standard for sulfur dioxide	✓			
60.43Da(a), (b)(1), (c), (d), (e), (f), (g), (h), (i), (j), (k)	Standard for sulfur dioxide		-		
60.44Da(b), (c), (e), (f)	Standard for nitrogen oxides		-		
60.44Da (a), (d)	Standard for nitrogen oxides	✓			
60.45Da	Standard for mercury		-		
60.47Da	Commercial demonstration permit		-		
60.48Da (a), (b), (c), (e) – (k)	Compliance provisions	✓			
60.48Da (d), (l)-(p)	Compliance provisions		-		
60.48Da(q)	Compliance provisions for sources subject to 60.42Da(b)	✓			
60.49Da (a), (o), (u)(2), (w)	Emission Monitoring	✓			
60.49Da (b)-(n), (p)- (t), (u)(1), (v)	Emission Monitoring		-		
60.50Da (a), (b), (d), (e), and (f)	Compliance determination procedures and methods	✓			
60.50Da (c), (g), and (h)	Compliance determination procedures and methods		-		
60.51Da (a)	Reporting requirements	✓			
60.51Da (b)-(k)	Reporting requirements		-		
60.52Da	Recordkeeping requirements	✓			
<i>Subpart Db – Standards of Performance for Industrial – Commercial – Institutional Steam Generating Units</i>					
60.42Db	Standard for sulfur dioxide.		-		
60.43Db	Standard for particulate matter.		-		
60.44Db	Standard for nitrogen oxides.		-		
60.45Db	Compliance and performance test methods and procedures for sulfur dioxide.		-		
60.46Db	Compliance and performance test methods and procedures for particulate matter and nitrogen oxides.		-		
60.47Db	Emission monitoring for sulfur dioxide.		-		

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) ¹ EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
60.48Db	Emission monitoring for particulate matter and nitrogen oxides.		-		
60.49Db	Reporting and recordkeeping.		-		
<i>Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units</i>					
60.42Dc	Standard for sulfur dioxide.		-		
60.43Dc	Standard for particulate matter.		-		
60.44Dc	Compliance and performance test methods and procedures for sulfur dioxide.		-		
60.45Dc	Compliance and performance test methods and procedures for particulate matter.		-		
60.46Dc	Emission monitoring for sulfur dioxide.		-		
60.47Dc	Emission monitoring for particulate matter.		-		
60.48Dc	Reporting and recordkeeping.		-		
<i>Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978</i>					
60.112	Standard for volatile organic compounds (VOC)		-		
60.113	Monitoring of operations.		-		
<i>Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984</i>					
60.115a	Monitoring of operations		-		
<i>Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification commenced After July 23, 1984</i>					
60.110b	Applicability and designation of affected facility	✓			
60.111b	Definitions	✓			
60.112b	Standard for volatile organic compounds	✓			
60.113b	Testing and procedures	✓			
60.114b	Alternative means of emission limitations	✓			
60.115b	Recordkeeping and reporting requirements	✓			
60.116b	Monitoring of operations	✓			
<i>Subpart Y – Standards of Performance for Coal Preparation Plants</i>					
60.252	Standard for particulate matter		-		
60.253	Monitoring of operations		-		
60.254	Test methods and procedures		-		
<i>Subpart GG – Standard of Performance for Stationary Gas Turbines</i>					

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) ¹ EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
60.332(a)(1),(3), and (4), (b) and (f)	Standard for nitrogen oxides	✓			
60.332(a)(2); (c)- (e), (g)-(l)	Standard for nitrogen oxides		-		
60.333	Standard for sulfur dioxide	✓			
60.334(a), (b), (d) – (g)	Monitoring of operations		-	Daily monitoring of fuel sulfur and nitrogen content not required because custom schedule requested and approved.	
60.334 (b), (c), (h), (i), and (j)	Monitoring of operations	✓			
60.335	Test methods and procedures	✓			
<i>Subpart 000 – Standards of Performance for Nonmetallic Mineral Processing Plants</i>					
60.672	Standard for Particulate Matter		-		
60.674	Monitoring of Operations		-		
60.676	Reporting and Recordkeeping		-		
<i>Subpart HHHH– Emission Guidelines and Compliance Times for Coal-Fired Electric Steam Generating Units</i>					
60.4106	Standard requirements		-		
60.4110	Authorization and Responsibilities of Hg designated representative		-		
60.4111	Alternate Hg designated representative		-		
60.4112	Changing Hg designated representative and alternate Hg designated representative; changes in owners and operators		-		
60.4113	Certificate of representation		-		
60.4114	Objections concerning Hg designated representative		-		
60.4120	General Hg budget trading program permit requirements		-		
60.4121	Submission of Hg budget permit applications		-		
60.4122	Information requirements for Hg budget permit applications		-		
60.4123	Hg budget permit contents and term		-		
60.4124	Hg budget permit revisions		-		
60.4142	Hg allowance allocations.		-		

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) ¹ EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
60.4151	Establishment of accounts		-		
60.4152	Responsibilities of Hg authorized account representative		-		
60.4154	Compliance with Hg budget emissions limitation		-		
60.4160	Submission of Hg allowance transfers		-		
60.4170	General requirements		-		
60.4171	Initial certification and recertification procedures		-		
60.4172	Out of control periods		-		
60.4173	Notifications		-		
60.4174	Recordkeeping and reporting		-		
60.4175	Petitions		-		
60.4176	Additional requirements to provide heat input data		-		
<i>Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines</i>					
<i>Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines</i>					
60.4230	Am I subject to this subpart?		-		
60.4231	What emission standards must I meet if I am a manufacturer of stationary SI internal combustion engines?		-		
60.4232	How long must my engines meet the emission standards if I am a manufacturer of stationary SI internal combustion engines?		-		
60.4233	What emission standards must I meet if I am an owner or operator of a stationary SI internal combustion engine?		-		
60.4234	How long must I meet the emission standards if I am an owner or operator of a stationary SI internal combustion engine?		-		
60.4235	What fuel requirements must I meet if I am an owner or operator of a stationary SI gasoline fired internal combustion engine subject to this subpart?		-		
60.4236	What is the deadline for importing or installing stationary SI ICE produced in the previous model year?		-		
60.4237	What are the monitoring requirements if I am an owner or operator of an emergency stationary SI internal combustion engine?		-		
60.4238	What are my compliance requirements if I am a manufacturer of stationary SI internal combustion engines 519 KW (25 HP)?		-		
60.4239	What are my compliance requirements if I am a manufacturer of stationary SI internal combustion engines >19 KW (25 HP) that use gasoline?		-		

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) ¹ EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
60.4240	What are my compliance requirements if I am a manufacturer of stationary SI internal combustion engines >19 KW (25 HP) that are rich burn engines that use LPG?		-		
60.4241	What are my compliance requirements if I am a manufacturer of stationary SI internal combustion engines participating in the voluntary certification program?		-		
60.4242	What other requirements must I meet if I am a manufacturer of stationary SI internal combustion engines?		-		
60.4243	What are my compliance requirements if I am an owner or operator of a stationary SI internal combustion engine?		-		
60.4244	What test methods and other procedures must I use if I am an owner or operator of a stationary SI internal combustion engine?		-		
60.4245	What are my notification, reporting, and recordkeeping requirements if I am an owner or operator of a stationary SI internal combustion engine?		-		
60.4246	What parts of the General Provisions apply to me?		-		
60.4247	What parts of the mobile source provisions apply to me if I am a manufacturer of stationary SI internal combustion engines?		-		
60.4248	What definitions apply to this subpart?		-		
<i>Subpart KKKK — Standards of Performance for Stationary Combustion Turbine</i>					
60.4300	What is the purpose of this subpart?		-		
60.4305	Does this subpart apply to my stationary combustion turbine?		-		
60.4310	What types of operations are exempt from these standards of performance?		-		
60.4315	What pollutants are regulated by this subpart?		-		
60.4320	What emission limits must I meet for nitrogen oxides (NO _x)?		-		
60.4325	What emission limits must I meet for NO _x if my turbine burns both natural gas and distillate oil (or some other combination of fuels)?		-		
60.4330	What emission limits must I meet for sulfur dioxide (SO ₂)?		-		
60.4333	What are my general requirements for complying with this subpart?		-		
60.4335	How do I demonstrate compliance or NO _x if I use water or steam injection?		-		
60.4340	How do I demonstrate continuous compliance for NO _x if I do not use water or steam injection?		-		
60.4345	What are the requirements for the continuous emission monitoring system equipment, if I choose to use this option?		-		

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) ¹ EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
60.4350	How do I use data from the continuous emission monitoring equipment to identify excess emissions?		-		
60.4355	How do I establish and document a proper parameter monitoring plan?		-		
60.4360	How do I determine the total sulfur content of the turbine's combustion fuel?		-		
60.4365	How can I be exempted from monitoring the total sulfur content of the fuel?		-		
60.4370	How often must I determine the sulfur content of the fuel?		-		
60.4375	What reports must I submit?		-		
60.4380	How are excess emissions and monitor downtime defined for NOx		-		
60.4385	How are excess emissions and monitoring downtime defined for SO2?		-		
60.4390	What are my reporting requirements if I operate an emergency combustion turbine or a research and development turbine?		-		
60.4410	How do I establish a valid parameter range if I have chosen to continuously monitor parameters?		-		
60.4415	How do I conduct the initial and subsequent performance tests for sulfur?		-		
60.4420	What definitions apply to this subpart?		-		
Table to Subpart K K K K of Part 60	Nitrogen Oxide Emission Limits For New Stationary Combustion Turbines		-		
Part 61 – EPA Regulations on National Emission Standards for Hazardous Air Pollutants					
<i>Subpart A – General Provisions</i>					
61.05	Prohibited Activities	✓			Facility
61.09	Notification of Startup		-		Facility
61.10	Source Reporting and Request for Waiver of Compliance		-		Facility
61.11	Waiver of Compliance		-		Facility
61.12(b)	Compliance with Standards and Maintenance Requirements	✓			Facility
61.13	Emission Tests and Waiver of Emission Tests		-		Facility
61.14	Monitoring Requirements		-		Facility
61.19	Circumvention		-		Facility
<i>Subpart M – National Emission Standards for Asbestos</i>		✓			Facility
Appendix C to Part 61 – Quality Assurance Procedures		✓			Facility
Part 63 – EPA Regulations on National Emissions Standard for Hazardous Air Pollutants for Source Categories					
40 CFR Part 63 – National Emission Standards for Hazardous Air Pollutants for Source Categories			-	No NESHAP contains	

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) ¹ EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
				requirements which are applicable to the Smith Unit 3 CTGs.	
<i>Subpart A – General Provisions</i>					
63.4	Prohibited Activities and Circumvention		-		
63.6	Compliance with Standards and Maintenance Requirements		-		
63.7	Performance Testing Requirements		-		
63.8	Monitoring Requirements		-		
63.9	Notification Requirements		-		
63.10	Reporting and Recordkeeping Requirements		-		
63.11	Control Device Requirements		-		
<i>Subpart Q – National Emission Standards for Industrial Process Cooling Towers</i>					
63.402	Standard		-		
63.403	Compliance Dates		-		
63.404	Compliance Demonstrations		-		
63.405	Notification Requirements		-		
63.406	Recordkeeping and Reporting Requirements		-		
<i>Subpart T – National Standards for Halogenated Solvent Cleaning</i>					
63.462	Batch Cold Cleaning Machine Standards		-		
63.463	Batch Vapor and In-Line Cleaning Machine Standards		-		
63.464	Alternative Standards		-		
63.465	Test Methods		-		
63.466	Monitoring Procedures		-		
63.467	Recordkeeping Requirements		-		
63.468	Reporting Requirements		-		
63.471	Facility-wide Standards		-		
<i>Subpart ZZZZ– National Emission Standards for Stationary Reciprocating Internal Combustion Engines</i>					
63.6580	Purpose		-		
63.6585	Applicability		-		
63.6590	Affected Parts of Plant		-		
63.6595	Compliance Date		-		

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) ¹ EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
63.6600	Emission Limitations for Stationary RICE with Site Rating more than 500 HP located at Major Source of HAPs		-		
63.6601	Emission Limitations for 4SLB stationary RICE with Site Rating greater than/equal to 250 brake HP and less than 500 brake HP at a Major Source of HAPs		-		
63.6605	General Requirements		-		
63.6610	Initial Performance Tests		-		
63.6611	Initial Performance Tests		-		
63.6615	Subsequent Performance Tests		-		
63.6620	Performance Tests		-		
63.6625	Monitoring, Installation, Operation, and Maintenance Requirements		-		
63.6630	Demonstration of Initial Compliance		-		
63.6635	Monitoring and Data Collection		-		
63.6640	Demonstration of Continuous Compliance		-		
63.6645	Notifications		-		
63.6650	Reports		-		
63.6655	Records		-		
63.6670	Implementation and Enforcement		-		
63.6675	Definitions		-		
Tables	1-8		-		
Part 64 – Compliance Assurance Monitoring					
64.2	Applicability		-	Exempt – 40 CFR 64.2(b)(1)(vi)	
64.3	Monitoring design criteria		-	Exempt – 40 CFR 64.2(b)(1)(vi)	
64.4	Submittal requirements		-	Exempt – 40 CFR 64.2(b)(1)(vi)	
64.7	Operation of approved monitoring		-	Exempt – 40 CFR 64.2(b)(1)(vi)	
64.8	Quality improvement plan (QIP) requirements		-	Exempt – 40 CFR 64.2(b)(1)(vi)	
64.9	Reporting and recordkeeping requirements		-	Exempt – 40 CFR 64.2(b)(1)(vi)	

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) ¹ EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
64.10	Savings provisions		-	Exempt – 40 CFR 64.2(b)(1)(vi)	
40 CFR Part 72 – Acid Rain Program Permits					
<i>Subpart A – Acid Rain Program Permits</i>					
72.1	Purpose and scope	✓			
72.2	Definitions	✓			
72.3	Measurements, Abbreviations, and Acronyms	✓			
72.6	Applicability	✓			
72.7	New Units Exemption		-		
72.8	Retired Units Exemption		-		
72.9 excluding (c)(3)(i), (ii), and (iii), and (d)	Standard Requirements	✓			
<i>Subpart B – Designated Representative</i>					
72.20	Authorization and Responsibilities of the Designated Representative	✓			
72.21	Submission	✓			
72.22	Alternate Designated Representative	✓			
72.23	Changing the Designated Representative; Alternate Designated Representative; Changes in the Owners and Operators	✓			
72.24	Certificate of Representation	✓			
72.26	Delegation by Designated Representative and Alternative Designated Representative	✓			
<i>Subpart C – Acid Rain Applications</i>					
72.30	Requirements to Apply	✓			
72.31	Information Requirements for Acid Rain Permit Applications	✓			
72.32	Permit Applications to Shield and Binding Effect of Permit Application	✓			
72.33	Identification of Dispatch System	✓			
<i>Subpart D – Acid Rain Compliance Plan and Compliance Options</i>					
72.40 (a)(1)	General	✓			
72.40 (a)(2)	General		-		
72.41	Phase I Substitution Plans		-		
72.42	Phase I Extension Plans		-		

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) ¹ EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
72.43	Phase I Reduced Utilization Plans		-		
72.44	Phase II Repowering Extensions		-		
<i>Subpart E – Acid Rain Permit Contents</i>					
72.51	Permit Shield	✓			
<i>Subpart H – Permit Revisions</i>					
72.80	General	✓			
72.81	Permit Modifications	✓			
72.82 (a) and (c)	Fast-track Modifications	✓			
72.83	Administrative Permit Amendment	✓			
72.84	Automatic Permit Amendment	✓			
72.85	Permit Reopenings	✓			
<i>Subpart I – Compliance Certification</i>					
72.90	Annual Compliance Certification Report	✓			
72.91	Phase I Unit Adjusted Utilization		-		
72.92	Phase I Unit Allowance Surrender		-		
72.93	Units with Phase I Extension Plans		-		
72.94	Units with Repowering Extension Plans		-		
72.95	Allowance Deduction Formula	✓			
72.96	Administrator’s Action on Compliance Certifications		-		
Part 73 – Sulfur Dioxide Allowance System					
73.13	Procedures for Submittals	✓			
73.33	Authorized Account Representative	✓			
73.35	Compliance	✓			
Part 75 – Continuous Emissions Monitoring					
75.4	Compliance Dates	✓			
75.5	Prohibitions	✓			
75.10	General Operating Requirements	✓			
75.11 (d)(2)	Specific Provisions for Monitoring SO ₂ Emissions (SO ₂ and Flow Monitors)	✓			
75.12 (a), (b)	Specific Provisions for Monitoring NO _x Emissions (NO _x and Diluent Gas Monitors)	✓			
75.13 (b)	Specific Provisions for Monitoring CO ₂ Emissions	✓			

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) ¹ EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
75.14 (c)	Specific Provisions for Monitoring Opacity	✓			
75.15	Specific Provisions for Monitoring SO ₂ Emissions Removal by Qualifying Phase I Technology		-		
75.16	Specific Provisions for Monitoring Emissions from Common, By-Pass, and Multiple Stacks for SO ₂ Emissions and Heat Input Determinations		-		
75.17	Specific Provisions for Monitoring Emissions from Common, By-Pass, and Multiple Stacks for NO _x Emission Rate		-		
75.18	Specific Provisions for Monitoring Emissions from Common, By-Pass, and Multiple Stacks for Opacity		-		
75.19	Optional SO ₂ , NO _x , and CO ₂ Emissions Calculations for Low Mass Emissions (LME) Units	✓			
75.20 (b), (c)	Certification and Recertification Procedures	✓			
75.21	Quality Assurance and Quality Control Requirements	✓			
75.22	Reference Test Methods	✓			
75.23	Alternatives to Standards Incorporated by Reference	✓			
75.24	Out-of-Control Periods	✓			
75.30	General Provisions	✓			
75.31	Initial Missing Data Procedures	✓			
75.32	Determination of Monitor Data Availability for Standard Missing Data Procedures	✓			
75.33	Standard Missing Data Procedures	✓			
75.34	Units with Add-On Emission Controls	✓			
75.35	Missing Data Procedures for CO ₂	✓			
75.36	Missing Data Procedures for Heat Input	✓			
75.37	Missing Data Procedure for Moisture	✓			
75.38	Standard Missing Data Procedures for Hg CEMS		-		
75.39	Missing Data Procedures for Sorbent Trap Monitoring Systems		-		
75.40	General Demonstration Requirements	✓			
75.41	Precision Criteria	✓			
75.42	Reliability Criteria	✓			
75.43	Accessibility Criteria	✓			
75.44	Timeliness Criteria	✓			

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) ¹ EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
75.45	Daily Quality Assurance Criteria	✓			
75.46	Missing Data Substitution Criteria	✓			
75.47	Criteria for a Class of Affected Units	✓			
75.48	Petition for an Alternative Monitoring System	✓			
75.53	Monitoring Plan	✓			
75.57	General Recordkeeping Provisions	✓			
75.58	General Recordkeeping Provisions for Specific Situations	✓			
75.59	Certification, Quality Assurance, and Quality Control Record Provisions	✓			
75.60	General Provisions	✓			
75.61	Notifications	✓			
75.62	Monitoring Plan Submittals	✓			
75.63	Initial Certification or Recertification Application	✓			
75.64	Quarterly Reports	✓			
75.65	Opacity Reports	✓			
75.66	Petitions to Administrator	✓			
75.67	Retired Units Petitions		-		
75.70	NO _x Mass Emissions Provisions	✓			
75.71	Specific Provisions for Monitoring NO _x and Heat Input for the Purpose of Calculating NO _x Mass Emissions	✓			
75.72	Determination of NO _x Mass Emissions	✓			
75.73	Recordkeeping and Reporting	✓			
75.74	Annual and Ozone Season Monitoring and Reporting Requirements	✓			
75.75	Annual and Ozone Season Calculation Procedures for Special Circumstances	✓			
75.80	General Provisions	✓			
75.81	Monitoring of Hg Mass Emissions and Heat Input at the Unit Level		-		
75.82	Monitoring of Hg Mass Emissions and Heat Input at the Common and Multiple Stacks		-		
75.83	Calculation of Hg Mass Emissions and Heat Input Rate		-		
75.84	Recordkeeping and Reporting	✓			
Appendix A to Part 75 – Specifications and Test Procedures		✓			
Appendix B to Part 75 – Quality Assurance and Quality Control Procedures		✓			
Appendix C to Part 75 – Missing Data Statistical Estimation Procedures		✓			

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) ¹ EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
Appendix D to Part 75 – Optional SO ₂ Emissions Data Protocol for Gas-Fired Units and Oil-Fired Units		✓			
Appendix E to Part 75 – Optional NO _x Emissions Estimation Protocol for Gas-Fired Peaking Units and Oil-Fired Peaking Units			-		
Appendix F to Part 75 - Conversion Procedures		✓			
Appendix G to Part 75 - Determination of CO Emissions		✓			
Appendix H to Part 75 – Revised Traceability Protocol No. 1		✓			
Appendix I to Part 75 – Optional F-Factor/Fuel Flow Method			-		
Appendix J to Part 75 – Compliance Dates for Revised Recordkeeping Requirements and Missing Data Procedures		✓			
Appendix K to Part 75 – Quality Assurance and Operating Procedures for Sorbent Trap Monitoring Systems			-		
Part 76 – Acid Rain Nitrogen Oxides Emission Reduction Program					
76.5	NO _x Emission Limitations for Group 1 Boilers		-		
76.6	NO emission limitations for Group 2 boilers		-		
76.7	Revised NO _x emission limitations for Group 1, Phase II boilers		-		
76.8	Early Election for Group I, Phase II Boilers		-		
76.9	Permit Applications and Compliance Plans		-		
76.10	Alternative Emission Limitations		-		
76.11	Emissions Averaging		-		
76.12	Phase I NO _x Compliance Extensions		-		
76.13	Compliance and Excess Emissions		-		
76.14	Monitoring, Recordkeeping, and Reporting		-		
76.15	Test Methods and Procedures		-		
Part 77 – Excess Emissions					
77.3	Offset Plans	✓		Possible future requirement	
77.5	Deduction of Allowances	✓		Possible future requirement	
77.6	Excess Emission Penalties for SO ₂ and NO _x	✓		Possible future requirement	
Part 82 - Protection of Stratospheric Ozone					
82.34	Prohibitions		-		

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) ¹ EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
82.36	Approved refrigerant recycling equipment		-		
82.38	Approved independent standards testing organizations		-		
82.40	Technician training and certification		-		
82.42	Certification, recordkeeping and public notification requirements		-		
82.154	Prohibitions		-		
82.156	Required practice		-		
82.158	Standards for recycling and recovery equipment		-		
82.160	Approved equipment testing organizations		-		
82.161	Technician certification		-		
82.162	Certification by owners of recovery and recycling equipment		-		
82.164	Reclaimer certification		-		
82.166(k)(m)	Reporting and recordkeeping requirements for owners/operators		-	Facility has no units > 50 lbs.	
40 CFR 279.72	Used oil Regulations		-	Facility burns on-spec used oil	
Part 96 - Clean Air Interstate Rule					
<i>Subpart A</i>	<i>NOx Budget Trading Program General Provisions</i>		-		
<i>Subpart B</i>	<i>Authorized Account Representative for NOx Budget Sources</i>		-		
<i>Subpart C</i>	<i>Permits</i>		-		
<i>Subpart D</i>	<i>Compliance Certification</i>		-		
<i>Subpart E</i>	<i>NOx Allowance Allocations</i>		-		
<i>Subpart F</i>	<i>NOx Allowances Tracking System</i>		-		
<i>Subpart G</i>	<i>NOx Allowance Transfers</i>		-		
<i>Subpart H</i>	<i>Monitoring and Reporting</i>		-		
<i>Subpart I</i>	<i>Individual Unit Opt-ins</i>		-		
<i>Subpart J</i>	<i>Mobile and Area Sources (Reserved)</i>		-		
<i>Subpart AA - CAIR NOx Annual Trading Program General Provisions</i>					
96.101	Purpose	✓			
96.102	Definitions	✓			
96.103	Measurements, abbreviations, and acronyms	✓			
96.104	Applicability	✓			

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) ¹ EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
96.105	Retired unit exemption	✓		Possible future requirement	
96.106	Standard requirements	✓			
96.107	Computation of time	✓			
96.108	Appeal procedures	✓		Possible future requirement	
<i>Subpart BB - CAIR Designated Representative for CAIR NOx Sources</i>					
96.110	Authorization and responsibilities of CAIR designated representative	✓			
96.111	Alternate CAIR designated representative	✓			
96.112	Changing CAIR designated representative and alternate CAIR designated representative; changes in owners and operators	✓			
96.113	Certificate of representation	✓			
96.114	Objections concerning CAIR designated representative	✓			
96.115	Delegation by CAIR designated representative and alternate CAIR designated representative	✓			
<i>Subpart CC - Permits</i>					
96.120	General CAIR NOx Annual Trading Program permit requirements	✓			
96.121	Submission of CAIR permit applications	✓			
96.122	Information requirements for CAIR permit applications	✓			
96.123	CAIR permit contents and terms	✓			
96.124	CAIR permit revisions	✓			
<i>Subpart EE -CAIR NOx Allowance Allocations</i>					
96.140	State trading budgets		-		
96.141	Timing requirements for CAIR NOx allowance allocations		-		
96.142	CAIR NOx allowance allocations		-		
96.143	Compliance supplement pool		-		
<i>Subpart FF- CAIR NOx Allowance Tracking System</i>					
96.151	Establishment of accounts	✓			
96.152	Responsibilities of CAIR authorized account representative	✓			
96.153	Recordation of CAIR NOx allowance allocations	✓			
96.154	Compliance with CAIR NOx emissions limitation	✓			

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) ¹ EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
96.155	Banking	✓			
96.156	Account error		-		
96.157	Closing of general accounts	✓			
<i>Subpart GG - CAIR NOx Allowance Transfers</i>					
96.160	Submission of CAIR NOx allowance transfers	✓			
96.161	EPA recordation		-		
96.162	Notification		-		
<i>Subpart HH - Monitoring and Reporting</i>					
96.170	General requirements	✓			
96.171	Initial certification and recertification procedures	✓			
96.172	Out of control periods	✓			
96.173	Notifications	✓			
96.174	Recordkeeping and reporting	✓			
96.175	Petitions	✓			
<i>Subpart II - CAIR NOx Opt-In Units</i>					
<i>Subpart AAA - CAIR SO₂ Trading Program General Provisions</i>					
96.201	Purpose	✓			
96.202	Definitions	✓			
96.203	Measurements, abbreviations, and acronyms	✓			
96.204	Applicability	✓			
96.205	Retired unit exemption	✓		Possible future requirement	
96.206	Standard requirements	✓			
96.207	Computation of time	✓			
96.208	Appeal procedures	✓		Possible future requirement	
<i>Subpart BBB - CAIR Designated Representative for CAIR SO₂ Sources</i>					
96.210	Authorization and responsibilities of CAIR designated representative	✓			
96.211	Alternate CAIR designated representative	✓			
96.212	Changing CAIR designated representative and alternate CAIR designated representative; changes in owners and operators	✓			

EPA Rule	Stanton Units -025 and -026, two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) ¹ EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
96.213	Certificate of representation	✓			
96.214	Objections concerning CAIR designated representative	✓			
96.215	Delegation by CAIR designated representative and alternate CAIR designated representative	✓			
<i>Subpart CCC - Permits</i>					
96.220	General CAM SO ₂ Trading Program permit requirements	✓			
96.221	Submission of CAIR permit applications	✓			
96.222	Information requirements for CAIR permit applications	✓			
96.223	CAIR permit contents and term	✓			
96.224	CAIR permit revisions	✓			
<i>Subpart FFF - CAIR SO₂ Allowance Tracking System</i>					
96.251	Establishment of accounts	✓			
96.252	Responsibilities of CAIR authorized account representative	✓			
96.253	Recordation of CAIR SO ₂ allowances		-		
96.254	Compliance with CAIR SO ₂ emissions limitation	✓			
96.255	Banking	✓			
96.256	Account error		-		
96.257	Closing of general accounts	✓			
<i>Subpart GGG - CAIR SO₂ Allowance Transfers</i>					
96.260	Submission of CAIR allowance transfers	✓			
96.261	EPA recordation		-		
96.262	Notification		-		
<i>Subpart HHH - Monitoring and Reporting</i>					
96.270	General requirements	✓			
96.271	Initial certification and recertification procedures	✓			
96.272	Out of control periods	✓			
96.273	Notifications	✓			
96.274	Recordkeeping and reporting	✓			
96.275	Petitions	✓			
<i>Subpart III - CAIR SO₂ Opt-In Units</i>					
<i>Subpart AAAA-CAIR NO_x Ozone Season Trading Program General Provisions</i>					

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) ¹ EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
96.301	Purpose	✓			
96.302	Definitions	✓			
96.303	Measurements, abbreviations, and acronyms	✓			
96.304	Applicability	✓			
96.305	Retired unit exemption	✓		Possible future requirement	
96.306	Standard requirements	✓			
96.307	Computation of time	✓			
96.308	Appeal procedures	✓		Possible future requirement	
<i>Subpart BBBB - CAIR Designated Representative for CAIR NOx Ozone Season Sources</i>					
96.310	Authorization and responsibilities of CAIR designated representative	✓			
96.311	Alternate CAIR designated representative	✓			
96.312	Changing CAIR designated representative and alternate CAIR designated representative; changes in owners and operators	✓			
96.313	Certificate of representation	✓			
96.314	Objections concerning CAIR designated representative	✓			
96.315	Delegation by CAIR designated representative and alternate CAIR designated representative	✓			
<i>Subpart CCCC - Permits</i>					
96.320	General CAIR NOx Ozone Season Trading Program permit requirements	✓			
96.321	Submission of CAIR permit applications	✓			
96.322	Information requirements for CAIR permit applications	✓			
96.323	CAIR permit contents and term	✓			
96.324	CAIR permit revisions	✓			
<i>Subpart EEEE - CAIR NOx Ozone Season Allowance Allocations</i>					
96.340	State trading budgets		-		
96.341	Timing requirements for CAIR NOx Ozone Season allowance allocations		-		
96.342	CAIR NOx Ozone Season allowance allocations		-		
<i>Subpart FFFF - CAIR NOx Ozone Season Allowance Tracking System</i>					
96.351	Establishment of accounts	✓			

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) ¹ EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
96.352	Responsibilities of CAIR authorized account representative	✓			
96.353	Recordation of CAIR NOx Ozone Season allowance allocations		-		
96.354	Compliance with CAIR NOx emissions limitation	✓			
96.355	Banking	✓			
96.356	Account error		-		
96.357	Closing of general accounts	✓			
<i>Subpart GGGG - CAIR NOx Ozone Season Allowance Transfers</i>					
96.360	Submission of CAIR NOx Ozone Season allowance transfers	✓			
96.361	EPA recordation		-		
96.362	Notification		-		
<i>Subpart HHHH - Monitoring and Reporting</i>					
96.370	General requirements	✓			
96.371	Initial certification and recertification procedures	✓			
96.372	Out of control periods	✓			
96.373	Notifications	✓			
96.374	Recordkeeping and reporting	✓			
96.375	Petitions	✓			
<i>Subpart IIII - CAIR NOx Ozone Season Opt-in Units</i>					

Please Note: This Stanton (Units 025, 026, 027, and 028) specific applicability list overrides the general Title V Core list.

297792-v1D

ATTACHMENT SEC-FI-C6
Compliance Report and Plan



The Reliable One®

Certified Mail
No. 7007 0220 0000 7661 9940
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February 26, 2009

Ms. Rosalyn Hughes
Air Enforcement Section
United States
Environmental Protection Agency
Region IV
61 Forsyth Street, S. W.
Atlanta, GA 30303-8960

Mr. Jim Bradner, P. E.
Program Administrator
Air Resources Management
Florida Department of
Environmental Protection
3319 Maguire Blvd., Suite 232
Orlando, FL 32803

Dear Ms. Hughes:

Dear Mr. Bradner:

Enclosed are the completed 2008 Annual Statement of Compliance forms for
The following Title V facilities operated by the Orlando Utilities Commission:

<u>Facility</u>	<u>Title V Permit No.</u>
Stanton Energy Center – Units 1 & 2	0950137-001- AV - ORIS Code 0564
Stanton Energy Center – Unit A	0950137-001- AV - ORIS Code 55821
Indian River Plant	00900008-002-AV
St. Cloud City Power Plant	097002-002-AV

These forms are being submitted pursuant to each applicable Title V permit and Rule
62-213.440 (3), FAC. If you have any questions, please contact me at 407-737-4236.

Sincerely,

Denise M. Stalls
Vice President
Environmental Affairs

DMS:rc
Enclosures

USEC:\OUC\Finance\Reports\Annual Compliance Statements\2008\OUC Annual Compliance.dbr.doc

ORLANDO UTILITIES COMMISSION

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Department of Environmental Protection

Division of Air Resource Management

STATEMENT OF COMPLIANCE - TITLE V SOURCE

REASON FOR SUBMISSION (Check one to indicate why this statement of compliance is being submitted)

Annual Requirement Transfer of Permit Permanent Facility Shutdown

REPORTING PERIOD*	REPORT DEADLINE**
Jan. 1 through Dec. 31 of 2008 (year)	March 1, 2009

*The statement of compliance must cover all conditions that were in effect during the indicated reporting period, including any conditions that were added, deleted, or changed through permit revision.

**See Rule 62-213.440(3)(a)2., F.A.C.

Facility Owner/Company Name: Orlando Utilities Commission

Site Name: Stanton Energy Center Facility ID No. 0950137-006-AV County: Orange

COMPLIANCE STATEMENT (Check only one of the following three options)

A. This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part, and there were no reportable incidents of deviations from applicable requirements associated with any malfunction or breakdown of process, fuel burning or emission control equipment, or monitoring systems during the reporting period identified above.

B. This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part; however, there were one or more reportable incidents of deviations from applicable requirements associated with malfunctions or breakdowns of process, fuel burning or emission control equipment, or monitoring systems during the reporting period identified above, which were reported to the Department. For each incident of deviation, the following information is included:

1. Date of report previously submitted identifying the incident of deviation.
2. Description of the incident.

C. This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part, EXCEPT those identified in the pages attached to this report and any reportable incidents of deviations from applicable requirements associated with malfunctions or breakdowns of process, fuel burning or emission control equipment, or monitoring systems during the reporting period identified above, which were reported to the Department. For each item of noncompliance, the following information is included:

1. Emissions unit identification number.
2. Specific permit condition number (note whether the permit condition has been added, deleted, or changed during certification period).
3. Description of the requirement of the permit condition.
4. Basis for the determination of noncompliance (for monitored parameters, indicate whether monitoring was continuous, i.e., recorded at least every 15 minutes, or intermittent).
5. Beginning and ending dates of periods of noncompliance.
6. Identification of the probable cause of noncompliance and description of corrective action or preventative measures implemented.
7. Dates of any reports previously submitted identifying this incident of noncompliance.

For each incident of deviation, as described in paragraph B. above, the following information is included:

1. Date of report previously submitted identifying the incident of deviation.
2. Description of the incident.

STATEMENT OF COMPLIANCE - TITLE V SOURCE

RESPONSIBLE OFFICIAL CERTIFICATION

I, the undersigned, am a responsible official (Title V air permit application or responsible official notification form on file with the Department) of the Title V source for which this document is being submitted. With respect to all matters other than Acid Rain program requirements, I hereby certify, based on the information and belief formed after reasonable inquiry, that the statements made and data contained in this document are true, accurate, and complete.

Denise M Stalls
(Signature of Title V Source Responsible Official)

2/27/09
(Date)

Name: Denise M Stalls

Title: V.P. Environmental Affairs

DESIGNATED REPRESENTATIVE CERTIFICATION (only applicable to Acid Rain source)

I, the undersigned, am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Denise M Stalls
(Signature of Acid Rain Source Designated Representative)

2/27/09
(Date)

Name: Denise M Stalls

Title: V.P. Environmental Affairs

{Note: Attachments, if required, are created by a responsible official or designated representative, as appropriate, and should consist of the information specified and any supporting records. Additional information may also be attached by a responsible official or designated representative when elaboration is required for clarity. This report is to be submitted to both the compliance authority (DEP district or local air program) and the U.S. Environmental Protection Agency (EPA) (U.S. EPA Region 4, Air and EPCRA Enforcement Branch, 61 Forsyth Street, Atlanta GA 30303).}



Department of Environmental Protection

Division of Air Resource Management

STATEMENT OF COMPLIANCE - TITLE V SOURCE

REASON FOR SUBMISSION (Check one to indicate why this statement of compliance is being submitted)

Annual Requirement Transfer of Permit Permanent Facility Shutdown

REPORTING PERIOD*	REPORT DEADLINE**
January 1 through December 31 of 2008 (year)	March 1, 2009

*The statement of compliance must cover all conditions that were in effect during the indicated reporting period, including any conditions that were added, deleted, or changed through permit revision.

**See Rule 62-213.440(3)(a)2., F.A.C.

Facility Owner/Company Name: OUC/KUA/FMPA/Southern Company - Florida, LLC

Site Name: Stanton A Combined Cycle Facility ID No. 0950137 County: Orange

COMPLIANCE STATEMENT (Check only one of the following three options)

A. This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part, and there were no reportable incidents of deviations from applicable requirements associated with any malfunction or breakdown of process, fuel burning or emission control equipment, or monitoring systems during the reporting period identified above.

B. This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part; however, there were one or more reportable incidents of deviations from applicable requirements associated with malfunctions or breakdowns of process, fuel burning or emission control equipment, or monitoring systems during the reporting period identified above, which were reported to the Department. For each incident of deviation, the following information is included:

1. Date of report previously submitted identifying the incident of deviation.
2. Description of the incident.

C. This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part, EXCEPT those identified in the pages attached to this report and any reportable incidents of deviations from applicable requirements associated with malfunctions or breakdowns of process, fuel burning or emission control equipment, or monitoring systems during the reporting period identified above, which were reported to the Department. For each item of noncompliance, the following information is included:

1. Emissions unit identification number.
2. Specific permit condition number (note whether the permit condition has been added, deleted, or changed during certification period).
3. Description of the requirement of the permit condition.
4. Basis for the determination of noncompliance (for monitored parameters, indicate whether monitoring was continuous, i.e., recorded at least every 15 minutes, or intermittent).
5. Beginning and ending dates of periods of noncompliance.
6. Identification of the probable cause of noncompliance and description of corrective action or preventative measures implemented.
7. Dates of any reports previously submitted identifying this incident of noncompliance.

For each incident of deviation, as described in paragraph B. above, the following information is included:

1. Date of report previously submitted identifying the incident of deviation.
2. Description of the incident.

STATEMENT OF COMPLIANCE - TITLE V SOURCE

RESPONSIBLE OFFICIAL CERTIFICATION

I, the undersigned, am a responsible official (Title V air permit application or responsible official notification form on file with the Department) of the Title V source for which this document is being submitted. With respect to all matters other than Acid Rain program requirements, I hereby certify, based on the information and belief formed after reasonable inquiry, that the statements made and data contained in this document are true, accurate, and complete.


(Signature of Title V Source Responsible Official)

2/18/09
(Date)

Name: Joseph L. Miller

Title: Combined Cycle Site Manager

DESIGNATED REPRESENTATIVE CERTIFICATION (only applicable to Acid Rain source)

I, the undersigned, am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.


(Signature of Acid Rain Source Designated Representative)

2-20-09
(Date)

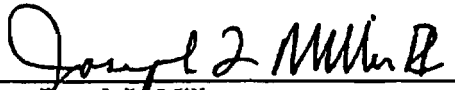
Name: Robert A. Schaffeld

Title: Director
Compliance & Corporate Affairs
Southern Power

{Note: Attachments, if required, are created by a responsible official or designated representative, as appropriate, and should consist of the information specified and any supporting records. Additional information may also be attached by a responsible official or designated representative when elaboration is required for clarity. This report is to be submitted to both the compliance authority (DEP district or local air program) and the U.S. Environmental Protection Agency (EPA) (U.S. EPA Region 4, Air and EPCRA Enforcement Branch, 61 Forsyth Street, Atlanta GA 30303).}

"This certification is based on Southern Company's understanding of existing regulations. However, I acknowledge that EPA has initiated enforcement action against numerous power-generating facilities in the U.S., including facilities owned/operated by Southern Company. These enforcement actions allege violations of state and federal prevention of significant deterioration and new source review (PSD/NSR) rules regarding certain new construction and/or maintenance activities. Southern Company disagrees with these allegations and EPA's interpretation of the scope of PSD/NSR rules concerning new construction and/or maintenance activities. The proper interpretation of the PSD/NSR rules as they apply to these issues currently is the subject of ongoing litigation."

"The following information is being submitted for the Stanton A Combined Cycle facility as periods of "non-compliance" and "incidents of deviation" for year 2008. This information was previously submitted to the Florida Department of Environmental Protection in quarterly excess emissions and semi-annual monitoring reports for the compliance year 2008. Other "incidents of deviation" for continuous emission monitors required under 40 CFR Part 75 (Acid Rain Program) have not been included in the attached information based on Southern Company's understanding of these regulations and quarterly reports previously submitted under those regulations."



Joseph L. Miller
Responsible Official
Stanton A Combined Cycle



Date

**2008 ANNUAL TITLE V CERTIFICATION REPORT
SOUTHERN POWER – STANTON A
PERMIT NO. 0950137-006-AV**

This facility was in compliance with all requirements identified in the Title V Operating Permit, EXCEPT for the following non-compliance item:

1) Emissions unit identification number: 026

2) Identify the Specific Condition Number: & 3) Description of the Requirement:

Section III, Specific Condition E.14; Nitrogen Oxides (NOx) Emissions shall not exceed 3.5 ppmvd @ 15% O2 on a 3-hour block average while operating on natural gas.

Appendix TV-5, Condition 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.

Appendix TV-5, Condition 10. Pursuant to Condition 9 above, the permittee shall "immediately" notify the Department meaning the same day, if during a workday (i.e. 8:00 am – 5:00 pm), or the first business day after the incident.

Appendix TV-5, Condition 12(6). The permittee shall properly operate and maintain the facility and systems of treatment and control that are installed and used by the permittee to achieve compliance with conditions of the permit, as required by Department rules.

Appendix TV-5, Condition 12(8)(a), (b). 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 description of and cause of the noncompliance; and, 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.

4) **Basis for the determination of noncompliance:** Continuous Emissions Monitor – 3-hour average and failure to make timely notice to the Department of the incident.

5) **Beginning and ending dates of periods of noncompliance.** 06/04/2008 @ 1200 hours to 1400 hours; One (3- hour block average) exceedance of the NOx emission limitation while operating on natural gas.

6) **Identification of the probable cause of noncompliance and description of corrective action or preventative measure implemented:** Stanton Unit 26 was being prepared for quarterly Part 75 quality assurance (QA) activities on the CEMS, which included a linearity and cylinder gas audit. These QA activities require the injection of several different concentrations of gas to challenge the CEMS (i.e. test their accuracy). During the duration of these activities the CEMS are not recording stack emissions. Because the ammonia flow to the plant's selective catalytic reduction (SCR) systems is automatically controlled using stack emissions feedback from the compliance NOx monitor, the ammonia flow must be switched to manual mode to prevent erroneous feedback during QA activities. Generally Stanton 25 and 26 are base loaded units that are dispatched together (i.e. same load) and the standard operating procedure for an SCR on manual during these events is to maintain the same ammonia flow as on the identical unit (in this case Stanton 25). However, during this event there were operational issues on both Stanton 25 and 26, which resulted in load

**2008 ANNUAL TITLE V CERTIFICATION REPORT
SOUTHERN POWER – STANTON A
PERMIT NO. 0950137-006-AV
(Continued)**

variations and quickly engaging and disengaging power augmentation (steam injection) on both units. The NOx at the inlet of the SCRs increased due to the increase in load, resulting in excess emissions on Stanton 26 because the ammonia flow system did not automatically adjust to compensate for the increase in NOx. To ensure a similar incident does not occur in the future, a procedural change was made to the operator's manual to require automatic mode be engaged during load changes that may result in NOx increases. Additional employee training was conducted on July 31, August 12, August 14 and August 19 to ensure prompt reporting of future excess emission incidents.

- 7) Dates of any reports previously submitted identifying this incident of noncompliance:** Initial telephone notification of the incident was made to FDEP on July 18, 2008. Additional information was routed by electronic format to FDEP on July 22, July 28 and August 22, 2008. A FDEP Warning Letter (OWL-AP-08-744) was received on September 23, 2008 and a revised FDEP Warning Letter (OWL-AP-08-744) was received on October 8, 2008. A meeting with FDEP was conducted on October 7, 2008 to discuss the results of Southern's investigation of the incident and to discuss resolution of the issue by short form consent order. A Consent Order (OCD-AP-08-51) was issued by the Department on October 8, 2008. The Order was executed on October 15, 2008 by all parties and the matter is considered resolved.

**2008 ANNUAL TITLE V CERTIFICATION REPORT
SOUTHERN POWER -STANTON A
PERMIT NO. 0950137-006-AV**

**This facility was in compliance with all requirements identified in the Title V Operating Permit,
EXCEPT for the following "incidents of deviations":**

**STANTON 25 AND 26 INCIDENTS OF DEVIATION REPORT
FIRST QUARTER 2008**

Part 60 NSPS

Stanton 25 had no NSPS excess emissions during the reporting period.
Mix = Combination of Oil and Gas

Stanton 26 had no NSPS excess emissions during the reporting period.
Mix = Combination of Oil and Gas

3 Hour Block Average Summary

Stanton 25 had no 3 Hour Block Average excess emissions during the reporting period.

Stanton 26 had no 3 Hour Block Average excess emissions during the reporting period.

CO 24 Hour Block Average Summary

Stanton 25 and Stanton 26 had no CO 24 Block Average excess emissions

CO/NOx 24 Hour Rolling Average Start-up/Shutdown Summary

Stanton 25 and Stanton 26 had no CO/NOx 24 Hour Rolling Average excess emissions during the reporting period.

STANTON 25 AND 26 INCIDENTS OF DEVIATION REPORT SECOND QUARTER 2008

Part 60 NSPS

Stanton 25 had no NSPS excess emissions during the reporting period.
Mix = Combination of Oil and Gas

Stanton 26 had no NSPS excess emissions during the reporting period.
Mix = Combination of Oil and Gas

3 Hour Block Average Summary

Stanton 25 had no 3 Hour Block Average excess emissions during the reporting period.

Stanton 26 had one 3 Hour Block Average excess emissions during the reporting period on June 4, 2008.

CO 24 Hour Block Average Summary

Stanton 25 had no CO 24 Block Average excess emissions during the reporting period.

Stanton 26 had no CO 24 Block Average excess emissions during the reporting period.

CO/NOx 24 Hour Rolling Average Start-up/Shutdown Summary

Stanton 25 had no CO/NOx 24 Hour Rolling Average excess emissions during the reporting period.

Stanton 26 had no CO/NOx 24 Hour Rolling Average excess emissions during the reporting period.

**STANTON 25 AND 26 INCIDENTS OF DEVIATION REPORT
THIRD QUARTER 2008**

Part 60 NSPS

Stanton 25 had no NSPS excess emissions during the reporting period.

Stanton 26 had no NSPS excess emissions during the reporting period.

3 Hour Block Average Summary

Stanton 25 had no 3 Hour Block Average excess emissions during the reporting period.

Stanton 26 had no 3 Hour Block Average excess emissions during the reporting period.

CO 24 Hour Block Average Summary

Stanton 25 had no CO 24 Block Average excess emissions during the reporting period.

Stanton 26 had no CO 24 Block Average excess emissions during the reporting period.

CO/NOx 24 Hour Rolling Average Start-up/Shutdown Summary

Stanton 25 had no CO/NOx 24 Hour Rolling Average excess emissions during the reporting period.

Stanton 26 had no CO/NOx 24 Hour Rolling Average excess emissions during the reporting period.

STANTON 25 AND 26 INCIDENTS OF DEVIATION REPORT FOURTH QUARTER 2008

Part 60 NSPS

Stanton 25 had no NSPS excess emissions during the reporting period.

Stanton 26 had no NSPS excess emissions during the reporting period.

3 Hour Block Average Summary

Stanton 25 had no 3 Hour Block Average excess emissions during the reporting period.

Stanton 26 had no 3 Hour Block Average excess emissions during the reporting period.

CO 24 Hour Block Average Summary

Stanton 25 had no CO 24 Block Average excess emissions during the reporting period.

Stanton 26 had no CO 24 Block Average excess emissions during the reporting period.

CO/NO_x 24 Hour Rolling Average Start-up/Shutdown Summary

Stanton 25 had no CO/NO_x 24 Hour Rolling Average excess emissions during the reporting period.

Stanton 26 had no CO/NO_x 24 Hour Rolling Average excess emissions during the reporting period.

STANTON A COMBINED CYCLE

COMPLIANCE REPORT & PLAN

1. **Compliance Report and Plan**

Attachment A to this application identifies the requirements that are applicable to the emissions units that comprise this Title V source. Each emissions unit is in compliance, and will continue to comply, with the respective applicable requirements.

The emission units that comprise this Title V source will comply with future-effective applicable requirements on a timely basis.

2. **Proposed Schedule for the Submission of Compliance Statements throughout the Permit Term**

Compliance statements are proposed to be submitted on an annual basis within 60 days after the end of each calendar year pursuant to the requirements of FDEP Rule 62-213.440(3)(a)2.a, F.A.C.

Attached to the plan is the most recent annual compliance statement for this Title V source.

Original



Energy to Serve Your World[®]

Internal Correspondence

Date: February 17, 2009

Re: 2008 Annual Title V Report for Stanton A

To: 1.26.3 (Annual Certification Report)
Robert A. Schaffeld, Southern Company
Joseph L. Miller, Southern Company
Jim Vick, Gulf Power Company

From: G. Dwain Waters, QEP

A handwritten signature in black ink that reads "Dwain Waters". The signature is written over the printed name "G. Dwain Waters, QEP".

- Please find attached the Title V Annual Certification for Stanton A. Please retain this document for reference for FDEP or EPA inspections or inquiries. Please note that the original of the Stanton A Title V certification document was submitted to Denise Stalls at OUC for plant wide submissions to FDEP.

Please let me know if you have any questions regarding these documents. Thanks,
Dwain

Cc: Brian Toth, Southern Company
Circe Starks, Southern Company
Allen Thomas, Southern Company
Greg Terry, Gulf Power Company
Denise Stalls, OUC



Department of Environmental Protection

Division of Air Resource Management

STATEMENT OF COMPLIANCE - TITLE V SOURCE

REASON FOR SUBMISSION (Check one to indicate why this statement of compliance is being submitted)

Annual Requirement Transfer of Permit Permanent Facility Shutdown

REPORTING PERIOD*	REPORT DEADLINE**
January 1 through December 31 of 2008 (year)	March 1, 2009

*The statement of compliance must cover all conditions that were in effect during the indicated reporting period, including any conditions that were added, deleted, or changed through permit revision.

**See Rule 62-213.440(3)(a)2., F.A.C.

Facility Owner/Company Name: OUC/KUA/FMPA/Southern Company - Florida, LLC

Site Name: Stanton A Combined Cycle Facility ID No. 0950137 County: Orange

COMPLIANCE STATEMENT (Check only one of the following three options)

A. This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part, and there were no reportable incidents of deviations from applicable requirements associated with any malfunction or breakdown of process, fuel burning or emission control equipment, or monitoring systems during the reporting period identified above.

B. This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part; however, there were one or more reportable incidents of deviations from applicable requirements associated with malfunctions or breakdowns of process, fuel burning or emission control equipment, or monitoring systems during the reporting period identified above, which were reported to the Department. For each incident of deviation, the following information is included:

1. Date of report previously submitted identifying the incident of deviation.
2. Description of the incident.

C. This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part, EXCEPT those identified in the pages attached to this report and any reportable incidents of deviations from applicable requirements associated with malfunctions or breakdowns of process, fuel burning or emission control equipment, or monitoring systems during the reporting period identified above, which were reported to the Department. For each item of noncompliance, the following information is included:

1. Emissions unit identification number.
2. Specific permit condition number (note whether the permit condition has been added, deleted, or changed during certification period).
3. Description of the requirement of the permit condition.
4. Basis for the determination of noncompliance (for monitored parameters, indicate whether monitoring was continuous, i.e., recorded at least every 15 minutes, or intermittent).
5. Beginning and ending dates of periods of noncompliance.
6. Identification of the probable cause of noncompliance and description of corrective action or preventative measures implemented.
7. Dates of any reports previously submitted identifying this incident of noncompliance.

For each incident of deviation, as described in paragraph B. above, the following information is included:

1. Date of report previously submitted identifying the incident of deviation.
2. Description of the incident.

STATEMENT OF COMPLIANCE - TITLE V SOURCE

RESPONSIBLE OFFICIAL CERTIFICATION

I, the undersigned, am a responsible official (Title V air permit application or responsible official notification form on file with the Department) of the Title V source for which this document is being submitted. With respect to all matters other than Acid Rain program requirements, I hereby certify, based on the information and belief formed after reasonable inquiry, that the statements made and data contained in this document are true, accurate, and complete.

Joseph L. Miller
(Signature of Title V Source Responsible Official)

2/18/09
(Date)

Name: Joseph L. Miller

Title: Combined Cycle Site Manager

DESIGNATED REPRESENTATIVE CERTIFICATION (only applicable to Acid Rain source)

I, the undersigned, am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Robert A. Schaffeld
(Signature of Acid Rain Source Designated Representative)

2.20.09
(Date)

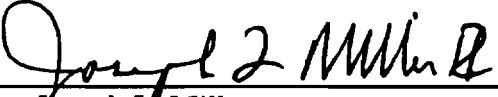
Name: Robert A. Schaffeld

Title: Director
Compliance & Corporate Affairs
Southern Power

{Note: Attachments, if required, are created by a responsible official or designated representative, as appropriate, and should consist of the information specified and any supporting records. Additional information may also be attached by a responsible official or designated representative when elaboration is required for clarity. This report is to be submitted to both the compliance authority (DEP district or local air program) and the U.S. Environmental Protection Agency (EPA) (U.S. EPA Region 4, Air and EPCRA Enforcement Branch, 61 Forsyth Street, Atlanta GA 30303).}

“This certification is based on Southern Company’s understanding of existing regulations. However, I acknowledge that EPA has initiated enforcement action against numerous power-generating facilities in the U.S., including facilities owned/operated by Southern Company. These enforcement actions allege violations of state and federal prevention of significant deterioration and new source review (PSD/NSR) rules regarding certain new construction and/or maintenance activities. Southern Company disagrees with these allegations and EPA’s interpretation of the scope of PSD/NSR rules concerning new construction and/or maintenance activities. The proper interpretation of the PSD/NSR rules as they apply to these issues currently is the subject of ongoing litigation.”

“The following information is being submitted for the Stanton A Combined Cycle facility as periods of “non-compliance” and “incidents of deviation” for year 2008. This information was previously submitted to the Florida Department of Environmental Protection in quarterly excess emissions and semi-annual monitoring reports for the compliance year 2008. Other “incidents of deviation” for continuous emission monitors required under 40 CFR Part 75 (Acid Rain Program) have not been included in the attached information based on Southern Company’s understanding of these regulations and quarterly reports previously submitted under those regulations.”



Joseph L. Miller
Responsible Official
Stanton A Combined Cycle



Date

**2008 ANNUAL TITLE V CERTIFICATION REPORT
SOUTHERN POWER – STANTON A
PERMIT NO. 0950137-006-AV**

This facility was in compliance with all requirements identified in the Title V Operating Permit, EXCEPT for the following non-compliance item:

1) Emissions unit identification number: 026

2) Identify the Specific Condition Number: & 3) Description of the Requirement:

Section III, Specific Condition E.14; Nitrogen Oxides (NO_x) Emissions shall not exceed 3.5 ppmvd @ 15% O₂ on a 3-hour block average while operating on natural gas.

Appendix TV-5, Condition 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.

Appendix TV-5, Condition 10. Pursuant to Condition 9 above, the permittee shall "immediately" notify the Department meaning the same day, if during a workday (i.e. 8:00 am – 5:00 pm), or the first business day after the incident.

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4) **Basis for the determination of noncompliance:** Continuous Emissions Monitor – 3-hour average and failure to make timely notice to the Department of the incident.

5) **Beginning and ending dates of periods of noncompliance.** 06/04/2008 @ 1200 hours to 1400 hours; One (3- hour block average) exceedance of the NO_x emission limitation while operating on natural gas.

6) **Identification of the probable cause of noncompliance and description of corrective action or preventative measure implemented:** Stanton Unit 26 was being prepared for quarterly Part 75 quality assurance (QA) activities on the CEMS, which included a linearity and cylinder gas audit. These QA activities require the injection of several different concentrations of gas to challenge the CEMS (i.e. test their accuracy). During the duration of these activities the CEMS are not recording stack emissions. Because the ammonia flow to the plant's selective catalytic reduction (SCR) systems is automatically controlled using stack emissions feedback from the compliance NO_x monitor, the ammonia flow must be switched to manual mode to prevent erroneous feedback during QA activities. Generally Stanton 25 and 26 are base loaded units that are dispatched together (i.e. same load) and the standard operating procedure for an SCR on manual during these events is to maintain the same ammonia flow as on the identical unit (in this case Stanton 25). However, during this event there were operational issues on both Stanton 25 and 26, which resulted in load

**2008 ANNUAL TITLE V CERTIFICATION REPORT
SOUTHERN POWER – STANTON A
PERMIT NO. 0950137-006-AV
(Continued)**

variations and quickly engaging and disengaging power augmentation (steam injection) on both units. The NOx at the inlet of the SCRs increased due to the increase in load, resulting in excess emissions on Stanton 26 because the ammonia flow system did not automatically adjust to compensate for the increase in NOx. To ensure a similar incident does not occur in the future, a procedural change was made to the operator's manual to require automatic mode be engaged during load changes that may result in NOx increases. Additional employee training was conducted on July 31, August 12, August 14 and August 19 to ensure prompt reporting of future excess emission incidents.

- 7) Dates of any reports previously submitted identifying this incident of noncompliance:** Initial telephone notification of the incident was made to FDEP on July 18, 2008. Additional information was routed by electronic format to FDEP on July 22, July 28 and August 22, 2008. A FDEP Warning Letter (OWL-AP-08-744) was received on September 23, 2008 and a revised FDEP Warning Letter (OWL-AP-08-744) was received on October 8, 2008. A meeting with FDEP was conducted on October 7, 2008 to discuss the results of Southern's investigation of the incident and to discuss resolution of the issue by short form consent order. A Consent Order (OCD-AP-08-51) was issued by the Department on October 8, 2008. The Order was executed on October 15, 2008 by all parties and the matter is considered resolved.

**2008 ANNUAL TITLE V CERTIFICATION REPORT
SOUTHERN POWER -STANTON A
PERMIT NO. 0950137-006-AV**

This facility was in compliance with all requirements identified in the Title V Operating Permit, EXCEPT for the following "incidents of deviations":

STANTON 25 AND 26 INCIDENTS OF DEVIATION REPORT FIRST QUARTER 2008

Part 60 NSPS

Stanton 25 had no NSPS excess emissions during the reporting period.
Mix = Combination of Oil and Gas

Stanton 26 had no NSPS excess emissions during the reporting period.
Mix = Combination of Oil and Gas

3 Hour Block Average Summary

Stanton 25 had no 3 Hour Block Average excess emissions during the reporting period.

Stanton 26 had no 3 Hour Block Average excess emissions during the reporting period.

CO 24 Hour Block Average Summary

Stanton 25 and Stanton 26 had no CO 24 Block Average excess emissions

CO/NOx 24 Hour Rolling Average Start-up/Shutdown Summary

Stanton 25 and Stanton 26 had no CO/NOx 24 Hour Rolling Average excess emissions during the reporting period.

STANTON 25 AND 26 INCIDENTS OF DEVIATION REPORT SECOND QUARTER 2008

Part 60 NSPS

Stanton 25 had no NSPS excess emissions during the reporting period.
Mix = Combination of Oil and Gas

Stanton 26 had no NSPS excess emissions during the reporting period.
Mix = Combination of Oil and Gas

3 Hour Block Average Summary

Stanton 25 had no 3 Hour Block Average excess emissions during the reporting period.

Stanton 26 had one 3 Hour Block Average excess emissions during the reporting period on June 4, 2008.

CO 24 Hour Block Average Summary

Stanton 25 had no CO 24 Block Average excess emissions during the reporting period.

Stanton 26 had no CO 24 Block Average excess emissions during the reporting period.

CO/NOx 24 Hour Rolling Average Start-up/Shutdown Summary

Stanton 25 had no CO/NOx 24 Hour Rolling Average excess emissions during the reporting period.

Stanton 26 had no CO/NOx 24 Hour Rolling Average excess emissions during the reporting period.

STANTON 25 AND 26 INCIDENTS OF DEVIATION REPORT THIRD QUARTER 2008

Part 60 NSPS

Stanton 25 had no NSPS excess emissions during the reporting period.

Stanton 26 had no NSPS excess emissions during the reporting period.

3 Hour Block Average Summary

Stanton 25 had no 3 Hour Block Average excess emissions during the reporting period.

Stanton 26 had no 3 Hour Block Average excess emissions during the reporting period.

CO 24 Hour Block Average Summary

Stanton 25 had no CO 24 Block Average excess emissions during the reporting period.

Stanton 26 had no CO 24 Block Average excess emissions during the reporting period.

CO/NOx 24 Hour Rolling Average Start-up/Shutdown Summary

Stanton 25 had no CO/NOx 24 Hour Rolling Average excess emissions during the reporting period.

Stanton 26 had no CO/NOx 24 Hour Rolling Average excess emissions during the reporting period.

STANTON 25 AND 26 INCIDENTS OF DEVIATION REPORT FOURTH QUARTER 2008

Part 60 NSPS

Stanton 25 had no NSPS excess emissions during the reporting period.

Stanton 26 had no NSPS excess emissions during the reporting period.

3 Hour Block Average Summary

Stanton 25 had no 3 Hour Block Average excess emissions during the reporting period.

Stanton 26 had no 3 Hour Block Average excess emissions during the reporting period.

CO 24 Hour Block Average Summary

Stanton 25 had no CO 24 Block Average excess emissions during the reporting period.

Stanton 26 had no CO 24 Block Average excess emissions during the reporting period.

CO/NOx 24 Hour Rolling Average Start-up/Shutdown Summary

Stanton 25 had no CO/NOx 24 Hour Rolling Average excess emissions during the reporting period.

Stanton 26 had no CO/NOx 24 Hour Rolling Average excess emissions during the reporting period.

CEMS AVAILABILITY FOR NOX FOURTH QUARTER 2008

Unit	October	November	December
Stanton 25	99.7	99.7	99.7
Stanton 26	99.8	99.8	99.8

Stanton Average = 99.8%

NOTE: Availability is the EPA defined rolling availability based on last 8,760 boiler operating hours.

SOUTHERN COMPANY

Energy to Serve Your World™

Certified Mail

February 24, 2008

Ms. Wanda Parker-Garvin
Florida Department of Environmental Protection
Central District
319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Dear Ms. Parker-Garvin:

**RE: 2008 ACID RAIN PROGRAM - PHASE II ANNUAL CERTIFICATION
STANTON A COMBINED CYCLE - Facility ID # 0950137
ORIS Code: 55821**

Attached, please find the Phase II Acid Rain Annual Certification Compliance Report for the Stanton A Combined Cycle Generating Unit (ORIS Code 55821) for year 2008. As outlined in the Title V Air Permit for Stanton A, this document is being copied to the Division of Air Resources Management of the Florida Department of Environmental Protection, Tallahassee, Florida and to EPA Region IV. Please note that the above referenced reports were submitted electronically for 2008 as outlined in EPA's CAMD Business System. If you have questions regarding the electronic submission, please contact Kenon Smith at EPA Washington Headquarters at (202)-343-9164.

If you have any questions or need further information regarding the Phase II Annual Certification Compliance Report for the Stanton A Combined Cycle Generating Unit please call me at (850) 444.6527.

Sincerely,


G. Dwain Waters, QEP

cc: w/att: Joseph L. Miller, Southern Company
Robert A. Schaffeld, Southern Company
Allen Thomas, Southern Company
Circe Starks, Southern Company
Brian Toth, Southern Company
Denise Stalls, Orlando Utilities Commission
Greg Terry, Gulf Power Company
Jim Vick, Gulf Power Company
Gary Perko, Hopping, Green & Sams

Trina Vielhauer, FDEP, Air Resources Management, Tallahassee, Florida
Beverly H. Banister, U.S. EPA IV Air, Pesticides and Toxics Management Division

PHASE II ANNUAL COMPLIANCE CERTIFICATION REPORT

Southern Power – Florida, LLC
5100 South Alafaya Trail
Orlando, FL 32531

List of all affected units subject to requirements under the
Acid Rain Program being certified for year 2008.

<u>Plant-Unit Name</u>	<u>State</u>	<u>ATS Account Number</u>
Stanton A Unit 25	Florida	055821FACLT
Stanton A Unit 26	Florida	055821FACLT

All certifications conducted electronically through EPA's CAMD Business System.

Waters, G. Dwain

From: Starks, Circe (SPC)
Sent: Monday, February 23, 2009 10:06 PM
To: Waters, G. Dwain; Thomas, Allen L. (SPC)
Subject: FW: Receipt of Allowance Deduction Information

Plant Stanton Acid Rain Deduction Information. Please place a copy in your Acid Rain files.

Thanks,
 Circe

From: EPA Clean Air Markets Division [mailto:IRMC@epa.gov]
Sent: Monday, February 23, 2009 10:03 PM
To: Starks, Circe (SPC)
Cc: Boyd, Kenneth W.; Schaffeld, Robert A. (SPC); cmhobson-DR
Subject: Receipt of Allowance Deduction Information

Dear Circe Starks,

Thank you for your recent on-line submission of allowance deduction information for compliance year 2008. Information was received for the account listed below.

Deduct From

Program: ARP **Account Number:** 055821FACLT **Account Name and State:** Stanton A, FL

Order	Year	Serial Start	Serial End	Amount
1	2004	3100536	3100539	4
			Total	4 If you have any questions about this specific action, please contact Kenon Smith at smith.kenon@epa.gov or (202) 343-9164 or Paula Branch at branch.paula@epa.gov or (202) 343-9168.

ATTACHMENT SEC-FI-C8
Requested Changes to Current Title V Air Operation Permit:

UNREGULATED

Appendix U-1. List of Insignificant Emissions Units and Activities.

Unregulated Emissions Units and 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.

For those unregulated emissions units subject to the *General Visible Emissions Standard* at Rule 62-296.320(4)(b), F.A.C., then the provisions of Rule 62-210.700, F.A.C., *Excess Emissions*, are available for purposes of compliance.

The below listed emissions units and activities are neither ‘regulated emissions units’ nor ‘exempt emissions units’.

E.U. ID No.	Brief Description of Emissions Units and Activities
-017	Material Handling ✓
-019	0950137001AVWATER Treatment ✓
-018	Fuel Storage Tanks ✓
-020	Unconfined Emissions ✓
xxx -021	Surface Coating and Solvent Cleaning ✓
xxx -022	General Purpose Engines ✓
-018	Fuel Storage Tanks ✓
xxx -023	Helper Cooling Towers ✓
xxx -024	Emergency Generators ✓
-027	Mechanical Draft Cooling Towers ✓
-036	Inline Insertable Dust Collector ✓
-037	Natural Draft Cooling Towers ✓

The Mechanical Draft Cooling Tower and Natural Draft Cooling Towers are not subject to NESHAP because a chromium-based chemical treatment is not used.

[0950137-002-AC, Specific Condition 6.]

ATTACHMENT SEC-FI-C7
Verification of Risk Management Plan Submission to EPA
Stanton Energy Center

Facility Name: Stanton Energy Center
EPA ID: 1000 0014 0661

RMP Report for Stanton Energy Center

Section 1. Registration Information

1.1 Source Identification: Facility ID: 26

- a. Facility Name: Stanton Energy Center
b. Parent Company #1 Name: Orlando Utilities Commission
c. Parent Company #2 Name:

1.2 EPA Facility Identifier: 1000 0014 0661

1.3 Other EPA Systems Facility ID: FLD 981924988

1.4 Dun and Bradstreet Numbers (DUNS):

- a. Facility DUNS:
b. Parent Company #1 DUNS:
c. Parent Company #2 DUNS:

1.5 Facility Location Address:

- a. Street 1: 5100 South Alafaya Trail
b. Street 2:
c. City: Orlando d. State: FL e. Zip: 32831 -2005
f. County: Orange

Facility Latitude and Longitude:

- g. Lat. (dd.ddddddd): 28.476944 h. Long. (ddd.ddddddd): -081.165833
i. Lat/Long Method: AO Address Matching - Other
j. Lat/Long Description: PG Plant Entrance (General)
k. Horizontal accuracy measure (m): 12.2
l. Horizontal Reference Datum Code: 002 North American Datum of 1983
m. Source Map Scale Number:

1.6 Owner or Operator:

- a. Name: Orlando Utilities Commission
b. Phone: (407) 423-9100

Mailing address:

- c. Street 1: 500 South Orange Avenue d. Street 2:
e. City: Orlando f. State: FL g. Zip: 32831 -2005

Facility Name: Stanton Energy Center
EPA ID: 1000 0014 0661

1.7 Name and title of person or position responsible for part 68 (RMP) implementation:

a. **Name of person:** Len Mancini
b. **Title of person or position:** Senior Environmental Engineer
c. **Email address:** lmancini@ouc.com

1.8 Emergency contact:

a. **Name:** Harold Ross
b. **Title:** Safety and Training Manager
c. **Phone:** (407) 658-6444
d. **24-hour phone:** (407) 491-5033
e. **Ext. or PIN:**
f. **Email address:** hross@ouc.com

1.9 Other points of contact:

a. **Facility or Parent Company E-Mail Address:** webmaster@ouc.com
b. **Facility Public Contact Phone:** (407) 658-6444
c. **Facility or Parent Company WWW Homepage Address:** www.ouc.com

1.10 LEPC: District 6 LEPC

1.11 Number of full time employees on site: 179

1.12 Covered by:

a. **OSHA PSM:** Yes
b. **EPCRA 302:** Yes
c. **CAA Title V:** Yes **Air operating permit ID:** PA81-14

1.13 OSHA Star or Merit Ranking: No

1.14 Last Safety Inspection (by an External Agency) Date: 02/13/2004

1.15 Last Safety Inspection Performed by an External Agency: DCA

1.16 Will this RMP involve predictive filing?: No

1.18 RMP Preparer Information:

a. **Name:** Golder Associates Inc
b. **Telephone:** (904) 363-3430
c. **Street1:** 8933 Western Way, Suite 12

Facility Name: Stanton Energy Center
EPA ID: 1000 0014 0661

d. Street2:

e. City: Jacksonville

f. State: FL **g. ZIP:** 32256 -

Section 1.17 Process(es)

a. Process ID: 30 **Program Level** 3 Chlorine Process

b. NAICS Code

22111 Electric Power Generation

c. Process Chemicals

c.1 Process Chemical (ID / Name)

33 Chlorine

c.2 CAS Nr.

7782-50-5

c.3 Qty (lbs.)

20,000

a. Process ID: 31 **Program Level** 3 Ammonia Process

b. NAICS Code

22111 Electric Power Generation

c. Process Chemicals

c.1 Process Chemical (ID / Name)

34 Ammonia (anhydrous)

c.2 CAS Nr.

7664-41-7

c.3 Qty (lbs.)

259,000

Section 2. Toxics: Worst Case

Toxics: Worst Case ID 27

2.1 a. Chemical Name: Ammonia (anhydrous)

b. Percent Weight of Chemical (if in a mixture): 100.0

2.2 Physical State: Gas Liquified by Pressure

2.3 Model used: EPA's RMP*Comp(TM)

2.4 Scenario: Gas Release

2.5 Quantity released: 129,500 lbs

2.6 Release rate: 12,950.0 lbs/min

2.7 Release duration: 10.0 mins

2.8 Wind speed: 1.5 m/sec

2.9 Atmospheric Stability Class: F

2.10 Topography: Urban

2.11 Distance to Endpoint: 4.40 mi

Facility Name: Stanton Energy Center
EPA ID: 1000 0014 0661

2.12 Estimated Residential population within distance to endpoint: 16,000

2.13 Public receptors within distance to endpoint:

a. Schools:	No	d. Prisons/Correction facilities:	Yes
b. Residences:	Yes	e. Recreation areas:	Yes
c. Hospitals:	No	f. Major commercial, office or, industrial areas:	Yes
g. Other (Specify):			

2.14 Environmental receptors within distance to endpoint:

a. National or state parks, forests, or monuments:	No
b. Officially designated wildlife sanctuaries, preserves, or refuges:	No
c. Federal wilderness areas:	No
d. Other (Specify):	

2.15 Passive mitigation considered:

a. Dikes:	No	d. Drains:	No
b. Enclosures:	No	e. Sumps:	No
c. Berms:	No	f. Other (Specify):	

2.16 Graphic file name:

Section 3. Toxics: Alternative Release

Toxics: Alternative Release ID: 35

3.1 a. Chemical Name: Chlorine

b. Percent Weight of Chemical (if in a mixture): 100.0

3.2 Physical State: Gas Liquefied by Pressure

3.3 Model: EPA's RMP*Comp(TM)

3.4 Scenario: Gas release from valve failure

3.5 Quantity released: 2,000 lbs

3.6 Release rate: 78.0 lbs/min

3.7 Release duration: 26.0 mins

3.8 Wind speed: 3.0 m/sec

3.9 Atmospheric Stability Class: D

3.10 Topography: Urban

3.11 Distance to Endpoint: 0.20 mi

3.12 Estimated Residential population within distance to endpoint: 0

3.13 Public receptors within distance to endpoint:

a. Schools:	No	d. Prisons/Correction facilities:	No
b. Residences:	No	e. Recreation areas:	No

Facility Name: Stanton Energy Center
EPA ID: 1000 0014 0661

c. Hospitals: No f. Major commercial, office, or industrial areas: No

g. Other (Specify):

3.14 Environmental receptors within distance to endpoint:

a. National or state parks, forests, or monuments: No

b. Officially designated wildlife sanctuaries, preserves, or refuges: No

c. Federal wilderness areas: No

d. Other (Specify):

3.15 Passive mitigation considered:

a. Dikes: No d. Drains: No

b. Enclosures: No e. Sumps: No

c. Berms: No f. Other (Specify):

3.16 Active mitigation considered:

a. Sprinkler systems: No f. Flares: No

b. Deluge system: No g. Scrubbers: No

c. Water curtain: No h. Emergency shutdown systems: No

d. Neutralization: No i. Other (Specify): Response capabilities

e. Excess flow valve: No

3.17 Graphic file name:

Facility Name: Stanton Energy Center
EPA ID: 1000 0014 0861

Toxics: Alternative Release ID: 36

- 3.1 a. Chemical Name: Ammonia (anhydrous)
b. Percent Weight of Chemical (if in a mixture): 100.0
3.2 Physical State: Gas Liquified by Pressure
3.3 Model: EPA's RMP*Comp(TM)
3.4 Scenario: Gas release from pressure relief valve failure
3.5 Quantity released: 20,724 lbs
3.6 Release rate: 345.0 lbs/min
3.7 Release duration: 60.0 mins
3.8 Wind speed: 3.0 m/sec
3.9 Atmospheric Stability Class: D
3.10 Topography: Urban
3.11 Distance to Endpoint: 0.10 mi
3.12 Estimated Residential population within distance to endpoint: 0
3.13 Public receptors within distance to endpoint:
a. Schools: No d. Prisons/Correction facilities: No
b. Residences: No e. Recreation areas: No
c. Hospitals: No f. Major commercial, office, or industrial areas: No
g. Other (Specify):
3.14 Environmental receptors within distance to endpoint:
a. National or state parks, forests, or monuments: No
b. Officially designated wildlife sanctuaries, preserves, or refuges: No
c. Federal wilderness areas: No
d. Other (Specify):
3.15 Passive mitigation considered:
a. Dikes: No d. Drains: No
b. Enclosures: No e. Sumps: No
c. Berms: No f. Other (Specify):
3.16 Active mitigation considered:
a. Sprinkler systems: No f. Flares: No
b. Deluge system: No g. Scrubbers: No
c. Water curtain: No h. Emergency shutdown systems: No
d. Neutralization: No i. Other (Specify): HAZMAT Response
e. Excess flow valve: No
3.17 Graphic file name:

Section 4. Flammables: Worst Case --- No Data To Report

Section 5. Flammables: Alternative Release --- No Data To Report

Section 6. Accident History --- No Data To Report

Section 7. Prevention Program 3

Process ID: 30 Chlorine Process

Prevention Program ID: 30

Prevention Program Description: water treatment process

7.1 NAICS Code 22111

7.2 Chemicals Chemical Name
Chlorine

7.3 Date on which the safety information was last reviewed or revised: 03/06/2004

7.4 Process Hazard Analysis (PHA):

a. **Date of last PHA or PHA update:** 02/12/2004

b. **The technique used:**

What If:	No	Failure Mode and Effects Analysis:	No
Checklist:	No	Fault Tree Analysis:	No
What If/Checklist:	Yes	Other (Specify):	
HAZOP:	No		

c. **Expected or actual date of completion of all changes from last PHA or PHA update:** 08/12/2004

d. **Major hazards identified:**

Toxic release:	Yes	Contamination:	No
Fire:	No	Equipment failure:	Yes
Explosion:	No	Loss of cooling, heating, electricity, instrument air:	No
Runaway reaction:	No	Earthquake:	No
Polymerization:	No	Floods (flood plain):	No
Overpressurization:	No	Tornado:	Yes
Corrosion:	Yes	Hurricanes:	Yes
Overfilling:	No	Other (Specify):	

e. **Process controls in use:**

Vents:	No	Emergency air supply:	No
Relief valves:	No	Emergency power:	No

Facility Name: Stanton Energy Center
EPA ID: 1000 0014 0661

Check valves:	Yes	Backup pump:	No
Scrubbers:	No	Grounding equipment:	No
Flares:	No	Inhibitor addition:	No
Manual shutoffs:	Yes	Rupture disks:	No
Automatic shutoffs:	Yes	Excess flow device:	No
Interlocks:	Yes	Quench system:	No
Alarms and procedures:	Yes	Purge system:	No
Keyed bypass:	No	None:	No
		Other (Specify):	Fusible plug on container

f. Mitigation systems in use:

Sprinkler system:	No	Water curtain:	No
Dikes:	No	Enclosure:	No
Fire walls:	No	Neutralization:	No
Blast walls:	No	None:	Yes
Deluge system:	No	Other (Specify):	

g. Monitoring/detection systems in use:

Process area detectors:	Yes	None:	No
Perimeter monitors:	No	Other (Specify):	

h. Changes since last PHA or PHA update:

Reduction in chemical inventory:	No	Installation of perimeter monitoring systems:	No
Increase in chemical inventory:	No	Installation of mitigation systems:	No
Change process parameters:	No	None recommended:	No
Installation of process controls:	No	None:	No
Installation of process detection systems:	No	Other (Specify):	pipe labeling, posting emergency information, installing remote ventilation controls

7.5 Date of most recent review or revision of operating procedures: 05/03/2004

7.6 Training:

a. The date of the most recent review or revision of training programs: 03/31/2004

b. The type of training provided:

Classroom: Yes On the job: Yes Other (Specify):

c. The type of competency testing used:

Written test:	Yes	Observation:	No
Oral test:	No	Other (Specify):	

Facility Name: Stanton Energy Center
EPA ID: 1000 0014 0661

Demonstration: Yes

7.7 Maintenance:

- a. The date of the most recent review or revision of maintenance procedures: 03/31/2004
b. The date of the most recent equipment inspection or test: 03/30/2004
c. Equipment most recently inspected or tested : chlorination system

7.8 Management of change:

- a. The date of the most recent change that triggered management of change procedures:
b. The date of the most recent review or revision of management of change procedures: 03/31/2004

7.9 The date of the most recent pre-startup review:

7.10 Compliance audits:

- a. The date of the most recent compliance audit: 03/11/2002
b. Expected date of completion of all changes resulting from the compliance audit: 08/13/2004

7.11 Incident investigation:

- a. The date of the most recent incident investigation (if any):
b. Expected or actual date of completion of all changes resulting from the investigation:

7.12 The date of the most recent review or revision of employee participation plans: 03/31/2004

7.13 The date of the most recent review or revision of hot work permit procedures: 03/31/2004

7.14 The date of the most recent review or revision of contractor safety procedures: 03/31/2004

7.15 The date of the most recent evaluation of contractor safety performance: 03/19/2004

Process ID: 31 Ammonia Process

Prevention Program ID: 31

Prevention Program Description: selective catalytic reduction system

7.1 NAICS Code 22111

7.2 Chemicals Chemical Name
Ammonia (anhydrous)

7.3 Date on which the safety information was last reviewed or revised: 03/06/2002

7.4 Process Hazard Analysis (PHA):

a. Date of last PHA or PHA update: 02/11/2004

b. The technique used:

What If:	No	Failure Mode and Effects Analysis:	No
Checklist:	No	Fault Tree Analysis:	No
What If/Checklist:	Yes	Other (Specify):	

Facility Name: Stanton Energy Center
EPA ID: 1000 0014 0661

HAZOP: No

c. Expected or actual date of completion of all changes from last PHA or PHA update: 08/11/2004

d. Major hazards identified:

Toxic release:	Yes	Contamination:	No
Fire:	No	Equipment failure:	Yes
Explosion:	No	Loss of cooling, heating, electricity, instrument air:	No
Runaway reaction:	No	Earthquake:	No
Polymerization:	No	Floods (flood plain):	No
Overpressurization:	No	Tornado:	Yes
Corrosion:	Yes	Hurricanes:	Yes
Overfilling:	No	Other (Specify):	Operator Error

e. Process controls in use:

Vents:	No	Emergency air supply:	No
Relief valves:	Yes	Emergency power:	No
Check valves:	Yes	Backup pump:	No
Scrubbers:	No	Grounding equipment:	Yes
Flares:	No	Inhibitor addition:	No
Manual shutoffs:	Yes	Rupture disks:	No
Automatic shutoffs:	Yes	Excess flow device:	No
Interlocks:	Yes	Quench system:	No
Alarms and procedures:	Yes	Purge system:	No
Keyed bypass:	No	None:	No
		Other (Specify):	

f. Mitigation systems in use:

Sprinkler system:	No	Water curtain:	No
Dikes:	Yes	Enclosure:	No
Fire walls:	No	Neutralization:	No
Blast walls:	No	None:	No
Deluge system:	Yes	Other (Specify):	

g. Monitoring/detection systems in use:

Process area detectors:	Yes	None:	No
Perimeter monitors:	No	Other (Specify):	

h. Changes since last PHA or PHA update:

Reduction in chemical inventory:	No	Installation of perimeter monitoring systems:	No
----------------------------------	----	---	----

Facility Name: Stanton Energy Center
EPA ID: 1000 0014 0661

Increase in chemical inventory:	No	Installation of mitigation systems:	No
Change process parameters:	No	None recommended:	No
Installation of process controls:	No	None:	No
Installation of process detection systems:	No	Other (Specify):	documentation of equipment information and emergency lighting

7.5 Date of most recent review or revision of operating procedures: 05/03/2004

7.6 Training:

a. The date of the most recent review or revision of training programs: 03/01/2004

b. The type of training provided:

Classroom: Yes On the job: Yes Other (Specify):

c. The type of competency testing used:

Written test: Yes Observation: Yes

Oral test: No Other (Specify):

Demonstration: Yes

7.7 Maintenance:

a. The date of the most recent review or revision of maintenance procedures: 03/31/2004

b. The date of the most recent equipment inspection or test: 03/30/2004

c. Equipment most recently inspected or tested : ammonia system

7.8 Management of change:

a. The date of the most recent change that triggered management of change procedures: 04/16/1999

b. The date of the most recent review or revision of management of change procedures: 03/31/2004

7.9 The date of the most recent pre-startup review: 04/22/2003

7.10 Compliance audits:

a. The date of the most recent compliance audit: 03/11/2002

b. Expected date of completion of all changes resulting from the compliance audit: 08/13/2004

7.11 Incident investigation:

a. The date of the most recent incident investigation (if any):

b. Expected or actual date of completion of all changes resulting from the investigation:

7.12 The date of the most recent review or revision of employee participation plans: 03/31/2004

7.13 The date of the most recent review or revision of hot work permit procedures: 03/31/2004

7.14 The date of the most recent review or revision of contractor safety procedures: 03/31/2004

7.15 The date of the most recent evaluation of contractor safety performance: 02/15/2003

Section 8. Prevention Program 2 --- No Data To Report

Section 9. Emergency Response

9.1 Written Emergency Response (ER) Plan:

- a. Is facility included in written community emergency response plan? Yes
- b. Does facility have its own written emergency response plan? Yes

9.2 Does facility's ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)? Yes

9.3 Does facility's ER plan include procedures for informing the public and local agencies responding to accidental releases? Yes

9.4 Does facility's ER plan include information on emergency health care? Yes

9.5 Date of most recent review or update of facility's ER plan: 07/31/2003

9.6 Date of most recent ER training for facility's employees: 02/11/2004

9.7 Local agency with which facility's ER plan or response activities are coordinated:

- a. Name of agency: Orange County Fire Dept.
- b. Telephone number: (000) 000-0911

9.8 Subject to:

- a. OSHA Regulations at 29 CFR 1910.38: Yes
- b. OSHA Regulations at 29 CFR 1910.120: Yes
- c. Clean Water Act Regulations at 40 CFR 112: Yes
- d. RCRA Regulations at 40 CFR 264, 265, and 279.52: No
- e. OPA-90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254: No
- f. State EPCRA Rules/Law: Yes
- g. Other (Specify):

Executive Summary

STANTON ENERGY CENTER
RISK MANAGEMENT PLAN
EXECUTIVE SUMMARY

1. Corporate Prevention and Emergency Response Approach

The Stanton Energy Center is a division of Orlando Utilities Commission, headquartered in Orlando, Florida. Corporate policy requires each site to develop and maintain accident prevention programs and an emergency response plan appropriate to the site. The Corporate environmental organization provides support to the sites in the form of advise and direction on regulatory compliance issues, training for site employees, budgeting and procurement of environmental services, and assistance in the development of new programs.

2. Description of Stationary Source

The Stanton Energy Center is a two unit coal-fired power generating facility that supplies 420 MW electric power from each unit to the greater Orlando metropolitan area and distributes excess capacity.

The Stanton Energy Center adds chlorine to the water in the cooling tower basins as a biocide. Liquefied chlorine gas is stored in up to ten one-ton containers at the Circulating Water Chemical Feed facility. Five containers are always connected to the system, and five are on standby. The total chlorine inventory in the process is 20,000 lbs. This is greater than the 2,500 lb. threshold quantity.

The Stanton Energy Center also stores liquefied anhydrous ammonia in two 30,000 gallon tanks for addition to the Selective Catalytic Reduction System. Although the tanks have a total capacity of 60,000 gallons, the Ammonia Unloading, Storage and Supply procedure limits the tank levels to 85% of capacity, or a maximum total inventory of 51,000 gallons. This is equivalent to approximately 259,000 lbs. of ammonia, which exceeds the 10,000 lb. threshold quantity.

3. Prevention Program

The Stanton Energy Center has a program in place to comply with the OSHA Process Safety Management Standard, 29 CFR 1910.119. The PSM Program also serves as the RMP prevention plan. The PSM Program was established in 1994 for the chlorine process and was extended to cover the ammonia process when the SCR system was constructed in 1996. Improvements have been made to the program as a result of audits performed in July of 1997, May of 1999, and March of 2003. The Stanton Energy Center PSM Program receives full support of plant management and involvement of employees at all levels.

4. Accident History

The Stanton Energy Center has had no accidental releases of chlorine or ammonia in the past five years.

5. Emergency Response Program

The Stanton Energy Center has an emergency response plan in place that complies with 29 CFR 1910.38. Additionally facility employees are trained to respond defensively to small releases of chlorine and ammonia. The plan has been coordinated with the Orange County Fire Department, and the District 6 Local Emergency Planning Committee. Notification is made locally by dialing 911, and by notifying Florida State Warning Point at (800) 320-0519 or (904) 413-9911.

RMP Validation Errors/Warnings --- No Data To Report

ATTACHMENT SEC-FI-C7
Verification of Risk Management Plan Submission to EPA

Stanton A

3.14.1

Facility Name: Curtis H. Energy Center Unit A
EPA ID: 1000 0018 2713



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

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

Ashley Keough
Southern Company- Florida LLC
One Energy Place
Pensacola, FL 32520-0328

November 03, 2006

EPA Facility ID#: 1000 0018 2713
Postmark Date: 11/01/2006
Anniversary Date: 06/21/2009

NOTIFICATION LETTER: COMPLETE RMP

The U.S. Environmental Protection Agency (EPA) received your Risk Management Plan (RMP) dated with the above postmark date. **This letter notifies you that your RMP is "complete" according to EPA's completion check.** The completion check is a program implemented by EPA to determine whether a submitted RMP includes the minimum amount of information every RMP must provide. The completion check does not assess whether a submitted RMP should have provided additional information or whether the information it provides is accurate or appropriate. In other words, it does not indicate that the RMP meets the requirements of 40 CFR Part 68.

Please note the anniversary date indicated above. Your RMP must be revised and updated by this date or earlier as required by 40 CFR §68.190. Please also note your EPA Facility ID number as identified at the top of this letter; all future Risk Management Plan submissions, corrections and other correspondence must include this number.

If you have any questions, please call one of the following numbers:

(1) For RMP rule interpretation questions, call the EPCRA Hotline at (800) 424-9346 or (703) 412-9810 (in the D.C. Metro area).

(2) For RMP*Submit installation and software questions, or information on the status of your RMP, contact the RMP Reporting Center at (301) 429-5018, or write to the:

RMP Reporting Center
P.O. Box 1515
Lanham-Seabrook, MD 20703-1515

(3) For more information on the Risk Management Program, you can contact your Implementing Agency. Your Implementing Agency is

**Florida Department of Community Affairs, 2555 Shumard Oak Boulevard,
Tallahassee, FL, 32399, Phone: 850-413-9970.**

Thank you for your cooperation in this matter.

Sincerely,

RMP Reporting Center

Enclosure:

Risk Management Plan (if submitted on paper)

3.14.1

Southern Company Services, Inc.
One Energy Place
Pensacola, Florida 32520
850.444.6111



October 31, 2006

Ms. Keyonta Gillem
Risk Management Plan (RMP) Reporting Center
c/o CSC
Suite 300
8400 Corporate Drive
New Carrollton, Maryland 20785


RE: Curtis H. Stanton Energy Center- Unit A
Facility Identifier: 1000 0018 2713

Dear Ms. Keyonta Gillem:

The Curtis H. Stanton Energy Center Unit A has two processes that are covered under the Risk Management Program (RMP) regulations, 40 CFR Part 68, as program level three processes. The enclosed Stanton- Unit A RMP submittal has been revised to update the facility contact information and the person responsible for RMP implementation. The estimated residential population within the distance to the worst case chlorine endpoint as well as the dates provided in Section 7 were also updated.

If you have any questions regarding this information, please contact me at (850) 444-6141.

Sincerely,


Ashley J. Keough
Environmental Engineer II

cc: D.P. Claburn
J.P. Horishny
R.M. Markey
J.O. Vick

Facility Name: Curtis H. Energy Center Unit A
EPA ID: 1000 0018 2713

1.7 Name and title of person or position responsible for part 68 (RMP) implementation:

a. **Name of person:** Ashley Keough
b. **Title of person or position:** Environmental Engineer II
c. **Email address:** adjansen@southernco.com

1.8 Emergency contact:

a. **Name:** John Horishny
b. **Title:** Compliance Team Leader
c. **Phone:** (321) 235-2593
d. **24-hour phone:** (407) 488-8358
e. **Ext. or PIN:**
f. **Email address:** jphorish@southernco.com

1.9 Other points of contact:

a. **Facility or Parent Company E-Mail Address:**
b. **Facility Public Contact Phone:**
c. **Facility or Parent Company WWW Homepage Address:**

1.10 LEPC: District 6 LEPC

1.11 Number of full time employees on site: 21

1.12 Covered by:

a. **OSHA PSM:** Yes
b. **EPCRA 302:** Yes
c. **CAA Title V:** Yes **Air operating permit ID:** 0950137-006-AV

1.13 OSHA Star or Merit Ranking: No

1.14 Last Safety Inspection (by an External Agency) Date:

1.15 Last Safety Inspection Performed by an External Agency: Never had one

1.16 Will this RMP involve predictive filing?: No

1.18 RMP Preparer Information:

a. **Name:**
b. **Telephone:**
c. **Street1:**

Facility Name: Curtis H. Energy Center Unit A
EPA ID: 1000 0018 2713

d. Street2:

e. City:

f. State:

g. ZIP:

Section 1.17 Process(es)

a. Process ID: **1** Program Level **3** Anhydrous Ammonia

b. NAICS Code

22111 Electric Power Generation

c. Process Chemicals

c.1 Process Chemical (ID / Name)

1 Ammonia (anhydrous)

c.2 CAS Nr.

7664-41-7

c.3 Qty (lbs.)

80,789

a. Process ID: **2** Program Level **3** Chlorine

b. NAICS Code

22111 Electric Power Generation

c. Process Chemicals

c.1 Process Chemical (ID / Name)

2 Chlorine

c.2 CAS Nr.

7782-50-5

c.3 Qty (lbs.)

12,000

Section 2. Toxics: Worst Case

Toxics: Worst Case ID **1**

2.1 a. Chemical Name: Ammonia (anhydrous)

b. Percent Weight of Chemical (if in a mixture):

2.2 Physical State: Gas Liquified by Pressure

2.3 Model used: DEGADIS

2.4 Scenario: Gas Release

2.5 Quantity released: 80,789 lbs

2.6 Release rate: 8,078.9 lbs/min

2.7 Release duration: 10.0 mins

2.8 Wind speed: 1.5 m/sec

2.9 Atmospheric Stability Class: F

2.10 Topography: Rural

2.11 Distance to Endpoint: 2.10 mi

Facility Name: Curtis H. Energy Center Unit A
EPA ID: 1000 0018 2713

2.12 Estimated Residential population within distance to endpoint: 6,401

2.13 Public receptors within distance to endpoint:

a. Schools:	Yes	d. Prisons/Correction facilities:	Yes
b. Residences:	Yes	e. Recreation areas:	Yes
c. Hospitals:	No	f. Major commercial, office or, industrial areas:	Yes
g. Other (Specify):			

2.14 Environmental receptors within distance to endpoint:

a. National or state parks, forests, or monuments:	No
b. Officially designated wildlife sanctuaries, preserves, or refuges:	No
c. Federal wilderness areas:	No
d. Other (Specify):	

2.15 Passive mitigation considered:

a. Dikes:	No	d. Drains:	No
b. Enclosures:	No	e. Sumps:	No
c. Berms:	No	f. Other (Specify):	

2.16 Graphic file name:

Toxics: Worst Case ID 2

2.1 a. Chemical Name: Chlorine

b. Percent Weight of Chemical (If in a mixture):

2.2 Physical State: Gas Liquified by Pressure

2.3 Model used: EPA's RMP*Comp(TM)

2.4 Scenario: Gas Release

2.5 Quantity released: 2,000 lbs

2.6 Release rate: 200.0 lbs/min

2.7 Release duration: 10.0 mins

2.8 Wind speed: 1.5 m/sec

2.9 Atmospheric Stability Class: F

2.10 Topography: Rural

2.11 Distance to Endpoint: 3.00 mi

2.12 Estimated Residential population within distance to endpoint: 6,798

2.13 Public receptors within distance to endpoint:

a. Schools:	Yes	d. Prisons/Correction facilities:	Yes
b. Residences:	Yes	e. Recreation areas:	Yes

Facility Name: Curtis H. Energy Center Unit A
EPA ID: 1000 0018 2713

c. Hospitals: No f. Major commercial, office or, industrial areas: Yes

g. Other (Specify):

2.14 Environmental receptors within distance to endpoint:

a. National or state parks, forests, or monuments: No

b. Officially designated wildlife sanctuaries, preserves, or refuges: No

c. Federal wilderness areas: No

d. Other (Specify):

2.15 Passive mitigation considered:

a. Dikes: No d. Drains: No

b. Enclosures: No e. Sumps: No

c. Berms: No f. Other (Specify):

2.16 Graphic file name:

Section 3. Toxics: Alternative Release

Toxics: Alternative Release ID: 1

3.1 a. Chemical Name: Ammonia (anhydrous)

b. Percent Weight of Chemical (If in a mixture):

3.2 Physical State: Gas Liquefied by Pressure

3.3 Model: INPUFF

3.4 Scenario: Rupture disk/Relief Valve failure

3.5 Quantity released: 33,333 lbs

3.6 Release rate: 555.6 lbs/min

3.7 Release duration: 60.0 mins

3.8 Wind speed: 3.0 m/sec

3.9 Atmospheric Stability Class: D

3.10 Topography: Rural

3.11 Distance to Endpoint: 0.12 mi

3.12 Estimated Residential population within distance to endpoint: 0

3.13 Public receptors within distance to endpoint:

a. Schools: No d. Prisons/Correction facilities: No

b. Residences: No e. Recreation areas: No

c. Hospitals: No f. Major commercial, office, or industrial areas: No

g. Other (Specify):

3.14 Environmental receptors within distance to endpoint:

a. National or state parks, forests, or monuments: No

Facility Name: Curtis H. Energy Center Unit A
EPA ID: 1000 0018 2713

b. Officially designated wildlife sanctuaries, preserves, or refuges: No

c. Federal wilderness areas: No

d. Other (Specify):

3.15 Passive mitigation considered:

a. Dikes: No d. Drains: No

b. Enclosures: No e. Sumps: No

c. Berms: No f. Other (Specify):

3.16 Active mitigation considered:

a. Sprinkler systems: No f. Flares: No

b. Deluge system: No g. Scrubbers: No

c. Water curtain: No h. Emergency shutdown systems: No

d. Neutralization: No i. Other (Specify):

e. Excess flow valve: No

3.17 Graphic file name:

Toxics: Alternative Release ID: 3

- 3.1 a. Chemical Name: Chlorine
- b. Percent Weight of Chemical (if in a mixture):
- 3.2 Physical State: Gas Liquified by Pressure
- 3.3 Model: EPA's RMP*Comp(TM)
- 3.4 Scenario: Valve failure resulting in a 0.75" rupture
- 3.5 Quantity released: 9,114 lbs
- 3.6 Release rate: 151.9 lbs/min
- 3.7 Release duration: 60.0 mins
- 3.8 Wind speed: 3.0 m/sec
- 3.9 Atmospheric Stability Class: D
- 3.10 Topography: Rural
- 3.11 Distance to Endpoint: 0.60 mi
- 3.12 Estimated Residential population within distance to endpoint: 10
- 3.13 Public receptors within distance to endpoint:
 - a. Schools: No
 - b. Residences: No
 - c. Hospitals: No
 - d. Prisons/Correction facilities: No
 - e. Recreation areas: No
 - f. Major commercial, office, or industrial areas: Yes
 - g. Other (Specify):
- 3.14 Environmental receptors within distance to endpoint:
 - a. National or state parks, forests, or monuments: No
 - b. Officially designated wildlife sanctuaries, preserves, or refuges: No
 - c. Federal wilderness areas: No
 - d. Other (Specify):
- 3.15 Passive mitigation considered:
 - a. Dikes: No
 - b. Enclosures: No
 - c. Berms: No
 - d. Drains: No
 - e. Sumps: No
 - f. Other (Specify):
- 3.16 Active mitigation considered:
 - a. Sprinkler systems: No
 - b. Deluge system: No
 - c. Water curtain: No
 - d. Neutralization: No
 - e. Excess flow valve: No
 - f. Flares: No
 - g. Scrubbers: No
 - h. Emergency shutdown systems: No
 - i. Other (Specify):
- 3.17 Graphic file name:

Section 4. Flammables: Worst Case --- No Data To Report

Section 5. Flammables: Alternative Release --- No Data To Report

Section 6. Accident History --- No Data To Report

Section 7. Prevention Program 3

Process ID: 1 Anhydrous Ammonia

Prevention Program ID: 1

Prevention Program Description: Ammonia Injection System

7.1 NAICS Code 22111

7.2 Chemicals **Chemical Name**
Ammonia (anhydrous)

7.3 Date on which the safety information was last reviewed or revised: 03/01/2006

7.4 Process Hazard Analysis (PHA):

a. Date of last PHA or PHA update: 03/11/2003

b. The technique used:

What If:	Yes	Failure Mode and Effects Analysis:	No
Checklist:	No	Fault Tree Analysis:	No
What If/Checklist:	No	Other (Specify):	
HAZOP:	Yes		

c. Expected or actual date of completion of all changes from last PHA or PHA update: 12/17/2004

d. Major hazards identified:

Toxic release:	Yes	Contamination:	No
Fire:	No	Equipment failure:	Yes
Explosion:	No	Loss of cooling, heating, electricity, instrument air:	No
Runaway reaction:	No	Earthquake:	No
Polymerization:	No	Floods (flood plain):	No
Overpressurization:	No	Tornado:	No
Corrosion:	Yes	Hurricanes:	No
Overfilling:	No	Other (Specify):	

e. Process controls in use:

Vents:	No	Emergency air supply:	No
Relief valves:	Yes	Emergency power:	Yes

Facility Name: Curtis H. Energy Center Unit A
EPA ID: 1000 0018 2713

Check valves:	Yes	Backup pump:	Yes
Scrubbers:	No	Grounding equipment:	Yes
Flares:	No	Inhibitor addition:	No
Manual shutoffs:	Yes	Rupture disks:	No
Automatic shutoffs:	No	Excess flow device:	No
Interlocks:	No	Quench system:	No
Alarms and procedures:	Yes	Purge system:	No
Keyed bypass:	No	None:	No
		Other (Specify):	

f. Mitigation systems in use:

Sprinkler system:	No	Water curtain:	Yes
Dikes:	No	Enclosure:	No
Fire walls:	No	Neutralization:	No
Blast walls:	No	None:	No
Deluge system:	No	Other (Specify):	Kevlar jacket

g. Monitoring/detection systems in use:

Process area detectors:	Yes	None:	No
Perimeter monitors:	No	Other (Specify):	

h. Changes since last PHA or PHA update:

Reduction in chemical inventory:	No	Installation of perimeter monitoring systems:	No
Increase in chemical inventory:	No	Installation of mitigation systems:	No
Change process parameters:	No	None recommended:	No
Installation of process controls:	No	None:	Yes
Installation of process detection systems:	No	Other (Specify):	

7.5 Date of most recent review or revision of operating procedures: 01/18/2005

7.6 Training:

a. The date of the most recent review or revision of training programs: 02/15/2006

b. The type of training provided:

Classroom: Yes On the job: No Other (Specify):

c. The type of competency testing used:

Written test:	No	Observation:	Yes
Oral test:	No	Other (Specify):	
Demonstration:	No		

7.7 Maintenance:

- a. The date of the most recent review or revision of maintenance procedures: 10/31/2006
- b. The date of the most recent equipment inspection or test: 08/01/2006
- c. Equipment most recently inspected or tested : ammonia sensors

7.8 Management of change:

- a. The date of the most recent change that triggered management of change procedures:
- b. The date of the most recent review or revision of management of change procedures: 01/18/2005

7.9 The date of the most recent pre-startup review: 06/26/2003

7.10 Compliance audits:

- a. The date of the most recent compliance audit: 04/26/2006
- b. Expected date of completion of all changes resulting from the compliance audit: 11/01/2006

7.11 Incident investigation:

- a. The date of the most recent incident investigation (if any):
- b. Expected or actual date of completion of all changes resulting from the investigation:

7.12 The date of the most recent review or revision of employee participation plans: 12/02/2005

7.13 The date of the most recent review or revision of hot work permit procedures: 12/02/2005

7.14 The date of the most recent review or revision of contractor safety procedures: 12/02/2005

7.15 The date of the most recent evaluation of contractor safety performance: 12/02/2005

Process ID: 2 Chlorine

Prevention Program ID: 2

Prevention Program Description: Chlorine Process

7.1 NAICS Code 22111

7.2 Chemicals Chemical Name
Chlorine

7.3 Date on which the safety information was last reviewed or revised: 12/15/2005

7.4 Process Hazard Analysis (PHA):

a. Date of last PHA or PHA update: 03/11/2003

b. The technique used:

What If:	Yes	Failure Mode and Effects Analysis:	No
Checklist:	No	Fault Tree Analysis:	No
What If/Checklist:	No	Other (Specify):	
HAZOP:	Yes		

Facility Name: Curtis H. Energy Center Unit A
EPA ID: 1000 0018 2713

c. Expected or actual date of completion of all changes from last PHA or PHA update: 12/17/2004

d. Major hazards identified:

Toxic release:	Yes	Contamination:	No
Fire:	No	Equipment failure:	Yes
Explosion:	No	Loss of cooling, heating, electricity, instrument air:	No
Runaway reaction:	No	Earthquake:	No
Polymerization:	No	Floods (flood plain):	No
Overpressurization:	No	Tornado:	Yes
Corrosion:	Yes	Hurricanes:	Yes
Overfilling:	No	Other (Specify):	

e. Process controls in use:

Vents:	No	Emergency air supply:	No
Relief valves:	No	Emergency power:	Yes
Check valves:	Yes	Backup pump:	No
Scrubbers:	No	Grounding equipment:	No
Flares:	No	Inhibitor addition:	No
Manual shutoffs:	Yes	Rupture disks:	No
Automatic shutoffs:	Yes	Excess flow device:	No
Interlocks:	Yes	Quench system:	No
Alarms and procedures:	Yes	Purge system:	No
Keyed bypass:	No	None:	No
		Other (Specify):	

f. Mitigation systems in use:

Sprinkler system:	No	Water curtain:	No
Dikes:	No	Enclosure:	No
Fire walls:	No	Neutralization:	No
Blast walls:	No	None:	Yes
Deluge system:	No	Other (Specify):	

g. Monitoring/detection systems in use:

Process area detectors:	Yes	None:	No
Perimeter monitors:	No	Other (Specify):	

h. Changes since last PHA or PHA update:

Reduction in chemical inventory:	No	Installation of perimeter monitoring systems:	No
Increase in chemical inventory:	No	Installation of mitigation systems:	No

Facility Name: Curtis H. Energy Center Unit A
EPA ID: 1000 0018 2713

Change process parameters: No None recommended: No
Installation of process controls: No None: Yes
Installation of process detection systems: No Other (Specify):

7.5 Date of most recent review or revision of operating procedures: 01/17/2005

7.6 Training:

a. The date of the most recent review or revision of training programs: 02/15/2006

b. The type of training provided:

Classroom: Yes On the job: No Other (Specify):

c. The type of competency testing used:

Written test: No Observation: Yes
Oral test: No Other (Specify):
Demonstration: No

7.7 Maintenance:

a. The date of the most recent review or revision of maintenance procedures: 01/17/2005

b. The date of the most recent equipment inspection or test: 08/01/2006

c. Equipment most recently inspected or tested : flexible connections and valves

7.8 Management of change:

a. The date of the most recent change that triggered management of change procedures: 05/15/2003

b. The date of the most recent review or revision of management of change procedures: 01/18/2005

7.9 The date of the most recent pre-startup review: 05/15/2003

7.10 Compliance audits:

a. The date of the most recent compliance audit: 04/26/2006

b. Expected date of completion of all changes resulting from the compliance audit: 11/01/2006

7.11 Incident investigation:

a. The date of the most recent incident investigation (if any):

b. Expected or actual date of completion of all changes resulting from the investigation:

7.12 The date of the most recent review or revision of employee participation plans: 12/02/2005

7.13 The date of the most recent review or revision of hot work permit procedures: 12/02/2005

7.14 The date of the most recent review or revision of contractor safety procedures: 12/02/2005

7.15 The date of the most recent evaluation of contractor safety performance: 12/02/2005

Section 8. Prevention Program 2 --- No Data To Report

Section 9. Emergency Response

9.1 Written Emergency Response (ER) Plan:

- a. Is facility included in written community emergency response plan? Yes
- b. Does facility have its own written emergency response plan? Yes

9.2 Does facility's ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)? Yes

9.3 Does facility's ER plan include procedures for informing the public and local agencies responding to accidental releases? Yes

9.4 Does facility's ER plan include information on emergency health care? Yes

9.5 Date of most recent review or update of facility's ER plan: 03/01/2006

9.6 Date of most recent ER training for facility's employees: 09/19/2005

9.7 Local agency with which facility's ER plan or response activities are coordinated:

- a. Name of agency: Orange County Fire Department
- b. Telephone number: (407) 249-4555

9.8 Subject to:

- a. OSHA Regulations at 29 CFR 1910.38: Yes
- b. OSHA Regulations at 29 CFR 1910.120: Yes
- c. Clean Water Act Regulations at 40 CFR 112: Yes
- d. RCRA Regulations at 40 CFR 264, 265, and 279.52: No
- e. OPA-90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254: Yes
- f. State EPCRA Rules/Law: Yes
- g. Other (Specify):

Executive Summary

Facility Name: Curtis H. Energy Center Unit A

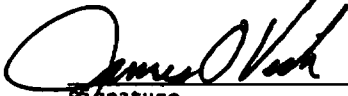
EPA ID: 1000 0018 2713

The Curtis H. Stanton Energy Center located at 5100 South Alafaya Trail in Orlando, Orange County, Florida, has two coal fired operating units. Stanton Unit A, a 633 MW combined cycle operating unit located to the north of the coal fired units is jointly owned by Southern Company- Florida, the Orlando Utilities Commission, the Kissimmee Utility Authority, and the Florida Municipal Power Agency. The unit is operated by Southern Company- Florida. Employee safety and health is a fundamental value of Southern Company-Florida. It is the policy of the facility to provide and maintain safe working conditions and to operate and manage facilities in a manner that protects the environment and meets or surpasses all federal, state, and local environmental regulations. Stanton Unit A has a safety program designed to ensure that employees and contractors are working in a safe environment. The program includes training, operating and maintenance procedures, as well as auditing and incident investigation procedures. Stanton Unit A has two processes that are covered under the Risk Management Plan (RMP) regulations, 40 CFR Part 68, as Program level 3 processes. Anhydrous ammonia is stored on site in one 18,000 gallon tank for use as part of the Selective Catalytic Reduction system used to reduce nitrogen oxide emissions. The facility also has a chlorine process for use as a biocide treatment for the cooling water. Chlorine is stored on site in up to 6 one ton (2,000 pound) cylinders. Stanton Unit A has developed an emergency response plan that complies with 29 CFR Part 1910.38 to protect the public health and the environment. This plan includes procedures for notifying the public in the event of an accidental release, procedures for the use and maintenance of response equipment, employee training, and procedures to review and update the plan. The Orange County Fire Department has visited the site and has been made aware of the facility's emergency response procedure. Emergency notification will be made by dialing 911 for notification to the Orange County Hazardous Materials team.

RMP Validation Errors/Warnings --- No Data To Report

Certification Statement for a Correction

To the best of the undersigned's knowledge, information, and belief formed after reasonable inquiry, these corrections and/or administrative changes are true, accurate, and complete.



Signature

James O. Vick

Print Name

DIRECTOR, ENVIRONMENTAL AFFAIRS

Title

10/31/06

Date

EPA Facility ID # 1000 0018 2713

ATTACHMENT SEC-FI-C9
Acid Rain Application (DEP Form No. 62-210.900(1)(a))

Acid Rain Part Application

For more information, see instructions and refer to 40 CFR 72.30, 72.31, and 74; and Chapter 62-214, F.A.C.

This submission is: New Revised Renewal

STEP 1

Identify the source by plant name, state, and ORIS or plant code.

Stanton A	FL	55821
Plant name	State	ORIS/Plant Code

STEP 2

Enter the unit ID# for every Acid Rain unit at the Acid Rain source in column "a."

If unit a SO₂ Opt-in unit, enter "yes" in column "b".

For new units or SO₂ Opt-in units, enter the requested information in columns "d" and "e."

a	b	c	d	e
Unit ID#	SO ₂ Opt-in Unit? (Yes or No)	Unit will hold allowances in accordance with 40 CFR 72.9(c)(1)	New or SO ₂ Opt-in Units Commence Operation Date	New or SO ₂ Opt-in Units Monitor Certification Deadline
25		Yes		
26		Yes		
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		

STEP 3

**Read the
standard
requirements.**

Acid Rain Part Requirements.

- (1) The designated representative of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Submit a complete Acid Rain Part application (including a compliance plan) under 40 CFR Part 72 and Rules 62-214.320 and 330, F.A.C., in accordance with the deadlines specified in Rule 62-214.320, F.A.C.; and
 - (ii) Submit in a timely manner any supplemental information that the DEP determines is necessary in order to review an Acid Rain Part application and issue or deny an Acid Rain Part;
- (2) The owners and operators of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Operate the unit in compliance with a complete Acid Rain Part application or a superseding Acid Rain Part issued by the DEP; and
 - (ii) Have an Acid Rain Part.

Monitoring Requirements.

- (1) The owners and operators and, to the extent applicable, designated representative of each Acid Rain source and each Acid Rain unit at the source shall comply with the monitoring requirements as provided in 40 CFR Part 75, and Rule 62-214.420, F.A.C.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR Part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR Part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.
- (4) For applications including a SO₂ Opt-in unit, a monitoring plan for each SO₂ Opt-in unit must be submitted with this application pursuant to 40 CFR 74.14(a). For renewal applications for SO₂ Opt-in units include an updated monitoring plan if applicable under 40 CFR 75.53(b).

Sulfur Dioxide Requirements.

- (1) The owners and operators of each source and each Acid Rain unit at the source shall:
 - (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)), or in the compliance subaccount of another Acid Rain unit at the same source to the extent provided in 40 CFR 73.35(b)(3), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An Acid Rain unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
 - (i) Starting January 1, 2000, an Acid Rain unit under 40 CFR 72.6(a)(2); or
 - (ii) Starting on the later of January 1, 2000, or the deadline for monitor certification under 40 CFR Part 75, an Acid Rain unit under 40 CFR 72.6(a)(3).
- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain Part application, the Acid Rain Part, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements. The owners and operators of the source and each Acid Rain unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements.

- (1) The designated representative of an Acid Rain unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR Part 77.
- (2) The owners and operators of an Acid Rain unit that has excess emissions in any calendar year shall:
 - (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR Part 77; and
 - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR Part 77.

Recordkeeping and Reporting Requirements.

- (1) Unless otherwise provided, the owners and operators of the source and each Acid Rain unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the EPA or the DEP:
 - (i) The certificate of representation for the designated representative for the source and each Acid Rain unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with Rule 62-214.350, F.A.C.; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
 - (ii) All emissions monitoring information, in accordance with 40 CFR Part 75, provided that to the extent that 40 CFR Part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply;
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,

Stanton A
Plant Name (from STEP 1)

**STEP 3,
Continued.**

Recordkeeping and Reporting Requirements (cont)

(iv) Copies of all documents used to complete an Acid Rain Part application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.

(2) The designated representative of an Acid Rain source and each Acid Rain unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR Part 72, Subpart I, and 40 CFR Part 75.

Liability.

(1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain Part application, an Acid Rain Part, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.

(2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.

(3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.

(4) Each Acid Rain source and each Acid Rain unit shall meet the requirements of the Acid Rain Program.

(5) Any provision of the Acid Rain Program that applies to an Acid Rain source (including a provision applicable to the designated representative of an Acid Rain source) shall also apply to the owners and operators of such source and of the Acid Rain units at the source.

(6) Any provision of the Acid Rain Program that applies to an Acid Rain unit (including a provision applicable to the designated representative of an Acid Rain unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans) and 40 CFR 76.11 (NO_x averaging plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR Part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one Acid Rain unit shall not be liable for any violation by any other Acid Rain unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.

(7) Each violation of a provision of 40 CFR Parts 72, 73, 74, 75, 76, 77, and 78 by an Acid Rain source or Acid Rain unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities.

No provision of the Acid Rain Program, an Acid Rain Part application, an Acid Rain Part, or an exemption under 40 CFR 72.7 or 72.8 shall be construed as:

(1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an Acid Rain source or Acid Rain unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;

(2) Limiting the number of allowances a unit can hold; *provided*, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act;

(3) Requiring a change of any kind in any state law regulating electric utility rates and charges, affecting any state law regarding such state regulation, or limiting such state regulation, including any prudence review requirements under such state law;

(4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,

(5) Interfering with or impairing any program for competitive bidding for power supply in a state in which such program is established.

**STEP 4
For SO₂ Opt-in
units only.**

**In column "f" enter
the unit ID# for
every SO₂ Opt-in
unit identified in
column "a" of
STEP 2.**

**For column "g"
describe the
combustion unit
and attach
information and
diagrams on the
combustion unit's
configuration.**

**In column "h"
enter the hours.**

F	g	h (not required for renewal application)
Unit ID#	Description of the combustion unit	Number of hours unit operated in the six months preceding initial application

Stanton A
Plant Name (from STEP 1)

STEP 5

For SO₂ Opt-in units only.
(Not required for SO₂ Opt-in renewal applications.)

In column "i" enter the unit ID# for every SO₂ Opt-in unit identified in column "a" (and in column "f").

For columns "j" through "n," enter the information required under 40 CFR 74.20-74.25 and attach all supporting documentation required by 40 CFR 74.20-74.25.

i	j	k	l	m	n
Unit ID#	Baseline or Alternative Baseline under 40 CFR 74.20 (mmBtu)	Actual SO ₂ Emissions Rate under 40 CFR 74.22 (lbs/mmBtu)	Allowable 1985 SO ₂ Emissions Rate under 40 CFR 74.23 (lbs/mmBtu)	Current Allowable SO ₂ Emissions Rate under 40 CFR 74.24 (lbs/mmBtu)	Current Promulgated SO ₂ Emissions Rate under 40 CFR 74.25 (lbs/mmBtu)

STEP 6

For SO₂ Opt-in units only.

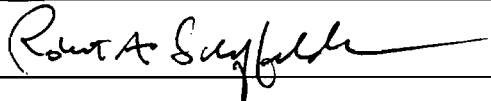
Attach additional requirements, certify and sign.

- A. If the combustion source seeks to qualify for a transfer of allowances from the replacement of thermal energy, a thermal energy plan as provided in 40 CFR 74.47 for combustion sources must be attached.
- B. A statement whether the combustion unit was previously an affected unit under 40 CFR 74.
- C. A statement that the combustion unit is not an affected unit under 40 CFR 72.6 and does not have an exemption under 40 CFR 72.7, 72.8, or 72.14.
- D. Attach a complete compliance plan for SO₂ under 40 CFR 72.40.
- E. The designated representative of the combustion unit shall submit a monitoring plan in accordance with 40 CFR 74.61. For renewal application, submit an updated monitoring plan if applicable under 40 CFR 75.53(b).
- F. The following statement must be signed by the designated representative or alternate designated representative of the combustion source: "I certify that the data submitted under 40 CFR Part 74, Subpart C, reflects actual operations of the combustion source and has not been adjusted in any way."

Signature	Date
-----------	------

STEP 7

Read the certification statement; provide name, title, owner company name, phone, and e-mail address; sign, and date.

Certification (for designated representative or alternate designated representative only)	
I am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.	
Name Robert A. Schaffeld	Title General Manager, E&CS Design
Owner Company Name Southern Power – Florida, LLC	
Phone (205) 257-6311	E-mail address raschaff@southernco.com
Signature 	Date 07.29.09

Acid Rain Part Application

For more information, see instructions and refer to 40 CFR 72.30, 72.31, and 74; and Chapter 62-214, F.A.C.

This submission is: New Revised Renewal

STEP 1

Identify the source by plant name, state, and ORIS or plant code.

STANTON ENERGY CENTER	FL	564
Plant name	State	ORIS/Plant Code

STEP 2

Enter the unit ID# for every Acid Rain unit at the Acid Rain source in column "a."

If unit a SO₂ Opt-in unit, enter "yes" in column "b".

For new units or SO₂ Opt-in units, enter the requested information in columns "d" and "e."

a	b	c	d	e
Unit ID#	SO ₂ Opt-in Unit? (Yes or No)	Unit will hold allowances in accordance with 40 CFR 72.9(c)(1)	New or SO ₂ Opt-in Units Commence Operation Date	New or SO ₂ Opt-in Units Monitor Certification Deadline
1	NO	Yes		
2	NO	Yes		
B	NO	Yes	3-1-2010	6-1-2010
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		
		Yes		

Plant Name (from STEP 1) STANTON ENERGY CENTER

STEP 3

Read the standard requirements.

Acid Rain Part Requirements.

- (1) The designated representative of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Submit a complete Acid Rain Part application (including a compliance plan) under 40 CFR Part 72 and Rules 62-214.320 and 330, F.A.C., in accordance with the deadlines specified in Rule 62-214.320, F.A.C.; and
 - (ii) Submit in a timely manner any supplemental information that the DEP determines is necessary in order to review an Acid Rain Part application and issue or deny an Acid Rain Part;
- (2) The owners and operators of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Operate the unit in compliance with a complete Acid Rain Part application or a superseding Acid Rain Part issued by the DEP; and
 - (ii) Have an Acid Rain Part.

Monitoring Requirements.

- (1) The owners and operators and, to the extent applicable, designated representative of each Acid Rain source and each Acid Rain unit at the source shall comply with the monitoring requirements as provided in 40 CFR Part 75, and Rule 62-214.420, F.A.C.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR Part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR Part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.
- (4) For applications including a SO₂ Opt-in unit, a monitoring plan for each SO₂ Opt-in unit must be submitted with this application pursuant to 40 CFR 74.14(a). For renewal applications for SO₂ Opt-in units include an updated monitoring plan if applicable under 40 CFR 75.53(b).

Sulfur Dioxide Requirements.

- (1) The owners and operators of each source and each Acid Rain unit at the source shall:
 - (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)), or in the compliance subaccount of another Acid Rain unit at the same source to the extent provided in 40 CFR 73.35(b)(3), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An Acid Rain unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
 - (i) Starting January 1, 2000, an Acid Rain unit under 40 CFR 72.6(a)(2); or
 - (ii) Starting on the later of January 1, 2000, or the deadline for monitor certification under 40 CFR Part 75, an Acid Rain unit under 40 CFR 72.6(a)(3).
- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain Part application, the Acid Rain Part, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements. The owners and operators of the source and each Acid Rain unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements.

- (1) The designated representative of an Acid Rain unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR Part 77.
- (2) The owners and operators of an Acid Rain unit that has excess emissions in any calendar year shall:
 - (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR Part 77; and
 - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR Part 77.

Recordkeeping and Reporting Requirements.

- (1) Unless otherwise provided, the owners and operators of the source and each Acid Rain unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the EPA or the DEP:
 - (i) The certificate of representation for the designated representative for the source and each Acid Rain unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with Rule 62-214.350, F.A.C.; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
 - (ii) All emissions monitoring information, in accordance with 40 CFR Part 75, provided that to the extent that 40 CFR Part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply;
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and

Plant Name (from STEP 1) **STANTON ENERGY CENTER**

**STEP 3,
Continued.**

Recordkeeping and Reporting Requirements (cont)

- (iv) Copies of all documents used to complete an Acid Rain Part application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.
- (2) The designated representative of an Acid Rain source and each Acid Rain unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR Part 72, Subpart I, and 40 CFR Part 75.

Liability.

- (1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain Part application, an Acid Rain Part, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
- (2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
- (3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
- (4) Each Acid Rain source and each Acid Rain unit shall meet the requirements of the Acid Rain Program.
- (5) Any provision of the Acid Rain Program that applies to an Acid Rain source (including a provision applicable to the designated representative of an Acid Rain source) shall also apply to the owners and operators of such source and of the Acid Rain units at the source.
- (6) Any provision of the Acid Rain Program that applies to an Acid Rain unit (including a provision applicable to the designated representative of an Acid Rain unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans) and 40 CFR 75.11 (NO_x averaging plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR Part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one Acid Rain unit shall not be liable for any violation by any other Acid Rain unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.
- (7) Each violation of a provision of 40 CFR Parts 72, 73, 74, 75, 76, 77, and 78 by an Acid Rain source or Acid Rain unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities.

No provision of the Acid Rain Program, an Acid Rain Part application, an Acid Rain Part, or an exemption under 40 CFR 72.7 or 72.8 shall be construed as:

- (1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an Acid Rain source or Acid Rain unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;
- (2) Limiting the number of allowances a unit can hold; provided, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act;
- (3) Requiring a change of any kind in any state law regulating electric utility rates and charges, affecting any state law regarding such state regulation, or limiting such state regulation, including any prudence review requirements under such state law;
- (4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
- (5) Interfering with or impairing any program for competitive bidding for power supply in a state in which such program is established.

STEP 4

For SO₂ Opt-in units only.

In column "f" enter the unit ID# for every SO₂ Opt-in unit identified in column "a" of STEP 2.

For column "g" describe the combustion unit and attach information and diagrams on the combustion unit's configuration.

In column "h" enter the hours.

f	g	h (not required for renewal application)
Unit ID#	Description of the combustion unit	Number of hours unit operated in the six months preceding initial application

STANTON ENERGY CENTER
Plant Name (from STEP 1)

STEP 5

For SO₂ Opt-in units only.
(Not required for SO₂ Opt-in renewal applications.)

In column "i" enter the unit ID# for every SO₂ Opt-in unit identified in column "a" (and in column "f").

For columns "j" through "n," enter the information required under 40 CFR 74.20-74.25 and attach all supporting documentation required by 40 CFR 74.20-74.25.

i	j	k	l	m	n
Unit ID#	Baseline or Alternative Baseline under 40 CFR 74.20 (mmBtu)	Actual SO ₂ Emissions Rate under 40 CFR 74.22 (lbs/mmBtu)	Allowable 1985 SO ₂ Emissions Rate under 40 CFR 74.23 (lbs/mmBtu)	Current Allowable SO ₂ Emissions Rate under 40 CFR 74.24 (lbs/mmBtu)	Current Promulgated SO ₂ Emissions Rate under 40 CFR 74.25 (lbs/mmBtu)

STEP 6

For SO₂ Opt-in units only.

Attach additional requirements, certify and sign.

- A. If the combustion source seeks to qualify for a transfer of allowances from the replacement of thermal energy, a thermal energy plan as provided in 40 CFR 74.47 for combustion sources must be attached.
- B. A statement whether the combustion unit was previously an affected unit under 40 CFR 74.
- C. A statement that the combustion unit is not an affected unit under 40 CFR 72.6 and does not have an exemption under 40 CFR 72.7, 72.8, or 72.14.
- D. Attach a complete compliance plan for SO₂ under 40 CFR 72.40.
- E. The designated representative of the combustion unit shall submit a monitoring plan in accordance with 40 CFR 74.61. For renewal application, submit an updated monitoring plan if applicable under 40 CFR 75.53(b).
- F. The following statement must be signed by the designated representative or alternate designated representative of the combustion source: "I certify that the data submitted under 40 CFR Part 74, Subpart C, reflects actual operations of the combustion source and has not been adjusted in any way."

STEP 7

Read the certification statement; provide name, title, owner company name, phone, and e-mail address; sign, and date.

Signature	Date
Certification (for designated representative or alternate designated representative only)	
I am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.	
DENISE M. STALLS	VICE PRESIDENT,
Name	Title ENVIRONMENTAL AFFAIRS
Owner Company Name ORLANDO UTILITIES COMMISSION	
Phone (407) 737-4236	E-mail address dstalls@ouc.com
Signature <i>Denise M Stalls</i>	Date 5/13/09

Acid Rain Program Instructions for Acid Rain Part Application (40 CFR 72.30 - 72.31, and 74; and Rule 62-214.320, F.A.C.)

The Acid Rain Program requires the designated representative to submit an Acid Rain Part application for each source with an Acid Rain unit. A complete Certificate of Representation must be received by EPA before the Acid Rain Part application is submitted to the DEP Bureau of Air Regulation. A complete Acid Rain Part application, once submitted, is binding on the owners and operators of the Acid Rain source and is enforceable in the absence of an Acid Rain Part until the DEP Bureau of Air Regulation either issues an Acid Rain Part to the source or disapproves the application.

DEFINITIONS

"Act" - The federal Clean Air Act:

"CFR" - Code of Federal Regulations

"DOE" - U.S. Department of Energy

"EIA" - U.S. Energy Information Agency

"F.A.C." - Florida Administrative Code

"DEP" - Florida Department of Environmental Protection

"lbs" - pounds

"mmBtu" - million British thermal units

"NO_x" - Nitrogen oxides

"SO₂ Opt-in unit" - A combustion unit that has elected to become an affected unit under the Acid Rain Program.

For the purposes of applying 40 CFR Parts 72, 73, 75, 77, and 78, and

Chapter 62-214, F.A.C., each SO₂ Opt-in unit shall be treated as an Acid Rain unit.

"ORIS" - Office of Regulatory Information Systems

Please type or print. The alternate designated representative may sign in lieu of the designated representative. If assistance is needed, contact the DEP Bureau of Air Regulation at (850) 488-0114.

- STEP 1** Use the plant name and ORIS Code listed on the Certificate of Representation for the plant. An ORIS code is a 4-digit number assigned by the EIA at the DOE to power plants owned by utilities. If the plant is not owned by a utility but has a 5-digit plant code (also assigned by EIA), use the plant code. If no code has been assigned or if there is uncertainty regarding what the code number is, contact EIA at (202) 588-2402.
- STEP 2** For column "a," identify each Acid Rain unit at the Acid Rain source by providing the appropriate unit identification numbers, consistent with the unit identification numbers entered on the Certificate of Representation and with unit identification numbers used in reporting to the DOE and/or EIA. For new units without identification numbers, owners and operators may assign such numbers consistent with EIA and DOE requirements. If the unit is a SO₂ Opt-in unit, or electing to become one, enter "yes" in column "b." For columns "d" and "e," enter the commence operation date(s) and monitor certification deadline(s) for new units in accordance with 40 CFR 72.2 and 75.4, respectively.
- STEP 3** Read the standard requirements.
- STEP 4** For SO₂ Opt-in units only. In column "f" enter the unit ID# for every SO₂ Opt-in unit identified in column "a" of STEP 2. For column "g" describe the combustion unit and attach information and diagrams on the combustion unit's configuration. If not a renewal application, in column "h" enter the number of hours each unit operated in the six months preceding initial application and attach supporting documentation.
- STEP 5** For SO₂ Opt-in units only. (Not required for renewal applications.) In column "i" enter the unit ID# for every SO₂ Opt-in unit identified in column "a" (and in column "f"). For columns "j" through "n," enter the information required under 40 CFR 74.20-74.25 and attach all supporting documentation required by 40 CFR 74.20-74.25.

STEP 6 For SO₂ Opt-in units only. Complete the additional requirements A - F. The designated representative or alternate designated representative must read the certification statement, sign and date.

The Administrator shall be responsible for the following activities under the opt-in provisions of the Acid Rain Program:

- (1) Calculating the baseline or alternative baseline and allowance allocation, and allocating allowances for combustion or process sources that become affected units under 40 CFR Part 74;
- (2) Certifying or recertifying monitoring systems for combustion or process sources as provided under 40 CFR 74.20;
- (3) Establishing allowance accounts, tracking allowances, assessing end-of-year compliance, determining reduced utilization, approving thermal energy transfer and accounting for the replacement of thermal energy, closing accounts for opt-in sources that shut down, are reconstructed, become affected under 40 CFR 72.6, or fail to renew their opt-in permit, and deducting allowances as provided under 40 CFR Part 74, Subpart E; and
- (4) Ensuring that the opt-in source meets all withdrawal conditions prior to withdrawal from the Acid Rain Program as provided under 40 CFR 74.18; and
- (5) Approving and disapproving the request to withdraw from the Acid Rain Program.

The DEP shall be responsible for the following activities:

- (1) Issuing the draft and final opt-in permit;
- (2) Revising and renewing the opt-in permit; and
- (3) Terminating the opt-in permit for an opt-in source as provided in 40 CFR 74.18 (withdrawal), 40 CFR 74.46 (shutdown, reconstruction or change in affected status) and 40 CFR 74.50 (deducting allowances).

STEP 7 The designated representative or alternate designated representative must read the certification statement; provide name, title, owner company name, phone, and e-mail address; sign and date.

Submission Deadlines

For new units, an initial Acid Rain Part application must be submitted to the DEP Bureau of Air Regulation 24 months before the date the unit commences operation.

Acid Rain Part renewal applications must meet the same submission deadline as the Title V permit renewal application for the source.

The designated representative of any operating combustion unit that wishes the unit to become a SO₂ Opt-in unit may submit an Acid Rain Part application and a monitoring plan to the Administrator and DEP Bureau of Air Regulation at any time. Within 21 calendar days from the date the DEP Bureau of Air Regulation issues or denies a draft Title V permit revision incorporating the unit as an acid rain unit, the designated representative of the unit must submit to the Administrator and DEP Bureau of Air Regulation, in writing, a confirmation or rescission of the unit's intention to become a SO₂ Opt-in unit. The Administrator shall treat the failure to make a timely submission as a rescission of the unit's intention to become a SO₂ Opt-in unit and as a withdrawal of the application.

Submit this form and a copy to:

DEP Bureau of Air Regulation
MS 5505
2600 Blair Stone Rd
Tallahassee, FL 32399-2400

For SO₂ Opt-in units, also send this form or its equivalent to the Administrator at:

U.S. Environmental Protection Agency
Clean Air Markets Division (6204J)
1200 Pennsylvania Ave NW
Washington, DC 20460

ATTACHMENT SEC-FI-C10
CAIR Part (DEP Form No. 62-210.900(1)(b))

Clean Air Interstate Rule (CAIR) Part

For more information, see instructions and refer to 40 CFR 96.121, 96.122, 96.221, 96.222, 96.321 and 96.322; and Rule 62-296.470, F.A.C.

This submission is: New Revised Renewal

STEP 1

Identify the source by plant name and ORIS or EIA plant code

Plant Name: Stanton A Combined Cycle	State: Florida	ORIS or EIA Plant Code: 055821
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STEP 2

In column "a" enter the unit ID# for every CAIR unit at the CAIR source.

In columns "b," "c," and "d," indicate to which CAIR program(s) each unit is subject by placing an "X" in the column(s).

For new units, enter the requested information in columns "e" and "f."

a	b	c	d	e	f
Unit ID#	Unit will hold nitrogen oxides (NO _x) allowances in accordance with 40 CFR 96.106(c)(1)	Unit will hold sulfur dioxide (SO ₂) allowances in accordance with 40 CFR 96.206(c)(1)	Unit will hold NO _x Ozone Season allowances in accordance with 40 CFR 96.306(c)(1)	New Units Expected Commence Commercial Operation Date	New Units Expected Monitor Certification Deadline
25	X	X	X		
26	X	X	X		

Plant Name (from STEP 1) **Stanton A Combined Cycle**

STEP 3

Read the
standard
requirements.

CAIR NO_x ANNUAL TRADING PROGRAM

CAIR Part Requirements.

- (1) The CAIR designated representative of each CAIR NO_x source and each CAIR NO_x unit at the source shall:
 - (i) Submit to the DEP a complete and certified CAIR Part form under 40 CFR 96.122 and Rule 62-296.470, F.A.C., in accordance with the deadlines specified in Rule 62-213.420, F.A.C.; and
 - (ii) [Reserved];
- (2) The owners and operators of each CAIR NO_x source and each CAIR NO_x unit at the source shall have a CAIR Part included in the Title V operating permit issued by the DEP under 40 CFR Part 96, Subpart CC, and operate the source and the unit in compliance with such CAIR Part.

Monitoring, Reporting, and Recordkeeping Requirements.

- (1) The owners and operators, and the CAIR designated representative, of each CAIR NO_x source and each CAIR NO_x unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR Part 96, Subpart HH, and Rule 62-296.470, F.A.C.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR Part 96, Subpart HH, shall be used to determine compliance by each CAIR NO_x source with the following CAIR NO_x Emissions Requirements.

NO_x Emission Requirements.

- (1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NO_x source and each CAIR NO_x unit at the source shall hold, in the source's compliance account, CAIR NO_x allowances available for compliance deductions for the control period under 40 CFR 96.154(a) in an amount not less than the tons of total NO_x emissions for the control period from all CAIR NO_x units at the source, as determined in accordance with 40 CFR Part 96, Subpart HH.
- (2) A CAIR NO_x unit shall be subject to the requirements under paragraph (1) of the NO_x Requirements starting on the later of January 1, 2009, or the deadline for meeting the unit's monitor certification requirements under 40 CFR 96.170(b)(1) or (2) and for each control period thereafter.
- (3) A CAIR NO_x allowance shall not be deducted, for compliance with the requirements under paragraph (1) of the NO_x Requirements, for a control period in a calendar year before the year for which the CAIR NO_x allowance was allocated.
- (4) CAIR NO_x allowances shall be held in, deducted from, or transferred into or among CAIR NO_x Allowance Tracking System accounts in accordance with 40 CFR Part 96, Subparts FF and GG.
- (5) A CAIR NO_x allowance is a limited authorization to emit one ton of NO_x in accordance with the CAIR NO_x Annual Trading Program. No provision of the CAIR NO_x Annual Trading Program, the CAIR Part, or an exemption under 40 CFR 96.105 and no provision of law shall be construed to limit the authority of the state or the United States to terminate or limit such authorization.
- (6) A CAIR NO_x allowance does not constitute a property right.
- (7) Upon recordation by the Administrator under 40 CFR Part 96, Subpart EE, FF, or GG, every allocation, transfer, or deduction of a CAIR NO_x allowance to or from a CAIR NO_x unit's compliance account is incorporated automatically in any CAIR Part of the source that includes the CAIR NO_x unit.

Excess Emissions Requirements.

If a CAIR NO_x source emits NO_x during any control period in excess of the CAIR NO_x emissions limitation, then:

- (1) The owners and operators of the source and each CAIR NO_x unit at the source shall surrender the CAIR NO_x allowances required for deduction under 40 CFR 96.154(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable state law; and
- (2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 96, Subpart AA, the Clean Air Act, and applicable state law.

Recordkeeping and Reporting Requirements.

- (1) Unless otherwise provided, the owners and operators of the CAIR NO_x source and each CAIR NO_x unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the DEP or the Administrator.
 - (i) The certificate of representation under 40 CFR 96.113 for the CAIR designated representative for the source and each CAIR NO_x unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under 40 CFR 96.113 changing the CAIR designated representative.
 - (ii) All emissions monitoring information, in accordance with 40 CFR Part 96, Subpart HH, of this part, provided that to the extent that 40 CFR Part 96, Subpart HH, provides for a 3-year period for recordkeeping, the 3-year period shall apply.
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR NO_x Annual Trading Program.
 - (iv) Copies of all documents used to complete a CAIR Part form and any other submission under the CAIR NO_x Annual Trading Program or to demonstrate compliance with the requirements of the CAIR NO_x Annual Trading Program.
- (2) The CAIR designated representative of a CAIR NO_x source and each CAIR NO_x unit at the source shall submit the reports required under the CAIR NO_x Annual Trading Program, including those under 40 CFR Part 96, Subpart HH.

Plant Name (from STEP 1)

Stanton A Combined Cycle

**STEP 3,
Continued**

Liability.

- (1) Each CAIR NO_x source and each CAIR NO_x unit shall meet the requirements of the CAIR NO_x Annual Trading Program.
- (2) Any provision of the CAIR NO_x Annual Trading Program that applies to a CAIR NO_x source or the CAIR designated representative of a CAIR NO_x source shall also apply to the owners and operators of such source and of the CAIR NO_x units at the source.
- (3) Any provision of the CAIR NO_x Annual Trading Program that applies to a CAIR NO_x unit or the CAIR designated representative of a CAIR NO_x unit shall also apply to the owners and operators of such unit.

Effect on Other Authorities.

No provision of the CAIR NO_x Annual Trading Program, a CAIR Part, or an exemption under 40 CFR 96.105 shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR NO_x source or CAIR NO_x unit from compliance with any other provision of the applicable, approved State Implementation Plan, a federally enforceable permit, or the Clean Air Act.

CAIR SO₂ TRADING PROGRAM

CAIR Part Requirements.

- (1) The CAIR designated representative of each CAIR SO₂ source and each CAIR SO₂ unit at the source shall:
 - (i) Submit to the DEP a complete and certified CAIR Part form under 40 CFR 96.222 and Rule 62-296.470, F.A.C., in accordance with the deadlines specified in Rule 62-213.420, F.A.C.; and
 - (ii) [Reserved];
- (2) The owners and operators of each CAIR SO₂ source and each CAIR SO₂ unit at the source shall have a CAIR Part included in the Title V operating permit issued by the DEP under 40 CFR Part 96, Subpart CCC, for the source and operate the source and each CAIR unit in compliance with such CAIR Part.

Monitoring, Reporting, and Recordkeeping Requirements.

- (1) The owners and operators, and the CAIR designated representative, of each CAIR SO₂ source and each SO₂ CAIR unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR Part 96, Subpart HHH, and Rule 62-296.470, F.A.C.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR Part 96, Subpart HHH, shall be used to determine compliance by each CAIR SO₂ source with the following CAIR SO₂ Emission Requirements.

SO₂ Emission Requirements.

- (1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR SO₂ source and each CAIR SO₂ unit at the source shall hold, in the source's compliance account, a tonnage equivalent in CAIR SO₂ allowances available for compliance deductions for the control period, as determined in accordance with 40 CFR 96.254(a) and (b), not less than the tons of total sulfur dioxide emissions for the control period from all CAIR SO₂ units at the source, as determined in accordance with 40 CFR Part 96, Subpart HHH.
- (2) A CAIR SO₂ unit shall be subject to the requirements under paragraph (1) of the Sulfur Dioxide Emission Requirements starting on the later of January 1, 2010 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 96.270(b)(1) or (2) and for each control period thereafter.
- (3) A CAIR SO₂ allowance shall not be deducted, for compliance with the requirements under paragraph (1) of the SO₂ Emission Requirements, for a control period in a calendar year before the year for which the CAIR SO₂ allowance was allocated.
- (4) CAIR SO₂ allowances shall be held in, deducted from, or transferred into or among CAIR SO₂ Allowance Tracking System accounts in accordance with 40 CFR Part 96, Subparts FFF and GGG.
- (5) A CAIR SO₂ allowance is a limited authorization to emit sulfur dioxide in accordance with the CAIR SO₂ Trading Program. No provision of the CAIR SO₂ Trading Program, the CAIR Part, or an exemption under 40 CFR 96.205 and no provision of law shall be construed to limit the authority of the state or the United States to terminate or limit such authorization.
- (6) A CAIR SO₂ allowance does not constitute a property right.
- (7) Upon recordation by the Administrator under 40 CFR Part 96, Subpart FFF or GGG, every allocation, transfer, or deduction of a CAIR SO₂ allowance to or from a CAIR SO₂ unit's compliance account is incorporated automatically in any CAIR Part of the source that includes the CAIR SO₂ unit.

Excess Emissions Requirements.

If a CAIR SO₂ source emits SO₂ during any control period in excess of the CAIR SO₂ emissions limitation, then:

- (1) The owners and operators of the source and each CAIR SO₂ unit at the source shall surrender the CAIR SO₂ allowances required for deduction under 40 CFR 96.254(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable state law; and
- (2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 96, Subpart AAA, the Clean Air Act, and applicable state law.

Recordkeeping and Reporting Requirements.

- (1) Unless otherwise provided, the owners and operators of the CAIR SO₂ source and each CAIR SO₂ unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the Department or the Administrator.
- (i) The certificate of representation under 40 CFR 96.213 for the CAIR designated representative for the source and each CAIR SO₂ unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under 40 CFR 96.213 changing the CAIR designated representative.
- (ii) All emissions monitoring information, in accordance with 40 CFR Part 96, Subpart HHH, of this part, provided that to the extent that 40 CFR Part 96, Subpart HHH, provides for a 3-year period for recordkeeping, the 3-year period shall apply.
- (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR SO₂ Trading Program.
- (iv) Copies of all documents used to complete a CAIR Part form and any other submission under the CAIR SO₂ Trading Program or to demonstrate compliance with the requirements of the CAIR SO₂ Trading Program.
- (2) The CAIR designated representative of a CAIR SO₂ source and each CAIR SO₂ unit at the source shall submit the reports required under the CAIR SO₂ Trading Program, including those under 40 CFR Part 96, Subpart HHH.

Liability.

- (1) Each CAIR SO₂ source and each CAIR SO₂ unit shall meet the requirements of the CAIR SO₂ Trading Program.
- (2) Any provision of the CAIR SO₂ Trading Program that applies to a CAIR SO₂ source or the CAIR designated representative of a CAIR SO₂ source shall also apply to the owners and operators of such source and of the CAIR SO₂ units at the source.
- (3) Any provision of the CAIR SO₂ Trading Program that applies to a CAIR SO₂ unit or the CAIR designated representative of a CAIR SO₂ unit shall also apply to the owners and operators of such unit.

Effect on Other Authorities.

No provision of the CAIR SO₂ Trading Program, a CAIR Part, or an exemption under 40 CFR 96.205 shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR SO₂ source or CAIR SO₂ unit from compliance with any other provision of the applicable, approved State Implementation Plan, a federally enforceable permit, or the Clean Air Act.

CAIR NO_x OZONE SEASON TRADING PROGRAM

CAIR Part Requirements.

- (1) The CAIR designated representative of each CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit at the source shall:
- (i) Submit to the DEP a complete and certified CAIR Part form under 40 CFR 96.322 and Rule 62-296.470, F.A.C., in accordance with the deadlines specified in Rule 62-213.420, F.A.C.; and
- (ii) [Reserved];
- (2) The owners and operators of each CAIR NO_x Ozone Season source required to have a Title V operating permit or air construction permit, and each CAIR NO_x Ozone Season unit required to have a Title V operating permit or air construction permit at the source shall have a CAIR Part included in the Title V operating permit or air construction permit issued by the DEP under 40 CFR Part 96, Subpart CCCC, for the source and operate the source and the unit in compliance with such CAIR Part.

Monitoring, Reporting, and Recordkeeping Requirements.

- (1) The owners and operators, and the CAIR designated representative, of each CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR Part 96, Subpart HHHH, and Rule 62-296.470, F.A.C.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR Part 96, Subpart HHHH, shall be used to determine compliance by each CAIR NO_x Ozone Season source with the following CAIR NO_x Ozone Season Emissions Requirements.

NO_x Ozone Season Emission Requirements.

- (1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit at the source shall hold, in the source's compliance account, CAIR NO_x Ozone Season allowances available for compliance deductions for the control period under 40 CFR 96.354(a) in an amount not less than the tons of total NO_x emissions for the control period from all CAIR NO_x Ozone Season units at the source, as determined in accordance with 40 CFR Part 96, Subpart HHHH.
- (2) A CAIR NO_x Ozone Season unit shall be subject to the requirements under paragraph (1) of the NO_x Ozone Season Emission Requirements starting on the later of May 1, 2009 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 96.370(b)(1),(2), or (3) and for each control period thereafter.
- (3) A CAIR NO_x Ozone Season allowance shall not be deducted, for compliance with the requirements under paragraph (1) of the NO_x Ozone Season Emission Requirements, for a control period in a calendar year before the year for which the CAIR NO_x Ozone Season allowance was allocated.
- (4) CAIR NO_x Ozone Season allowances shall be held in, deducted from, or transferred into or among CAIR NO_x Ozone Season Allowance Tracking System accounts in accordance with 40 CFR Part 96, Subparts FFFF and GGGG.
- (5) A CAIR NO_x Ozone Season allowance is a limited authorization to emit one ton of NO_x in accordance with the CAIR NO_x Ozone Season Trading Program. No provision of the CAIR NO_x Ozone Season Trading Program, the CAIR Part, or an exemption under 40 CFR 96.305 and no provision of law shall be construed to limit the authority of the state or the United States to terminate or limit such authorization.
- (6) A CAIR NO_x Ozone Season allowance does not constitute a property right.
- (7) Upon recordation by the Administrator under 40 CFR Part 96, Subpart EEEE, FFFF or GGGG, every allocation, transfer, or deduction of a CAIR NO_x Ozone Season allowance to or from a CAIR NO_x Ozone Season unit's compliance account is incorporated automatically in any CAIR Part of the source that includes the CAIR NO_x Ozone Season unit.

**STEP 3,
Continued**

Stanton A Combined Cycle
Plant Name (from STEP 1)

**STEP 3,
Continued**

Excess Emissions Requirements.

If a CAIR NO_x Ozone Season source emits NO_x during any control period in excess of the CAIR NO_x Ozone Season emissions limitation, then:
 (1) The owners and operators of the source and each CAIR NO_x Ozone Season unit at the source shall surrender the CAIR NO_x Ozone Season allowances required for deduction under 40 CFR 96.354(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable state law; and
 (2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 96, Subpart AAAAA, the Clean Air Act, and applicable state law.

Recordkeeping and Reporting Requirements.

(1) Unless otherwise provided, the owners and operators of the CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the DEP or the Administrator.
 (i) The certificate of representation under 40 CFR 96.313 for the CAIR designated representative for the source and each CAIR NO_x Ozone Season unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under 40 CFR 96.113 changing the CAIR designated representative.
 (ii) All emissions monitoring information, in accordance with 40 CFR Part 96, Subpart HHHH, of this part, provided that to the extent that 40 CFR Part 96, Subpart HHHH, provides for a 3-year period for recordkeeping, the 3-year period shall apply.
 (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR NO_x Ozone Season Trading Program.
 (iv) Copies of all documents used to complete a CAIR Part form and any other submission under the CAIR NO_x Ozone Season Trading Program or to demonstrate compliance with the requirements of the CAIR NO_x Ozone Season Trading Program.
 (2) The CAIR designated representative of a CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit at the source shall submit the reports required under the CAIR NO_x Ozone Season Trading Program, including those under 40 CFR Part 96, Subpart HHHH.

Liability.

(1) Each CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit shall meet the requirements of the CAIR NO_x Ozone Season Trading Program.
 (2) Any provision of the CAIR NO_x Ozone Season Trading Program that applies to a CAIR NO_x Ozone Season source or the CAIR designated representative of a CAIR NO_x Ozone Season source shall also apply to the owners and operators of such source and of the CAIR NO_x Ozone Season units at the source.
 (3) Any provision of the CAIR NO_x Ozone Season Trading Program that applies to a CAIR NO_x Ozone Season unit or the CAIR designated representative of a CAIR NO_x Ozone Season unit shall also apply to the owners and operators of such unit.

Effect on Other Authorities.

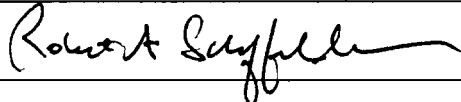
No provision of the CAIR NO_x Ozone Season Trading Program, a CAIR Part, or an exemption under 40 CFR 96.305 shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR NO_x Ozone Season source or CAIR NO_x Ozone Season unit from compliance with any other provision of the applicable, approved State Implementation Plan, a federally enforceable permit, or the Clean Air Act.

STEP 4

Certification (for designated representative or alternate designated representative only)

Read the certification statement; provide name, title, owner company name, phone, and e-mail address; sign, and date.

I am authorized to make this submission on behalf of the owners and operators of the CAIR source or CAIR units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name Robert A. Schaffeld	Title General Manger E&CS Design
Company Owner Name Southern Power – Florida, LLC	
Phone (205) 257-6311	E-mail Address raschaff@southernco.com
Signature 	Date 04/29/09

Clean Air Interstate Rule (CAIR) Part

For more information, see instructions and refer to 40 CFR 96.121, 96.122, 96.221, 96.222, 96.321 and 96.322; and Rule 62-296.470, F.A.C.

This submission is: New Revised Renewal

STEP 1

Identify the source by plant name and ORIS or EIA plant code

Plant Name: STANTON ENERGY CENTER	State: Florida FL	ORIS or EIA Plant Code: 564
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STEP 2

In column "a" enter the unit ID# for every CAIR unit at the CAIR source.

In columns "b," "c," and "d," indicate to which CAIR program(s) each unit is subject by placing an "X" in the column(s).

For new units, enter the requested information in columns "e" and "f."

a	b	c	d	e	f
Unit ID#	Unit will hold nitrogen oxides (NO _x) allowances in accordance with 40 CFR 96.106(c)(1)	Unit will hold sulfur dioxide (SO ₂) allowances in accordance with 40 CFR 96.206(c)(1)	Unit will hold NO _x Ozone Season allowances in accordance with 40 CFR 96.306(c)(1)	New Units Expected Commence Commercial Operation Date	New Units Expected Monitor Certification Deadline
1	X	X	X		
2	X	X	X		
B	X	X	X	3-1-2010	6-1-2010

Plant Name (from STEP 1) STANTON ENERGY CENTER

STEP 3

Read the standard requirements.

CAIR NO_x ANNUAL TRADING PROGRAM

CAIR Part Requirements.

- (1) The CAIR designated representative of each CAIR NO_x source and each CAIR NO_x unit at the source shall:
 - (i) Submit to the DEP a complete and certified CAIR Part form under 40 CFR 96.122 and Rule 62-296.470, F.A.C., in accordance with the deadlines specified in Rule 62-213.420, F.A.C.; and
 - (ii) [Reserved];
- (2) The owners and operators of each CAIR NO_x source and each CAIR NO_x unit at the source shall have a CAIR Part included in the Title V operating permit issued by the DEP under 40 CFR Part 96, Subpart CC, and operate the source and the unit in compliance with such CAIR Part.

Monitoring, Reporting, and Recordkeeping Requirements.

- (1) The owners and operators, and the CAIR designated representative, of each CAIR NO_x source and each CAIR NO_x unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR Part 96, Subpart HH, and Rule 62-296.470, F.A.C.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR Part 96, Subpart HH, shall be used to determine compliance by each CAIR NO_x source with the following CAIR NO_x Emissions Requirements.

NO_x Emission Requirements.

- (1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NO_x source and each CAIR NO_x unit at the source shall hold, in the source's compliance account, CAIR NO_x allowances available for compliance deductions for the control period under 40 CFR 96.154(a) in an amount not less than the tons of total NO_x emissions for the control period from all CAIR NO_x units at the source, as determined in accordance with 40 CFR Part 96, Subpart HH.
- (2) A CAIR NO_x unit shall be subject to the requirements under paragraph (1) of the NO_x Requirements starting on the later of January 1, 2009, or the deadline for meeting the unit's monitor certification requirements under 40 CFR 96.170(b)(1) or (2) and for each control period thereafter.
- (3) A CAIR NO_x allowance shall not be deducted, for compliance with the requirements under paragraph (1) of the NO_x Requirements, for a control period in a calendar year before the year for which the CAIR NO_x allowance was allocated.
- (4) CAIR NO_x allowances shall be held in, deducted from, or transferred into or among CAIR NO_x Allowance Tracking System accounts in accordance with 40 CFR Part 96, Subparts FF and GG.
- (5) A CAIR NO_x allowance is a limited authorization to emit one ton of NO_x in accordance with the CAIR NO_x Annual Trading Program. No provision of the CAIR NO_x Annual Trading Program, the CAIR Part, or an exemption under 40 CFR 96.105 and no provision of law shall be construed to limit the authority of the state or the United States to terminate or limit such authorization.
- (6) A CAIR NO_x allowance does not constitute a property right.
- (7) Upon recordation by the Administrator under 40 CFR Part 96, Subpart EE, FF, or GG, every allocation, transfer, or deduction of a CAIR NO_x allowance to or from a CAIR NO_x unit's compliance account is incorporated automatically in any CAIR Part of the source that includes the CAIR NO_x unit.

Excess Emissions Requirements.

If a CAIR NO_x source emits NO_x during any control period in excess of the CAIR NO_x emissions limitation, then:

- (1) The owners and operators of the source and each CAIR NO_x unit at the source shall surrender the CAIR NO_x allowances required for deduction under 40 CFR 96.154(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable state law; and
- (2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 96, Subpart AA, the Clean Air Act, and applicable state law.

Recordkeeping and Reporting Requirements.

- (1) Unless otherwise provided, the owners and operators of the CAIR NO_x source and each CAIR NO_x unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the DEP or the Administrator.
 - (i) The certificate of representation under 40 CFR 96.113 for the CAIR designated representative for the source and each CAIR NO_x unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under 40 CFR 96.113 changing the CAIR designated representative.
 - (ii) All emissions monitoring information, in accordance with 40 CFR Part 96, Subpart HH, of this part, provided that to the extent that 40 CFR Part 96, Subpart HH, provides for a 3-year period for recordkeeping, the 3-year period shall apply.
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR NO_x Annual Trading Program.
 - (iv) Copies of all documents used to complete a CAIR Part form and any other submission under the CAIR NO_x Annual Trading Program or to demonstrate compliance with the requirements of the CAIR NO_x Annual Trading Program.
- (2) The CAIR designated representative of a CAIR NO_x source and each CAIR NO_x unit at the source shall submit the reports required under the CAIR NO_x Annual Trading Program, including those under 40 CFR Part 96, Subpart HH.

Plant Name (from STEP 1) STANTON ENERGY CENTER

**STEP 3,
Continued**

Liability.

- (1) Each CAIR NO_x source and each CAIR NO_x unit shall meet the requirements of the CAIR NO_x Annual Trading Program.
- (2) Any provision of the CAIR NO_x Annual Trading Program that applies to a CAIR NO_x source or the CAIR designated representative of a CAIR NO_x source shall also apply to the owners and operators of such source and of the CAIR NO_x units at the source.
- (3) Any provision of the CAIR NO_x Annual Trading Program that applies to a CAIR NO_x unit or the CAIR designated representative of a CAIR NO_x unit shall also apply to the owners and operators of such unit.

Effect on Other Authorities.

No provision of the CAIR NO_x Annual Trading Program, a CAIR Part, or an exemption under 40 CFR 96.105 shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR NO_x source or CAIR NO_x unit from compliance with any other provision of the applicable, approved State Implementation Plan, a federally enforceable permit, or the Clean Air Act.

CAIR SO₂ TRADING PROGRAM

CAIR Part Requirements.

- (1) The CAIR designated representative of each CAIR SO₂ source and each CAIR SO₂ unit at the source shall:
 - (i) Submit to the DEP a complete and certified CAIR Part form under 40 CFR 96.222 and Rule 62-296.470, F.A.C., in accordance with the deadlines specified in Rule 62-213.420, F.A.C.; and
 - (ii) [Reserved];
- (2) The owners and operators of each CAIR SO₂ source and each CAIR SO₂ unit at the source shall have a CAIR Part included in the Title V operating permit issued by the DEP under 40 CFR Part 96, Subpart CCC, for the source and operate the source and each CAIR unit in compliance with such CAIR Part.

Monitoring, Reporting, and Recordkeeping Requirements.

- (1) The owners and operators, and the CAIR designated representative, of each CAIR SO₂ source and each SO₂ CAIR unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR Part 96, Subpart HHH, and Rule 62-296.470, F.A.C.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR Part 96, Subpart HHH, shall be used to determine compliance by each CAIR SO₂ source with the following CAIR SO₂ Emission Requirements.

SO₂ Emission Requirements.

- (1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR SO₂ source and each CAIR SO₂ unit at the source shall hold, in the source's compliance account, a tonnage equivalent in CAIR SO₂ allowances available for compliance deductions for the control period, as determined in accordance with 40 CFR 96.254(a) and (b), not less than the tons of total sulfur dioxide emissions for the control period from all CAIR SO₂ units at the source, as determined in accordance with 40 CFR Part 96, Subpart HHH.
- (2) A CAIR SO₂ unit shall be subject to the requirements under paragraph (1) of the Sulfur Dioxide Emission Requirements starting on the later of January 1, 2010 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 96.270(b)(1) or (2) and for each control period thereafter.
- (3) A CAIR SO₂ allowance shall not be deducted, for compliance with the requirements under paragraph (1) of the SO₂ Emission Requirements, for a control period in a calendar year before the year for which the CAIR SO₂ allowance was allocated.
- (4) CAIR SO₂ allowances shall be held in, deducted from, or transferred into or among CAIR SO₂ Allowance Tracking System accounts in accordance with 40 CFR Part 96, Subparts FFF and GGG.
- (5) A CAIR SO₂ allowance is a limited authorization to emit sulfur dioxide in accordance with the CAIR SO₂ Trading Program. No provision of the CAIR SO₂ Trading Program, the CAIR Part, or an exemption under 40 CFR 96.205 and no provision of law shall be construed to limit the authority of the state or the United States to terminate or limit such authorization.
- (6) A CAIR SO₂ allowance does not constitute a property right.
- (7) Upon recordation by the Administrator under 40 CFR Part 96, Subpart FFF or GGG, every allocation, transfer, or deduction of a CAIR SO₂ allowance to or from a CAIR SO₂ unit's compliance account is incorporated automatically in any CAIR Part of the source that includes the CAIR SO₂ unit.

Excess Emissions Requirements.

If a CAIR SO₂ source emits SO₂ during any control period in excess of the CAIR SO₂ emissions limitation, then:

- (1) The owners and operators of the source and each CAIR SO₂ unit at the source shall surrender the CAIR SO₂ allowances required for deduction under 40 CFR 96.254(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable state law; and
- (2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 96, Subpart AAA, the Clean Air Act, and applicable state law.

Plant Name (from STEP 1) STANTON ENERGY CENTER

**STEP 3,
Continued**

Recordkeeping and Reporting Requirements.

- (1) Unless otherwise provided, the owners and operators of the CAIR SO₂ source and each CAIR SO₂ unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the Department or the Administrator.
 - (i) The certificate of representation under 40 CFR 96.213 for the CAIR designated representative for the source and each CAIR SO₂ unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under 40 CFR 96.213 changing the CAIR designated representative.
 - (ii) All emissions monitoring information, in accordance with 40 CFR Part 96, Subpart HHH, of this part, provided that to the extent that 40 CFR Part 96, Subpart HHH, provides for a 3-year period for recordkeeping, the 3-year period shall apply.
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR SO₂ Trading Program.
 - (iv) Copies of all documents used to complete a CAIR Part form and any other submission under the CAIR SO₂ Trading Program or to demonstrate compliance with the requirements of the CAIR SO₂ Trading Program.
- (2) The CAIR designated representative of a CAIR SO₂ source and each CAIR SO₂ unit at the source shall submit the reports required under the CAIR SO₂ Trading Program, including those under 40 CFR Part 96, Subpart HHH.

Liability.

- (1) Each CAIR SO₂ source and each CAIR SO₂ unit shall meet the requirements of the CAIR SO₂ Trading Program.
- (2) Any provision of the CAIR SO₂ Trading Program that applies to a CAIR SO₂ source or the CAIR designated representative of a CAIR SO₂ source shall also apply to the owners and operators of such source and of the CAIR SO₂ units at the source.
- (3) Any provision of the CAIR SO₂ Trading Program that applies to a CAIR SO₂ unit or the CAIR designated representative of a CAIR SO₂ unit shall also apply to the owners and operators of such unit.

Effect on Other Authorities.

No provision of the CAIR SO₂ Trading Program, a CAIR Part, or an exemption under 40 CFR 96.205 shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR SO₂ source or CAIR SO₂ unit from compliance with any other provision of the applicable, approved State Implementation Plan, a federally enforceable permit, or the Clean Air Act.

CAIR NO_x OZONE SEASON TRADING PROGRAM

CAIR Part Requirements.

- (1) The CAIR designated representative of each CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit at the source shall:
 - (i) Submit to the DEP a complete and certified CAIR Part form under 40 CFR 96.322 and Rule 62-296.470, F.A.C., in accordance with the deadlines specified in Rule 62-213.420, F.A.C.; and
 - (ii) [Reserved];
- (2) The owners and operators of each CAIR NO_x Ozone Season source required to have a Title V operating permit or air construction permit, and each CAIR NO_x Ozone Season unit required to have a Title V operating permit or air construction permit at the source shall have a CAIR Part included in the Title V operating permit or air construction permit issued by the DEP under 40 CFR Part 96, Subpart CCCC, for the source and operate the source and the unit in compliance with such CAIR Part.

Monitoring, Reporting, and Recordkeeping Requirements.

- (1) The owners and operators, and the CAIR designated representative, of each CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR Part 96, Subpart HHHH, and Rule 62-296.470, F.A.C.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR Part 96, Subpart HHHH, shall be used to determine compliance by each CAIR NO_x Ozone Season source with the following CAIR NO_x Ozone Season Emissions Requirements.

NO_x Ozone Season Emission Requirements.

- (1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit at the source shall hold, in the source's compliance account, CAIR NO_x Ozone Season allowances available for compliance deductions for the control period under 40 CFR 96.354(a) in an amount not less than the tons of total NO_x emissions for the control period from all CAIR NO_x Ozone Season units at the source, as determined in accordance with 40 CFR Part 96, Subpart HHHH.
- (2) A CAIR NO_x Ozone Season unit shall be subject to the requirements under paragraph (1) of the NO_x Ozone Season Emission Requirements starting on the later of May 1, 2009 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 96.370(b)(1), (2), or (3) and for each control period thereafter.
- (3) A CAIR NO_x Ozone Season allowance shall not be deducted, for compliance with the requirements under paragraph (1) of the NO_x Ozone Season Emission Requirements, for a control period in a calendar year before the year for which the CAIR NO_x Ozone Season allowance was allocated.
- (4) CAIR NO_x Ozone Season allowances shall be held in, deducted from, or transferred into or among CAIR NO_x Ozone Season Allowance Tracking System accounts in accordance with 40 CFR Part 96, Subparts FFFF and GGGG.
- (5) A CAIR NO_x Ozone Season allowance is a limited authorization to emit one ton of NO_x in accordance with the CAIR NO_x Ozone Season Trading Program. No provision of the CAIR NO_x Ozone Season Trading Program, the CAIR Part, or an exemption under 40 CFR 96.305 and no provision of law shall be construed to limit the authority of the state or the United States to terminate or limit such authorization.
- (6) A CAIR NO_x Ozone Season allowance does not constitute a property right.
- (7) Upon recordation by the Administrator under 40 CFR Part 96, Subpart EEEE, FFFF or GGGG, every allocation, transfer, or deduction of a CAIR NO_x Ozone Season allowance to or from a CAIR NO_x Ozone Season unit's compliance account is incorporated automatically in any CAIR Part of the source that includes the CAIR NO_x Ozone Season unit.

Plant Name (from STEP 1) STANTON ENERGY CENTER

**STEP 3,
Continued**

Excess Emissions Requirements.

If a CAIR NO_x Ozone Season source emits NO_x during any control period in excess of the CAIR NO_x Ozone Season emissions limitation, then:
(1) The owners and operators of the source and each CAIR NO_x Ozone Season unit at the source shall surrender the CAIR NO_x Ozone Season allowances required for deduction under 40 CFR 96.354(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable state law; and
(2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 96, Subpart AAAA, the Clean Air Act, and applicable state law.

Recordkeeping and Reporting Requirements.

(1) Unless otherwise provided, the owners and operators of the CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the DEP or the Administrator.

(i) The certificate of representation under 40 CFR 96.313 for the CAIR designated representative for the source and each CAIR NO_x Ozone Season unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under 40 CFR 96.113 changing the CAIR designated representative.

(ii) All emissions monitoring information, in accordance with 40 CFR Part 96, Subpart HHHH, of this part, provided that to the extent that 40 CFR Part 96, Subpart HHHH, provides for a 3-year period for recordkeeping, the 3-year period shall apply.

(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR NO_x Ozone Season Trading Program.

(iv) Copies of all documents used to complete a CAIR Part form and any other submission under the CAIR NO_x Ozone Season Trading Program or to demonstrate compliance with the requirements of the CAIR NO_x Ozone Season Trading Program.

(2) The CAIR designated representative of a CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit at the source shall submit the reports required under the CAIR NO_x Ozone Season Trading Program, including those under 40 CFR Part 96, Subpart HHHH.

Liability.

(1) Each CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit shall meet the requirements of the CAIR NO_x Ozone Season Trading Program.

(2) Any provision of the CAIR NO_x Ozone Season Trading Program that applies to a CAIR NO_x Ozone Season source or the CAIR designated representative of a CAIR NO_x Ozone Season source shall also apply to the owners and operators of such source and of the CAIR NO_x Ozone Season units at the source.

(3) Any provision of the CAIR NO_x Ozone Season Trading Program that applies to a CAIR NO_x Ozone Season unit or the CAIR designated representative of a CAIR NO_x Ozone Season unit shall also apply to the owners and operators of such unit.

Effect on Other Authorities.

No provision of the CAIR NO_x Ozone Season Trading Program, a CAIR Part, or an exemption under 40 CFR 96.305 shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR NO_x Ozone Season source or CAIR NO_x Ozone Season unit from compliance with any other provision of the applicable, approved State Implementation Plan, a federally enforceable permit, or the Clean Air Act.

STEP 4

Read the certification statement; provide name, title, owner company name, phone, and e-mail address; sign, and date.

Certification (for designated representative or alternate designated representative only)

I am authorized to make this submission on behalf of the owners and operators of the CAIR source or CAIR units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name	DENISE M. STALLS	VICE PRESIDENT, ENVIRONMENTAL AFFAIRS	Title	
Owner Name	ORLANDO UTILITIES COMMISSION		Company	
Phone	(407) 737-4236	E-mail Address	dstalls@ouc.com	
Signature	<i>Denise M. Stalls</i>		Date	5-13-09

Southern Company Services, Inc.

One Energy Place
Pensacola, Florida 32520

850.444.6111



Energy to Serve Your World™

CERTIFIED MAIL
7005 3110 0001 6429 1666

May 29, 2008

Ms Trina Vielhauer
Bureau Air regulation, Chief
Florida Department of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Road, MS 5500
Tallahassee, FL 32399-2400

RE: Updated Title V Responsible Official
Stanton A Combined Cycle Project / Southern Company – L.L.C.
Permit No.: 00950137-006-AV

Dear Ms. Vielhauer:

Enclosed please find a completed copy of the Department of Environmental Protection Form 62-213.900(8). Please revise your records to designate Mr. Joseph L. Miller as an Additional Responsible Official for Orlando Utilities Commission/KUA/FMPA/Southern Company – Florida, L.L.C. (Stanton A Combined Cycle Project).

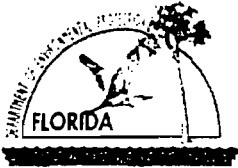
If you have any questions concerning this request or need any additional information, please contact me at 850/444-6537 or kwhite@southernco.com.

Sincerely,

Kevin M. White
Environmental Affairs

Enclosure

cc: James N. Bradner, FDEP Central District
Denise Stalls, Orlando Utilities Commission
Circe Starks, Southern Power
Joe Miller, Oleander Power Project
Greg Terry, Southern Company
File No.: 1.27.27



Department of Environmental Protection

Division of Air Resource Management

RESPONSIBLE OFFICIAL NOTIFICATION FORM

Note: A responsible official is not necessarily a designated representative under the Acid Rain Program. To become a designated representative, submit a certificate of representation to the U.S. Environmental Protection Agency (EPA) in accordance with 40 CFR Part 72.24.

Identification of Facility

1. Facility Owner/Company Name: Orlando Utilities Commission/KUA/FMPA/Southern Company – Florida, L.L.C.	
2. Site Name: Curtis H. Stanton Energy Center	3. County: Orange
4. Title V Air Operation Permit/Project No. (leave blank for initial Title V applications): 0950137-006-AV	

Notification Type (Check one or more)

<input type="checkbox"/> INITIAL:	Notification of responsible officials for an initial Title V application.
<input type="checkbox"/> RENEWAL:	Notification of responsible officials for a renewal Title V application.
<input checked="" type="checkbox"/> CHANGE:	Notification of change in responsible official(s).
Effective date of change in responsible official(s) <u>May 1, 2008</u>	

Primary Responsible Official

1. Name and Position Title of Responsible Official: Jan C. Aspuru Vice President, Power Resources
2. Responsible Official Mailing Address: P.O. Box 3193, Orlando, Florida 32802 Organization/Firm: Orlando Utilities Commission Street Address: 500 South Orange Avenue City: Orlando State: Florida Zip Code: 32801
3. Responsible Official Telephone Numbers: Telephone: (407) 658-6444 x 3900 - Fax: (407) 275 - 4120 -
4. Responsible Official Qualification (Check one or more of the following options, as applicable): [] For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. [] For a partnership or sole proprietorship, a general partner or the proprietor, respectively. [X] For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. [] The designated representative at an Acid Rain source.
5. Responsible Official Statement: <i>I, the undersigned, am a responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this notification. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete. Further, I certify that I have authority over the decisions of all other responsible officials, if any, for purposes of Title V permitting.</i> Signature: <u>Jan C. Aspuru</u> Date: <u>5/02/08</u>

Additional Responsible Official

1. Name and Position Title of Responsible Official: Denise Stalls
2. Responsible Official Mailing Address: P.O. Box 3193, Orlando, Florida 32802 Organization/Firm: Orlando Utilities Commission Street Address: 500 South Orange Avenue City: Orlando State: Florida Zip Code: 32801
3. Responsible Official Telephone Numbers: Telephone: (407) 423-9100 x 4381 - Fax: (407) 384-4062
4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input checked="" type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.

Additional Responsible Official

1. Name and Position Title of Responsible Official: Joseph L. Miller
2. Responsible Official Mailing Address: Organization/Firm: Stanton Combined Cycle Project / Southern Company – L.L.C. Street Address: 5150 Alafaya Trail City: Orlando State: Florida Zip Code: 32831
3. Responsible Official Telephone Numbers: Telephone: (321) 235-2521 Fax: ((321)235 - 2955
4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input checked="" type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.

Clean Air Interstate Rule (CAIR) Program

Instructions for CAIR Part Form

(40 CFR 96.121, 96.122, 96.221, 96.222, 96.321, 96.322,
and Rule 62-296.470, F.A.C.)

The CAIR Program requires the designated representative or alternate designated representative to submit a CAIR Part form for each source with a CAIR unit. A complete Certificate of Representation must be received by EPA before the CAIR Part form is submitted to the DEP Bureau of Air Regulation.

DEFINITIONS:

"CAIR" – Clean Air Interstate Rule
"CFR" - Code of Federal Regulations
"DOE"- U.S. Department of Energy
"EIA" – U.S. Energy Information Agency
"F.A.C." - Florida Administrative Code
"DEP" - Florida Department of Environmental Protection
"NO_x" – Nitrogen oxides
"ORIS" - Office of Regulatory Information Systems
"SO₂" – Sulfur dioxide

Please type or print. The alternate designated representative may sign in lieu of the designated representative. If assistance is needed, contact the DEP Bureau of Air Regulation at (850) 488-0114.

- STEP 1** Use the plant name and ORIS Code listed on the Certificate of Representation for the plant. An ORIS code is a 4-digit number assigned by the EIA at the DOE to power plants owned by utilities. If the plant is not owned by a utility but has a 5-digit plant code (also assigned by EIA), use the plant code. If no code has been assigned or if there is uncertainty regarding what the code number is, contact EIA at (202) 586-2402.
- STEP 2** For column "a," identify each CAIR unit at the CAIR source by providing the appropriate unit identification numbers, consistent with the unit identification numbers entered on the Certificate of Representation and with unit identification numbers used in reporting to DOE and/or EIA. For new units without identification numbers, owners and operators may assign such numbers consistent with EIA and DOE requirements. For columns "b," "c," and "d," indicate to which CAIR program(s) each unit is subject by placing an "X" in the column(s). For columns "e" and "f," enter the expected commence commercial operation date(s) and expected monitor certification deadline(s) for new units in accordance with 40 CFR 96.102, 96.202, and 96.302; and 40 CFR 96.170(b), 96.270(b), and 96.370(b), respectively.
- STEP 3** Read the standard requirements.
- STEP 4** Read the certification statement; provide name, title, owner company name, phone, and e-mail address; sign, and date.

Submission deadlines: See Rule 62-213.420, F.A.C.

Submit this form to: DEP Bureau of Air Regulation
MS 5505
2600 Blair Stone Rd
Tallahassee, FL 32399-2400

ATTACHMENT SEC-EU1-I2
Fuel Analysis or Specification

Stanton Energy Center Fuel Oil Specifications

	<u>Steam Generator</u>		<u>Particulate Removal</u>		<u>Desulfurization</u>	
	<u>Illinois Basin Coal Washed</u>		<u>Appalachian Coal Washed</u>		<u>Illinois Basin Coal Not Washed</u>	
	<u>Typical</u>	<u>Range</u>	<u>Typical</u>	<u>Range</u>	<u>Typical</u>	<u>Range</u>
<u>Proximate Analysis</u>						
Moisture (%)	8.00	7.0-9.0	5.0	4.5-5.5	7.5	6.5-8.5
Ash (%)	7.80	7.0-8.5	10.0	8.5-11.0	16.5	15.5-18.5
Volatile (%)	39.20	38.0-40.4	28.4	28.2-29.2	35.4	33.5-37.0
Fixed Carbon (%)	45.00	43.0-47.0	56.6	54.3-58.4	40.6	39.0-42.0
Heating Value (Btu/lb)	12,400	12,200-12,600	13,000	12,900-13,150	11,000	10,900-11,300
Sulfur (%)	2.8	2.5-3.1	0.77	0.71-0.82	3.85	3.5-4.0
<u>Sulfur Forms</u>						
Pyritic (%)	1.30	1.20-1.40	0.22	0.20-0.24	2.25	2.0-2.5
Organic (%)	1.65	1.55-1.77	0.54	0.52-0.56	1.83	1.70-1.95
Sulfate (%)	0.09	0.07-0.11	0.00		0.08	0.06-0.10
Reduction of SO ₂ by Washing (%)	35.48		--		-0-	
<u>Ultimate Analysis %</u>						
Moisture	8.0	7.0-9.0	5.00	4.5-5.5	7.5	6.5-8.5
Carbon	68.73	66.0-70.0	74.09	73.0-78.0	60.15	58.0-62.0
Hydrogen	4.86	4.5-5.1	4.71	4.65-4.90	4.20	4.0-4.4
Nitrogen	1.14	1.0-1.3	1.26	1.24-1.49	1.14	1.0-1.3
Chlorine	0.16	0.12-0.20	0.13	0.02-0.15	0.12	0.08-0.16
Sulfur	2.80	2.2-3.4	0.76	0.71-0.82	3.85	3.5-4.0
Ash	7.8	7.0-8.5	10.00	8.5-11.0	16.50	15.5-18.5
Oxygen	6.51	6.0-7.0	4.04	2.38-4.04	6.54	5.5-7.0
<u>Mineral Analysis of Ash (%)</u>						
Phosphate Pentoxide, (P ₂ O ₅)	0.12	0.08-0.16	0.30	0.25-0.45	0.18	0.15-0.20
Silica, (SiO ₂)	49.67	48.0-51.0	47.94	46.09-48.77	43.66	42.0-45.0
Ferric Oxide, (Fe ₂ O ₃)	19.09	17.5-20.5	9.39	8.60-11.82	21.21	20.0-22.4
Alumina, (Al ₂ O ₃)	20.25	19.0-21.5	28.95	27.5-30.36	16.17	15.5-17.0
Titania, (TiO ₂)	0.98	0.75-1.25	1.27	1.20-1.48	0.81	0.65-0.95
Lime, (CaO)	3.01	2.5-3.5	3.21	2.97-3.27	6.70	6.0-7.5
Magnesia, (MgO)	1.02	0.8-1.2	1.28	1.27-1.33	0.90	0.80-1.0
Sulfur Trioxide, (SO ₃)	2.42	2.0-3.0	2.66	1.91-3.21	7.20	6.5-8.0
Potassium Oxide, (K ₂ O)	2.65	2.2-3.2	2.08	1.39-2.15	2.19	2.0-2.4
Sodium Oxide, (Na ₂ O)	0.50	0.4-0.7	0.14	0.12-0.45	0.58	0.50-0.70
Undetermined	0.24		2.78		0.40	
<u>Fusion Temperature of Ash, F</u>						
<u>Reducing Atmosphere</u>						
Initial Deformation	2,000	1,950-2,050	2,350	2,320-2,400	2,020	1,950-2,050
Softening (H-W)	2,150	2,100-2,200	2,510	2,500-2,600	2,130	2,050-2,200
Hemispherical (H-W/2)	2,200	2,150-2,250	2,670	2,600-2,740	2,160	2,100-2,200
Fluid	2,610	2,550-2,650	2,770	2,750-2,800	2,300	2,250-2,350
Viscosity T250, F	2,440	2,400-2,500	2,699	2,656-2,742	2,290	2,270-2,310
<u>Oxidizing Atmosphere</u>						
Initial Deformation	2,150	2,100-2,200			2,150	2,100-2,200
Softening (H-W)	2,290	2,250-2,350			2,320	2,280-2,360
Hemispherical (H-W/2)	2,350	2,300-2,400			2,350	2,300-2,400
Fluid	2,560	2,600-2,700			2,480	2,430-2,520
Viscosity, T250, F						
<u>Fouling and Slagging Indices</u>						
Base/Acid Ratio	0.37	0.34-0.40	0.206		0.52	0.48-0.56
Base/Acid Ratio x per cent Sulfur (dry basis)	1.13	1.05-1.21	0.167		2.16	2.0-2.3
Base/Acid Ratio x Na ₂ O (per cent of Ash) ²	0.19	0.17-0.21	0.029		0.30	0.25-0.35
Free Swelling Index	5.5	5.0-6.0	7	6-8	5.5	5.0-6.0
Hardgrove Grindability Index	55	50-60	73	65-75	55	53-58
Minimum Grindability Index	50		65		53	
Minimum Heating Value	12,200		12,900		10,900	
Top Size of Coal	1.5"		+1.25"		+2"	
Size of Bottom Mesh	28		28		28	
Per cent of Coal Passing Bottom Mesh	7.81	6-9	29.6	25-34	8.50	

STANTON ENERGY CENTER

FUEL SPECIFICATIONS

Fuel Type: No. 6 Fuel Oil

<u>DATA</u>	<u>TYPE</u>	<u>GUARANTEED QUALITY</u>
API Gravity @ 60 deg. F.	Min.	12.1
Viscosity, SSU @ 122 deg. F.	Max	175
Flash Point, deg. F.	Min	175
Pour Point, deg. F.	Max	60
Sulfur, %	Max	0.70
BS&W (combined), %	Max	1.0
Sediment (only), %	Max	0.01
Water (only), %	Max	1.00
Ash (only), %	Max	0.1
Vanadium, ppm	Max	200
Asphaltenes, %	Max	6.0
BTU/barrel	Min	6,100,000

Fuel Specification

No. 2 Fuel Oil

API Gravity @ 60 deg F	Min	30.1
Viscosity , SSU @ 100 deg F	Max	45.0
	Min	32.0
Flash Point , deg F	Min	150
Pour Point , deg F	Min	0
Sulfur , %	Max	0.30
BS&W (combined) , %	Max	0.05
Ash , %	Max	0.02
Cetane Number	Min	40.0
Carbon Residue	Max	0.28
(on 10% bottoms)		
BTU per Barrel	Min	5,650,000
Color	no darker than	2.5
Distillation		
10% Recovery , deg F		347 - 450
90% Recovery , deg F		630

FUEL SPECIFICATIONS

1. PIPELINE NATURAL GAS

Density 0.4 - 0.6 rel.
Heat Value 980 - 1060 btu/scf
% S < 1%
% N < 0.5%
% Ash < 1%

2. LANDFILL WASTE GAS

Density 0.4 - 0.6 rel
Heat Value 500 btu/scf
% S < 1%
% N < 0.5%
% Ash < 1%

3. ON SPEC USED OIL

Density 0.9 - 1.0 s.g
Heat Value 4.5 - 5.5 MMBtu/bbls.
% S < 1%
% N < 0.5%
% Ash < 1%

ATTACHMENT SEC-EU1-I3
Detailed Description of Control Equipment

II. GENERAL DESCRIPTION

ORLANDO UTILITIES COMMISSION

Stanton Energy Center Unit 1 Particulate Removal Equipment Precipitator and Auxiliaries

The electrostatic precipitators consist of four (4) major components:

- Discharge System
- Collecting System
- Gas Distribution System
- Casing

In addition, the following auxiliaries are also provided:

- Electrical Equipment
- Key Interlock System
- Roof Girder Blower System

1.1 Discharge System

The function of the discharge system is to cause an ionization to occur within the gas passing through the precipitator. The ionization creates a negative charge on the particulate within the gas stream.

The discharge system consists of pipe frames which support the discharge electrodes. These frames ensure that no electrode will have an unsupported length longer than five (5) feet.

The pipe frames are in turn supported at each side by a discharge system support frame. The discharge system support frame ensures that the pipe frames are properly positioned within each gas passage.

The discharge system support frame is in turn supported at two (2) points by installing a suspension pipe between the frame and a support insulator which is located within the box girder.

Since in normal operation a certain amount of particulate can be expected to collect on the discharge frames and electrodes, each frame is individually hit by a swinging hammer. The magnitude of this impact can be adjusted at the cam release mechanism which is located above the box girder.

1.2 Collecting System

The function of the collecting system is to collect negatively charged particles within the gas stream on a grounded surface.



The collecting system consists of formed 18-gauge steel strips. These strips interlock together to form a gas passage that is 18'-3/4" wide x 46'-5-1/2" high. The forming operation gives the strips their necessary stiffness and produces vertical pockets which create quiescent zones within the gas stream. This zone allows the particulate that is loosened from the plates by rapping, to fall directly into the hopper without re-entering the gas stream.

The rapping system consists of a shaft and hammers that span the width of the precipitator. A motor and gear reducer located outside the casing rotates the shaft. As it rotates, each hammer is free to swing and hit an anvil at the end of the rapper bar. This bar is attached to the bottom of the collecting strips. Each hammer is mounted individually in a designated position to minimize the number of collecting strips which are rapped at any one time.

1.3 Gas Distribution System

The purpose of the gas distribution system is to distribute gas uniformly throughout the cross-section of the precipitator. This is to ensure that the discharge and collecting systems are uniformly loaded in removing the particulate matter from the gas stream. The system is also designed to prevent re-entrainment of dust that is collected in the hoppers.

The gas distribution system consists of three perforated gas distribution plates and a air straightening grid located in the inlet nozzle. Vertical baffles are located in the outlet nozzle. The perforated plates and vertical baffles utilize the principle of resistance to flow to produce a uniform gas distribution. In addition, the air straightening grid produces horizontal flow into the precipitator. The distribution system is rapped in a manner similar to that used for rapping the collecting system. This is done to dislodge any particulate which would cling to the distribution plate and cause a disruption in the normal flow of gas through the precipitator. Since the vertical baffles are located on the "clean" side of the precipitator, no rapping is required.

1.4 Casing

The function of the precipitator casing is to form a gas tight container which supports the three other major components to the precipitator.

The gas tight roof for the precipitator casing is supported on beams which also support the collecting strips. These beams are framed into box girders which span in a perpendicular direction from gas flow. The box girder inside dimensions permit access to the insulators supporting the discharge system.

Above the box girders and the gas tight roof, a separate weather enclosure building is installed. The building protects the insulation across the gas tight building and working area for maintenance and removal of transformer rectifiers and substation transformers.

- c) For other routine restarts, the air-load test should be conducted in Manual and Automatic control modes with little, if any, adjustments necessary to the controls.
- d) Power readings should be at or near those attained during the initial air-load test, if not, purge the casing with F.D. and I.D. fan(s) and retest.

2.0 PRECIPITATOR SYSTEM START-UP

The system can be started after the precipitator and auxiliary equipment have been checked and adjusted for proper operation.

Cold Start-Up Procedures

The electrostatic precipitators should not be in service during the initial stages of boiler start-up due to the potential explosion hazards. Prolonged operation at a temperature below that of the acid dew point may result in the formation of sticky deposits which will adversely affect future performance. However, if regulatory authorities require the stack discharge be controlled during all phases of operation, the Wheelabrator-Lurgi precipitators can be started up once the operator is sure that boiler ignition has been attained and that stable conditions exist.

The following procedure should be utilized during precipitator start-up:

- 2.1 Turn on the insulator heaters. These should be on a minimum of two (2) hours prior to start-up of the precipitator.
- 2.2 Turn on the hopper heating system. This system should remain on except for maintenance or long outages.
- 2.3 Turn on the material handling system (furnished by others).
- 2.4 Turn on the precipitator CS, DS and GDS rapping systems and operate in a continuous mode, thus manual setting of control.

NOTE: The precipitator can be ENERGIZED at this time. This does not mean the precipitator must be energized. The plant operators should incorporate this function into this overall system operation.

- 2.5 Energize the first field in a manual mode at low level just enough to stay within the stack emission limitation. This will prevent excessive fouling of the precipitator internals.
- 2.6 Additional fields can be energized as gas volume and dust load increase.
- 2.7 The precipitator can be completely energized and switched to automatic operation once the gas temperature at E/P outlet reaches 300°F and burning has been stabilized.

CAUTION: Prolonged operation below 300°F may cause premature corrosion of the precipitator internals.

Each box girder is supported at each end by a pair of columns. On the exterior walls a stiffened steel plate is installed between these pairs of columns, which forms part of the gas tight container. The columns in turn carry the load from the roof girder and stiffened plate down to the precipitator base frame.

The bottom of the precipitator is composed of pyramidal hoppers which are used to collect the dust. As an integral part of the hopper design, a girder section is designed to carry vertical loads from the hoppers to the base framing and to the interior hopper support columns. These girders also tie the walls together across the bottom of the precipitator.

The base framing consists of girders running parallel to gas flow. These girders receive the loads from the columns supporting the box girders and the girders which are part of the hopper system. Also as part of the base framing, girders are located at the inlet and outlet end of the precipitators. This base framing system is designed to transfer the loads from the precipitator to the supporting structure located below the precipitator.

1.5 Electrical Equipment

The electrical equipment is provided to energize and control the discharge system and control the various rapping and heating systems.

All equipment is furnished in accordance with pertinent ASA, AIEE, and NEMA standards as well as the National Electrical Code. The precipitator control cubicles are self-contained units with 120 volt control circuits. Terminal boards for outgoing connections are provided. Circuit breakers, magnetic and thermal overcurrent protective devices are included. Power to the precipitator is controlled automatically by means of spark sensitive transistorized circuit which transmits a signal to magnetic amplifier which in turn controls the thyristors in the primary circuit of the transformer-rectifier. If maximum daily ambient is not in excess of the 40°C, the control equipment shall be suitable for operation at full rated load.

The high voltage electrical set comprising of rectifier and transformer is liquid cooled, single phase and designed for a 45°C rise at rated load provided the maximum daily ambient shall not exceed 50°C.

The transformer rectifier is provided with a dial thermometer, magnetic liquid level gage, drain, low voltage junction box, liquid filled output bushing and grounding switch.

1.6 Key Interlock System

A key interlock system is provided to prevent access to the precipitator internals when high voltage is present.

INTRODUCTION

The C-E Flue Gas Desulfurization System (FGDS) furnished for Stanton Unit No. 1 is the equipment responsible for removing sulfur oxides from the flue gases leaving the steam generating unit and transferring the material removed to the customer's disposal system.

The major components of the system are the three SO₂ absorber modules with reaction tanks, pH sample holding tanks, and emergency quench tanks, the limestone additive prep. system, the effluent removal system, cleaning (washing) system, and system pumps. In addition to these are the auxiliary equipment, tanks, mixers, pumps, valves, and the component controls which all contribute to the operation of the system. (See schematic flow diagram drawing 09182-3E-2800). For additional system and equipment mechanical information see Volume 1, Tabs 1 thru 5.

Most of the equipment (pumps, mills, etc.) are arranged in sets. Each set of equipment has an installed spare that should be kept ready for operation. It is recommended that the equipment be alternated periodically to keep the lubrication film intact and provide even wear on all equipment in the set.

Manual isolation valves are provided for some equipment for maintenance purposes. When maintenance has been accomplished return these valves to the open position to permit start-up of the system. Position status lights are provided for some.

Manual drain valves are provided where required for freeze protection purposes. Before operating the equipment, make certain these valves are closed; there are no interlocks, alarms, or status lights.

Proper operation of the system requires absorber module gas inlet and outlet dampers, system bypass dampers, and other shutoff/isolation dampers to open and shut in proper sequence; control of solids in the process tanks and spray system; control of the additive feed rate; control of the water/slurry levels in the system tanks and the ability to clean up equipment in the gas flow path with minimum interruption of equipment availability.

All mechanical equipment associated with the modules should be inspected before attempting to start any of it. Equipment should be checked for proper lubrication periodically. Levels in the various tanks should be checked regularly. The seal water supply to the pumps should be established and maintained. The seal water connections to the equipment should be inspected prior to pump start-up and then again following each start-up to ensure that packing glands are not leaking excessively. It is recommended that a check list be prepared by the operating department to ensure that no equipment is overlooked.

It is the responsibility of the operating department to check and insure that all tanks are full to normal operating levels, mixers are operating, and that pumps, fans, damper and valve actuators, etc. and other items of equipment and processes which are not furnished by C-E but are associated with the system are available prior to and during unit start-up and operation.

Any equipment and/or processes not controlled from the FGDS or additive prep console boards must be started and operated from their respective control stations - such as control power, instrument air, makeup water, treated waste water, seal water, cooling water, and limestone supplies, etc.

SYSTEM GAS FLOW

A boiler start-up does not require any of the absorber modules to be in service. For start-up the absorber system will be on bypass, the bypass damper being interlocked to remain fully open. Only after one absorber has been placed in service will the operator be able to remove the bypass dampers from full open position. The entire system may be bypassed to the stack, maintaining the requirement of having a gas flow path to the stack at all times of operation.

Each of the two bypass ducts contains a double damper with seal air to provide tight shutoff when fully closed. The upstream stage of each is a louver type and is split into two sections. The top section is for shutoff, the bottom section is fully positionable. The downstream stage of each is a guillotine type for shutoff.

The two bypass ducts are capable of handling 100% of the boiler MCR gases, approximately 50% per duct. Once coal is being fired, the individual modules may be placed in service as required by unit gas flow loading and sulfur content of the flue gas. It will be up to the operator to determine the amount of gases to be directed through the system (up to maximum design gas flow), the number of modules in service, and the number of spray levels in service per absorber. The positionable sections of the two bypass dampers are capable of handling approximately 30% of MCR.

During normal operation, above 50% MCR and with two absorbers in service, the bypass dampers should be set with both downstream stages left fully open, both upstream shutoff sections (top) fully closed, and both positionable sections adjusted as required - based on SO₂ content and removal, outlet temperature at the stack, and system differential pressure.

The absorber module inlet and outlet dampers are interlocked such that once a flow path through the modules has been established, the bypass damper must be fully opened before the last module can be taken out of service. This will insure a gas path to the stack at all times.

Before the operator closes any gas path damper an alternate path should be confirmed.

In the event of a boiler master fuel trip the gas path should not be changed immediately thereafter until sufficient time has elapsed for the furnace pressure and air flow controls to return to equilibrium.

These instructions will present a recommended method of operation, based on the control logic and conditions prior to actual operation of the equipment. As operating experience is gained and equipment functions become more evident to the operator, it may be necessary to modify these methods of operation.

Before the individual modules are operated, check to be sure the entire system is ready for operation. Energize all electrical systems and instrument device supplies, be sure that the instrument air supply is available.

To operate the modules, see the following equipment description sections, the "System Operation" sections, the "Analog Control System" section, and the "Special Control Features" section of this set of operation and control instructions.

The system operation section is a general, fairly concise description of the various systems and the operating sequence, providing a good overview - whereas the other sections deal with specific details and operating instructions.

SYSTEM OPERATION

STARTUP

Operating conditions for the equipment is discussed in the previous sections of this instruction. Check all equipment that is to be operated. Determine that tank levels are satisfactory and that makeup water, seal water, cooling water, and raw limestone supplies are available and adequate. Then start selected recirc water pump and unit seal air fan. These supplies are required continuously for startup and operation. The reaction tank additive, effluent bleed, makeup/flush water, and wash water have to be ready to be placed into service once an absorber module is in operation.

When all equipment has been checked and is ready, the absorber modules may be placed in service. Putting an absorber into service consists of starting at least two absorber spray pumps and then opening the absorber's inlet and outlet isolation dampers. Although the absorber may operate temporarily with only one spray pump on after startup, at least two should be on at all times, and additional pump(s) will be required at higher loads in order to insure adequate SO₂ removal. Refer to sections "Absorber Gas Path Dampers" and "Absorber Spray Pumps".

Prior to opening the absorber inlet and outlet isolation dampers, the associated demister seal air fan must be placed in service to prevent flue gas leakage into the atmosphere through the absorber side wall penetration openings. The purge air fan must be off and the absorber vent (access door) closed before starting spray pumps.

After a spray pump has started, the pump motor current indicator should be checked to ascertain that operation is normal.

When at least two spray pumps are established in service, the associated absorber inlet and outlet isolation dampers are opened sequentially, admitting flue gas to the absorber module, and the remaining module functions, i.e., addition of additive slurry, operation of effluent bleed and introduction of make-up water will be automatically placed into or removed from service as required. Additional selector switches on the control boards allow the operator versatility for emergency situations or equipment malfunction.

The absorber additive line isolation valve will open when the absorber is placed in service (any two spray pumps on), establishing an auto permit for the absorber additive flow control valve to regulate the additive feed to the reaction tank.

As the reactions in the system progress, the solids concentration of the reaction tank slurry will increase. The effluent bleed system is placed in service to automatically control the reaction tank solids at approximately 13 percent. When the control system receives a high solids signal from the slurry density transmitter, the bleed valve is automatically opened.

The effluent bleed system is now in operation delivering slurry from the reaction tank to the waste slurry sump and is pumped from there to the thickener where water is removed and returned to the recirc water tank. The thickened slurry handling and disposal control is by others.

When the reaction tank density is no longer high the bleed valve automatically closes and a timed flush of the line is initiated (flush valve opens, flushes, and closes).

As the effluent bleed system removes solids from the reaction tanks, additive slurry and makeup water must be added to the tanks to sustain the process and maintain the reaction tanks at their normal operating level and pH. An alarm will sound if the reaction tank density, pH, or level goes too high or too low.

The level element in the reaction tank provides a signal to the level controller to automatically position the makeup water control valve to maintain an adequate slurry level in the tank. The makeup water is pumped from the recirculation water tank to the reaction tanks by one of two recirc water pumps. Recirc water is also used for the system flush water supply.

When placing the additive feed system in service, assure that an adequate level for pump suction exists in the tank. With the additive feed pump operating (slurry lines charged), the additive feed line will recirculate a portion of the additive slurry back to the additive storage tank. This will assure high enough velocities in the lines to prevent settling out of solids and possible pluggage.

The additive system is now ready to admit additive to the reaction tanks. The additive line isolation and control valve(s) for the absorber(s) in service will be opened, as mentioned previously, completing the additive flow path to the reaction tanks. The additive flow control valve station is released for auto operation when the isolation valve is open. The additive flow controller loop positions the additive flow control valve in response to reaction tank pH, which is indicative of SO₂ concentration in the incoming flue gas, the quantity of gas to be treated, and the removal rate required to obtain the proper outlet SO₂. Magnetic flow meters in the additive feed lines to the reaction tanks feed back additive flow rates to the controllers.

The remaining absorber module(s) are placed in service, as required, in a similar manner

NORMAL OPERATION

The second absorber module should be placed in service soon after the first absorber in anticipation of increasing boiler load. It is expected that, in most cases, the boiler will be operated at or near rated load. The second module is placed in service in the same manner used for startup of the first module. The third module is expected to be used as a spare, but may be required when firing higher sulfur coals in the boiler if the EPA emission level maximum limit of 1.2 pounds SO₂ per million BTU heat input is being exceeded (due to insufficient available spray pumps for the two operating modules).

When one absorber is in service, the bypass dampers may be changed to the control mode. Move the inlet damper selector switches to "Close", which will close the isolation (top) section of the upstream stages. Next slowly and alternately push/release the "Jog Close" pushbuttons, closing the control (bottom) sections, until outlet SO₂ is reduced to the required value.

Once the bypass dampers have been put in the control mode, most of the flue gas flows through the modules, with the remainder going through the positionable control sections of the bypass dampers, which will limit the amount of flue gas bypassed in proportion to the SO₂ in the flue gas entering the absorbers. As the SO₂ in the entering flue gas increases, the bypass dampers should be closed more to direct more flue gas through the absorbers to maintain the stack emission below the EPA limits (see "Bypass Damper Control" section under "Analog Controls"). They may also be positioned to control system differential pressure or outlet temperature (stack plume/condensate) if required.

With absorber modules in operation and all associated equipment in service and the bypass dampers in control mode, flue gas is flowing through the absorbers with the slurry sprays contacting and removing the SO₂ from the gases. The treated gases leave the absorbers and are mixed with any bypassed flue gas, before the mixture is sent out the stack.

This process reduces the flue gas temperature considerably. To prevent a stack plume from forming and to prevent corrosion in the downstream ductwork or stack, the flue gas exiting the system outlet duct may be reheated to a temperature above the dew point by increasing the amount of bypass, provided SO₂ removal rate permits.

As the flue gases are treated by the sprays inside the absorbers, the reaction tank solids are increased. If the solids concentration in the slurry is not bled off (kept under control) then the slurry concentration will increase continually and eventually start causing pluggage and erosion problems. pH will reach equilibrium - inhibiting further SO₂ removal and causing scaling problems.

The effluent bleed system controls the solids concentration in the reaction tank. When the reaction tank density reaches the high percent solids set point (14%), the effluent bleed isolation valve is automatically opened. This will lower the reaction tank level which means make-up water and additive has to be added to maintain the reaction tank level.

When the reaction tank density is reduced to the low percent solids set point (12%), the effluent bleed isolation valve will be closed, and a timed flush of the system will be initiated with water through to the waste slurry sump. The bleed valve will remain closed until the slurry density is again high.

All equipment associated with the limestone preparation system should be mechanically checked and kept ready for operation. Check oil levels of all rotating equipment. It is recommended that a check list be prepared by the operating department to ensure that no equipment is overlooked.

The additive mill process flow is as follows:

Limestone enters the milling system through the weigh feeder and combines with grinding water at the mill inlet. The slurry mixture is ground in the rotating ball mill before flowing from the mill into the mill slurry sump. Dilution water is added at the sump to obtain the required density. The slurry is pumped from the sump to the cyclone classifiers by the mill circuit pump. In the classifier the oversize limestone particles are separated from the finished slurry and are returned thru the distributor to the mill for further grinding. The finished slurry flows thru the distributor to the additive storage tank.

As the absorbers continue operating, it will be necessary to replenish the additive supply. As the additive storage tank empties, an alarm will sound when the tank level is low and the additive milling system must be placed in service to refill the additive storage tank. Mill startup is operator initiated, either automatically or manually. See "Additive Preparation Milling Systems" section for further information.

When an additive mill system automatic start sequence is initiated, the mill drive motor will start first. When the motor has started, the duplex lubricating/hydrostatic (high lift) pumps will start. When the high lift pumps have built up enough pressure to raise the mill barrel off the bearings, the mill clutch will engage to turn the mill barrel. At this time the gear lube system is also energized to provide lubrication to the drive gear.

With the mill running (clutch engaged), grinding water is supplied to the mill inlet. The limestone feeder starts 30 seconds later. The ground limestone and water slurry mixture from the mill is collected in the mill slurry sump. The 54% limestone slurry leaving the mill is reduced to about 35% solids by the addition of dilution water to the additive mill sump. When a sufficient sump level is attained, the mill circuit pump will start. With the circuit pump operating, additive slurry will flow via the cyclone classifiers to the additive storage tank. Once the additive storage tank is full an alarm will sound (high level) and the milling system will automatically shut down (if still in auto).

During mill operation, meters on the control panel board give a visual indication of equipment operation. These include grinding water ratio, sump slurry density, storage silo level, mill motor amps, grinding water flow, total feed, elapsed operating time, feed rate, additive storage tank level, and agitator motor amps.

During milling system normal operation, if the mill slurry sump reaches a hi-hi level an alarm will sound, and the feeder and grinding water flow will stop, but the mill will continue to run. When the sump level drops below the hi-hi level the feeder and grinding water flow will resume again.

If the slurry sump level drops to a low level, the system will go into a recycle mode, causing the slurry to recycle back to the mill sump (no product flow). If the slurry in the sump drops to a lo/lo level, an alarm will sound and the mill circuit pump is shut down so the pump doesn't cavitate and lose suction. When the sump level becomes high, the system will return to the normal mode.

When the additive storage tank reaches the high level (tank full), it initiates an auto stop command to the milling system, stopping the limestone feed. The mill will continue to run for 30 minutes to allow time to cool, flush, and dilute the mill contents, after which the mill clutch is dis-engaged - stopping the gear lube system and the grinding water. Next an auto circuit flush from the sump to the distributor is initiated for 18 minutes. When the entire system flush is complete, the sump is drained and the circuit pump is shut down and back flushed. The mill motor and mill lube pumps are stopped manually at the operator's discretion.

With the absorbers in service, additive must be fed to the reaction tanks at a sufficient rate to provide adequate SO₂ removal. The additive feed pump is put into service by the operator. Additive flow is measured by a flow meter and indicated on the absorber control board.

The pH in the reaction tanks is also affected by the SO₂ being absorbed from the flue gases. It is expected that during normal operation the pH in the reaction tank will stabilize at about 6.0 pH as limestone is added to the tank and SO₂ is removed from the flue gas.

Reaction tank pH is measured and then recorded on the Absorber control board. The additive flow rate is automatically controlled by a set point proportional to reaction tank pH, which is a resultant of boiler load, number of absorbers in service, and SO₂ concentration at the system inlet duct.

When firing high sulfur coals at high loads, it may be necessary to run the additive milling system continuously to maintain an adequate supply of additive in the storage tank to meet the demand of the reaction tanks and maintain proper pH.

During absorber operation, a mudlike residue continually builds up on the mist eliminator vanes. This must be periodically removed to insure proper gas passage through the system and proper operation of the mist eliminators. The vanes are cleaned by the demister washers. These consist of traversing and rotating lances which spray high pressure water onto the vanes. The vanes must be washed at least once every 24 hour period. Because of system capacity, only one washer lance may be operated at a time. See "Demister Wash System" section.

Spray line header pressure for each pump is monitored to warn the operator of impending pluggage in the spray lines or nozzles. If the pressure is high or low, an alarm will sound. If it is low for more than 30 seconds, the pump will be tripped.

As long as there is any spray pump in service in an absorber module, the module can remain in service. There should be at least two spray pumps in service however, to insure adequate treatment of the gas and cooling of the module internals. High temperatures may damage seals, expansion joints, mist eliminators, fiberglass spray headers, gaskets, etc.

Should temperature in any absorber module become high, an absorber shutdown is initiated and an emergency quench valve will automatically open to admit water to the gas stream entering the absorber (Refer to "Emergency Quench Tank" section). This will reduce the module temperature to protect heat sensitive parts of the absorber. A quench will be initiated for any absorber trip.

The liquid level in the reaction tank makes a seal with the open bottom of the absorber modules. This seal is essential at all times while the system is operating. If the seal is broken (low reaction tank level condition), untreated gases would issue forth from this opening to the atmosphere. The absorber module will be shut down and the bleed system for the module will be shut off until the condition is corrected.

ABSORBER MODULE NORMAL SHUTDOWN

If boiler load is reduced or if the sulfur content of the coal being fired is reduced, the volume of gas flow decreases and/or less SO₂ is being generated, and one absorber module may be taken out of service when not required. It is not usually necessary to remove a module from service, as the absorbers are designed to operate at a wide load range - independent of gas velocity. However, to conserve both energy and equipment an absorber module can be taken out of service if the EPA standards (1.2 lbs/10⁶ Btu) can be met with only one absorber in service. Any load that the absorber was carrying must be able to be picked up by the remaining module in service, and an assured gas path must be maintained.

Turning the absorber module auto Stop/Start selector switch to "Stop" will initiate an absorber module auto shutdown sequence, during which the following will occur:

The absorber outlet and inlet double isolation dampers will close sequentially. When the dampers are closed, the spray pumps will be shut down in reverse sequence, which will close the additive feed line isolation valve and flush. An absorber wash required signal will start the wash pump. When the pump is on, a demister wash cycle will be initiated. When the wash cycle is completed, the wash pump will stop and shutdown is complete.

Whenever there is slurry in the reaction tanks, the tank agitators should be kept in service to prevent solids from settling out. The agitators will be tripped if the level drops below their impellers.

When the absorber module inlet and outlet isolation dampers are closed, the chemical reactions in the reaction tank will ultimately reach equilibrium and the solids content will not increase. Thereafter the bleed line isolation valve will remain closed while out of service.

EMERGENCY SHUTDOWN

During any trip or emergency equipment shutdown, the primary objective is to maintain a gas path to the stack, either through the modules or through the bypass duct. Operation of the absorber modules will be affected in some way by various trip conditions.

An emergency trip will fully open the bypass dampers, and will initiate a shutdown for all absorbers in operation. An emergency trip will result from any of the following conditions:

- A. Boiler Air Preheater failure.
- B. Loss of all 6900V bus.
- C. Loss of all 6900V feed (spray pumps).
- D. System seal water off for more than 30 seconds.

For additional information see "Emergency Trip Conditions" section.

A boiler trip does not trip any of the absorbers in service. Therefore, if the boiler will be restarted in a short period of time, the absorber system will still be in service saving some restart time. However, on a boiler trip fuel is no longer being burned, therefore no SO₂ is being formed. Since there is no SO₂ to be absorbed, additive is no longer needed for chemical reaction. Therefore, if the boiler will

be down for a longer period of time, then the modules may be shut down by the operator in an orderly manner.

In the event of a boiler master fuel trip, the FGDS gas path should not be changed immediately thereafter until sufficient time has elapsed for the furnace pressure and air flow controls to return to equilibrium.

In the event of an absorber trip, the gas flow must be taken over by the remaining operating absorbers, or be transferred through the system bypass. As SO₂ emissions may not be meeting standards, the spare absorber may have to be placed in service or else load may have to be reduced and utilize only the remaining absorber modules. An absorber trip will be initiated by loss of all spray pumps (caused by loss of seal water or low flow, or 6900V undervoltage) by reaction tank level lo-lo (skirt uncovered), by absorber inlet or outlet temperature high, or by an emergency trip.

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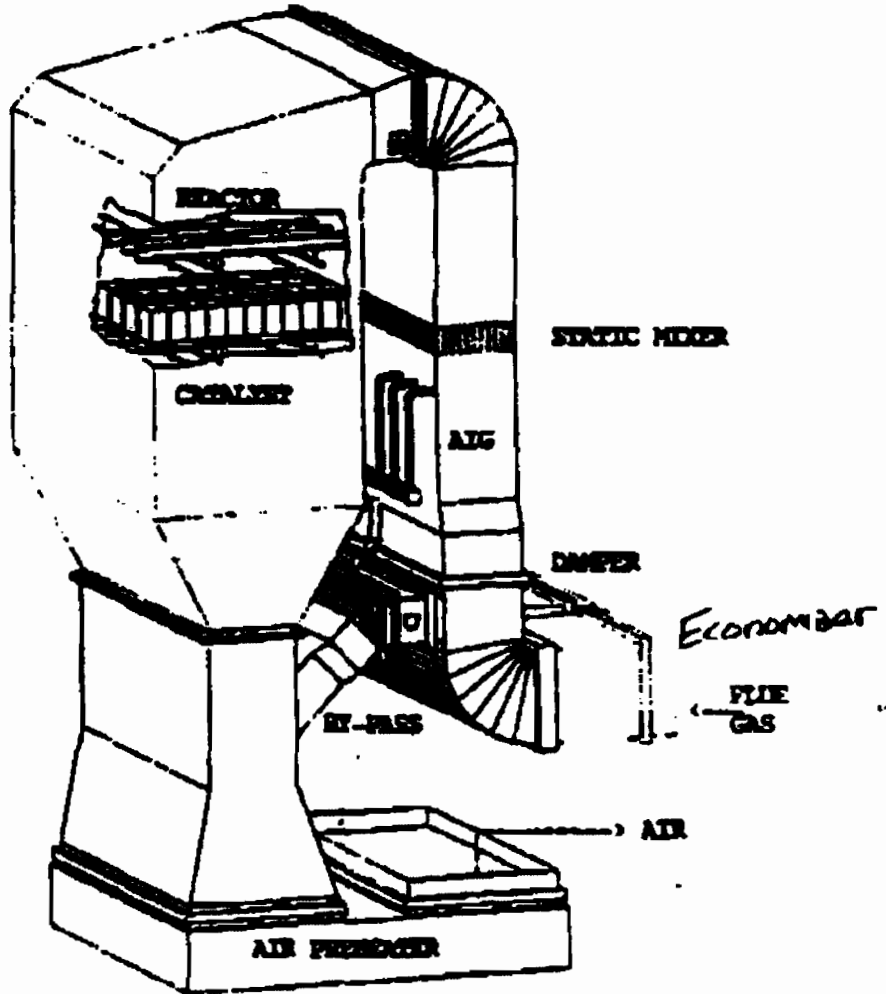


Figure 1: SCR System for Stanton Energy Center Unit 2 in Orlando, Florida.

Unit Capacity: 415MW

Fuel: Coal

1.2 Selective Catalytic Reduction System

The Selective-Catalytic Reduction system (SCR) is designed and supplied, by Nuell Inc., to remove nitrogen oxides (NO and NO₂) from the flue gas before it emits into atmosphere. This is a typical "conventional" high dust, hot-end SCR system installed between the economizer and air preheaters. The design and operation of the SCR system conform to the following requirements:

- The SCR system is designed for 47% DeNO_x and 2 ppm ammonia slip under three year guarantee.
- The SCR system places no primary constraints on the boiler operation. It can be independently start up and shut down during the boiler operation.
- Daily start-up and shutdowns of the SCR system are allowed with a restraint of three times maximum cold start-up per each year.

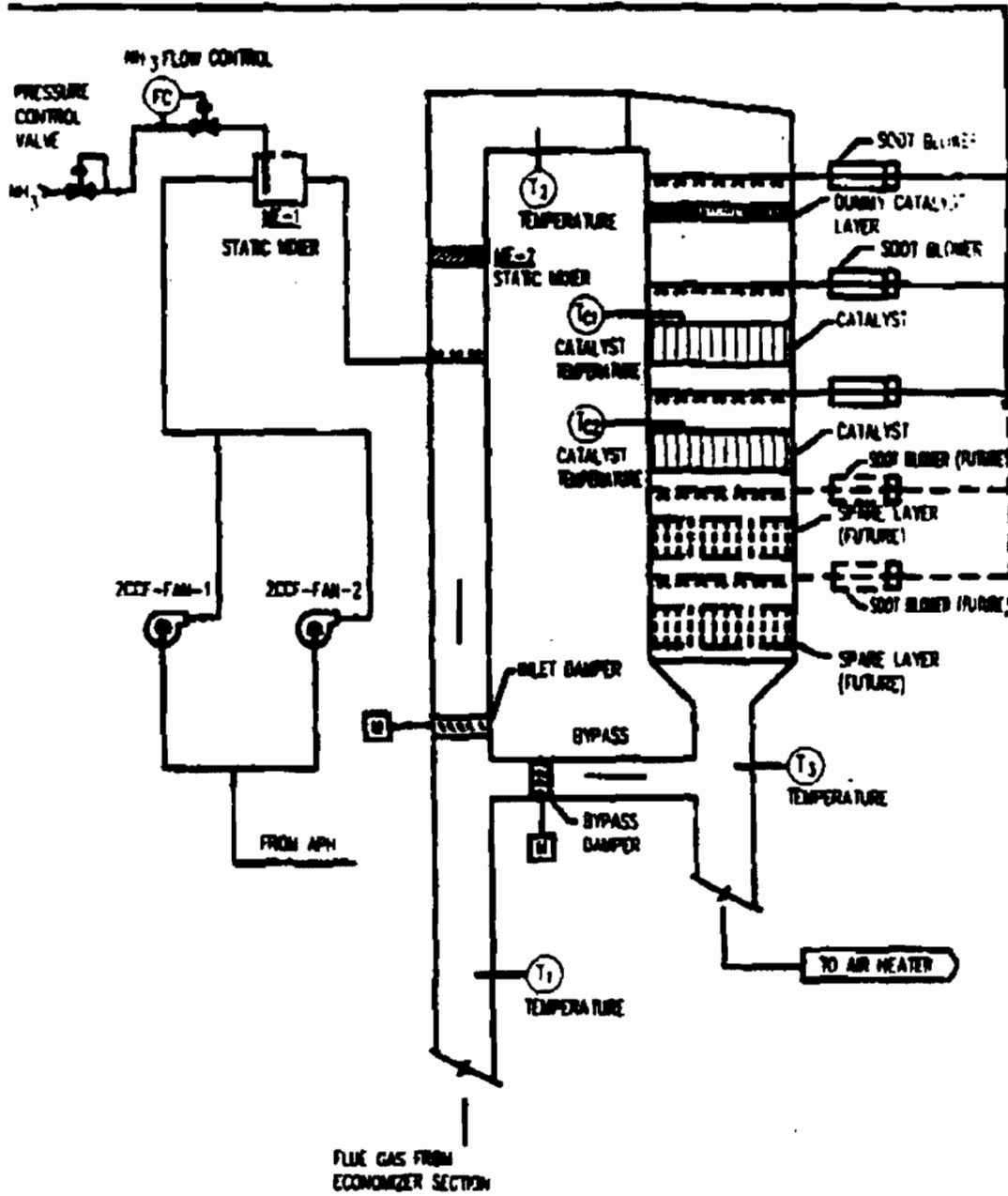
The major components of the SCR system include anhydrous ammonia unloading, storage and supply, ammonia flow control and injection, catalyst reactor, and the control system supplied by others.

The anhydrous ammonia storage unloading and supply sub-system consist of two compressors, two 30,000 gallon storage tanks and two ammonia vaporizers. The vapor pressure of the anhydrous ammonia is maintained above 45 PSIG, corresponding to an ammonia vapor temperature 30 °F, so that the ammonia flow can be controlled properly.

The flow control/injection consists of flow control valves, blowers and an injection grid. The blowers withdraw a constant amount of hot air from the air preheater. Metered amounts of ammonia vapor are injected immediately upstream of the ammonia premixer that is located downstream of the blowers. The ammonia vapor and the hot dilution air supplied by the blowers are thoroughly mixed by the ammonia premixer. The ammonia/dilution air mixture is introduced into the duct through an injection grid located in front of SCR reactor. The ammonia injection grid is designed and positioned upstream of a static mixer to allow the ammonia to be thoroughly distributed across the flue gas stream before entering the catalyst bed.

The catalyst reactor is located between the economizer and air preheater to provide the sites for the NO_x removal reactions to occur. Sootblowers are provided to blow off deposition from the catalyst surface.

The SCR system is controlled by the plant Distributed Control System (DCS). The DCS system takes SCR system's field I/O, perform the control logic, data acquisition and calculation, and determine the conditions under which ammonia should be injected and the amount of ammonia to be injected. The DCS also monitors the SCR system performance and interfaces with the power plant operation.



REACTOR SIDE ELEVATION

1.3 Process Chemistry

The SCR system removes NO_x (NO and NO₂) through a selective catalytic reduction process. This is a heterogeneous catalytic process. Anhydrous ammonia (NH₃) is used as the reducing agent. The process is selective because ammonia reacts primarily with NO and NO₂ as shown in the following equations. These are considered the main chemical reactions:



Several additional side reactions may occur under certain conditions. One of the major concerns is the oxidation of SO₂ to SO₃, as shown below:



This reaction must be minimized. Otherwise, ammonium bisulfate and ammonium sulfate is formed as shown below.



The condensation of these salts depends on the concentration of SO₃ and NH₃ in the flue gas and the temperature. In coal and oil fired boilers, temperatures below 480 °F favor this condensation. This condensation can cause equipment plugging downstream of the catalyst.

The formation of undesirable nitrous oxide (N₂O) is minimal within the operating temperature range of this SCR system:



Other side reactions, such as the direct oxidation of ammonia to NO_x, occur significantly

at above 800 °F, which is above the operating temperature of this SCR system.



1.4 SCR Catalyst

The catalyst module is made up of compact, plate type, ceramic/steel elements. The chemical composition of the catalyst is a mixture of titanium dioxide (TiO_2), tungsten oxide (WO_3), and vanadium pentoxide (V_2O_5). The catalyst bed is located in a parallel flue gas duct between the economizer and air preheater. The reactor contains one dummy layer, two layers of catalyst and two additional spare layers.

The injected ammonia is adsorbed on the catalyst surface. NO and NO_2 undergo a chemical reaction with the ammonia on the surface of the catalyst. There are 13,066 ft^3 of catalyst, installed in two layers in order to provide enough surface area to achieve the guaranteed 47% NO_x reduction. The products of the chemical reaction are N_2 and H_2O that leave the stack along with the balance of the flue gas.

The SCR system is designed to remove 70% of NO_x during the initial performance tests and 47% for three years guarantee under full load conditions while maintaining the stack ammonia concentration below 2 parts per million (ppm @ 3% O_2 , dry). This performance guarantee that the NO_x emissions will be equal to or less than 0.10 lb NO_x per million BTU.

The SCR catalyst is manufactured by Siemens, Inc. The specifications are:

- Designation:	--	SP 328
- Type:	--	Plate type, supported on a metallic base
- Formulation:	--	Vanadia/Titania
- Pitch:	mm	6
- Wall Thickness:	mm	0.95
- Open Area:	%	84
- Surface Area:	m^2/m^3 ft^2/ft^3	328 100
- Operating Temperature:	$^{\circ}\text{F}$	600-750
- Bulk Density:	kg/m^3 lb/ft^3	700 44
- Number of Layers:	--	4 (two layers in use with the two more lay available as spares)

-	Number of Modules	-	220 total
-	Number of Elements per Module:	-	16
-	Reactor Cross Section	ft.	66 x 35
-	Catalyst Surface to Incident Flow	m^2 ft^2	192 2000
	Dimension of Element	mm inch	464 x 464 x 530 5.9 x 5.9 x 15.7
-	Catalyst Volume	m^3 ft^3	370 (installed) 13066
-	Module Dimensions	Height Width Length	74.1 inches 37.6 inches 55.1 inches
-	Estimated Module Weight	lbs, each	2890

The catalyst elements are constructed such that the catalytic surface is supported by a metallic base material and then sintered for mechanical integrity. They are assembled by the manufacturer in easy-to-install steel modules. The space between adjacent modules is sealed to ensure that the flue gas only flows through the catalyst element openings. At the end of their lifetimes, the catalyst modules are removable and new modules can be installed.

The reactor contains one ceramic dunway layer that serves to ensure flue gas distribution across the catalyst and to minimize fly ash erosion of the active catalyst. The lifetime is guaranteed to be 3 years at 47 % removal efficiency. In order to receive real data of the expected lifetimes, removable test plates are installed in each catalyst layer. Every time the boiler is shut down, the test plates will be removed from the catalyst and sent to the manufacturer. These plates will be tested for reactivity loss. After the tests, the rest of the catalyst lifetimes can be predicted.

ATTACHMENT SEC-EU1-I4
Compliance Demonstration Reports/Records



1531 Wyngate Drive DeLand, FL 32724

Phone (386) 943-9241 / Cell (386) 451-0102 / Fax (386) 943-9212

COMPLETE EMISSIONS TESTING SERVICES • PERMITTING ASSISTANCE • CEMS CERTIFICATION • AMBIENT AIR MONITORING

Emissions Test Report

No. 109-030

ORLANDO UTILITIES COMMISSION

Unit 1

PARTICULATE EMISSIONS

Prepared for:

Orlando Utilities Commission
5100 South Alafaya Trail
Orlando, FL 32831

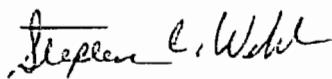
Prepared by:

Coastal Air Consulting, Inc.
1531 Wyngate Dr.
DeLand, FL 32724
(386) 943-9241

July 1, 2008

STATEMENT OF VALIDITY

All testing activities and results represented herein were conducted and obtained in accordance with the EPA protocols listed in 40 CFR Part 60. The contents have been reviewed and verified to be true and correct representation of the source emissions at the time of testing.



Stephen C. Webb
President

PROJECT STATISTICS

Client: Orlando Utilities Commission

Facility: Stanton Energy Center Unit 1

Location: 5100 South Alafaya Trail
Orlando, FL 32831

Type of Process Tested: Coal Fired Utility Steam Generating Unit

Test Protocols Performed: Particulate-EPA Method 5B
Opacity-EPA Method 9

Testing Firm: Coastal Air Consulting, Inc.
1531 Wyngate Dr.
DeLand, FL 32724

Test Personnel: Stephen Webb Site Supervisor
Bob Righter Technician

Test Date: June 10, 2008

Client Representative: David Baez

Observers: None

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1.0 Introduction

Coastal Air Consulting, Inc. (Coastal) was contracted by Orlando Utilities Commission to perform the annual compliance testing for particulate emissions at the Stanton Energy Center Unit 1 in Orlando, Florida.

The sampling program was conducted June 10, 2008. The testing was performed by Coastal personnel, with the assistance of personnel assigned by Orlando Utilities Commission. Mr. David Baez of Orlando Utilities Commission coordinated plant operation during the testing.

2.0 Test Program Summary

A summary of test results developed by this source sampling program is presented in Tables 1 and 2 as follows:

TABLE 1
Summary of Particulate Emissions

Source	Particulate (lb/mmBtu)	Permit (lb/mmBtu)
Unit 1	0.008	0.03

TABLE 2
Summary of Visible Emissions

Source	Average VE(%)	Highest 6 min (%)	Permitted (%)
Unit 1	0.0	0.0	20

3.0 Results of Testing

Individual test run results are shown in Table 3 and are tabulated in Appendix 1. These results indicate that Unit 1 was in compliance at the time of testing under normal operating conditions.

4.0 Description of Source

Stanton Energy Center Unit 1 is a coal fired utility steam generator. The unit is located in Orlando, FL.

The flue gas is exhausted through the Unit 1 stack. A schematic of the process and stack sampling location is included in Appendix 3 "Figures".

5.0 Sampling Procedures

EPA testing protocols utilized during this test program include the following;

EPA Method 1	Sample and Velocity Traverse for Stationary Sources
EPA Method 2	Determination of Stack Gas Velocity and Volumetric Flow Rate
EPA Method 3	Gas Analysis for CO ₂ , O ₂ , Excess Air and Dry Molecular Weight
EPA Method 4	Determination of Moisture Content in Stack Gas
EPA Method 5B	Determination of Nonsulfuric Acid Particulate Matter from Stationary Sources

The test runs were conducted in triplicate for all parameters with each being 120 minutes in duration.

5.1 Particulate – EPA Method 5B

This method of analysis is similar to EPA Method 5 except where specifically modified for the determination of nonsulfuric acid particulate matter from stationary sources. Emissions were determined in accordance with procedures outlined in EPA Method 5B. Specifically, while maintaining the probe liner and filter heater box to 320 ± 25 °F a sample of flue gas is isokinetically extracted from the stack gas stream and the particulate emissions are calculated by gravimetrically determining the amount of particulate matter collected in the glass nozzle, glass probe liner and glass fiber filter.

Gas sample volume is measured by passing the gas through a set of weighed impingers used to determine moisture content then through a calibrated dry gas meter. An S-type pitot tube is attached to the probe to simultaneously measure stack gas velocity and is used to maintain an isokinetic sampling profile. A "K-type" thermocouple, integral with the probe is used to measure the flue gas temperature.

Following each run, the nozzle, probe liner and filter holder upstream of the filter are brushed and rinsed with acetone and stored in a leak free container for transport to the laboratory. The total impinger content is weighed and compared to pretest weights to calculate the increase in grams of moisture used in determining flue gas water content.

Particulate matter is determined by drying each filter at 320 °F for six hours, desiccated to a final weight and results are recorded to within +/- 0.1 mg. Evaporate the acetone rinse in a tared beaker, desiccate to a final weight and record results to within +/- 0.1 mg.

Testing was conducted in a vertical section of the stack which is 249.8 inches in diameter. There are four test ports orientated 90 degrees apart. The test ports are located greater

than 8 duct diameters downstream and greater than 2 duct diameters upstream from the nearest flow disturbance. The sampling was performed at three (3) traverse points for each port, 12 total points. Each test point was sampled for 10 minutes for a total sample time of 120 minutes.

6.0 Operating Conditions

Orlando Utilities Commission personnel monitored operating conditions throughout the duration of the sampling program. The unit was operating under normal conditions at an approximate output of 446 MW (gross).

7.0 Quality Assurance Procedures

Quality assurance procedures followed during these testing activities were applied consistent with the requirements outlined by the EPA methods referenced in 40 CFR Part 60. The specific procedures for this test program are listed below.

7.1 Isokinetic Equipment

- **Nozzles** - Inspected and measured across three different diameters to ensure uniformity determine the appropriate nozzle diameter.
- **S-type pitot tubes** were visually inspected and measured to meet the design specifications of EPA Method 2 for a 0.84 pitot coefficient.
- Both legs of the pitot tube were leaked checked before and after each sample run.
- Thermocouples were calibrated prior to the testing and a post-test check to ensure as found and as left consistency is performed after each testing project.
- **Manometers** are leveled and zeroed before each sample run.
- Dry gas meters are fully calibrated on a semi-annual schedule using a set of EPA critical orifices.
- Post-test dry gas meter checks were completed to verify the accuracy of the meter Y values.
- Pre-test and post-test leak checks were completed and were less than 0.02 cfm at the highest sampling vacuum.

7.2 Chain of Custody

All the field samples were collected, sealed and transported to the Coastal office in DeLand, FL under the supervision of Stephen Webb.



1531 Wyngate Drive Deland, FL 32724

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COMPLIANCE EMISSIONS TESTING SERVICES • PERMITTING ASSISTANCE • CEMS CERTIFICATION • AIR QUALITY MONITORING

Emissions Test Report

No. 109-032

ORLANDO UTILITIES COMMISSION

Unit 1

RELATIVE ACCURACY TEST AUDIT REPORT

Prepared for:

Orlando Utilities Commission
5100 South Alafaya Trail
Orlando, FL 32831

Prepared by:

Coastal Air Consulting, Inc.
1531 Wyngate Dr.
DeLand, FL 32724
(386) 943-9241

July 9, 2008

STATEMENT OF VALIDITY

All testing activities and results represented herein were conducted and obtained in accordance with the approved EPA protocols listed in 40 CFR Parts 60 & 75. The contents have been reviewed and verified to be true and correct at the time of testing.



Stephen C. Webb
President

PROJECT STATISTICS

Client: Orlando Utilities Commission

Facility: Stanton Energy Center Unit 1

Location: 5100 South Alafaya Trail
Orlando, FL 32831

Type of Process Tested: Coal Fired Utility Steam Generating Unit

Test Protocols Performed: Oxygen/Carbon Dioxide-EPA Method 3A
Nitrogen Oxide-EPA Method 7E
Sulfur Dioxide-EPA Method 6C
Flow-EPA Method 2 & 2H

Source Analyzers: Monitor Labs CO2 – 76
Monitor Labs NOx – 373
Monitor Labs SO2 – 363 & 745 Inlet
Rosemount Flow – 180919
Servomex O2 – 01420C/1013

Testing Firm: Coastal Air Consulting, Inc.
1531 Wyngate Dr.
DeLand, FL 32724

Test Personnel: Steve Webb Site Supervisor
Bob Righter Technician

Test Date: June 9-13, 2008

Client Representative: David Baez

Observers: None

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1.0 Introduction

Coastal Air Consulting, Inc. (Coastal) was contracted by Orlando Utilities Commission (OUC) to determine the relative accuracy of the Continuous Emissions Monitoring System (CEMS) at the Stanton Energy Center Unit 1 in Orlando, Florida.

The sampling program was conducted the week of June 9, 2008. The RATA was performed by Coastal personnel, with the assistance of personnel assigned by Orlando Utilities Commission. Orlando Utilities Commission personnel coordinated plant operation during testing activities.

2.0 Test Program Summary

A summary of test results developed by this source sampling program is presented in Table 1.

TABLE 1
Relative Accuracy Summary

PARAMETERS	RELATIVE ACCURACY %	BIAS	ALLOWABLE %
FLOW (Mid)	6.685	NB	7.5
FLOW (Normal)	6.349	NB	7.5
NOx (lb/mmBtu)	3.449	NB	7.5
SO2 (PPM)	4.129	NB	7.5
C02 (%)	1.056	NA	7.5
Inlet A SO2 (PPM)	3.352	NA	20
Inlet A O2 (%)	7.883	NA	20
Inlet B SO2 (PPM)	4.911	NA	20
Inlet B O2 (%)	1.876	NA	20

3.0 Results of Testing

These results indicate that Unit 1 passes the RATA at the time of testing under normal operating conditions.

4.0 Description of Source

Stanton Energy Center Unit 1 is a coal fired utility steam generator. The flue gas is exhausted through the Unit 1 stack. A schematic of the process and stack sampling location is included in Appendix 5 "Figures".

5.0 Sampling Procedures

EPA testing protocols utilized during this test program include the following;

EPA Method 1	Sample and Velocity Traverse for Stationary Sources
EPA Method 2	Determination of Stack Gas Velocity and Volumetric Flow Rate
EPA Method 2H	Determination of Stack Gas Velocity Taking Into Account Velocity Decay near the Stack Wall
EPA Method 3A	Gas Analysis for CO ₂ , O ₂ , Excess Air and Dry Molecular Weight (Instrumental Analyzer Method)
EPA Method 4	Determination of Moisture Content in Stack Gas
EPA Method 6C	Determination of Sulfur Dioxide Emissions From Stationary Sources (Instrumental Analyzer Method)
EPA Method 7E	Determination of Nitrogen Oxides Emissions From Stationary Sources (Instrumental Analyzer Method)

6.0 Operating Conditions

Orlando Utilities Commission personnel monitored operating conditions throughout the duration of the sampling program.

7.0 Quality Assurance Procedures

Quality assurance procedures followed during these testing activities were applied consistent with the requirements outlined by the EPA methods referenced in 40 CFR Part 60 & 75. Analyzer calibrations, system bias and drift checks were completed before and after each sample run utilizing EPA Protocol 1 calibration gases.

APPENDIX 1
Reference Data

NO_x LB/MMBTU RELATIVE ACCURACY

PLANT: OUC STANTON
 UNIT: 1 Outlet
 LOAD: NORMAL
 DATE: 6/9/2008

ANALYZER: Monitor Labs
 SERIAL # 373

RUN	TIME START	TIME END	REFERENCE METHOD (NO _x lb/mmBTU)	CEM RESPONSE (NO _x lb/mmBTU)	ARITHMATIC DIFFERENCE	DIFFERENCE SQUARED
1	847	908	0.413	0.428	-0.0148302	0.00022
2	923	944	0.415	0.425	-0.0102988	0.00011
3	959	1020	0.396	0.407	-0.0112033	0.00013
4	1033	1054	0.404	0.415	-0.0108421	0.00012
5	1109	1130	0.408	0.424	-0.0158839	0.00025
6	1144	1205	0.414	0.425	-0.0110174	0.00012
7	1220	1241	0.417	0.429	-0.0120134	0.00014
8	1255	1316	0.424	0.422	0.00189638	0.00000
9	1331	1352	0.425	0.422	0.00316748	0.00001
			AVERAGE	AVERAGE	SUM OF DIFF.	SUM OF THE SQUARES
			0.4129	0.4219	-0.0810253	0.001101

**MEAN DIFFERENCE, \bar{d} (Eq. A-7) -0.0090
 **STANDARD DEVIATION, S_d (Eq. A-8) 0.0068
 **CONFIDENCE COEFFICIENT, $|CC|$ (Eq. A-9) 0.0052

**PERCENT (%) RELATIVE ACCURACY, RA (Eq. A-10) 3.449

**BIAS ADJUSTMENT FACTOR, BAF (Eq. A-12) 1.000

** 40 CFR 75, Appendix A

SO2 PPM RELATIVE ACCURACY

PLANT: OUC STANTON
 UNIT: 1 Outlet
 LOAD: NORMAL
 DATE: 6/9/2008

ANALYZER: Monitor Labs
 SERIAL # 363

RUN	TIME START	TIME END	REFERENCE METHOD (SO2 ppm)	CEM RESPONSE (SO2 ppm)	ARITHMETIC DIFFERENCE	DIFFERENCE SQUARED
1	847	908	110.06	107.10	2.959	8.756
2	923	944	116.41	110.80	5.606	31.424
3	959	1020	108.38	106.70	1.676	2.810
4	1033	1054	108.18	111.60	-3.417	11.677
5	1109	1130	109.53	114.90	-5.374	28.883
6	1144	1205	112.96	119.00	-6.039	36.469
7	1220	1241	111.26	113.70	-2.436	5.936
8	1255	1316	113.41	117.30	-3.893	15.158
9	1331	1352	117.25	120.20	-2.954	8.728
AVERAGE				AVERAGE	SUM OF DIFF.	SUM OF THE SQUARES
111.936				113.478	-13.873	149.842

**MEAN DIFFERENCE, d (Eq. A-7) -1.5415
 **STANDARD DEVIATION, S_d (Eq. A-8) 4.0071
 **CONFIDENCE COEFFICIENT, $|CC|$ (Eq. A-9) 3.0801

**PERCENT (%) RELATIVE ACCURACY, RA (Eq. A-10) 4.129

**BIAS ADJUSTMENT FACTOR, BAF (Eq. A-12) 1.000

** 40 CFR 75, Appendix A

CO2 % RELATIVE ACCURACY

PLANT: OUC STANTON
 UNIT: 1 Outlet
 LOAD: NORMAL
 DATE: 6/9/2008

ANALYZER Monitor Labs
 SERIAL # 76

RUN	TIME START	TIME END	REFERENCE METHOD* (CO2 %)	CEM RESPONSE (CO2 %)	ARITHMETIC DIFFERENCE	DIFFERENCE SQUARED
1	847	908	11.00	10.80	0.195	0.038
2	923	944	10.91	10.90	0.014	0.000
3	959	1020	10.89	10.90	-0.013	0.000
4	1033	1054	10.81	10.90	-0.087	0.008
5	1109	1130	10.94	10.90	0.043	0.002
6	1144	1205	11.02	11.00	0.025	0.001
7	1220	1241	10.96	11.00	-0.038	0.001
8	1255	1316	10.88	11.10	-0.217	0.047
9	1331	1352	10.86	11.00	-0.142	0.020
			AVERAGE	AVERAGE	SUM OF DIFF.	SUM OF THE SQUARES
			10.9200	10.9444	-0.2197	0.1173

**MEAN DIFFERENCE, d (Eq. A-7) -0.0244
 **STANDARD DEVIATION, S_d (Eq. A-8) 0.1183
 **CONFIDENCE COEFFICIENT, $|CC|$ (Eq. A-9) 0.0909

**PERCENT (%) RELATIVE ACCURACY, RA (Eq. A-10)

1.056

** 40 CFR 75, Appendix A

ATTACHMENT SEC-EU1-15
Identification of Applicable Requirements



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit by:

Mr. Frederick F. Haddad, Jr.
Vice President, Power Resources Business Unit
Orlando Utilities Commission
500 South Orange Avenue
P.O. Box 3193
Orlando, Florida 32802

Title V Air Operation Permit Renewal
0950137-006-AV
Curtis H. Stanton Energy Center
Facility ID: **0950137**; ORIS Codes: **0564** and **55821**

Enclosed is FINAL Title V Permit Renewal Number 0950137-006-AV for the Curtis H. Stanton Energy Center, located at 5100 Alafaya Trail, Orlando, Orange County, issued pursuant to Chapter 403, Florida Statutes (F.S.).

An electronic version of this permit has been posted on the Division of Air Resource Management's world wide web site for the United States Environmental Protection Agency (U.S. EPA) Region 4 office's review. The web site address is:

<http://www.dep.state.fl.us/air/eproducts/airpermit/AirSearch.asp>

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office, and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the permitting authority.

Executed in Tallahassee, Florida.

Trina L. Vielhauer, Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT RENEWAL (including the FINAL permit renewal) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 12/30/04 to the person(s) listed or as otherwise noted:

Frederick F. Haddad, Jr.*
G. Dwain Waters, Gulf Power
U.S. EPA, Region 4 (INTERNET E-mail Memorandum)
Len Kozlov, P.E., Central District Office
Denise Stalls, OUC

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to Section 120.52(7), Florida
Statutes, with the designated agency Clerk, receipt
of which is hereby acknowledged.

Barbara J. Stalls 12/30/04
(Clerk) (Date)

FINAL PERMIT DETERMINATION

I. Comment(s).

No comments were received from U.S. EPA, Region 4, concerning the PROPOSED Title V Permit Renewal that was posted on the Department's web site on November 15, 2004.

II. Conclusion.

The permitting authority hereby issues the FINAL Permit Renewal No. 0950137-006-AV with no changes.

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Frederick F. Haddad, Jr.
 Vice President, Power Resources
 Business Unit
 Orlando Utilities Commission
 500 South Orange Avenue
 P.O. Box 3193
 Orlando, Florida 32802

2. Article Number
 (Transfer from service label)

7004 1350 0000 1910 3154

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

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A. Signature
 X *Frederick F. Haddad, Jr.* Agent Addressee

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D. Is delivery address different from item 1? Yes No
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 or PO Box No. 500 South Orange Ave., P.O. Box 3193
 City, State, ZIP+4
 Orlando, Florida 32802

PS Form 3800, June 2002

See Reverse for Instructions

STATEMENT OF BASIS

Orlando Utilities Commission
and
OUC/KUA/FMPA/Southern Company – Florida, LLC

Curtis H. Stanton Energy Center

Facility ID No. 0950137
Orange County

Title V Air Operation Permit Renewal
Permit No. 0950137-006-AV

This Title V air operation permit renewal 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.

The purpose of this permit is to renew the facility's current Title V Air Operation Permit.

This facility consists primarily of two fossil fuel fired steam electric generating stations, an auxiliary boiler, two combined-cycle combustion turbines, and solid fuels, fly ash, limestone, gypsum, slag, and bottom ash storage and handling facilities.

Unit No. 1 consists of a Babcock and Wilcox boiler/steam generator (Model RB 611) and steam turbine which drives a generator with a nameplate rating of 468 Megawatts. Unit No. 2 consists of a Babcock and Wilcox boiler/steam generator (Model RB 621) and steam turbine which drives a generator with a nameplate rating of 468 Megawatts. Each boiler/steam generator is a wall fired dry bottom unit. Unit Nos. 1 and 2 are fired with coal, with No. 6 fuel oil used for startup and flame stabilization. Each unit has their individual stacks. An auxiliary boiler, which serves both boilers and has a maximum heat input of 83 MMBtu/hour, is located at the facility. The auxiliary boiler is fired with No. 2 distillate fuel oil.

Fossil fuel fired steam generator # 1 is a nominal 468 megawatt steam generator designated as Unit # 1. The emission unit is fired primarily on bituminous coal and secondarily on No. 6 fuel oil for startup and flame stabilization, as permitted herein, with a maximum heat input of 4286 MMBtu per hour. Pipeline quality natural gas as well as landfill gas is also approved for combustion, although petroleum coke is not approved.

Fossil fuel fired steam generator # 2 is a nominal 468 megawatt steam generator designated as Unit # 2. The emission unit is fired primarily on bituminous coal and secondarily on No. 6 fuel oil and on-specification used oil for startup and flame stabilization, as permitted herein, with a maximum heat input of 4286 MMBtu per hour. Pipeline quality natural gas as well as landfill gas is also approved for combustion, although petroleum coke is not approved. Each boiler/steam

generator, units #1 and #2 drives a turbine generator and both units have an individual 550-foot exhaust stack. Particulate matter emissions generated during the operation of the unit are controlled by a dry electrostatic precipitator (ESP) manufactured by Wheelabrator-Frye Inc. The control efficiency of the ESP is 99.7%. Sulfur dioxide emissions are controlled by flue gas desulfurization equipment manufactured by Combustion Engineering.

Both boiler/steam generators (units #1 and #2) are regulated under the federal Acid Rain Program, Phase II, adopted and incorporated by reference in Rule 62-204.800, F.A.C.; and NSPS-40 CFR 60, Subpart Da, Standards of Performance for Fossil-Fuel Fired Steam Generators for Which Construction is Commenced After September 18, 1978, adopted and incorporated by reference in Rule 62-204.800(7), F.A.C.; Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD); Rule 62-212.400(6), F.A.C., Best Available Control Technology (BACT). Fossil fuel fired steam generator # 1 began commercial operation on May 12, 1987; and, fossil fuel fired steam generator # 2 began commercial operation on March 29, 1996. Due to the many (nearly 9) years of time which elapsed between the startup of these units, the PSD requirements are different, reflecting improvements in available control technology. Generally speaking, the emission limits for unit #2 are more stringent than those for unit #1, as can be seen from the permitted SO₂ and NO_x emission rates.

The auxiliary boiler is designated as Unit No. 3. The unit is a Babcock & Wilcox Model No. FM-2919 boiler. It is fired primarily with "new oil", which means oil which has been refined from crude oil and has not been used. Only No. 2 fuel oil can be burned in the auxiliary boiler. This auxiliary boiler serves both Unit No. 1 and 2 boiler/steam generators. The emission unit is regulated under Rule 62-210.300, F.A.C., Permits Required.

Fly Ash Silos No. 1 and No. 2 handle fly ash from Steam Generators No. 1 and No. 2 respectively. Fly ash is pneumatically conveyed from the individual electrostatic precipitators to Silos No. 1 and No. 2 and then is gravity fed by tubing into totally enclosed tanker trucks. Particulate matter emissions generated by silo loading and unloading to a tanker truck is controlled by baghouses in addition to reasonable precautions. The emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required.

Emission units -025 and -026 are nominal 170 MW, General Electric "F" Class (PG7241FA) combustion turbine-electrical generators, fired with pipeline natural gas or diesel and equipped with evaporative coolers on the inlet air system, two supplementary fired heat recovery steam generators (HRSGs), each with a 160 ft. stack, and one steam turbine-electrical generator rated at approximately 300 MW. The combustion turbines are equipped with Dry Low NO_x combustors as well as an SCR in order to control NO_x emissions to 3.5 ppmvd at 15% O₂ while firing natural gas. During fuel oil firing, emissions shall be held to 10 ppmvd at 15% O₂ using SCR plus water injection. Pipeline quality natural gas, 0.05% sulfur oil, and good combustion practices shall be employed to control all pollutants. Units 25 and 26 have a total nominal capacity of 640 MW and will achieve approximately 700 megawatts during extreme winter peaking conditions.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities. Based on the Title V permit renewal application received on May 25, 2004, this facility is not a major source of hazardous air pollutants (HAPs).

This permit renewal includes the following change to the facility's current Title V Air Operation Permit 0950137-005-AV:

- Excess emissions provisions from Rule 62-210.700, F.A.C., inadvertently omitted in the current Title V permit, have been included where appropriate.

The applicant requested that the following changes be made to the current Title V Air Operation Permit specific conditions:

E.19. Excess emissions resulting from startup, shutdown, fuel switching, or malfunction shall be permitted provided that best operational practices are adhered to and the duration of excess emissions shall be minimized. Excess emissions occurrences shall in no case exceed two hours in any 24-hour period, with the following exception: during any 24-hour period in which an hour of start-up or shutdown occurs, the following alternative emission limits shall apply on the basis of a 24-hour rolling average:

- a) An alternative NO_x limit of 127 lb/hr shall apply if natural gas is the exclusively fired fuel;*
- b) An alternative NO_x limit of 370 lb/hr shall apply if any fuel oil is fired; and,*
- c) An alternative CO limit of 155 lb/hr firing either natural gas or fuel oil.*

In addition, excess emissions resulting from a major DLN tuning session shall be permitted provided the tuning session is performed in accordance with the manufacturer's specifications and in no case shall exceed 72 hours in any calendar year. A "major tuning session" would occur after a combustor change-out, a major repair to a combustor, or other similar circumstances. Prior to performing any major tuning session, the permittee shall provide the Compliance Authority with an advance notice that details the activity and proposed tuning schedule. The notice may be made by telephone, facsimile transmittal, or electronic mail.

The 24-hour averages shall be based on all available data excluding calibration data.

[BACT Determination; Rule 62-210.700, F.A.C.; and 0950137-002-AC, Specific Condition 26., modified on May 16, 2003.]

Note: These requested changes were *not made* in the permit renewal, because the current language was taken directly from the facility's federally enforceable air construction permit 0950137-002-AC. Such changes would require an air construction permit to implement.

- Pursuant to the comment period, the applicant recommended adding the following Permitting note after Specific Condition E.11. (the note applies to both E.10. and E.11.):

{Permitting note: Heat input capacity shall be determined by CEMs database used for the acid rain program. CEM data availability shall meet 40 CFR Part 75 requirements at greater than 95% of the time. Only valid hourly data shall be used to determine compliance with this provision. The source shall maintain this database for up to 5 years and make the information available upon request by the Department. }

The change is acceptable and more consistent with the original air construction/PSD permit as well as the Conditions of Certification. The change has been made in the PROPOSED permit.

- The Applicant recommended adding the following permitting note:

"Startup/Shutdown is defined as operations less than 50% load of the combustion turbine. The alternative 24 hour startup average is calculated every hour during startup using post hourly emission data. The alternative 24 hour shutdown average is calculated every hour during shutdown using previous hourly data. There shall be no more than (2) episodes of exceedances of the alternative 24 hour startup/shutdown standard in any 24 hour period. (2 periods allowed for excess emissions). All 24 hour alternative startup/shutdown averages shall be based on all available hourly data excluding calibration data."

Department response:

This change is not acceptable, because the conditions cited could occur outside startup and shutdown phases of operation. To change the wording of Specific Condition E.19, would require a construction permit (AC) modification to the facility's PSD permit.

- The Applicant requested the addition of the following permitting note to clarify when annual stack tests for operation on fuel oil test are required:

"Prior to the next annual stack tests, the hours of operation on fuel oil for the 2004-2005 Federal Fiscal Year should be determined. If it is less than 400 hours, a stack test on fuel oil is not required for units 25 and 26."

The permitting note language was reviewed and approved by the Department's Central District Office compliance and enforcement management. The Department therefore agrees with the addition of this permitting note, and it has been added in the PROPOSED permit following Specific Condition E.31.

- The Applicant requested that the permit include the addition of the Fourier Transform Infra-Red (FTIR) Method to determine annual ammonia slip under condition E.23., and therefore add EPA Method 320 as an option to Method CTM-027. The Department agrees with the addition of this alternate test method, and it has been added in the PROPOSED permit.

Orlando Utilities Commission
and
OUC/KUA/FMPA/Southern Company – Florida, LLC

Curtis H. Stanton Energy Center

Facility ID No. **0950137**
Orange County

Title V Air Operation Permit Renewal
FINAL Permit No. **0950137-006-AV**

Permitting Authority:

State of Florida
Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation
Permitting South Section

Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Telephone: 850/488-0114
Fax: 850/922-6979

FINAL Permit Renewal No. 0950137-006-AV

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Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

Permittee:

Orlando Utilities Commission and
OUC/KUA/FMPA/Southern Company
– Florida, LLC
500 South Orange Avenue
P.O. Box 3193
Orlando, Florida 32802

FINAL Permit Renewal No. 0950137-006-AV

Facility ID No.: 0950137

SIC Nos.: 4911

Project: Title V Air Operation Permit Renewal

This permit renewal is for the operation of the Curtis H. Stanton Energy Center. This facility is located at 5100 South Alafaya Trail, Orlando, Orange County; UTM Coordinates: Zone 17, 484.00 km East and 3150.50 km North; Latitude: 28° 28' 50" North and Longitude: 81° 09' 40" West.

This Title V air operation permit renewal 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 renewal.

Referenced attachments made a part of this permit:

Phase II Acid Rain Part Application signed by the Designated Representative on April 23, 2004.

Phase II NO_x Compliance Plan signed by the Designated Representative on May 27, 2004.

Appendix U-1, List of Unregulated Emissions Units and/or Activities

Appendix I-1, List of Insignificant Emissions Units and/or Activities

APPENDIX TV-4, TITLE V CONDITIONS (version dated 02/12/02)

APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/07/96)

TABLE 297.310-1, CALIBRATION SCHEDULE

SUMMARY REPORT- GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING

SYSTEM PERFORMANCE REPORT (40 CFR 60, July 1996)

Appendix GG, Standards of Performance for Stationary Gas Turbines

Appendix CAM

Effective Date: January 1, 2005

Renewal Application Due Date: July 5, 2009

Expiration Date: December 31, 2009

Michael G. Cooke, Director
Division of Air Resource
Management

MGC/tbc

"More Protection, Less Process"

Printed on recycled paper.

Section I. Facility Information.

Subsection A. Facility Description.

This facility consists of two fossil fuel fired steam electric generating stations. E.U. ID No. -001 (Unit No. 1) and -002 (Unit No. 2); also, there are storage and handling facilities for solid fuels, fly ash, limestone, gypsum, slag, and bottom ash. Unit No. 1 consists of a Babcock and Wilcox boiler/steam generator (Model RB 611) and steam turbine, which drives a generator with a nameplate rating of 468 Megawatts. Unit No. 2 consists of a Babcock and Wilcox boiler/steam generator (Model RB 621) and steam turbine, which drives a generator with a nameplate rating of 468 Megawatts. Each boiler/steam generator is a wall fired dry bottom unit. Unit Nos. 1 and 2 are fired with coal, with No. 6 fuel oil used for startup and flame stabilization. Each unit has their individual stacks. Particulate matter emissions generated during the operation of the unit are controlled by a dry electrostatic precipitator (ESP) manufactured by Wheelabrator-Frye Inc. The control efficiency of the ESP is 99.7%. An auxiliary boiler, which serves both boilers and with a maximum heat input of 83 MMBtu/hour, is located at the facility. The auxiliary boiler is fired with No. 2 distillate fuel oil.

Emission Units 1 and 2 are subject to compliance assurance monitoring (CAM) for particulate matter (PM) emissions controlled by an ESP. Because the continuous opacity monitoring system (COMS) is required to be used at the facility (for Phase II Acid Rain Program purposes), it must also be used as part of the CAM plan. *A CAM plan is included for the ESP. See Appendix CAM.*

Emission units -025 and -026 are nominal 170 MW, General Electric "F" Class (PG7241FA) combustion turbine-electrical generators, fired with pipeline natural gas or diesel and equipped with evaporative coolers on the inlet air system, two supplementary fired heat recovery steam generators (HRSGs), each with a 160 ft. stack, and one steam turbine-electrical generator rated at approximately 300 MW. Units 25 and 26 have a total nominal capacity of 640 MW and will achieve approximately 700 megawatts during extreme winter peaking conditions.

The combustion turbines are equipped with Dry Low NO_x combustors as well as an SCR in order to control NO_x emissions to 3.5 ppmvd at 15% O₂ while firing natural gas. During fuel oil firing, emissions shall be held to 10 ppmvd at 15% O₂ using SCR plus water injection. Pipeline quality natural gas, 0.05% sulfur, by weight, fuel oil, and good combustion practices shall be employed to control all pollutants.

These emissions units (the combustion turbines) are not subject to continuous assurance monitoring (CAM) because the NO_x CEMS is used for continuance compliance determination. Thus no CAM plan is included for these units in this permit.

Also included in this permit are miscellaneous unregulated emissions units and insignificant emissions units and/or activities.

Based on the Title V permit revision application received on October 31, 2003, this facility is not a major source of hazardous air pollutants (HAPs). The facility holds ORIS codes **0564** and **55821** under the Acid Rain Program.

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U. ID No.	Brief Description
-001	Fossil Fuel Fired Steam Electric Generator No. 1
-002	Fossil Fuel Fired Steam Electric Generator No. 2
-003	Auxiliary Boiler
-004	Coal Transfer Baghouse
-005	Coal Crusher Building Baghouse
-006	Coal Plant Transfer and Silo Fill Area #1 Baghouse
-007	Coal Plant Transfer and Silo Fill Area #2 Baghouse
-008	Limestone Day Bin Baghouse
-009	Pebble Lime Receiving Hopper Baghouse
-010	Coal Reclaim Hopper Baghouse
-011	Flyash Exhauster Filter #1 Baghouse
-012	Flyash Exhauster Filter #2 Baghouse
-013	Flyash Exhauster Filter #3 Baghouse
-014	Flyash Exhauster Filter #4 Baghouse
-015	Flyash Silo Bin Vent Filter Baghouse
-016	Adipic Acid Storage Baghouse
-025	Combined-Cycle Combustion Turbine
-026	Combined-Cycle Combustion Turbine
-028	Distillate Fuel Oil Storage Tank
-029	Flyash Silo Bin Vent Filter Baghouse

Unregulated Emissions Units and/or Activities

- 017 Material Handling
- 018 Fuel Storage Tanks
- 019 Water Treatment
- 020 Unconfined Emissions
- 027 Mechanical Draft Cooling Tower

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
- Statement of Basis

These documents are on file with the permitting authority:

FINAL Title V Air Operation Permit Revision clerked on May 21, 2004.

Phase II Acid Rain Part Renewal Application signed by the Designated Representative on April 23, 2004.

Title V Permit Renewal Application received on 5/25/04.

Phase II NO_x Compliance Plan (Revised) signed by the Designated Representative on May 27, 2004.

Response from the applicant received on September 24, 2004.

DRAFT Title V Permit Renewal clerked on October 1, 2004.

E-mail memoranda from the Applicant received on October 7, 2004, and November 3, 2004.

PROPOSED Title V Permit Renewal posted for EPA review on November 15, 2004.

These documents are on file with the USEPA:

The Responsible Official has certified that the Risk Management Plan was submitted to the RMP Reporting Center.

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-4, TITLE V CONDITIONS, is a part of this permit.
{Permitting note: APPENDIX TV-4, 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. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall 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).
 - a. As required by Section 112(r)(7)(B)(iii) of the CAA and 40 CFR 68, the owner or operator shall submit an updated Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center.
 - b. As required under Section 252.941(1)(c), F.S., the owner or operator shall report to the appropriate representative of the Department of Community Affairs (DCA), as established by department rule, within one working day of discovery of an accidental release of a regulated substance from the stationary source, if the owner or operator is required to report the release to the United States Environmental Protection Agency under Section 112(r)(6) of the CAA.
 - c. The owner or operator shall submit the required annual registration fee to the DCA on or before April 1, in accordance with Part IV, Chapter 252, F.S. and Rule 9G-21, F.A.C.

Any required written reports, notifications, certifications, and data required to be sent to the DCA, should be sent to:

Department of Community Affairs
Division of Emergency Management
2555 Shumard Oak Boulevard
Tallahassee, FL 32399-2100
Telephone: 850/413-9921, Fax: 850/488-1739

Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:

RMP Reporting Center
Post Office Box 1515
Lanham-Seabrook, Maryland 20703-1515
Telephone: 301/429-5018

Any required reports to be sent to the National Response Center, should be sent to:

National Response Center
EPA Office of Solid Waste and Emergency Response
USEPA (5305 W)
401 M Street, SW
Washington, D.C. 20460
Telephone: 1/800/424-8802

Send the required annual registration fee using approved forms made payable to:

Cashier
Department of Community Affairs
State Emergency Response Commission
2555 Shumard Oak Boulevard
Tallahassee, FL 32399-2149

[Part IV, Chapter 252, F.S. and Rule 9G-21, F.A.C.]

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 Emissions or Organic Solvents Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents 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.]

8. The following reasonable precautions shall be taken to prevent emissions of unconfined particulate matter at this facility on an as-needed basis:

- ◆ Paving and maintenance of roads, parking areas, and yards,
- ◆ Chemical (dust suppressants) or water application to unpaved roads, and unpaved yard areas,
- ◆ Removal of particulate matter (PM) from roads and other paved areas to prevent re-entrainment, and from buildings or work areas to prevent airborne PM,
- ◆ Landscaping or planting of vegetation,
- ◆ Regular mowing of grass and care of vegetation,
- ◆ Confining abrasive blasting where possible,
- ◆ Limiting access to plant property by unnecessary vehicles, and
- ◆ Additional, or alternative activities, or other techniques to minimize unconfined PM emissions.

[Rule 62-296.320(4)(c)2., F.A.C.; and proposed by applicant in the Title V permit revision application received October 31, 2003.]

9. 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.]

10. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the Department and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C. [Rules 62-213.440(3) and 62-213.900, F.A.C.]

{Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. (see Condition 51. of Appendix TV-4, Title V Conditions).}

11. The permittee shall submit all compliance-related notifications and reports required of this permit to the Central District Office:

Department of Environmental Protection
Central District Office
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767
Telephone: 407/894-7555
Fax: 407/897-2966

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
Air and EPCRA Enforcement Branch, Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303
Telephone: 404/562-9155, Fax: 404/562-9163

13. BACT Determination. In accordance with paragraph (4) of 40 CFR 52.21 (j) and 40 CFR 51.166(j), the Best Available Control Technology (BACT) determination shall be reviewed and modified as appropriate in the event of a plant conversion. This paragraph states: "For phased construction projects, the determination of best available control technology shall be reviewed and modified as appropriate at the latest reasonable time which occurs no later than 18 months prior to commencement of construction of each independent phase of the project. At such time, the owner or operator of the applicable stationary source may be required to demonstrate the adequacy of any previous determination of best available control technology for the source." This reassessment will also be conducted for this project if there are any increases in heat input limits, hours of operation, oil firing, low or baseload operation, short-term or annual emission limits, annual fuel heat input limits or similar changes. [40 CFR 52.21(j); 40 CFR 51.166(j); Rule 62-4.070 F.A.C.; and 0950137-002-AC, Specific Condition 7., Section II.]

14. 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. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information.

[Rule 62-213.420(4), F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following Regulated Emissions Units.

E.U. ID No.	Brief Description
-001	Fossil Fuel Fired Steam Generator # 1
-002	Fossil Fuel Fired Steam Generator # 2

Fossil fuel fired steam generator # 1 is a nominal 468 megawatt steam generator designated as Unit # 1. The emission unit is fired primarily on bituminous coal and secondarily on No. 6 fuel oil for startup and flame stabilization, as permitted herein, with a maximum heat input of 4286 MMBtu per hour.

Fossil fuel fired steam generator # 2 is a nominal 468 megawatt steam generator designated as Unit # 2. The emission unit is fired primarily on bituminous coal and secondarily on No. 6 fuel oil and on-specification used oil for startup and flame stabilization, as permitted herein, with a maximum heat input of 4286 MMBtu per hour.

Each boiler/steam generator, units #1 and #2, drives a turbine generator and both units have an individual 550 foot exhaust stack. Particulate matter emissions generated during the operation of the unit are controlled by a dry electrostatic precipitator (ESP) manufactured by Wheelabrator-Frye Inc. The control efficiency of the ESP is 99.7%. Sulfur dioxide emissions are controlled by flue gas desulfurization equipment manufactured by Combustion Engineering.

Each boiler/steam generator, units #1 and #2 are regulated under the federal Acid Rain Program, Phase II, adopted and incorporated by reference in Rule 62-204.800, F.A.C. These units hold ORIS code 0564.

Emission Units 1 and 2 are subject to compliance assurance monitoring (CAM) for particulate matter (PM) emissions controlled by an ESP. Because the continuous opacity monitoring system (COMS) is required to be used at the facility (for Phase II Acid Rain Program purposes), it must also be used as part of the CAM plan. *A CAM plan is included for the ESP. See Appendix CAM.*

{Permitting note(s): The emissions units are regulated under Acid Rain, Phase II; NSPS-40 CFR 60, Subpart Da, Standards of Performance for Fossil-Fuel Fired Steam Generators for Which Construction is Commenced After September 18, 1978, adopted and incorporated by reference in Rule 62-204.800(7)(b)2, F.A.C.; Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD); and Rule 62-212.400(6), F.A.C., Best Available Control Technology (BACT), and Compliance Assurance Monitoring (CAM). Fossil fuel fired steam generator # 1 began commercial operation on May 12, 1987; and, fossil fuel fired steam generator # 2 began commercial operation on June 1, 1996.}

The following specific conditions apply to the emissions units listed above:

{Permitting note: In addition to the requirements listed below, these emissions units are also subject to the standards and requirements contained in the Acid Rain Part of this permit (see Section IV).}

A.1. Capacity. The maximum permitted heat input rate for Unit No. 1 and 2 is 4286 MMBTU/hr. Testing of emissions shall be conducted with the emissions unit operating at 90 to 100 percent of the maximum permitted heat input rate. If it is impractical 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 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.

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

[Rule 62-4.160(2), and Rule 62-297.310(2), F.A.C.]

A.2. Methods of Operation - Fuels. Coal is permitted to be fired in Units No. 1 and 2. Coal shall not be burned in the unit unless both the electrostatic precipitator and limestone scrubber are operating properly except as provided under 40 C.F.R. 60.46a. The fuel oil to be fired in Units 1 and 2 and the auxiliary boiler shall be primarily "new oil", which means an oil which has been refined from crude oil and has not been used. On-site generated lubricating oil and used fuel oil which meets the requirements of 40 CFR 266.40 may also be burned. Landfill gas from the Orange County Landfill and Natural gas as supplied by commercial pipeline may be burned in Unit No. 1 and 2.

[Rules 62-4.070(3), 62-4.160(2), 62-210.200, and 62-213.440(1), F.A.C., PSD-FL-084]

A.3. Methods of Operation - Flue Gas Desulfurization System (FGD). No fraction of flue gas shall be allowed to bypass the FGD system to reheat the gases exiting from the FGD system, if the bypass will cause overall SO₂ removal efficiency less than 90 percent (or 70 percent for mass SO₂ emission rates less than or equal to 0.6 lb/million Btu 30 day rolling average). The percentage and amount of flue gas bypassing the FGD system shall be documented and records kept for a minimum of two years available for Department's inspection. The flue gas scrubber shall be put into service during normal operational startup, and shutdown, when No. 6 fuel oil is being burned. The flue-gas desulfurization system and mist eliminators for Unit 2 will be maintained and operated in a manner consistent with good air pollution practice for minimizing emissions pursuant to the requirements of 40 C.F.R. 60.11(d).

[Rule 62-4.070(3), F.A.C., 40 CFR 60.40a, and Permit No. PSD-FL-084]

A.4. Hours of Operation. Units No. 1 & 2 are allowed to operate continuously (i.e., 8760 hrs./yr.).

[Rule 62-210.200, F.A.C., Definitions (PTE)]

Emission Limitations and Standards

{Permitting note: Unless otherwise specified, the averaging times for Specific Conditions A.5. through A.24. are based on the specified averaging time of the applicable test method.}

A.5. Particulate matter emissions from Unit No. 1 shall not exceed 0.03 lb/million Btu heat input and 1 percent of the potential combustion concentration (99 percent reduction) when combusting solid fuel. Particulate matter emissions from Unit No. 2 shall not exceed 0.02 lb/million Btu heat input and 1 percent of the potential combustion concentration (99 percent reduction) when combusting solid fuel. This standard applies at all times except during periods of startup, shutdown, or malfunction.

[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.42a(a); 40 CFR 60.46a(a); 40 CFR 60.46a(c)]

A.6. Based on the maximum permitted heat input rate listed in Specific Condition A.1., the particulate matter emissions from Unit No. 1 shall not exceed 124.1 lbs/hour and 543.5 tons/year. The particulate matter emissions from Unit No. 2 shall not exceed 85.7 lbs/hr and 375.4 tons/year.

[PSD-FL-084 and Rule 62-296.700(4)(b)1., F.A.C.]

A.7. Particulate matter emissions from Units No. 1 and 2 when combusting liquid fuel (No. 6 fuel oil) shall not exceed 0.03 lb/million Btu and 30 percent of potential combustion concentration (70 percent reduction).

[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.43a(b)(1)]

A.8. Visible emissions from Units No. 1 and 2 shall not exceed 20 (twenty) percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 (twenty-seven) percent opacity.

[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.42a(b)]

A.9. Sulfur dioxide emissions from Unit No. 1 when combusting solid fuel shall not exceed 1.2 lb/million Btu, (30 day rolling average) heat input or 1.2 lb/million Btu (2 hour emission rate) heat input. Additionally, sulfur dioxide emissions from Unit No. 1 when combusting solid fuel shall not exceed 1.14 lb/million Btu (3-hr average) heat input (4886 lbs/hr and 21,400 tons/year) and 10 percent of the potential combustion concentration (90 percent reduction) or 30 percent of the potential combustion concentration (70 percent reduction) when emissions are less than 0.60 lb/million Btu heat input.

[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.43a(a)(1) and (2); PSD-FL-084]

A.10. Sulfur dioxide emissions from Unit No. 2 when combusting solid fuel shall not exceed 0.25 lb/million Btu (30 day rolling average) heat input; 0.67 lb/million Btu (24 hour emission rate) heat input or 0.85 lb/million Btu (3 hour emission rate) heat input. This corresponds to 3643 lbs/hr and 4,693 tons/year emission rate.

[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.43a(a)(1); PSD-FL-084]

A.11. Sulfur dioxide emissions from Units No. 1 and 2 when combusting liquid fuel (No. 6 fuel oil) shall not exceed 0.80 lb/million Btu heat input and 10 percent of the potential combustion concentration (90 percent reduction).

[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.43a(b)(1)]

A.12. Compliance with a sulfur dioxide emission limitation and percent reduction requirements are both determined on a 30-day rolling average basis.
[Rule 62.204.800(7)(b)2., F.A.C.; 40 CFR 60.43a(g)]

A.13. When different fuels are combusted simultaneously in Unit No. 1, the applicable standard of sulfur dioxide is determined by proration using the following formula:

(1) If emissions of sulfur dioxide to the atmosphere are greater than 0.60 lb/million Btu heat input

$$Es = \text{the lesser of } (0.80x + 1.20y)/100 \text{ or } 1.14 \text{ and } \%Ps = 10$$

(2) If emissions of sulfur dioxide to the atmosphere are equal to or less than 0.60 lb/million Btu heat input:

$$Es = \text{the lesser of } (0.80x + 1.20y)/100 \text{ or } 1.14 \text{ and } \%Ps = (10x + 30y)/100$$

where:

- Es = the sulfur dioxide emission limit (lb/million Btu heat input),
- %Ps = the percentage of potential sulfur dioxide emission allowed.
- x = the percentage of total heat input derived from the combustion of liquid fuel
- y = the percentage of total heat input derived from the combustion of solid fuel

[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.43a(h); PSD-FL-084]

A.14. When different fuels are combusted simultaneously in Unit No. 2, the applicable standard of sulfur dioxide is determined by proration using the following formula:

(1) If emissions of sulfur dioxide to the atmosphere are greater than 0.60 lb/million Btu heat input:

$$Es = \text{the lesser of } (0.80x + 1.20y)/100 \text{ or } 0.85 \text{ and } \%Ps = 10$$

(2) If emissions of sulfur dioxide to the atmosphere are equal to or less than 0.60 lb/million Btu heat input:

$$Es = \text{the lesser of } (0.80x + 1.20y)/100 \text{ or } 0.85 \text{ and } \%Ps = (10x + 30y)/100$$

where:

- Es = the sulfur dioxide emission limit (lb/million Btu heat input),
- %Ps = the percentage of potential sulfur dioxide emission allowed.
- x = the percentage of total heat input derived from the combustion of liquid fuel
- y = the percentage of total heat input derived from the combustion of solid fuel

[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.43a(h); PSD-FL-084]

A.15. Nitrogen dioxide emissions from Unit No. 1 when combusting bituminous coal shall not exceed 0.60 lb./million Btu heat input (30 day rolling average) nor 0.46 lb./million Btu heat input on an annual average. Nitrogen dioxide emissions from Unit No. 2 when combusting bituminous coal shall not exceed 0.17 lb./million Btu heat input. Nitrogen dioxide emissions from Units No. 1 and 2 when combusting liquid fuel shall not exceed 0.30 lb/million Btu heat input. These emission limits are based on a 30-day rolling average. These standards apply at all times except during periods of startup, shutdown, or malfunction. Ammonia slip from the NOx control system

shall be limited to less than 30 ppmv, uncorrected. An ammonia monitoring protocol shall be submitted to EPA for review and approval prior to the operation of Unit 2.

{Permitting note: In accordance with 40 C.F.R. 70.6(a)(1)(ii), “where an applicable requirement of the Act is more stringent than an applicable requirement of the regulations promulgated under title IV of the Act, both provisions shall be incorporated in the permit and shall be enforceable by the Administrator.” Unit 1 is required to meet the more stringent NO_x limit of 0.46 pounds per MMBtu annual average, in addition to the 0.60 pounds per MMBtu PSD NO_x limit.}
[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.44a(a); 40 CFR 60.46a(b); 40 CFR 60.46a(c)]

A.16. When liquid and solid fuels are combusted simultaneously in Unit No. 1, the applicable standard for nitrogen dioxides is determined by proration using the following formula:

$$E_n = [0.30 x + 0.60 y]/100$$

where:

E_n = the applicable standard for nitrogen oxides when multiple fuels are combusted simultaneously (lb/million Btu heat input);

x = the percentage of total heat input derived from the combustion of liquid fuels

y = the percentage of total heat input derived from the combustion of solid fuels

[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.44a(c)]

A.17. When liquid and solid fuels are combusted simultaneously in Unit No. 2, the applicable standard for nitrogen dioxides is determined by proration using the following formula:

$$E_n = [0.30 x + 0.17 y]/100$$

where:

E_n = the applicable standard for nitrogen oxides when multiple fuels are combusted simultaneously (lb/million Btu heat input);

x = the percentage of total heat input derived from the combustion of liquid fuels

y = the percentage of total heat input derived from the combustion of solid fuels

[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.44a(c)]

A.18. Carbon monoxide (CO) emissions from Unit No. 2 shall not exceed 0.15 lb/million Btu heat input. Based upon a heat input of 4286 million Btu/hr, CO emissions shall not exceed 643 lb/hr (2816 TPY).

[PSD-FL-084]

A.19. Volatile Organic Compounds (VOC) emissions from Unit No. 2 shall not exceed 0.015 lb/million Btu heat input. Based upon a heat input of 4286 million Btu/hr, VOC emissions shall not exceed 64 lb/hr (282 TPY).

[PSD-FL-084]

A.20. Sulfuric acid mist (H₂SO₄) emissions from Unit No. 2 shall not exceed 0.033 lb/million Btu heat input. Based upon a heat input of 4286 million Btu/hr, H₂SO₄ emissions shall not exceed 140 lb/hr (613 TPY).

[PPS PA 81-14/SA1]

A.21. Beryllium (Be) emissions from Unit No. 2 shall not exceed 5.2×10^{-6} lb./million Btu heat input. Based upon a heat input of 4286 million Btu/hr, Be emissions shall not exceed 0.022 lb./hr (0.1 TPY).

[PPS PA 81-14/SA1]

A.22. Mercury (Hg) emissions from Unit No. 2 shall not exceed 1.1×10^{-5} lb/million Btu heat input. Based upon a heat input of 4286 million Btu/hr, Hg emissions shall not exceed 0.046 lb/hr (0.2 TPY).

[PPS PA 81-14/SA1]

A.23. Lead (Pb) emissions from Unit No. 2 shall not exceed 1.5×10^{-4} lb/million Btu heat input. Based upon a heat input of 4286 million Btu/hr, Pb emissions shall not exceed 0.64 lb/hr (2.8 TPY).

[PPS PA 81-14/SA1]

A.24. Fluorides (F1) emissions from Unit No. 2 shall not exceed 4.2×10^{-4} lb/million Btu heat input. Based upon a heat input of 4286 million Btu/hr, F1 emissions shall not exceed 1.8 lb/hr (7.9 TPY).

[PPS PA 81-14/SA1]

Excess Emissions

A.24.1. Excess emissions resulting from 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.]

A.24.2. 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.]

A.24.3. 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.]

Compliance Provisions

A.25. The sulfur dioxide emission standards in specific conditions A.9., A.10., A.11., A.13 and A.14., apply at all times except during periods of startup, shutdown, or when both emergency conditions exist and the following procedures in specific condition A.26. are implemented.

[Rule 62-296.800(7)(b)2., F.A.C.; 40 CFR 60.46a(c)]

A.26. During emergency conditions in the principal company, an affected facility with a malfunctioning flue gas desulfurization system may be operated if sulfur dioxide emissions are minimized by:

(1) Operating all operable flue gas desulfurization system modules, and bringing back into operation any malfunctioned module as soon as repairs are completed,

(2) Bypassing flue gases around only those flue gas desulfurization system modules that have been taken out of operation because they were incapable of any sulfur dioxide emission reduction or which would have suffered significant physical damage if they had remained in operation, and

(3) Operating a *spare* flue gas desulfurization system module. The Department may at their discretion require the permittee within 60 days of notification to demonstrate spare module capability. To demonstrate this capability, the owner or operator must demonstrate compliance with the appropriate requirements of specific conditions A.9., A.10., A.11., A.13 and A.14. for any period of operation lasting from 24 hours to 30 days when:

- (i) Any one flue gas desulfurization module is not operated,
- (ii) The affected facility is operating at the maximum heat input rate,
- (iii) The fuel fired during the 24-hour to 30-day period is representative of the type and average sulfur content of fuel used over a typical 30-day period, and
- (iv) The owner or operator has given the Department at least 30 days notice of the date and period of time over which the demonstration will be performed.

[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.46a(d)]

A.27. Compliance with the sulfur dioxide emission limitations and percentage reduction requirements in specific conditions A.9., A.10., A.11., A.13 and A.14., and the nitrogen oxides emission limitations in specific conditions A.15., A.16 and A.17., is based on the *average emission rate* for 30 successive boiler operating days. A separate performance test is completed at the end of each boiler operating day after the initial performance test, and a new 30-day *average emission rate* for both sulfur dioxide and nitrogen oxides and a new percent reduction for sulfur dioxide are calculated to show compliance with the standards.

[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.46a(e)]

A.28. Compliance is determined by calculating the arithmetic average of all hourly *emission rates* for SO₂ and NO_x for the 30 successive boiler operating days, except for data obtained during startup and shutdown (SO₂ & NO_x), simultaneous combustion of different fuels (SO₂ & NO_x), malfunction (NO_x only), or emergency conditions (SO₂ only). Compliance with the percentage reduction requirement for SO₂ is determined based on the average inlet and average outlet SO₂ emission rates for the 30 successive boiler operating days. Compliance with the limits determined from specific conditions A.13., A.14., A.15. and A.16. (above) shall be determined by calculating the arithmetic average of all hourly *emission rates* for SO₂ and NO_x from any operating hours for the 30 prior boiler operating days where simultaneous combustion of *different fuels occurred*.

[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.46a(g)]

A.29. If the permittee has not obtained the minimum quantity of emission data as required in the following emission monitoring specific conditions A.30. through A.39, compliance of Units No. 1 and 2 with the sulfur dioxide and nitrogen oxides standards for the day on which the 30-day period ends may be determined by the Administrator by following the applicable procedures in section 7 of Method 19, *Determination of Compliance When Minimum Data Requirement Is Not Met*.

[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.46a(h); 40 CFR 60, Appendix A, Method 19]

Compliance Assurance Monitoring (CAM) Requirements

A.29.1. These emissions units are subject to the CAM requirements contained in the attached Appendix CAM. Failure to adhere to the monitoring requirements specified does not necessarily indicate an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(7)(b), F.A.C.

[40 CFR 64; and Rules 62-204.800 and 62-213.440(1)(b)1.a., F.A.C.]

Emissions Monitoring

A.30. The permittee shall calibrate, maintain, and operate a continuous monitoring system, and record the output of the system, for measuring the opacity of emissions discharged to the atmosphere. Opacity interference exists due to water droplets in the stack from the use of an FGD system, therefore the opacity is monitored upstream of the interference (at the inlet to the FGD system). This monitoring method has been approved by the Department through permitting actions.

[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.47a(a), PSD-FL-084]

A.31. The permittee shall calibrate, maintain, and operate a continuous monitoring system, and record the output of the system, for measuring sulfur dioxide emissions as follows:

(1) Sulfur dioxide emissions are monitored at both the inlet and outlet of the sulfur dioxide control device.

(2) An "as fired" fuel monitoring system (upstream of coal pulverizers) meeting the requirements of Method 19, Determination of Sulfur Dioxide Removal Efficiency and Particulate Matter, Sulfur Dioxide, and Nitrogen Oxides Emission Rates, may be used to determine potential sulfur dioxide emissions in place of a continuous sulfur dioxide emission monitor at the inlet to the sulfur dioxide control device as required in the preceding specific condition A.31.(1).

(3) Within 90 days of commencement of operations, the applicant will determine and submit to EPA and FDER the pH level in the scrubber effluent that correlates with 90% removal of the SO₂ in the flue gas (or 70% for mass SO₂ emission rates less than or equal to 0.6 lb./MMBtu). Moreover, the applicant is required to operate a continuous pH meter equipped with an upset alarm to ensure that the operator becomes aware when pH value of the scrubber effluent rises above certain limited value. The value of the scrubber pH may be revised at a later date provided notification to EPA and FDER is made demonstrating that the minimum removal will be achieved on a continuous basis. Further, if compliance data show that higher FGD performance is necessary to maintain the minimum removal efficiency limit, a different pH value will be determined and maintained.

[PSD-FL-084, Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.47a(b); 40 CFR 60, App. A, Mth.19]

A.32. The permittee shall calibrate, maintain, and operate a continuous monitoring system, and record the output of the system, for measuring nitrogen oxide emissions discharged to the atmosphere.

[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.47a(c)]

A.33. The permittee shall calibrate, maintain, and operate a continuous monitoring system, and record the output of the system, for measuring the oxygen or carbon dioxide content of the flue gases at each location where sulfur dioxide or nitrogen oxide emissions are monitored. The oxygen monitor shall be used with automatic feedback or manual controls to continuously maintain optimum air/fuel ratio parameters.

[PSD-FL-084, Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.47a(d)]

A.34. The continuous monitoring systems required in specific conditions A.31., A.32., and A.33., shall be operated and record data during all periods of operation of Units No. 1 and 2 including periods of startup, shutdown, malfunction or emergency conditions, except for continuous monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments.

[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.47a(e)]

A.35. The permittee shall obtain emission data for at least 18 hours in at least 22 out of 30 successive boiler operating days. If this minimum data requirement cannot be met with a continuous monitoring system, the permittee shall supplement emission data with other monitoring systems approved by the Department, or the reference methods and procedures as described in Specific Condition **A.37**.

[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.47a (f)]

A.36. The 1-hour averages required under 40 CFR 60.13(h), *Monitoring Requirements*, are expressed in lbs/million Btu heat input and used to calculate the average emission rates required in specific conditions A.27. and A.28. The 1-hour averages are calculated using the data points required under 40 CFR 60.13(b), *Monitoring Requirements*. At least two data points must be used to calculate the 1-hour averages.

[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.47a(g)]

A.37. When it becomes necessary to supplement continuous monitoring system data to meet the minimum data requirements in Specific Condition **A.35.**, the permittee shall use the following reference methods and procedures. Acceptable alternative methods and procedures are given in Specific Condition **A.38**.

(1) Method 6 shall be used to determine the SO₂ concentration at the same location as the SO₂ monitor. Samples shall be taken at 60-minute intervals. The sampling time and sample volume for each sample shall be at least 20 minutes and 0.020 dscm (0.71 dscf). Each sample represents a 1-hour average.

(2) Method 7 shall be used to determine the NO_x concentration at the same location as the NO_x monitor. Samples shall be taken at 30-minute intervals. The arithmetic average of two consecutive samples represents a 1-hour average.

(3) The emission rate correction factor, integrated bag sampling and analysis procedure of Method 3B shall be used to determine the O₂ or CO₂ concentration at the same location as the O₂ or CO₂ monitor. Samples shall be taken for at least 30 minutes in each hour. Each sample represents a 1-hour average.

(4) The procedures in Method 19 shall be used to compute each 1-hour average concentration in lb/million Btu heat input.

[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.47a(h); 40 CFR 60, Appendix A, Methods 3B, 6, 7, and 19]

A.38. The permittee shall use the following methods and procedures to conduct the monitoring system performance evaluations required under 40 CFR 60.13(c), *Monitoring Requirements*, and the calibration checks required under 40 CFR 60.13(d), *Monitoring Requirements*. Acceptable alternative methods and procedures are given in specific condition A.39.

(1) Methods 6, 7, and 3B, as applicable, shall be used to determine O₂, SO₂, and NO_x concentrations

(2) SO₂ or NO_x (NO), as applicable, shall be used for preparing the calibration gas mixtures (in N₂, as applicable) under 40 CFR 60 Appendix B, Performance Specification 2.

(3) The span value for a continuous monitoring system for measuring opacity is between 60 and 80 percent and for a continuous monitoring system measuring nitrogen oxides is determined as follows:

Fossil fuel	Span value for nitrogen oxides (ppm)
-------------	--

Liquid.....	500
Solid.....	1,000
Combination.....	500y + 1,000z

where:

y = the fraction of total heat input derived from liquid fossil fuel, and

z = the fraction of total heat input derived from solid fossil fuel.

(4) All span values computed under the preceding specific condition A.38.(3) for burning combinations of fossil fuels are rounded to the nearest 500 ppm.

(5) For affected facilities burning fossil fuel alone or in combination with non-fossil fuel, the span value of the sulfur dioxide continuous monitoring system at the inlet to the sulfur dioxide control device is 125 percent of the maximum estimated hourly potential emissions of the fuel fired, and the outlet of the sulfur dioxide control device is 50 percent of maximum estimated hourly potential emissions oil fuel, alone or in combination with non-fossil fuel, the span value of the fuel fired.

[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.47a(i); 40 CFR 60.13; 40 CFR 60 Appendix A, Methods 3B, 6, and 7; 40 CFR 60 Appendix B, Performance Specification 2.]

A.39. The permittee may use the following as alternatives to the reference methods and procedures specified in conditions A.37. and A.38.:

(1) For Method 6, Method 6A or 6B (whenever Methods 6 and 3 or 3B data are used) or 6C may be used. Each Method 6B sample obtained over 24 hours represents 24 1-hour averages. If Method 6A or 6B is used under specific condition A.38., the conditions under 40 CFR 60.46(d)(1) apply; these conditions do not apply under specific condition A.37.

(2) For Method 7, Method 7A, 7C, 7D, or 7E may be used. If Method 7C, 7D, or 7E is used, the sampling time for each run shall be 1 hour.

(3) For Method 3, Method 3A or 3B may be used if the sampling time is 1 hour.

(4) For Method 3B, Method 3A may be used.

[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.47a(j); 40 CFR 60.46(d)(1), 40 CFR 60 Appendix A, Methods 3, 3A, 3B, 6, 6A, 6B, 6C, 7, 7A, 7C, 7D, and 7E]

Compliance determination procedures and methods

A.40. In conducting the performance tests required in 40 CFR 60.8, the owner or operator shall use as reference methods and procedures the methods in appendix A of 40 CFR 60 or the methods and procedures as specified in conditions A.41. through A.45., except as provided in 40 CFR 60.8(b). 40 CFR 60.8(f) does not apply to specific conditions A.42 and A.43. for SO₂ and NO_x. Acceptable alternative methods are given in specific condition A.45. Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance. [Rule 62-204.800(7)(b)2., 62-210.300(2)(a)1., F.A.C.; 40 CFR 60.48a(a); 40 CFR 60.8]

A.41. The permittee shall determine compliance with the particulate matter standards in specific conditions A.5., A.6., A.7 and A.8 as follows:

(1) The dry basis F factor (O₂) procedures in Method 19 shall be used to compute the emission rate of particulate matter.

(2) For the particulate matter concentration, Method 5B shall be used after wet FGD systems.

(i) The sampling time and sample volume for each run shall be at least 120 minutes and 1.70 dscm (60 dscf). The probe and filter holder heating system in the sampling train may be set to provide an average gas temperature of no greater than 160 ± 14 °C (320 ± 25 °F).

(ii) For each particulate run, the emission rate correction factor, integrated or grab sampling and analysis procedures of Method 3B shall be used to determine the O₂ concentration. The O₂ sample shall be obtained simultaneously with, and at the same traverse points as, the particulate run. If the particulate run has more than 12 traverse points, the O₂ traverse points may be reduced to 12 provided that Method 1 is used to locate the 12 O₂ traverse points. If the grab sampling procedure is used, the O₂ concentration for the run shall be the arithmetic mean of all the individual O₂ concentrations at each traverse point.

(3) Method 9 and the procedures in 40 CFR 60.11 shall be used to determine opacity.
[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.48a(b); 40 CFR 60.11, 40 CFR 60 Appendix A, Methods 1, 3B, 5B, 9, and 19]

A.42. The permittee shall determine compliance with the SO₂ standards in specific conditions A.9., A.10., A.11., A.13 and A.14. as follows:

(1) The percent of potential SO₂ emissions (%P_s) to the atmosphere shall be computed using the following equation:

$$\%P_s = [(100 - \%R_f) (100 - \%R_g)]/100$$

where:

- %P_s = percent of potential SO₂ emissions, percent.
%R_f = percent reduction from fuel pretreatment, percent.
%R_g = percent reduction by SO₂ control system, percent.

(2) The procedures in Method 19 may be used to determine percent reduction (%R_f) of sulfur by such processes as fuel pretreatment (physical coal cleaning, hydrodesulfurization of fuel oil, etc.), coal pulverizers, and bottom and flyash interactions. This determination is optional.

(3) The procedures in Method 19 shall be used to determine the percent SO₂ reduction (%R_g) of any SO₂ control system. Alternatively, a combination of an "as fired" fuel monitor and emission rates measured after the control system, following the procedures in Method 19, may be used if the percent reduction is calculated using the average emission rate from the SO₂ control device and the average SO₂ input rate from the "as fired" fuel analysis for 30 successive boiler operating days.

(4) The appropriate procedures in Method 19 shall be used to determine the emission rate.

(5) The continuous monitoring systems specified in conditions A.31. and A.33. shall be used to determine the concentrations of SO₂ and CO₂ or O₂.

[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.48a (c); 40 CFR 60 43a; 40 CFR 60.47a(b) and (d); 40 CFR 60 Appendix A, Method 19]

A.43. The permittee shall determine compliance with the NO_x standards in Specific Conditions A.15., A.16. and A.17. as follows:

(1) The appropriate procedures in Method 19 shall be used to determine the NO_x emission rate.

(2) The continuous monitoring systems specified in specific conditions A.32. and A.33. shall be used to determine the concentrations of NO_x and CO₂ or O₂.

[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.48a(d); 40 CFR 60.44a; 40 CFR 60.47a(c); 40 CFR 60.47a(d)]

A.44. The permittee shall determine initial compliance with the CO, VOC, Be, Hg, Pb and Fl standards in specific conditions A.18., A.19., A.21., A.22., A.23., and A.24 respectively as follows:

- (1) EPA Method 10 for CO emissions.
- (2) EPA Method 18, 25, 25A or 25B for VOC emissions.
- (3) EPA Method 104 for Be emissions.
- (4) EPA Method 101A or 108 for Hg emissions.
- (5) EPA Method 12 or 101A for Pb emissions
- (6) EPA Method 13A or 13B for Fl emissions.

The permittee shall conduct annual compliance tests for particulates, NO_x, SO₂ and visible emissions.

[PPS PA 81-14/SA1]

A.45. The permittee may use the following as alternatives to the reference methods and procedures specified in condition A.41:

(1) For Method 5 or 5B, Method 17 may be used at Units No. 1 and 2 if the stack temperature at the sampling location does not exceed an average temperature of 160 °C (320 °F). The procedures of sections 2.1 and 2.3 of Method 5B may be used in Method 17 only if it is used after wet FGD systems. Method 17 shall not be used after wet FGD systems if the effluent is saturated or laden with water droplets.

(2) The F_c factor (CO₂) procedures in Method 19 may be used to compute the emission rate of particulate matter under the stipulations of *40 CFR 60.46(d)(1)*. The CO₂ shall be determined in the same manner as the O₂ concentration.

[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.48a(e); 40 CFR 60.46(d)(1); 40 CFR 60 Appendix A, Methods 5, 5B, 17, and 19]

Reporting Requirements

A.46. For sulfur dioxide, nitrogen oxides, and particulate matter emissions, the performance test data from the initial performance test and from the performance evaluation of the continuous monitors (including the transmissometer) shall be submitted to the Department.

[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.49a(a)]

A.47. For sulfur dioxide and nitrogen oxides the following information shall be reported to the Department for each 24-hour period.

(1) Calendar date.

(2) The average sulfur dioxide and nitrogen oxide emission rates (lb/million Btu heat input) for each 30 successive boiler operating days, ending with the last 30-day period in the quarter; reasons for non-compliance with the emission standards; and, description of corrective actions taken.

(3) Percent reduction of the potential combustion concentration of sulfur dioxide for each 30 successive boiler operating days, ending with the last 30-day period in the quarter; reasons for non-compliance with the standard; and, description of corrective actions taken.

(4) Identification of the boiler operating days for which pollutant or diluent data have not been obtained by an approved method for at least 18 hours of operation of the facility; justification or not obtaining sufficient data; and description of corrective actions taken.

(5) Identification of the times when emissions data have been excluded from the calculation of average emission rates because of startup and shutdown (SO₂ & NO_x), simultaneous combustion of different fuels (SO₂ & NO_x), malfunction (NO_x only), emergency conditions (SO₂ only), or

other reasons, and justification for excluding data for reasons other than startup, shutdown, simultaneous fuel combustion, malfunction, or emergency conditions.

- (6) Identification of "F" factor used for calculations, method of determination, and type of fuel combusted.
 - (7) Identification of times when hourly averages have been obtained based on manual sampling methods.
 - (8) Identification of the times when the pollutant concentration exceeded full span of the continuous monitoring system.
 - (9) Description of any modifications to the continuous monitoring system which could affect the ability of the continuous monitoring system to comply with 40 CFR 60 Appendix B, Performance Specifications 2 or 3.
- [Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.49a(b); 40 CFR 60 Appendix B]

A.48. If the minimum quantity of emission data, as required by the emission monitoring specific conditions A.30. through A.39., is not obtained for any 30 successive boiler operating days, the following information obtained under the requirements of Specific Condition A.29. shall be reported to the Administrator for that 30-day period:

- (1) The number of hourly averages available for outlet emission rates (n_o) and inlet emission rates (n_i) as applicable.
 - (2) The standard deviation of hourly averages for outlet emission rates (s_o) and inlet emission rates (s_i) as applicable.
 - (3) The lower confidence limit for the mean outlet emission rate (E_o^*) and the upper confidence limit for the mean inlet emission rate (E_i^*) as applicable.
 - (4) The applicable potential combustion concentration.
 - (5) The ratio of the upper confidence limit for the mean outlet emission rate (E_o^*) and the allowable emission rate (E_{sid}) as applicable.
- [Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.49a(c); 40 CFR 60 Appendix A, Method 19]

A.49. If any sulfur dioxide standards under specific conditions A.9., A.10., A.11., A.13. or A.14. are exceeded during emergency conditions because of control system malfunction, the owner or operator of the affected facility shall submit a signed statement:

- (1) Indicating if emergency conditions existed and requirements under specific condition A.26. were met during each period, and
- (2) Listing the following information:
 - (i) Time periods the emergency condition existed;
 - (ii) Electrical output and demand on the owner or operator's electric utility system and the affected facility;
 - (iii) Amount of power purchased from interconnected neighboring utility companies during the emergency period;
 - (iv) Percent reduction in emissions achieved;
 - (v) Atmospheric emission rate (ng/J or lb/MMBtu) of the pollutant discharged; and
 - (vi) Actions taken to correct control system malfunction.

[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.49a(d); 40 CFR 60.43a; 40 CFR 60.46a(d)]

A.50. If fuel pretreatment credit is claimed toward the sulfur dioxide emission standards in specific conditions A.9., A.10., A.11., A.13. or A.14., the permittee shall submit a signed statement:

- (1) Indicating what percentage cleaning credit was taken for the calendar quarter, and whether the credit was determined in accordance with the provisions of specific condition A.42. and Method 19 (Appendix A of 40 CFR 60); and

(2) Listing the quantity, heat content, and date each pretreated fuel shipment was received during the previous quarter; the name and location of the fuel pretreatment facility; and the total quantity and total heat content of all fuels received at the affected facility during the previous quarter. -

[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.49a(e), 40 CFR 60.48a(c)]

A.51. For any periods for which opacity, sulfur dioxide or nitrogen oxides emissions data are not available, the owner or operator of the affected facility shall submit a signed statement indicating if any changes were made in operation of the emission control system during the period of data unavailability. Operations of the control system and affected facility during periods of data unavailability are to be compared with operation of the control system and affected facility before and following the period of data unavailability.

[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.49a(f)]

A.52. The owner or operator of the affected facility shall submit a signed statement indicating whether:

(1) The required continuous monitoring system calibration, span, and drift checks or other periodic audits have or have not been performed as specified.

(2) The data used to show compliance was or was not obtained in accordance with approved methods and procedures of this part and is representative of plant performance.

(3) The minimum data requirements have or have not been met; or, the minimum data requirements have not been met for errors that were unavoidable.

(4) Compliance with the standards has or has not been achieved during the reporting period.

[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.49a(g)]

A.53. For the purposes of the reports required under *40 CFR 60.7*, periods of excess emissions are defined as all 6-minute periods during which the average opacity exceeds the applicable opacity standards under specific condition A.8. Opacity levels in excess of the applicable opacity standard and the date of such excesses shall be submitted to the Administrator each calendar quarter.

[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.49a(h)]

A.54. The owner or operator of an affected facility shall submit the written reports required under this section and subpart A to the Department for every calendar quarter. All quarterly reports shall be postmarked by the 30th day following the end of each calendar quarter.

[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.49a(i)]

A.55. Samples of all fuel oil and coal fired in the boilers shall be taken and analyzed for sulfur content, ash content, and heating value. Accordingly, samples shall be taken of each fuel oil shipment received. Coal sulfur content shall be determined and recorded on a daily basis in accordance with EPA Reference Method 19. Records of all the analyses shall be kept for public inspection for a minimum of two years.

[PSD-FL-084]

A.55.1. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. 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.]

Subsection B. This section addresses the following Regulated Emissions Unit.

E.U. ID No.	Brief Description
-003	Auxiliary Boiler

The auxiliary boiler is designated as Unit No. 3. The unit is a Babcock & Wilcox Model No. FM-2919 boiler. It is fired primarily with “new oil”, which means an oil which has been refined from crude oil and has not been used. Only No. 2 fuel oil can be burned in the auxiliary boiler. This auxiliary boiler serves both Unit No. 1 and 2 boiler/steam generators.

{Permitting notes: This emission unit is regulated under Rule 62-210.300, F.A.C., Permits Required. Because this emissions unit has no add-on control devices, it is not subject to CAM.}

The following conditions apply to the Emission Unit listed above:

Essential Potential to Emit (PTE) Parameters

B.1. Capacity. The maximum permitted heat input rate for Unit No. 3 is 83 MMBtu/hour. {Permitting note: The heat input limitations have been placed in the permit to identify the capacity of each emissions unit for purposes of confirming that emissions testing is conducted within 90-100 percent of the emissions unit’s rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate limits and to aid in determining future rule applicability.}
 [Rule 62-210.200(PTE), F.A.C.]

B.2. Methods of Operation. Fuel. The auxiliary boiler shall be fired on No. 2 fuel oil having a sulfur content less than 0.5 percent, by weight.
 [Rule 62-4.160(2), F.A.C., Construction application request]

B.3. Hours of Operation. The emission unit may operate up to 150 hours/year.
 [Rule 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

{Permitting note: Unless otherwise specified, the averaging times for Specific Condition **B.4.** are based on the specified averaging time of the applicable test method.}

B.4. Emissions from the auxiliary boiler for burning No. 2 fuel oil shall not exceed the allowable emission limits listed in the following table:

Allowable Emission Limits

<u>Pollutant</u>	<u>lb/MMBtu</u>
PM	0.015
SO ₂	0.51
NO _x	0.16
Visible Emissions	20% Opacity

[Rule 62-4.160(2), F.A.C., and PSD-FL-084]

B.5. Compliance testing for PM, SO₂, NO_x, and visible emissions is not required if the unit operates for less than 400 hours annually.
[Rule 62-297.310(7)(a), F.A.C.]

B.6. The test method for visible emissions shall be EPA Method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C. Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C.
[PSD-FL-084]

Excess Emissions

B.6.1. Excess emissions resulting from 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.]

B.6.2. 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.]

B.6.3. 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.]

Record keeping and Reporting Requirements

B.7. Documentation of the type, quantity, and analysis of the fuel oil used/received is required.
[PSD-FL-084]

B.8. Documentation on operating hours shall be kept in order to ensure that the source is operating less than 150 hours per year and is exempted from compliance testing as per Specific Condition **B.5**.
[PSD-FL-084, Rule 62-297.310(7)(a), F.A.C.]

B.8.1. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. 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.]

Subsection C. This section addresses the following Regulated Emissions Units.

E.U. ID No.	Brief Description
-004	Coal Transfer Baghouse
-005	Coal Crusher Building Baghouse
-006	Coal Plant Transfer and Silo Fill Area #1 Baghouse
-007	Coal Plant Transfer and Silo Fill Area #2 Baghouse
-008	Limestone Day Bin Baghouse
-009	Pebble Lime Receiving Hopper Baghouse
-010	Coal Reclaim Hopper Baghouse
-011	Flyash Exhauster Filter #1 Baghouse
-012	Flyash Exhauster Filter #2 Baghouse
-013	Flyash Exhauster Filter #3 Baghouse
-014	Flyash Exhauster Filter #4 Baghouse
-015	Flyash Silo Bin Vent Filter Baghouse
-016	Adipic Acid Storage Baghouse
-029	Flyash Silo Bin Vent Filter Baghouse

Descriptions

Fly Ash Silos handle fly ash from Steam Generators No. 1 and No. 2 respectively. Fly ash is pneumatically conveyed from the individual electrostatic precipitators to Silos and then is gravity fed by tubing into totally enclosed tanker trucks. Particulate matter (PM) emissions generated by silo loading and unloading to a tanker truck is controlled by baghouses in addition to reasonable precautions. These units are subject to the applicable requirements under 40 C.F.R. 60 Subpart Y - Standards of Performance for Coal Preparation Plants, since Stanton has coal processing and conveying equipment (including breakers and crushers) and the facility commenced construction after October 24, 1974, per 40 C.F.R. §60.250.

{Permitting notes: The emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required. Because the potential to emit PM is below the major source threshold, these emissions units are not subject to CAM.}

The following conditions apply to the Emissions Units listed above:

Essential Potential to Emit (PTE) Parameters

C.1. Hours of Operation. Fly Ash Silos are each allowed to operate continuously (i.e., 8760 hrs./yr.)
 [Rule 62-210.200, F.A.C., Definition (PTE)]

Emission Limitations and Standards

{Permitting note: Unless otherwise specified, the averaging times for Specific Condition C.2. are based on the specified averaging time of the applicable test method.}

C.2. Particulate emissions from fly ash handling system shall be limited to 0.02 gr./acf. A visible emission reading of 5% opacity or less may be used to establish compliance with this emission limit. A visible emission reading greater than 5% opacity will not create a presumption

that the 0.02 gr./acf emission limit is being violated. However, a visible emission reading greater than 5% opacity will require the permittee to perform a stack test for particulate emissions.
[PPS PA 81-14/SA1]

C.3. The following requirements shall be met to minimize fugitive dust emissions from the coal storage and handling facilities, the limestone storage and handling facilities, haul roads and general plant operations:

- a. All conveyors and conveyor transfer points will be enclosed to preclude PM emissions (except those directly associated with the coal stacker/reclaimer and the emergency stockout facilities for which enclosure is operationally infeasible). All coal and limestone conveyors not underground or within buildings will be enclosed (roof and sides) with steel grating or concrete floors (except the stacker/reclaimer which will have windscreen protection);
- b. Inactive coal storage piles will be shaped, compacted and oriented to minimize wind erosion.
- c. Water sprays or chemical wetting agents and stabilizers will be applied to storage piles, handling equipment, etc. during dry periods and as necessary to all facilities to maintain an opacity of less than or equal to 5 percent except when adding, transferring and/or removing coal from the coal pile during which the opacity allowed shall be 20%.
- d. The limestone handling receiver hopper will be equipped with water spray dust control facilities. Limestone conveyors not underground or within buildings will be enclosed with open grating floors (except where concrete floors are provided over roads or other facilities). Limestone day silos and associated transfer points will be maintained at negative pressures during filling operations with the exhaust vented to a control system. Lime will be handled with a totally enclosed pneumatic system. Exhaust from the lime silos during filling will be vented to a collector system.
- e. The fly ash handling system (including transfer and silo storage) will be totally enclosed and vented (including pneumatic system exhaust) through fabric filters. Particulate emissions from fly ash handling system shall be limited to 0.02 gr./acf. A visible emission reading of 5% opacity or less may be used to establish compliance with this emission limit. A visible emission reading greater than 5% opacity will not create a presumption that the 0.02 gr./acf emission limit is being violated. However, a visible emission reading greater than 5% opacity will require the permittee to perform a stack test for particulate emissions.

[PSD-FL-084]

Test Methods and Procedures

C.4. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the permittee shall have formal compliance test conducted on each silo baghouse for opacity. Additionally, each baghouse shall be visually inspected on a daily basis to ensure that emissions are not visible. Records shall be maintained documenting that such inspections took place. Should emissions from a baghouse be visible, corrective action should be undertaken as well as conducting a Method 9 V.E. Records should include color, duration, and density of the plume of any abnormal visible emissions detected, as well as the cause and corrective action taken for any abnormal visible emissions.

{Permitting note: It is presumed that the threshold of visibility for opacity is equal to 5%.}
[Rule 62-297.310(7)(a)4., F.A.C., Rule 62-213.440, F.A.C.]

C.5. Compliance with the opacity limit listed in C.2. will be determined by EPA Reference Method 9.
[PPS PA 81-14/SA1]

Subsection D. Common Conditions.

The following conditions apply to the Emissions Units ID -001, -002, -025, and -026:

40 CFR 60 Subpart A

D.1. Definitions. For the purposes of Rule 62-204.800(7), F.A.C., the definitions contained in the various provisions of 40 CFR 60, shall apply except that the term "Administrator" when used in 40 CFR 60, shall mean the Secretary or the Secretary's designee.

[40 CFR 60.2; Rule 62-204.800(7)(a), F.A.C.]

Notification and Recordkeeping

D.2. The owner or operator subject to the provisions of 40 CFR 60 shall furnish the Administrator written notification as follows:

(1) A notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in 40 CFR 60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The Administrator may request additional relevant information subsequent to this notice.

[40 CFR 60.7(a)(4)]

D.3. The owner or operator subject to the provisions of 40 CFR 60 shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or, any periods during which a continuous monitoring system or monitoring device is inoperative.

[40 CFR 60.7(b)]

D.4. Each owner or operator required to install a continuous monitoring system (CMS) or monitoring device shall submit an excess emissions and monitoring systems performance report (excess emissions are defined in applicable subparts) and/or a summary report form [see 40 CFR 60.7(d)] to the Administrator semiannually, except when: more frequent reporting is specifically required by an applicable subpart; or, the CMS data are to be used directly for compliance determination, in which case quarterly reports shall be submitted; or, the Administrator, on a case-by-case basis, determines that more frequent reporting is necessary to accurately assess the compliance status of the source. All reports shall be postmarked by the 30th day following the end of each calendar half (or quarter, as appropriate). Written reports of excess emissions shall include the following information:

(1) The magnitude of excess emissions computed in accordance with 40 CFR 60.13(h), any conversion factor(s) used, and the date and time of commencement and completion of each time period of excess emissions. The process operating time during the reporting period.

- (2) Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the affected facility. The nature and cause of any malfunction (if known), the corrective action taken or preventative measures adopted.
 - (3) The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments.
 - (4) When no excess emissions have occurred or the continuous monitoring system(s) have not been inoperative, repaired, or adjusted, such information shall be stated in the report.
- [40 CFR 60.7(c)(1), (2), (3), and (4)]

D.5. The summary report form shall contain the information and be in the format shown in Figure 1 (attached) unless otherwise specified by the Administrator. One summary report form shall be submitted for each pollutant monitored at each affected facility.

(1) If the total duration of excess emissions for the reporting period is less than 1 percent of the total operating time for the reporting period and CMS downtime for the reporting period is less than 5 percent of the total operating time for the reporting period, only the summary report form shall be submitted and the excess emission report described in 40 CFR 60.7(c) need not be submitted unless requested by the Administrator.

(2) If the total duration of excess emissions for the reporting period is 1 percent or greater of the total operating time for the reporting period or the total CMS downtime for the reporting period is 5 percent or greater of the total operating time for the reporting period, the summary report form and the excess emission report described in 40 CFR 60.7(c) shall both be submitted.

{See attached Figure 1: Summary Report-Gaseous and Opacity Excess Emission and Monitoring System Performance} (electronic file name. figure1.doc)

[40 CFR 60.7(d)(1) and (2)]

D.6. (1) Notwithstanding the frequency of reporting requirements specified in 40 CFR 60.7(c), an owner or operator who is required by an applicable subpart to submit excess emissions and monitoring systems performance reports (and summary reports) on a quarterly (or more frequent) basis may reduce the frequency of reporting for that standard to semiannual if the following conditions are met:

(i) For 1 full year (e.g., 4 quarterly or 12 monthly reporting periods) the affected facility's excess emissions and monitoring systems reports submitted to comply with a standard under this part continually demonstrate that the facility is in compliance with the applicable standard;

(ii) The owner or operator continues to comply with all recordkeeping and monitoring requirements specified in 40 CFR 60, Subpart A, and the applicable standard; and

(iii) The Administrator does not object to a reduced frequency of reporting for the affected facility, as provided in 40 CFR 60.7(e)(2).

(2) The frequency of reporting of excess emissions and monitoring systems performance (and summary) reports may be reduced only after the owner or operator notifies the Administrator in writing of his or her intention to make such a change and the Administrator does not object to the intended change. In deciding whether to approve a reduced frequency of reporting, the Administrator may review information concerning the source's entire previous performance history during the required recordkeeping period prior to the intended change, including performance test results, monitoring data, and evaluations of an owner or operator's conformance with operation and maintenance requirements. Such information may be used by the Administrator to make a judgment about the source's potential for noncompliance in the future. If the Administrator disapproves the owner or operator's request to reduce the frequency of reporting, the Administrator will notify the owner or operator in writing within 45 days after receiving notice of the owner or operator's intention. The notification from the Administrator to

the owner or operator will specify the grounds on which the disapproval is based. In the absence of a notice of disapproval within 45 days, approval is automatically granted.

(3) As soon as monitoring data indicate that the affected facility is not in compliance with any emission limitation or operating parameter specified in the applicable standard, the frequency of reporting shall revert to the frequency specified in the applicable standard, and the owner or operator shall submit an excess emissions and monitoring systems performance report (and summary report, if required) at the next appropriate reporting period following the noncomplying event. After demonstrating compliance with the applicable standard for another full year, the owner or operator may again request approval from the Administrator to reduce the frequency of reporting for that standard as provided for in 40 CFR 60.7(e)(1) and (e)(2).
[40 CFR 60.7(e)(1)]

D.7. Any owner or operator subject to the provisions of 40 CFR 60 shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and, all other information required by 40 CFR 60 recorded in a permanent form suitable for inspection. The file shall be retained for at least 5 (five) years following the date of such measurements, maintenance, reports, and records.
[40 CFR 60.7(f); Rule 62-213.440(1)(b)2.b., F.A.C.]

Performance Tests

D.8. Performance tests shall be conducted under such conditions as the Administrator shall specify to the plant operator based on representative performance of the affected facility. The owner or operator shall make available to the Administrator such records as may be necessary to determine the conditions of the performance tests. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test nor shall emissions in excess of the level of the applicable emission limit during periods of startup, shutdown, and malfunction be considered a violation of the applicable emission limit unless otherwise specified in the applicable standard.
[40 CFR 60.8(c)]

Compliance with Standards and Maintenance Requirements

D.9. Compliance with standards in 40 CFR 60, other than opacity standards, shall be determined by performance tests established by 40 CFR 60.8, unless otherwise specified in the applicable standard.
[40 CFR 60.11(a)]

D.10. Compliance with opacity standards in 40 CFR 60 shall be determined by conducting observations in accordance with Reference Method 9 in Appendix A of 40 CFR 60, any alternative method that is approved by the Administrator, or as provided in 40 CFR 60.11(e)(5).
[40 CFR 60.11(b)]

D.11. The opacity standards set forth in 40 CFR 60 shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard.
[40 CFR 60.11(c)]

D.12. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[40 CFR 60.11(d)]

D.13. The owner or operator of an affected facility subject to an opacity standard may submit, for compliance purposes, continuous opacity monitoring system (COMS) data results produced during any performance test required under 40 CFR 60.8 in lieu of EPA Method 9 observation data. If an owner or operator elects to submit COMS data for compliance with the opacity standard, he or she shall notify the Administrator of that decision, in writing, at least 30 days before any performance test required under 40 CFR 60.8 is conducted. Once the owner or operator of an affected facility has notified the Administrator to that effect, the COMS data results will be used to determine opacity compliance during subsequent tests required under 40 CFR 60.8 until the owner or operator notifies the Administrator, in writing, to the contrary. For the purpose of determining compliance with the opacity standard during a performance test required under 40 CFR 60.8 using COMS data, the minimum total time of COMS data collection shall be averages of all 6-minute continuous periods within the duration of the mass emission performance test. Results of the COMS opacity determinations shall be submitted along with the results of the performance test required under 60.8. The owner or operator of an affected facility using a COMS for compliance purposes is responsible for demonstrating that the COMS meets the requirements specified in 40 CFR 60.13(c), that the COMS has been properly maintained and operated, and that the resulting data have not been altered in any way. If COMS data results are submitted for compliance with the opacity standard for a period of time during which EPA Method 9 data indicates noncompliance, the EPA Method 9 data will be used to determine opacity compliance.

[40 CFR 60.11(e)(5)]

Circumvention

D.14. No owner or operator subject to the provisions of 40 CFR 60 shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere.

[40 CFR 60.12]

Monitoring Requirements

D.15. For the purposes of 40 CFR 60.13, all continuous monitoring systems (CMS) required under applicable subparts shall be subject to the provisions of 40 CFR 60.13 upon promulgation of performance specifications for continuous monitoring systems under Appendix B of 40 CFR 60 and, if the continuous monitoring system is used to demonstrate compliance with emission limits on a continuous basis, Appendix F of 40 CFR 60, unless otherwise specified in an applicable subpart or by the Administrator. Appendix F is applicable December 4, 1987.

[40 CFR 60.13(a)]

D.16. If the owner or operator of an affected facility elects to submit continuous opacity monitoring system (COMS) data for compliance with the opacity standard as provided under 40 CFR 60.11(e)(5), he shall conduct a performance evaluation of the COMS as specified in Performance Specification 1, Appendix B, of 40 CFR 60 before the performance test required under 40 CFR 60.8 is conducted. Otherwise, the owner or operator of an affected facility shall conduct a performance evaluation of the COMS or continuous emission monitoring system (CEMS) during any performance test required under 40 CFR 60.8 or within 30 days thereafter in accordance with the applicable performance specification in Appendix B of 40 CFR 60. The owner or operator of an affected facility shall conduct COMS or CEMS performance evaluations at such other times as may be required by the Administrator under section 114 of the Act.

(1) The owner or operator of an affected facility using a COMS to determine opacity compliance during any performance test required under 60.8 and as described in 40 CFR 60.11(e)(5) shall furnish the Administrator two or, upon request, more copies of a written report of the results of the COMS performance evaluation described in 40 CFR 60.13(c) at least 10 days before the performance test required under 60.8 is conducted.

[40 CFR 60.13(c)(1)]

D.17. (1) Owners and operators of all continuous emission monitoring systems (CEMS) installed in accordance with the provisions of this part shall check the zero (or low-level value between 0 and 20 percent of span value) and span (50 to 100 percent of span value) calibration drifts at least once daily in accordance with a written procedure. The zero and span shall, as a minimum, be adjusted whenever the 24-hour zero drift or 24-hour span drift exceeds two times the limits of the applicable performance specifications in Appendix B. The system must allow the amount of excess zero and span drift measured at the 24-hour interval checks to be recorded and quantified, whenever specified. For continuous monitoring systems measuring opacity of emissions, the optical surfaces exposed to the effluent gases shall be cleaned prior to performing the zero and span drift adjustments except that for systems using automatic zero adjustments. The optical surfaces shall be cleaned when the cumulative automatic zero compensation exceeds 4 percent opacity.

(2) Unless otherwise approved by the Administrator, the following procedures shall be followed for continuous monitoring systems measuring opacity of emissions. Minimum procedures shall include a method for producing a simulated zero opacity condition and an upscale (span) opacity condition using a certified neutral density filter or other related technique to produce a known obscuration of the light beam. Such procedures shall provide a system check of the analyzer internal optical surfaces and all electronic circuitry including the lamp and photo detector assembly.

[40 CFR 60.13(d)(1) and (2)]

D.18. Except for system breakdowns, repairs, calibration checks, and zero and span adjustments required under 40 CFR 60.13(d), all continuous monitoring systems (CMS) shall be in continuous operation and shall meet minimum frequency of operation requirements as follows:

(1) All continuous monitoring systems referenced by 40 CFR 60.13(c) for measuring opacity of emissions shall complete a minimum of one cycle of sampling and analyzing for each successive 10-second period and one cycle of data recording for each successive 6-minute period.

(2) All continuous monitoring systems referenced by 40 CFR 60.13(c) for measuring emissions, except opacity, shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period.

[40 CFR 60.13(e)(1) and (2)]

D.19. All continuous monitoring systems (CMS) or monitoring devices shall be installed such that representative measurements of emissions or process parameters from the affected facility are obtained. Additional procedures for location of continuous monitoring systems contained in the applicable Performance Specifications of Appendix B of 40 CFR 60 shall be used.
[40 CFR 60.13(f)]

D.20. When the effluents from a single affected facility or two or more affected facilities subject to the same emission standards are combined before being released to the atmosphere, the owner or operator may install applicable continuous monitoring systems (CMS) on each effluent or on the combined effluent. When the affected facilities are not subject to the same emission standards, separate continuous monitoring systems shall be installed on each effluent. When the effluent from one affected facility is released to the atmosphere through more than one point, the owner or operator shall install an applicable continuous monitoring system on each separate effluent unless the installation of fewer systems is approved by the Administrator. When more than one continuous monitoring system is used to measure the emissions from one affected facility (e.g., multiple breechings, multiple outlets), the owner or operator shall report the results as required from each continuous monitoring system.
[40 CFR 60.13(g)]

D.21. Owners or operators of all continuous monitoring systems for measurement of opacity shall reduce all data to 6-minute averages and for continuous monitoring systems other than opacity to 1-hour averages for time periods as defined in 40 CFR 60.2. Six-minute opacity averages shall be calculated from 36 or more data points equally spaced over each 6-minute period. For continuous monitoring systems other than opacity, 1-hour averages shall be computed from four or more data points equally spaced over each 1-hour period. Data recorded during periods of continuous monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments shall not be included in the data averages computed under this paragraph. An arithmetic or integrated average of all data may be used. The data may be recorded in reduced or non-reduced form (e.g., ppm pollutant and percent O₂ or ng/J of pollutant). All excess emissions shall be converted into units of the standard using the applicable conversion procedures specified in subparts. After conversion into units of the standard, the data may be rounded to the same number of significant digits as used in the applicable subparts to specify the emission limit (e.g., rounded to the nearest 1 percent opacity).
[40 CFR 60.13(h)]

The following conditions apply only to the Emissions Units ID -001 and -002:

Additional Limitations for On-Specification Used Oil

D.22. Used Oil. Burning of on-specification used oil is allowed at this facility in accordance with all other conditions of this permit and the following conditions:

- a. **On-specification Used Oil Allowed as Fuel:** This permit allows the burning of used fuel oil meeting EPA "on-specification" used oil specifications, with a maximum sulfur content of 1.5 percent by weight for Units 1 and 2 and 0.5 percent by weight for the auxiliary boiler. The PCB concentration of used oil shall be less than 50 ppm. Used oil that does not meet the specifications for on-specification used oil shall not be burned at this facility. On-specification used oil shall meet the following specifications: [40 CFR 279, Subpart B.]

- Arsenic shall not exceed 5.0 ppm;
- Cadmium shall not exceed 2.0 ppm;
- Chromium shall not exceed 10.0 ppm;
- Lead shall not exceed 100.0 ppm;
- Total halogens shall not exceed 1000 ppm;
- Flash point shall not be less than 100 degrees F.

b. Quantity Limited: The maximum amount of on-specification used oil that can be burned at this facility shall be limited to 1.5 million gallons during each calendar year.

c. Used Oil Containing PCBs Not Allowed: 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.

d. PCB Concentration of 2 to less than 50 ppm: On-specification used oil with a PCB concentration of 2 to less than 50 ppm shall be burned only at normal source operating temperatures. On-specification used oil with a PCB concentration of 2 to less than 50 ppm shall not be burned during periods of startup or shutdown.

e. Testing Required: The owner or operator shall sample and analyze each batch of used oil to be burned for the following parameters:

Arsenic, cadmium, chromium, lead, total halogens, flash point, PCBs, and percent sulfur content by weight, ash, and BTU value (BTU per gallon).

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), latest edition. If the analytical results show that the used oil does not meet the specification for on-specification used oil, or that it contains a PCB concentration of 50 ppm or greater, the owner or operator shall:

- a. immediately notify the Central District Office in Orlando;
- b. provide the analytical results for the above parameters; and
- c. indicate the proposed means of disposal of the used oil.

f. Record Keeping Required: 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 279.61 and 761.20(e)]

- (1) The gallons of on-specification used oil generated and burned 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 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.
- (4) The total amount of lead emitted from burning used oil each month (calculated from the amount burned, the specific gravity of the used oil and the concentration of lead in the used oil), and the total amount of

lead emitted in the preceding consecutive 12-month period. (This record shall be completed no later than the fifteenth day of the succeeding month.)

g. Reporting Required: The owner or operator shall submit to Central District Office in Orlando, 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.

Also, 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 during the previous calendar year.

[Rules 62-4.070(3) and 62-213.440, F.A.C., 40 CFR 279 and 40 CFR 761]

Subsection E. This section addresses the following Regulated Emissions Units.

E.U. ID No.	Brief Description
-025	Combined-Cycle Combustion Turbine
-026	Combined-Cycle Combustion Turbine

These emissions units include two nominal 170 MW, General Electric "F" Class (PG7241FA) combustion turbine-electrical generators, fired with pipeline natural gas or diesel fuel oil and equipped with evaporative coolers on the inlet air system, two supplementary fired heat recovery steam generators (HRSGs), each with a 160 ft. stack, and one steam turbine-electrical generator rated at approximately 300 MW. Units 25 and 26 have a total nominal capacity of 640 MW and will achieve approximately 700 megawatts during extreme winter peaking conditions.

The combustion turbines are equipped with Dry Low NO_x combustors and a selective catalytic reduction (SCR) system in order to control NO_x emissions to 3.5 ppmvd at 15% O₂ while firing natural gas. During fuel oil firing, emissions shall be held to 10 ppmvd at 15% O₂ using SCR plus water injection. Pipeline quality natural gas, 0.05% sulfur fuel oil, by weight, and good combustion practices shall be used to control all pollutants.

The combustion turbines are subject to the requirements of Phase II of the federal Acid Rain Program. These units hold ORIS code 55821. Unit 025 commercial start date was April 28, 2003, and Unit 026 commercial start date was April 28, 2003.

These emissions units are not subject to compliance assurance monitoring (CAM) because the NO_x CEMS is used for continuance compliance determination. Thus, no CAM plan is included in this permit.

The following conditions apply to the emission units listed above:

General

E.1. NSPS Requirements: Each combustion turbine (CT) shall comply with all applicable requirements of 40 CFR 60, adopted by reference in Rule 62-204.800(7)(b), F.A.C.

- a. Subpart A, General Provisions (see Specific Condition E.2.)
- b. Subpart GG, Standards of Performance for Stationary Gas Turbines. [See attached Appendix GG.]

[0950137-002-AC, Specific Condition 2.]

E.2. These emission units shall comply with all applicable requirements of 40 CFR 60, Subpart A, General Provisions, including:

- 40 CFR 60.7, Notification and Recordkeeping
- 40 CFR 60.8, Performance Tests
- 40 CFR 60.11, Compliance with Standards and Maintenance Requirements
- 40 CFR 60.12, Circumvention
- 40 CFR 60.13, Monitoring Requirements
- 40 CFR 60.19, General Notification and Reporting Requirements

[0950137-002-AC, Specific Condition 4.]

E.3. Each emissions unit shall comply with all applicable provisions of 40 CFR 60, Subpart GG, Standards of Performance for Stationary Gas Turbines, adopted by reference in Rule 62-204.800(7)(b), F.A.C. The Subpart GG requirement to correct test data to ISO conditions applies. However, such correction is not used for compliance determinations with the BACT standard(s). Compliance determination for BACT standards shall comply with all applicable provisions of 40 CFR 60, Subpart Da, Standards of Performance for Electric Utility Steam Generating Units Which Construction is Commenced After September 18, 1978, adopted by reference in Rule 62-204.800(7), F.A.C.
[0950137-002-AC, Specific Condition 5.]

E.4. Operating Procedures. Operating procedures shall include good operating practices and proper training of all operators and supervisors. The good operating practices of pollution control equipment shall meet the guidelines and procedures as established by the equipment manufacturers. All operators (including supervisors) of air pollution control devices shall be properly trained in plant specific equipment.
[Rule 62-4.070(3), F.A.C.; and 0950137-002-AC, Specific Condition 14.]

E.5. Circumvention. The owner or operator shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly.
[Rule 62-210.650, F.A.C.; and 0950137-002-AC, Specific Condition 15.]

Control Technology

E.6. Dry Low NO_x (DLN) combustors and water injection capability are installed on each stationary combustion turbine. The permittee has installed a selective catalytic reduction system to comply with the NO_x and ammonia limits listed in Specific Condition E.14. Additionally, space is provided for the installation of oxidation catalysts.
[Rules 62-4.070 and 62-212.400, F.A.C.; and 0950137-002-AC, Specific Condition 18.]

E.7. The permittee shall design these units to accommodate adequate testing and sampling locations for compliance with the applicable emission limits (per each unit) listed in Specific Conditions E.14. through E.18.
[Rules 62-4.070 and 62-204.800, F.A.C.; 40 CFR60.40a(b); and 0950137-002-AC, Specific Condition 19.]

E.8. Drift eliminators are installed on the cooling tower to reduce PM/PM₁₀ emissions. A certification letter, following installation (and prior to startup) shall be submitted that the drift eliminators were installed and that the installation is capable of meeting 0.002-gallons/100 gallons recirculation water flowrate.
[0950137-002-AC, Specific Condition 20.]

Essential Potential to Emit (PTE) Parameters

E.9. Maximum allowable hours of operation for each CT/HRSG Emissions Unit are 8760 hours per year while firing natural gas. Fuel oil firing is permitted for 1000 hours during any consecutive 12-month period in each CT.
[Rule 62-210.200, F.A.C. (Definitions - Potential Emissions); 0950137-002-AC, Specific Condition 16.]

E.10. Combustion Turbine Capacity. The maximum heat input rates to each CT/HRSG shall not exceed 2,402 million Btu (HHV) per hour (MMBtu/hr) when firing natural gas with duct burner firing and power augmentation. The maximum heat input rates to each CT/HRSG shall not exceed 2,068 MMBtu/hr (HHV) when firing fuel oil. Manufacturer's curves corrected for ISO conditions were provided to the Department of Environmental Protection (DEP) within 45 days prior to the completion of the initial compliance testing.
[Rule 62-210.200, F.A.C. (Definitions - Potential Emissions); and 0950137-002-AC, Specific Condition 10.]

E.11. Heat Recovery Steam Generator equipped with Duct Burner. The maximum heat input rate of the natural gas fired duct burner shall not exceed 533 MMBtu/hour (LHV) at any temperature or under any scenario.
[Rule 62-210.200, F.A.C. (Definitions - Potential Emissions); and 0950137-002-AC, Specific Condition 11.]

{Permitting note: Heat input capacity shall be determined by CEMs database used for the acid rain program. CEM data availability shall meet 40 CFR Part 75 requirements at greater than 95% of the time. Only valid hourly data shall be used to determine compliance with this provision. The source shall maintain this database for up to 5 years and make the information available upon request by the Department.}

E.12. Fuels. Only pipeline natural gas or (up to) 1000 hours per year of 0.05%, by weight, distillate fuel oil shall be fired in each CT emissions unit. Only natural gas shall be fired in each duct burner.
[Rule 62-210.200, F.A.C. (Definitions - Potential Emissions); and 0950137-002-AC, Specific Condition 9.]

E.13. Simple Cycle Operation. The plant may not be operated without the use of the SCR system except during periods of startup and shutdown.
[0950137-002-AC, Specific Condition 17.]

Emission Limitations and Standards

{Permitting note: Unless otherwise specified, the averaging times for Specific Conditions **E.14.** through **E.18.** are based on the specified averaging time of the applicable test method.}

E.14. Nitrogen Oxides (NO_x) Emissions.

- The concentration of NO_x in the stack exhaust gas, with the combustion turbine operating on natural gas, shall not exceed 3.5 ppmvd @15% O₂ on a 3-hour block average. This limit shall apply whether or not the unit is operating with duct burner on and/or in power augmentation mode. Compliance shall be determined by the continuous emission monitor (CEMS).
- The emissions of NO_x in the stack exhaust gas, with the combustion turbine operating on fuel oil shall not exceed 10.0 ppmvd @15% O₂ on a 3-hour block average. Compliance shall be determined by the continuous emission monitor (CEMS).
- Emissions of NO_x from the duct burner shall not exceed 0.1 lb/MMBtu, which is more stringent than the NSPS (see Specific Condition **E.23.** for compliance procedures).

- The concentration of ammonia in the exhaust gas from each CT/HRSG shall not exceed 5.0 ppmvd @15% O₂. The compliance procedures are described in Specific Conditions E.22. and E.36.

[BACT Determination; Rules 62-4.070, 62-204.800(7), 62-212.400, and 62-4.070, F.A.C.; and 0950137-002-AC, Specific Condition 21.]

E.15. Carbon Monoxide (CO) Emissions. Emissions of CO in the stack exhaust gas (at ISO conditions) with the combustion turbine operating on natural gas shall not exceed 17 ppmvd @15% O₂ on a 24-hour block average to be demonstrated by CEMS; or 14 ppmvd @15% O₂ with the CT operating on fuel oil on a 24-hr block average to be demonstrated by CEMS. These limits shall also be demonstrated by annual stack test using EPA Method 10 or through annual RATA testing. Within 24 months of the date of completion of initial testing, the applicant shall either have installed oxidation catalyst in each CT/HRSG or forfeit its right to do so with the pre-determined (BACT) emission limits specified below.

In the event that an oxidation catalyst is installed for any reason in either CT/HRSG pair within 24 months of the date of completion of initial testing, the limits for CO and VOC shall be 5 ppmvd and 3 ppmvd (respectively, and for operating on natural gas or fuel oil) to be demonstrated by stack testing during power augmentation and duct burner firing (both initial and annual tests are required).

[BACT Determination; Rule 62-212.400, F.A.C.; and 0950137-002-AC, Specific Condition 22.]

E.16. Volatile Organic Compounds (VOC) Emissions. Emissions of VOC in the stack exhaust gas (baseload at ISO conditions) shall not exceed 2.7 ppmvd @15% O₂ with the CT firing fuel oil or 6.3 ppmvd @15% O₂ with the CT firing natural gas (with maximum duct burner firing and operating in power augmentation mode); to be demonstrated by *initial* stack tests using EPA Method 18, 25 and/or 25A.

[BACT Determination; Rule 62-212.400, F.A.C.; and 0950137-002-AC, Specific Condition 23.]

E.17. Sulfur Dioxide (SO₂) Emissions. SO₂ emissions shall be limited by firing pipeline natural gas (sulfur content not greater than 1.5 grains per 100 standard cubic foot) and up to 1000 hours per consecutive 12-month period of 0.05% sulfur, by weight, fuel oil. Compliance with these fuel limits in conjunction with implementation of the attached Appendix GG will demonstrate compliance with the applicable NSPS SO₂ emissions limitations from the duct burner and the combustion turbine. Note: This will effectively limit the combined SO₂ emissions for EU-025 and EU-026 to approximately 134 tons per year.

[BACT Determination; 40 CFR 60 Subpart GG; Rules 62-4.070, 62-212.400, and 62-204.800(7), F.A.C.; and 0950137-002-AC, Specific Condition 24.]

E.18. PM/PM₁₀ and Visible Emissions (VE). Visible emissions shall not exceed 10 percent opacity from the stack in use.

[BACT Determination; Rules 62-4.070, 62-212.400, and 62-204.800(7), F.A.C.; and 0950137-002-AC, Specific Condition 25.]

Excess Emissions

{Permitting note: The Excess Emissions Rule at Rule 62-210.700, F.A.C., cannot vary any requirement of a NSPS or NESHAP provision. }

E.19. Excess emissions resulting from startup, shutdown, fuel switching, or malfunction shall be permitted provided that best operational practices are adhered to and the duration of excess emissions shall be minimized. Excess emissions occurrences shall in no case exceed two hours in any 24-hour period. During any 24-hour period in which an hour of start-up or shutdown occurs, the following alternative emission limits shall apply on the basis of a 24-hour rolling average:

- a) An alternative NO_x limit of 127 lb/hr shall apply if natural gas is the exclusively fired fuel;
- b) An alternative NO_x limit of 370 lb/hr shall apply if any fuel oil is fired; and,
- c) An alternative CO limit of 155 lb/hr firing either natural gas or fuel oil.

The 24-hour averages shall be based on all available data excluding calibration data. Operation below 50% output per turbine shall otherwise be limited to 2 hours in any 24-hour period. [BACT Determination; Rule 62-210.700, F.A.C.; and 0950137-002-AC, Specific Condition 26., modified on May 16, 2003.]

E.20. Excess emissions entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction, shall be prohibited pursuant to Rule 62-210.700, F.A.C. These emissions shall be included in the 3-hr average for NO_x and the 24-hr average for CO. [0950137-002-AC, Specific Condition 27.]

E.21. Excess Emissions Report. If excess emissions occur for more than two hours due to malfunction, the owner or operator shall notify DEP's Central District office within (1) working day of: the nature, extent, and duration of the excess emissions; the cause of the excess emissions; and the actions taken to correct the problem. In addition, the Department may request a written summary report of the incident. Pursuant to the New Source Performance Standards, all excess emissions shall also be reported in accordance with 40 CFR 60.7, Subpart A. Following this format, 40 CFR 60.7, and using the monitoring methods listed in Specific Conditions **E.31.** through **E.35.**, periods of startup, shutdown, malfunction, shall be monitored, recorded, and reported as excess emissions when emission levels exceed the permitted standards listed in Specific Conditions **E.14.** through **E.18.** [Rules 62-4.130, 62-204.800, 62-210.700(6), F.A.C.; 40 CFR 60.7 (1998 version); and 0950137-002-AC, Specific Condition 28.]

Test Methods and Procedures

E.22. Compliance with the allowable emission limiting standards shall be determined within 60 days after achieving the maximum production rate for each fuel, but not later than 180 days of initial operation of the unit, and annually thereafter as indicated in this permit, by using the following reference methods as described in 40 CFR 60, Appendix A (1998 version), and adopted by reference in Chapter 62-204.800, F.A.C. [0950137-002-AC, Specific Condition 29.]

E.23. *Initial (I)* performance tests shall be performed by the deadlines in Specific Condition **E.22.** *Initial* tests shall also be conducted after any replacement of the major components of the air pollution control equipment (and shake down period not to exceed 100 days after re-starting the CT), such as replacement of SCR catalyst or addition of oxidation catalyst (or change of combustors, if specifically requested by the DEP on a case-by-case basis). Annual (A) compliance tests shall be performed during every federal fiscal year (October 1 - September 30) pursuant to Rule 62-297.310(7), F.A.C., on these units as indicated. The following reference methods shall be used. No other test methods may be used for compliance testing unless prior DEP approval is received in writing. Where initial tests only are indicated, these tests shall be repeated prior to renewal of each operation permit.

- EPA Reference Method 9, "Visual Determination of the Opacity of Emissions from Stationary Sources" (I, A).
- EPA Reference Method 10, "Determination of Carbon Monoxide Emissions from Stationary Sources" (I, A).
- EPA Reference Method 20, "Determination of Oxides of Nitrogen Oxide, Sulfur Dioxide and Diluent Emissions from Stationary Gas Turbines" (EPA reference Method 7E, "Determination of Nitrogen Oxides Emissions from Stationary Sources" or RATA test data may be used to demonstrate compliance for annual test requirement) shall be conducted a) while firing natural gas with maximum duct burner heat input as well as maximum power augmentation and b) while firing fuel oil at the maximum heat input; Initial test for compliance with 40 CFR 60 Subpart GG; Initial (only) NO_x compliance test for the duct burners (Subpart Da) shall be accomplished via testing with duct burners "on" as compared to "off" and computing the difference.
- EPA Reference Method 18, 25 and/or 25A, "Determination of Volatile Organic Concentrations." *Initial* test only.
- Method CTM-027, or EPA Method 320 (Fourier Transform Infra-Red, i.e., FTIR) for ammonia slip (I, A) to be completed simultaneously with NO_x compliance testing.

The applicant shall calculate and report the ppmvd ammonia slip (@ 15% O₂) at the measured lb/hr NO_x emission rate as a means of compliance with the BACT standard. The applicant shall also be capable of calculating ammonia slip at the Department's request, according to Specific Condition **E.35.**

[0950137-002-AC, Specific Condition 30.; and Applicant request in an e-mail memorandum received on October 7, 2004.]

E.24. Continuous compliance with the CO and NO_x emission limits. Continuous compliance with the CO and NO_x emission limits shall be demonstrated by the CEM system on the specified hourly average basis. Based on CEMS data, a separate compliance determination is conducted at the end of each period and a new average emission rate is calculated from the arithmetic average of all valid hourly emission rates from the previous period. Specific Condition **E.31.** further describes the CEM system requirements. Excess emissions periods shall be reported as required in Condition **E.21.**

[Rules 62-4.070 F.A.C., 62-210.700, F.A.C., 40 CFR 75 and BACT; and 0950137-002-AC, Specific Condition 31.]

E.25. Compliance with the SO₂ and PM/PM₁₀ emission limits. For the purposes of demonstrating compliance with the 40 CFR 60.333 SO₂ standard, the applicant is responsible for ensuring that the procedures outlined in attached Appendix GG are complied with.
[0950137-002-AC, Specific Condition 32.]

E.26. Compliance with CO emission limit. An *initial* and annual test for CO shall be conducted at 100% capacity with the duct burners off. The NO_x and CO test results shall be the average of three valid one-hour runs. Annual RATA testing for the CO and NO_x CEMS shall be required pursuant to 40 CFR 75 and may substitute for the annual CO stack testing requirement.
[0950137-002-AC, Specific Condition 33.]

E.27. Compliance with the VOC emission limit. An *initial* test is required to demonstrate compliance with the VOC emission limit. Thereafter, the CO emission limit will be employed as a surrogate and no annual testing is required (see Specific Condition E.15. for exception).
[0950137-002-AC, Specific Condition 34.]

E.28. Testing procedures. Unless otherwise specified, testing of emissions shall be conducted with the combustion turbine operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum heat input rate allowed by the permit, corrected for the average inlet air temperature during the test (with 100 percent represented by a curve depicting heat input vs. inlet temperature). Procedures for these tests shall meet all applicable requirements (i.e., testing time frequency, minimum compliance duration, etc.) of Chapters 62-204 and 62-297, F.A.C.
[0950137-002-AC, Specific Condition 35.]

E.29. Test Notification. The DEP's Central District office shall be notified, in writing, at least 30 days prior to the initial performance tests and at least 15 days before annual compliance tests.
[0950137-002-AC, Specific Condition 36.]

E.30. Special Compliance Tests. The DEP may request a special compliance test pursuant to Rule 62-297.310(7), F.A.C., when, after investigation (such as complaints, increased visible emissions, odors or questionable maintenance of control equipment), there is reason to believe that any applicable emission standard is being violated.
[0950137-002-AC, Specific Condition 37.]

E.31. Test Results. Compliance test results shall be submitted to the DEP's Central District office no later than 45 days after completion of the last test run.
[Rule 62-297.310(8), F.A.C.; and 0950137-002-AC, Specific Condition 38.]

{Permitting note: Prior to the next annual stack tests, the hours of operation on fuel oil for the 2004-2005 Federal Fiscal Year should be determined. If it is less than 400 hours, a stack test on fuel oil is not required for units 25 and 26.}

Monitoring Requirements

E.32. Continuous Monitoring System. The permittee shall install, calibrate, maintain, and operate a continuous emission monitor in the stack to measure and record the emissions of NO_x and CO from these emissions units, and the Carbon Dioxide (CO₂) content of the flue gas at the location where

NO_x and CO are monitored, in a manner sufficient to demonstrate compliance with the emission limits of this permit. The CEM system shall be used to demonstrate compliance with the emission limits for NO_x and CO established in this permit. Compliance with the emission limits for NO_x shall be based on a 3-hour block average. The 3-hour block average shall be calculated from 3 consecutive hourly average emission rate values. Compliance with the emission limits for CO shall be based on a 24-hour block average starting at midnight of each operating day. The 24-hour block average shall be calculated from 24 consecutive hourly average emission rate values. Each hourly value shall be computed using at least one data point in each fifteen-minute quadrant of an hour, where the unit combusted fuel during that quadrant of an hour. Notwithstanding this requirement, an hourly value shall be computed from at least two data points separated by a minimum of 15 minutes (where the unit operates for more than one quadrant of an hour). The owner or operator shall use all valid measurements or data points collected during an hour to calculate the hourly averages. All data points collected during an hour shall be, to the extent practicable, evenly spaced over the hour. The permittee may use the inlet SCR NO_x monitor as a backup analyzer in determining excess emissions during startup. If the CEM system measures concentration on a wet basis, the CEM system shall include provisions to determine the moisture content of the exhaust gas and an algorithm to enable correction of the monitoring results to a dry basis (0% moisture). Alternatively, the owner or operator may develop through manual stack test measurements a curve of moisture contents in the exhaust gas versus load for each allowable fuel, and use these typical values in an algorithm to enable correction of the monitoring results to a dry basis (0% moisture). Final results of the CEM system shall be expressed as ppmvd, corrected to 15% oxygen.

The NO_x monitor shall be certified and operated in accordance with the following requirements. The NO_x monitor shall be certified pursuant to 40 CFR Part 75 and shall be operated and maintained in accordance with the applicable requirements of 40 CFR Part 75, Subparts B and C. For purposes of determining compliance with the emission limits specified within this permit, missing data shall not be substituted. Instead the block average shall be determined using the remaining hourly data in the 3-hour block. However, in the event that the permittee maintains 95% or greater availability of the continuous emission monitoring systems used for determining NO_x emissions compliance for the previous quarter, then compliance with the emission limits for NO_x shall be based on 3 valid consecutive hours of data for a 3-hour block average. Record keeping and reporting shall be conducted pursuant to 40 CFR Part 75, Subparts F and G. The RATA tests required for the NO_x monitor shall be performed using EPA Method 20 or 7E, of Appendix A of 40 CFR 60. The NO_x monitor shall be a dual range monitor. The span for the lower range shall be between or inclusive of the values of 10 and 20 ppm, and the span for the upper range shall be between or inclusive of the values of 200 and 250 ppm, as corrected to 15% O₂.

The CO monitor and CO₂ monitor shall be certified and operated in accordance with the following requirements. The CO monitor shall be certified pursuant to 40 CFR 60, Appendix B, Performance Specification 4. The CO₂ monitor shall be certified pursuant to 40 CFR 60, Appendix B, Performance Specification 3. Quality assurance procedures shall conform to the requirements of 40 CFR 60, Appendix F, and the Data Assessment Report of section 7 shall be made each calendar quarter, and reported semi-annually to the Department's Central District Office. The RATA tests required for the CO monitor shall be performed using EPA Method 10, of Appendix A of 40 CFR 60. The Method 10 analysis shall be based on a continuous sampling train, and the ascarite trap may be omitted or the interference trap of section 10.1 may be used in lieu of the silica gel and ascarite traps. The CO monitor shall be a dual range monitor. The span for the lower range shall be between or inclusive of the values of 20 and 30 ppm, and the span for the upper range shall be between or inclusive of the values of 500 and 1000 ppm, as corrected to 15% O₂. The RATA tests required for the CO₂ monitor shall be performed using EPA Method 3B, of Appendix A of 40 CFR 60. NO_x, CO and CO₂ emissions data shall be recorded by the CEM system during episodes of startup, shutdown and malfunction. NO_x and CO emissions data recorded during malfunctions may be excluded from the block average calculated to demonstrate compliance with the emission limits specified within this permit.

Best operational practices shall be used to minimize hourly emissions that occur during episodes of startup, shutdown and malfunction. Emissions of any quantity or duration that occur entirely or in part from poor maintenance, poor operation, or any other equipment or process failure, which may reasonably be prevented, shall be prohibited.

A summary report of duration of data excluded from the block average calculation, and all instances of missing data from monitor downtime, shall be reported to the Department's Central District office semi-annually, and shall be consolidated with the report required pursuant to 40 CFR 60.7. For purposes of reporting "excess emissions" pursuant to the requirements of 40 CFR 60.7, excess emissions shall be defined as the hourly emissions which are recorded by the CEM system during periods of data excluded for episodes of startup, shutdown and malfunction, allowed above. The duration of excess emissions shall be the duration of the periods of data excluded for such episodes. Reports required by this paragraph and by 40 CFR 60.7 shall be submitted no less than semi-annually, including semi-annual periods in which no data is excluded or no instances of missing data occur. Upon request from the Department, the CEMS emission rates shall be corrected to ISO conditions to demonstrate compliance with the applicable standards of 40 CFR 60.332.

[Note: Compliance with these requirements will ensure compliance with the other CEM system requirements of this permit to comply with Subpart GG requirements, as well as the applicable requirements of Rule 62-297.520, F.A.C., 40 CFR 60.7(a)(5) and 40 CFR 60.13, and with 40 CFR Part 51, Appendix P, 40 CFR 60, Appendix B, Performance Specifications and 40 CFR 60, Appendix F, Quality Assurance Procedures]

[Rules 62-4.070(3) and 62-212.400., F.A.C.; BACT Determination; and 0950137-004-AC, Specific Condition 41., modified on May 16, 2003.]

E.33. Continuous Monitoring System Reports. The monitoring devices shall comply with the certification and quality assurance, and any other applicable requirements of Rule 62-297.520, F.A.C., 40 CFR 60.13, including certification of each device in accordance with 40 CFR 60, Appendix B, Performance Specifications and 40 CFR 60.7(a)(5) or 40 CFR Part 75. Quality assurance procedures must conform to all applicable sections of 40 CFR 60, Appendix F or 40 CFR 75. The monitoring plan, consisting of data on CEM equipment specifications, manufacturer, type, calibration and maintenance needs, and its proposed location shall be provided to the DEP Bureau of Ambient Monitoring & Mobile Sources (BAMMS) as well as the EPA for review no later than 45 days prior to the first scheduled certification test pursuant to 40 CFR 75.62.

[0950137-002-AC, Specific Condition 42.]

E.34. Determination of Process Variables.

- The permittee shall operate and maintain equipment and/or instruments necessary to determine process variables, such as process weight input or heat input, when such data is needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards. No later than 90 days prior to operation, the permittee shall submit for the Department's approval a list of process variables that will be measured to comply with this permit condition.
- Equipment and/or instruments used to directly or indirectly determine such process variables, including devices such as belt scales, weigh 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.; and 0950137-002-AC, Specific Condition 43.]

E.35. Subpart Da Monitoring and Recordkeeping Requirements. The permittee shall comply with all applicable requirements of 40 CFR 60 Subpart Da. [40 CFR 60, Subpart Da; and 0950137-002-AC, Specific Condition 44.].

E.36. Selective Catalytic Reduction System (SCR) Compliance Procedures.

- An annual stack emission test for nitrogen oxides and ammonia from the CT/HRSG pair shall be simultaneously conducted while operating in the power augmentation mode with the duct burner on as defined in Specific Condition E.14. The ammonia injection rate necessary to comply with the NO_x standard shall be established and reported during the each performance test.
- The SCR shall operate at all times that the turbine is operating, except during turbine start-up and shutdown periods, as dictated by manufacturer's guidelines and in accordance with this permit.
- The permittee shall install and operate an ammonia flow meter to measure and record the ammonia injection rate to the SCR system of the CT/HRSG set. It shall be maintained and calibrated according to the manufacturer's specifications.
- During the stack test, the permittee (at each tested load condition) shall determine and report the ammonia flow rate required to meet the emissions limitations. During NO_x CEM downtimes or malfunctions, the permittee shall operate at the ammonia flow rate, which was established during the last stack test.
- In the event of a complaint or concern by an inspector, the permittee shall be capable of making an instantaneous measurement using inlet and outlet NO_x concentrations from the SCR system and ammonia flow supplied to the SCR system to determine ammonia slip. This determination shall not be used as a compliance method but only as an indicator to determine if a special compliance test is needed to demonstrate NO_x and ammonia slip requirements of the permit. The calculation procedure shall be provided with the CEM monitoring plan required by 40 CFR Part 75. The following calculation represents one means by which the permittee may demonstrate compliance with this condition:

Ammonia slip @ 15%O₂ = (A-(BxC/1,000,000)) x (1,000,000/B) x D, where: A= ammonia injection rate (lb/hr) / 17 (lb/lb.mol)

B = dry gas exhaust flow rate (lb/hr) / 29 (lb/lb.mol)

C = change in measured NO_x (ppmv@15%O₂) across catalyst

D = correction factor, derived annually during compliance testing by comparing actual to tested ammonia slip

[Note: exhaust gas flow rate may be back calculated using heat input and F factor.]

- The calculation along with each newly determined correction factor shall be submitted with each annual compliance test. Calibration data ("as found" and "as left") shall be provided for each measurement device utilized to make the ammonia emission measurement and submitted with each annual compliance test.
- Upon specific request by the Department, a special re-test shall occur as described in the previous conditions concerning annual test requirements, in order to demonstrate that all NO_x and ammonia slip related permit limits can be complied with.

[0950137-002-AC, Specific Condition 45.]

Recordkeeping and Reporting Requirements

E.37. Records. All measurements, records, and other data required to be maintained by the applicant shall be recorded in a permanent form and retained for at least five (5) years following the date on which such measurements, records, or data are recorded. These records shall be made available to DEP representatives upon request.

- The applicant will be required to maintain records indicating the daily hours of operation of each CT/HRSG unit. These records shall specify which type of fuel is being combusted and the records shall be available for review at the site. Each calendar month, a compilation of the hours of operation for each CT/HRSG unit combusting fuel oil shall be made and totaled for the most recent consecutive 12-month period. Each AOR submitted by the applicant shall include a compilation of each consecutive 12-month period during the preceding calendar year.

[0950137-002-AC, Specific Condition 39.]

E.38. Compliance Test Reports. The test report shall provide sufficient detail on the tested emission unit and the procedures used to allow the Department to determine if the test was properly conducted and if the test results were properly computed. At a minimum, the test report shall provide the applicable information listed in Rule 62-297.310(8), F.A.C.

[0950137-002-AC, Specific Condition 40.]

E.39. Annual Reports. Pursuant to Rule 62-210.370(2), F.A.C., Annual Operation Reports, the permittee is required to submit annual reports on the actual operating rates and emissions from this facility. Annual operating reports shall be sent to the DEP's Central District Office by March 1st of each year.

[0950137-002-AC, Specific Condition 12., Section II.]

E.40. Quarterly Reports. Quarterly excess emission reports, in accordance with 40 CFR 60.7 (a)(7) (c) (1998 version), shall be submitted to the DEP's Central District Office.

[0950137-002-AC, Specific Condition 14., Section II.]

Subsection F. This section addresses the following Regulated Emissions Unit.

E.U. ID No.	Brief Description
-028	Distillate Fuel Oil Storage Tank

This fuel storage unit, consisting of a 1.86 million gallon distillate fuel oil storage tank (Unit 028), shall comply with all applicable provisions of 40 CFR 60. Subpart Kb. Standards of Performance for Volatile Organic Liquid Storage Vessels, adopted by reference in Rule 62-204.800, F.A.C.

[0950137-002-AC, Specific Condition 7.]

The following conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

F.1. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.

[Rules 62-4.160(2) and 62-210.200, F.A.C., Definitions - (PTE).]

Recordkeeping Requirements

F.2. The permittee shall maintain records on site for storage vessel identification number 028 to include the date of construction, the material storage capacity, and type of material stored for the life of this storage vessel.

[40 CFR 60.116b(b).]

Section IV. This section is the Acid Rain Part.

Operated by: Orlando Utilities Commission and OUC/KUA/FMPA/Southern Company – Florida, LLC
 ORIS codes: 0564 and 55821

Subsection A. This subsection addresses Acid Rain, Phase II.

The emissions units listed below are regulated under Phase II of the federal Acid Rain Program.

E.U. ID No.	Description
-001	Fossil Fuel Fired Steam Generator No. 1
-002	Fossil Fuel Fired Steam Generator No. 2
-025	Combined-Cycle Combustion Turbine
-026	Combined-Cycle Combustion Turbine

A.1. The Acid Rain Part application submitted for this facility, as approved by the Department, is a part of this permit. The owners and operators of these acid rain units 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), dated 06/16/03, and signed by the Designated Representative on 04/23/04.
 [Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

A.2. Sulfur dioxide (SO₂) allowance allocations and nitrogen oxide (NO_x) limitations for each Acid Rain unit are:

E.U. ID No.	EPA I.D.	Year	2005	2006	2007	2008	2009
-001	1	SO ₂ allowances, under Table 2 of 40 CFR 73	11290*	11290*	11290*	11290*	11290*
		NO _x limit	0.46 [†] lb./mmBtu	0.46 [†] lb./mmBtu	0.46 [†] lb./mmBtu	0.46 [†] lb./mmBtu	0.46 [†] lb./mmBtu
-002	2	SO ₂ allowances, under Table 2 of 40 CFR 73	0*	0*	0*	0*	0*
		NO _x limit	0.17 lb./mmBtu	0.17 lb./mmBtu	0.17 lb./mmBtu	0.17 lb./mmBtu	0.17 lb./mmBtu
-025	25	SO ₂ allowances to be determined by USEPA	0*	0*	0*	0*	0*
-026	26	SO ₂ allowances to be determined by USEPA	0*	0*	0*	0*	0*

*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.

[†]This is an annual average.

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 requirements of the Act.

- a. 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 62-213.440(3), F.A.C.
- b. No limit shall be placed on the number of allowances held by the source under the Federal Acid Rain Program.
- c. 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, F.A.C., Fast-Track Revisions of Acid Rain Parts.
[Rules 62-213.413 and 62-214.370(4), F.A.C.]

A.5. Comments, notes, and justifications: None.

A.6. Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall be incorporated into the permit and shall be enforceable by the Administrator.
[40 CFR 70.6(a)(1)(ii); and, Rule 62-210.200, Definitions – Applicable Requirements, F.A.C.]

Orlando Utilities Commission
 OUC/KUA/FMPA/Southern Company – Florida, LLC
 Stanton Energy Center

Permit No. 0950137-006-AV
 Facility ID No. 0950137

Appendix H-1, Permit History/ID Number Changes

Permit History (for tracking purposes):

E.U. ID No	Description	Permit No.	Issue Date	Expiration Date	Revised Date(s)
-001	Fossil Fuel Steam Generation Unit #1	PPS PA 81-14 PSD-FL-084	12/15/82		12/24/97
-002	Pulverized Coal Fired Unit No. 2	PPS PA 81-14 PSD-FL-084	12/17/91 12/23/91		12/24/97
-003	Auxiliary Boiler	PPS PA 81-14 PSD-FL-084			
	All of the above.	0950137-001-AV	1/01/00	12/31/04	
-025	Combined-Cycle Combustion Turbine	0950137-002-AC	9/26/01	12/31/04	
-026	Combined-Cycle Combustion Turbine	PSD-FL-313 PA81-14SA2			
-028	Distillate Fuel Oil Storage Tank				
-025	Combined-Cycle Combustion Turbine	0950137-003-AC	5/16/03	5/16/08	
-026	Combined-Cycle Combustion Turbine	PSD-FL-313 PA81-14SA2			
-025	Combined-Cycle Combustion Turbine	0950137-004-AC	5/16/03	5/16/08	
-026	Combined-Cycle Combustion Turbine	PSD-FL-313 PA81-14SA2			
	All of the above.	0950137-005-AV	5/09/04	12/31/04	

ID Number Changes (for tracking purposes): From: Facility ID No. 30ORL480137 To: Facility ID No. 0950137

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Permit No. 0950137-006-AV

Appendix U-1. List of Unregulated Emissions Units and/or Activities.

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.

For those unregulated emissions units subject to the *General Visible Emissions Standard* at Rule 62-296.320(4)(b), F.A.C., then the provisions of Rule 62-210.700, F.A.C., *Excess Emissions*, are available for purposes of compliance.

The below listed emissions units and/or activities are neither ‘regulated emissions units’ nor ‘insignificant emissions units’.

Emissions Unit	Description
-xxx	Surface Coating and Solvent Cleaning
-xxx	General Purpose Engines
-018	Fuel Storage Tanks
-xxx	Helper Cooling Towers
-xxx	Emergency Generators
-027	Mechanical Draft Cooling Tower

The Mechanical Draft Cooling Tower is not subject to a NESHAP because a chromium-based chemical treatment is not used.

[0950137-002-AC, Specific Condition 6.]

Orlando Utilities Commission
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Curtis H. Stanton Energy Center

Permit No. 0950137-006-AV

Appendix I-1, List of Insignificant Emissions Units and/or Activities.

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, or that meet the criteria specified in Rule 62-210.300(3)(b)1., F.A.C., Generic Emissions Unit Exemption, are exempt from the permitting requirements of Chapters 62-210, 62-212 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 Rules 62-210.300(3)(a) and (b)1., 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 Rules 62-210.300(3)(a) and (b)1., 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.

1	Lube Oil System Vents
2	Lube Oil Reservoir Tank
3	Oil Water Separators
4	Fixated Ash Disposal
5	Parts Washers/Degreasers
6	Waste Oil Storage Tanks
7	Lube Oil Storage Building
8	Portable Unleaded Gasoline Tank
9	Evaporation of non-hazardous boiler cleaning chemical
10	Sulfuric Acid Tanks

Curtis H. Stanton Energy Center

APPENDIX CAM

Compliance Assurance Monitoring Requirements

Compliance Assurance Monitoring Requirements

Pursuant to Rule 62-213.440(1)(b)1.a., F.A.C., the CAM plans that are included in this appendix contain the monitoring requirements necessary to satisfy 40 CFR 64. Conditions 1. – 17. are generic conditions applicable to all emissions units that are subject to the CAM requirements. Specific requirements related to each emissions unit are contained in the attached tables, as submitted by the applicant and approved by the Department.

40 CFR 64.6 Approval of Monitoring.

1. The attached CAM plan(s), as submitted by the applicant, is/are approved for the purposes of satisfying the requirements of 40 CFR 64.3.
[40 CFR 64.6(a)]
2. The attached CAM plan(s) include the following information:
 - (i) The indicator(s) to be monitored (such as temperature, pressure drop, emissions, or similar parameter);
 - (ii) The means or device to be used to measure the indicator(s) (such as temperature measurement device, visual observation, or CEMS); and
 - (iii) The performance requirements established to satisfy 40 CFR 64.3(b) or (d), as applicable.[40 CFR 64.6(c)(1)]
3. The attached CAM plan(s) describe the means by which the owner or operator will define an exceedance of the permitted limits or an excursion from the stated indicator ranges and averaging periods for purposes of responding to (see **CAM Conditions 5. - 9.**) and reporting exceedances or excursions (see **CAM Conditions 10. – 14.**).
[40 CFR 64.6(c)(2)]
4. The permittee is required to conduct the monitoring specified in the attached CAM plan(s) and shall fulfill the obligations specified in the conditions below (see **CAM Conditions 5. - 17.**).
[40 CFR 64.6(c)(3)]

40 CFR 64.7 Operation of Approved Monitoring.

5. Commencement of operation. The owner or operator shall conduct the monitoring required under this appendix upon the effective date of this Title V permit.
[40 CFR 64.7(a)]
6. Proper maintenance. At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
[40 CFR 64.7(b)]
7. Continued operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times

that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

[40 CFR 64.7(c)]

8. Response to excursions or exceedances.

- a. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions, if allowed by this permit). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- b. Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

[40 CFR 64.7(d)(1) & (2)]

9. Documentation of need for improved monitoring. If the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[40 CFR 64.7(e)]

40 CFR 64.8 Quality Improvement Plan (QIP) Requirements.

10. Based on the results of a determination made under **CAM Condition 8.a.**, above, the permitting authority may require the owner or operator to develop and implement a QIP. Consistent with **CAM Condition 4.**, an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, may require the implementation of a QIP. The threshold may be set at a higher or lower percent or may rely on other criteria for purposes of indicating whether a

pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices.

[40 CFR 64.8(a)]

11. Elements of a QIP:

- a. The owner or operator shall maintain a written QIP, if required, and have it available for inspection.
- b. The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:
 - (i) Improved preventive maintenance practices.
 - (ii) Process operation changes.
 - (iii) Appropriate improvements to control methods.
 - (iv) Other steps appropriate to correct control performance.
 - (v) More frequent or improved monitoring (only in conjunction with one or more steps under **CAM Condition 11.b(i)** through **(iv)**, above).

[40 CFR 64.8(b)]

12. If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the permitting authority if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

[40 CFR 64.8(c)]

13. Following implementation of a QIP, upon any subsequent determination pursuant to **CAM Condition 8.b.**, the permitting authority may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have:

- a. Failed to address the cause of the control device performance problems; or
- b. Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

[40 CFR 64.8(d)]

14. Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.

[40 CFR 64.8(e)]

40 CFR 64.9 Reporting And Recordkeeping Requirements.

15. General reporting requirements.

- a. On and after the date specified in **CAM Condition 5.** by which the owner or operator must use monitoring that meets the requirements of this appendix, the owner or operator shall submit monitoring reports semi-annually to the permitting authority in accordance with Rule 62-213.440(1)(b)3.a., F.A.C.
- b. A report for monitoring under this part shall include, at a minimum, the information required under Rule 62-213.440(1)(b)3.a., F.A.C.. and the following information, as applicable:

- (i) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
- (ii) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
- (iii) A description of the actions taken to implement a QIP during the reporting period as specified in **CAM Conditions 10. through 14.** Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

[40 CFR 64.9(a)]

16. General recordkeeping requirements.

- a. The owner or operator shall comply with the recordkeeping requirements specified in Rule 62-213.440(1)(b)2., F.A.C. The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to **CAM Conditions 10. through 14.** and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).
- b. Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

[40 CFR 64.9(b)]

40 CFR 64.10 Savings Provisions.

17. It should be noted that nothing in this appendix shall:

- a. Excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act. The requirements of this appendix shall not be used to justify the approval of monitoring less stringent than the monitoring which is required under separate legal authority and are not intended to establish minimum requirements for the purpose of determining the monitoring to be imposed under separate authority under the Act, including monitoring in permits issued pursuant to title I of the Act. The purpose of this part is to require, as part of the issuance of a permit under Title V of the Act, improved or new monitoring at those emissions units where monitoring requirements do not exist or are inadequate to meet the requirements of this part.
- b. Restrict or abrogate the authority of the Administrator or the permitting authority to impose additional or more stringent monitoring, recordkeeping, testing, or reporting requirements on any owner or operator of a source under any provision of the Act, including but not limited to sections 114(a)(1) and 504(b), or state law, as applicable.
- c. Restrict or abrogate the authority of the Administrator or permitting authority to take any enforcement action under the Act for any violation of an applicable requirement or of any person to take action under section 304 of the Act.

[40 CFR 64.10]

MONITORING APPROACH

	Compliance Indicator
I. INDICATOR	Opacity of ESP Exhaust
Measurement Approach	(COMS)
II. INDICATOR RANGE	An excursion is defined as any 1-hour average stack opacity greater than 10%, excluding periods of start-up, shutdown, and malfunction pursuant to Rule 62-210.700, F.A.C.
	An excursion will trigger an evaluation of the boiler and ESP with corrective action taken as appropriate. An excursion will trigger recordkeeping and reporting requirements.
III. PERFORMANCE CRITERIA	
Data Representativeness	The COMS was installed at a representative location in the ESP exhaust per 40 CFR 60, Appendix B, PS-1.
Verification of Operational Status	Results of initial COMS performance evaluation was conducted per PS-1.
QA/QC Practices and Criteria	The COMS was initially installed and evaluated per PS-1. Zero and span drift are checked daily; a periodic filter audit is reformed; and preventative maintenance per the manufacturer is performed.
Monitoring Frequency	Opacity is monitored continuously.
Data Collection Procedures	Opacity data are collected and recorded through the Data Acquisition System (DAS). The data collected by the DAS are reduced to calculate 6-minute block averages. The 6-minute block averages are used to calculate the rolling 1-hour averages.
Averaging Period	The averaging period for opacity observations is a 6-minute block average.

**APPENDIX GG
 NSPS SUBPART GG REQUIREMENTS FOR GAS TURBINES**

[01950137-002-AC]

NSPS SUBPART GG REQUIREMENTS

[Note: Inapplicable provisions have been deleted in the following conditions, but the numbering of the original rules has been preserved for ease of reference to the original rules. The term “Administrator” when used in 40 CFR 60 shall mean the Department’s Secretary or the Secretary’s designee. Department notes and requirements related to the Subpart GG requirements are shown in **bold** immediately following the section to which they refer. The rule basis for the Department requirements specified below is Rule 62-4.070(3), F.A.C.]

Pursuant to 40 CFR 60.332 Standard for Nitrogen Oxides:

(a) On and after the date of the performance test required by § 60.8 is completed, every owner or operator subject to the provisions of this subpart as specified in paragraph (b) section shall comply with:

(1) No owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any stationary gas turbine, any gases which contain nitrogen oxides in excess of:

$$STD = 0.0075 \frac{(14.4)}{Y} + F$$

where:

STD = allowable NO_x emissions (percent by volume at 15 percent oxygen and on a dry basis).

Y = manufacturer’s rated heat rate at manufacturer’s rated load (kilojoules per watt hour) or, actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt-hour.

F = NO_x emission allowance for fuel-bound nitrogen as defined in paragraph (a)(3) of this section.

(3) F shall be defined according to the nitrogen content of the fuel as follows:

Fuel-bound nitrogen (percent by weight)	F (NO _x percent by volume)
N ≤ 0.015	0
0.015 < N ≤ 0.1	0.04(N)
0.1 < N ≤ 0.25	0.004 + 0.0067(N - 0.1)
N > 0.25	0.005

Where, N = the nitrogen content of the fuel (percent by weight).

Department requirement: While firing gas, the “F” value shall be assumed to be 0.

[Note: This is required by EPA’s March 12, 1993 determination regarding the use of NO_x CEMS. The “Y” values are approximately 10.0 for natural gas and 10.6 for fuel

oil. The equivalent emission standards are 108 and 102 ppmvd at 15% oxygen. The emissions standards of this permit are more stringent than this requirement.]

- (b) Electric utility stationary gas turbines with a heat input at peak load greater than 107.2 gigajoules per hour (100 million Btu/hour) based on the lower heating value of the fuel fired shall comply with the provisions of paragraph (a)(1) of this section.

Pursuant to 40 CFR 60.333 Standard for Sulfur Dioxide:

On and after the date on which the performance test required to be conducted by 40 CFR 60.8 is completed, every owner or operator subject to the provision of this subpart shall comply with:

- (b) No owner or operator subject to the provisions of this subpart shall burn in any stationary gas turbine any fuel, which contains sulfur in excess of 0.8 percent by weight.

Pursuant to 40 CFR 60.334 Monitoring of Operations:

- (b) The owner or operator of any stationary gas turbine subject to the provisions of this subpart shall monitor sulfur content and nitrogen content of the fuel being fired in the turbine. The frequency of determination of these values shall be as follows:

- (1) If the turbine is supplied its fuel from a bulk storage tank, the values shall be determined on each occasion that fuel is transferred to the storage tank from any other source.

Department requirement: The owner or operator is allowed to use vendor analyses of the fuel as received to satisfy the sulfur content monitoring requirements of this rule for fuel oil. Alternatively, if the fuel oil storage tank is isolated from the combustion turbines while being filled, the owner or operator is allowed to determine the sulfur content of the tank after completion of filling of the tank, before it is placed back into service.

[Note: This is consistent with guidance from EPA Region 4 dated May 26, 2000 to Ronald W. Gore of the Alabama Department of Environmental Management.]

- (2) If the turbine is supplied its fuel without intermediate bulk storage the values shall be determined and recorded daily. Owners, operators or fuel vendors may develop custom schedules for determination of the values based on the design and operation of the affected facility and the characteristics of the fuel supply. These custom schedules shall be substantiated with data and must be approved by the Administrator before they can be used to comply with paragraph (b) of this section.

(1) **Department requirement:** The requirement to monitor the nitrogen content of pipeline quality natural gas fired is waived. The requirement to monitor the nitrogen content of fuel oil fired is waived because a NO_x CEMS shall be used to demonstrate compliance with the NO_x limits of this permit. For purposes of complying with the sulfur content monitoring requirements of this rule, the owner or operator shall obtain a monthly report from the vendor indicating the sulfur content of the natural gas being supplied from the pipeline for each month of operation.

(2) [Note: This is consistent with EPA's custom fuel monitoring policy and guidance from EPA Region 4.]

- (c) For the purpose of reports required under 40 CFR 60.7(c), periods of excess emissions that shall be reported are defined as follows:

- (1) *Nitrogen oxides.* Any one-hour period during which the average water-to-fuel ratio, as measured by the continuous monitoring system, falls below the water-to-fuel ratio determined to demonstrate compliance with 40 CFR 60.332 by the performance test required in § 60.8 or any period during which the fuel-bound nitrogen of the fuel is

greater than the maximum nitrogen content allowed by the fuel-bound nitrogen allowance used during the performance test required in § 60.8. Each report shall include the average water-to-fuel ratio, average fuel consumption, ambient conditions, gas turbine load, and nitrogen content of the fuel during the period of excess emissions, and the graphs or figures developed under 40 CFR 60.335(a).

Department requirement: NO_x emissions monitoring by CEM system shall substitute for the requirements of paragraph (c)(1) because a NO_x monitor is required to demonstrate compliance with the standards of this permit. Data from the NO_x monitor shall be used to determine "excess emissions" for purposes of 40 CFR 60.7 subject to the conditions of the permit.

[Note: This is consistent with guidance from EPA Region 4 dated May 26, 2000 to Ronald W. Gore of the Alabama Department of Environmental Management.]

- (2) *Sulfur dioxide.* Any daily period during which the sulfur content of the fuel being fired in the gas turbine exceeds 0.8 percent.

Pursuant to 40 CFR 60.335 Test Methods and Procedures:

- (a) To compute the nitrogen oxides emissions, the owner or operator shall use analytical methods and procedures that are accurate to within 5 per-cent and are approved by the Administrator to determine the nitrogen content of the fuel being fired.
- (b) In conducting the performance tests required in 40 CFR 60.8, the owner or operator shall use as reference methods and procedures the test methods in appendix A of this part or other methods and procedures as specified in this section, except as provided for in 40 CFR 60.8(b). Acceptable alternative methods and procedures are given in paragraph (f) of this section.
- (c) The owner or operator shall determine compliance with the nitrogen oxides and sulfur dioxide standards in 40 CFR 60.332 and 60.333(a) as follows:
- (1) The nitrogen oxides emission rate (NO_x) shall be computed for each run using the following equation:

$$NO_x = (NO_{xo}) (Pr/Po)^{0.5} e^{19(Ho-0.00633)} (288^\circ K/Ta)^{1.53}$$

where:

NO_x = emission rate of NO_x at 15 percent O₂ and ISO standard ambient conditions, volume percent.

NO_{xo} = observed NO_x concentration, ppm by volume.

Pr = reference combustor inlet absolute pressure at 101.3 kilopascals ambient pressure, mm Hg.

Po = observed combustor inlet absolute pressure at test, mm Hg.

Ho = observed humidity of ambient air, g H₂O/g air.

e = transcendental constant, 2.718.

Ta = ambient temperature, °K.

Department requirement: The owner or operator is not required to have the NO_x monitor continuously correct NO_x emissions concentrations to ISO conditions. However, the owner or operator shall keep records of the data needed to make the correction, and shall make the correction when required by the Department or Administrator.

[Note: This is consistent with guidance from EPA Region 4.]

- (2) The monitoring device of 40 CFR 60.334(a) shall be used to determine the fuel consumption and the water-to-fuel ratio necessary to comply with 40 CFR 60.332 at 30, 50, 75, and 100 percent of peak load or at four points in the normal operating range of the gas turbine, including the minimum point in the range and peak load. All loads shall be corrected to ISO conditions using the appropriate equations supplied by the manufacturer.

Department requirement: The owner or operator is allowed to conduct initial performance tests at a single load because a NO_x monitor shall be used to demonstrate compliance with the BACT NO_x limits of this permit.

[Note: This is consistent with guidance from EPA Region 4.]

- (3) Method 20 shall be used to determine the nitrogen oxides, sulfur dioxide, and oxygen concentrations. The span values shall be 300 ppm of nitrogen oxide and 21 percent oxygen. The NO_x emissions shall be determined at each of the load conditions specified in paragraph (c)(2) of this section.

Department requirement: The owner or operator is allowed to make the initial compliance demonstration for NO_x emissions using certified CEM system data, provided that compliance be based on a minimum of three test runs representing a total of at least three hours of data, and that the CEMS be calibrated in accordance with the procedure in section 6.2.3 of Method 20 following each run. Alternatively, initial compliance may be demonstrated using data collected during the initial relative accuracy test audit (RATA) performed on the NO_x monitor. The span value specified in the permit shall be used instead of that specified in paragraph (c)(3) above.

[Note: These initial compliance demonstration requirements are consistent with guidance from EPA Region 4. The span value is changed pursuant to Department authority and is consistent with guidance from EPA Region 4.]

- (d) The owner or operator shall determine compliance with the sulfur content standard in 40 CFR 60.333(b) as follows: ASTM D 2880-71 shall be used to determine the sulfur content of liquid fuels and ASTM D 1072-80, D 3031-81, D 4084-82, or D 3246-81 shall be used for the sulfur content of gaseous fuels (incorporated by reference – see 40 CFR 60.17). The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to the approval of the Administrator.

Department requirement: The permit specifies sulfur testing methods and allows the owner or operator to follow the requirements of 40 CFR 75 Appendix D to determine the sulfur content of liquid fuels.

[Note: This requirement establishes different methods than provided by paragraph (d) above, but the requirements are equally stringent and will ensure compliance with this rule.]

- (e) To meet the requirements of 40 CFR 60.334(b), the owner or operator shall use the methods specified in paragraphs (a) and (d) of this section to determine the nitrogen and sulfur contents of the fuel being burned. The analysis may be performed by the owner or operator, a service contractor retained by the owner or operator, the fuel vendor, or any other qualified agency.

[Note: The fuel analysis requirements of the permit meet or exceed the requirements of this rule and will ensure compliance with this rule.]

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

Orlando Utilities Commission

Stanton Energy Center

E.U. ID Nos. Brief Description

Permit No. 0950137-006-AV

Facility ID No. 0950137

-001		Fossil Fuel Fired Steam Generator #1				Allowable Emissions		Equivalent Emissions		Regulatory Citation(s)	See Permit Condition(s)
Pollutant Name	Fuel(s) *	Hours/ Year *	Standards	lb/ hour	TPY	lb/hour **	TPY **				
PM Emissions	Coal F.O.	8760	0.03 lb/MMBtu 0.03 lb/MMBtu			128.6	563.2	Rule 62-204.800(7)(b)2, F.A.C. Rule 62-204.800(7)(b)2, F.A.C.	A.5, A.6 A.7		
Visible Emissions	Coal F.O.	8760	20% Opacity					Rule 62-204.800(7)(b)2, F.A.C.	A.8		
Sulfur Dioxide	Coal F.O.	8760	1.14 lb/MMBtu 0.80 lb/MMBtu			4886	21,400	Rule 62.204.800(7)(b)2, F.A.C. Rule 62.204.800(7)(b)2, F.A.C.	A.9, Sec IV-A2 A.11		
Nitrogen Oxide	Coal F.O.	8760	0.46 lb/MMBtu 0.30 lb/MMBtu			1971	8,635	Rule 62-204.800(7)(b)2, F.A.C. Rule 62-204.800(7)(b)2, F.A.C.	A.15, Sec IV-A2 A.15		

-002		Fossil Fuel Fired Steam Generator #2				Allowable Emissions		Equivalent Emissions		Regulatory Citation(s)	See Permit Condition(s)
Pollutant Name	Fuel(s) *	Hours/ Year *	Standards	lb/ hour	TPY	lb/hour **	TPY **				
PM Emissions	Coal F.O.	8760	0.02 lb/MMBtu 0.03 lb/MMBtu			85.7	375.4	Rule 62.204.800(7)(b)2, F.A.C.	A.5, A.6 A.7		
Visible Emissions	Coal F.O.	8760	20% Opacity					Rule 62.204.800(7)(b)2, F.A.C.	A.8		
Sulfur Dioxide	Coal F.O.	8760	0.25 lb/MMBtu 0.80 lb/MMBtu			3643	4693	Rule 62.204.800(7)(b)2, F.A.C. Rule 62.204.800(7)(b)2, F.A.C.	A.10, Sec IV-A2 A.11		
Nitrogen Oxide	Coal F.O.	8760	0.17 lb/MMBtu 0.30 lb/MMBtu			729	3191	Rule 62-204.800(7)(b)2, F.A.C. Rule 62-204.800(7)(b)2, F.A.C.	A.15, Sec IV-A2 A.15		
Carbon Monoxide	Coal	8760	0.15 lb/MMBtu			643	2816	PSD-FL-084	A.18		
VOC	Coal	8760	0.015 lb/MMBtu			64	282	PSD-FL-084	A.19		
Sulfuric Acid Mist	Coal	8760	0.033 lb/MMBtu			140	613	PPS PA 81-14/SA1	A.20		
Beryllium	Coal	8760	5.2x10 ⁻⁶ lb/MMBtu			0.022	0.1	PPS PA 81-14/SA1	A.21		
Mercury	Coal	8760	1.1x10 ⁻⁵ lb/MMBtu			0.046	0.2	PPS PA 81-14/SA1	A.22		
Lead	Coal	8760	1.5x10 ⁻⁴ lb/MMBtu			0.64	2.8	PPS PA 81-14/SA1	A.23		
Fluorides	Coal	8760	4.2x10 ⁻² lb/MMBtu			1.8	7.9	PPS PA 81-14/SA1	A.24		

*Unit No.1 shall fire "new oil". Unit No.2 shall fire "new oil" as well as on-specification used fuel oil as per specific condition D.22.

** The "Equivalent Emissions" listed are for informational purposes only. Unit 1 NO_x emission limit is 0.60 lb/MMBtu on a 30-day rolling average, and 0.46 lb/MMBtu on an annual average.

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

Table 1-2, Summary of Air Pollutant Standards and Terms

Orlando Utilities Commission
Stanton Energy Center

Permit No.: 0950137-006-AV
Facility ID No.: 0950137

E.U. ID Nos. Brief Description

-003		Auxiliary Boiler #3				Equivalent Emissions		Regulatory Citation(s)	See Permit Condition(s)
		Allowable Emissions							
Pollutant Name	Fuel(s) *	Hours/ Year *	Standards	lb/ hour	TPY	lb/hour **	TPY **		
PM Emissions	F.O.	150	0.015 lb/MMBtu			1.2	0.1	Rules 62-4.160(2), F.A.C.	B.4
Visible Emissions	F.O.	150	20% Opacity					Rule 62-4.160(2), F.A.C.	B.4
Sulfur Dioxide	F.O.	150	0.51 lb/MMBtu			42.3	3.2	Rule 62-4.160(2), F.A.C.	B.4
Nitrogen Oxide	F.O.	150	0.16 lb/MMBtu			13.3	0.1	Rule 62-4.160(2), F.A.C.	B.4

-004, -005, -006, and -007		Fly Ash Silo System				Equivalent Emissions		Regulatory Citation(s)	See Permit Condition(s)
		Allowable Emissions							
Pollutant Name	Fuel(s) *	Hours/ Year *	Standards	lb/ hour	TPY	lb/hour **	TPY **		
Visible Emissions	N/A	8760	5% Opacity					PPS PA 81-14/SA1	C.2

-025 and -026		Combined-Cycle Combustion Turbines				Equivalent Emissions		Regulatory Citation(s)	See Permit Condition(s)
Pollutant Name	Fuel(s) *	Hours/ Year *	Standards	lb/ hour	TPY	lb/hour **	TPY **		
Nitrogen Oxides	Natural gas		3.5 ppmvd					0950137-002-AC	E.14.
	Fuel oil	1000	10 ppmvd					0950137-002-AC	E.14.
Carbon Monoxide	Natural gas		17 ppmvd					0950137-002-AC	E.15.
	Fuel oil	1000	14 ppmvd					0950137-002-AC	E.15.
Volatile organic compounds	Natural gas		6.3 ppmvd					0950137-002-AC	E.16.
	Fuel oil	1000	2.7 ppmvd					0950137-002-AC	E.16.
Sulfur dioxide	Natural gas		1.5 grains per 100 standard cubic foot				134	0950137-002-AC	E.17.
	Fuel oil	1000	.05% sulfur by weight					0950137-002-AC	E.17.
Visible Emissions	N/A	8760	10% Opacity					0950137-002-AC	E.18.

* The auxiliary boiler is fired primarily with No. 2 "new oil" having a sulfur content less than 0.5 percent, by weight.

** The "Equivalent Emissions" listed are for informational purposes only.

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

Table 2-1, Summary of Compliance Requirements

Orlando Utilities Commission
Stanton Energy Center

Permit No. 0950137-006-AV
Facility ID No. 0950137

E.U. # -001		Fossil Fuel Fired Steam Generator #1					
Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time or Frequency	Frequency Base Date ¹	Min. Compliance Test Time	CMS ²	See Permit Condition(s)
PM Emissions	Coal	EPA Method 5B	Annual	N/A	6 hours	No	A.41(2)
Visible Emissions	Coal	EPA Method 9	Annual	N/A	1 hour	Yes	A.41(3)
Sulfur Dioxide	Coal	EPA method 6	Annual	N/A	1 hour	Yes	A.37(1)
Nitrogen Oxide	Coal	EPA Method 7	Annual	N/A	1 hour	Yes	A.37(2)

E.U. # -002		Fossil Fuel Fired Steam Generator #2					
Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time or Frequency	Frequency Base Date ¹	Min. Compliance Test Time	CMS ²	See Permit Condition(s)
PM Emissions	Coal	EPA Method 5B	Annual	N/A	6 hours	No	A.41(2)
Visible Emissions	Coal	EPA Method 9	Annual	N/A	1 hour	Yes	A.41(3)
Sulfur Dioxide	Coal	EPA Method 6	Annual	N/A	1 hour	Yes	A.37(1)
Nitrogen Oxide	Coal	EPA Method 7	Annual	N/A	1 hour	Yes	A.37(2)
Carbon Monoxide	Coal	EPA Method 10	Annual	N/A	N/A	No	A.44(1)
VOC	Coal	EPA Method 18	Annual	N/A	N/A	No	A.44(2)
Beryllium	Coal	EPA Method 104	Annual	N/A	N/A	No	A.44(3)
Mercury	Coal	EPA Method 101A	Annual	N/A	N/A	No	A.44(4)
Lead	Coal	EPA Method 12	Annual	N/A	N/A	No	A.44(5)
Fluorides	Coal	EPA Method 13A	Annual	N/A	N/A	No	A.44(6)

Table 2-2, Summary of Compliance Requirements

Orlando Utilities Commission
Stanton Energy Center

Permit No.: 0950137-006-AV
Facility ID No.: 0950137

E.U. # -003	Auxiliary Boiler #3						
Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time or Frequency	Frequency Base Date ¹	Min. Compliance Test Time	CMS ²	See Permit Condition(s)
Visible Emissions	F.O.	EPA Method 9	Annual	N/A	1 hour	No	B.5

E.U. # -004,-005,-006 and -007	Fly Ash Silo System						
Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time or Frequency	Frequency Base Date ¹	Min. Compliance Test Time	CMS ²	See Permit Condition(s)
Visible Emissions	N/A	EPA Method 9	Annual	N/A	1 hour	No	C.2

-025 and -026		Combined-Cycle Combustion Turbines					
Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time or Frequency	Frequency Base Date ¹	Min. Compliance Test Time	CMS ²	See Permit Condition(s)
Nitrogen Oxides	Natural gas	EPA Method 7E	Annual			Yes	E.23.
	Fuel oil					Yes	E.23.
Carbon Monoxide	Natural gas	EPA Method 10	Annual			Yes	E.23.
	Fuel oil					Yes	E.23.
Volatile organic compounds	Natural gas	EPA Methods 18, 25, and/ or 25A	Initial				E.23.
	Fuel oil		Initial				E.23.
Sulfur dioxide	Natural gas	Fuel analysis					E.25.
	Fuel oil						E.25.
Visible Emissions	N/A	EPA Method 9	Annual				E.23.

1 - Frequency base date established for planning purposes only; see guidance memo and Rule 62-297.310, F.A.C.

2 - Continuous Monitoring System.

3 - EPA Method 17 may be used only if the stack gas exit temperature is less than 375 degrees F.

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

Friday, Barbara

To: Kozlov, Leonard; 'GDWATERS@southernco.com'; dstalls@ouc.com
Cc: Cascio, Tom
Subject: FINAL Title V Permit Renewal No.: 0950137-006-AV - Orlando Utilities Commission - Curtis H. Stanton Energy Center

Attached for your records is a zip file which contains the FINAL Title V Permit Renewal and associated documents.

If I may be of further assistance, please feel free to contact me.

Barbara J. Friday
Planner II
Bureau of Air Regulation
(850)921-9524
Barbara.Friday@dep.state.fl.us

12/30/2004

ATTACHMENT SEC-EU2-I1
Compliance Demonstration Reports/Records



1531 Wyngate Drive, Deland, FL 32724
Phone: (386) 943-9241 / Cell: (386) 451-0169 / Fax: (386) 943-9242

CONDUIT EMISSIONS TESTING SERVICES • PERMITTING ASSISTANCE • CEMS CERTIFICATION • AMBIENT AIR MONITORING

Emissions Test Report

No. 109-031

ORLANDO UTILITIES COMMISSION

Unit 2

PARTICULATE EMISSIONS

Prepared for:

Orlando Utilities Commission
1500 South Alafaya Trail
Orlando, FL 32831

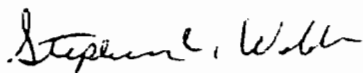
Prepared by:

Coastal Air Consulting, Inc.
1531 Wyngate Dr.
DeLand, FL 32724
(386) 943-9241

July 1, 2008

STATEMENT OF VALIDITY

All testing activities and results represented herein were conducted and obtained in accordance with the EPA protocols listed in 40 CFR Part 60. The contents have been reviewed and verified to be true and correct representation of the source emissions at the time of testing.



Stephen C. Webb
President

PROJECT STATISTICS

Client: Orlando Utilities Commission

Facility: Stanton Energy Center Unit 2

Location: 5100 South Alafaya Trail
Orlando, FL 32831

Type of Process Tested: Coal Fired Utility Steam Generating Unit

Test Protocols Performed: Particulate-EPA Method 5B
Opacity-EPA Method 9

Testing Firm: Coastal Air Consulting, Inc.
1531 Wyngate Dr.
DeLand, FL 32724

Test Personnel: Steve Webb Site Supervisor
Bob Righter Technician

Test Date: June 3, 2008

Client Representative: David Baez

Observers: None

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- 5 Reference Method Quality Assurance
- 6 Sample Calculations

1.0 Introduction

Coastal Air Consulting, Inc. (Coastal) was contracted by Orlando Utilities Commission to perform the annual compliance testing for particulate emissions at the Stanton Energy Center Unit 2 in Orlando, Florida.

The sampling program was conducted June 3, 2008. The testing was performed by Coastal personnel, with the assistance of personnel assigned by Orlando Utilities Commission. Mr. David Baez of Orlando Utilities Commission coordinated plant operation during the testing.

2.0 Test Program Summary

A summary of test results developed by this source sampling program is presented in Tables 1 and 2 as follows:

TABLE 1
Summary of Particulate Emissions

Source	Particulate (lb/mmBtu)	Permit (lb/mmBtu)
Unit 2	0.005	0.02

TABLE 2
Summary of Visible Emissions

Source	Average VE(%)	Highest 6 min (%)	Permitted (%)
Unit 2	0.0	0.0	20

3.0 Results of Testing

Individual test run results are shown in Table 3 and are tabulated in Appendix 1. These results indicate that Unit 2 was in compliance at the time of testing under normal operating conditions.

4.0 Description of Source

Stanton Energy Center Unit 2 is a coal fired utility steam generator. The unit is located in Orlando, FL.

The flue gas is exhausted through the Unit 2 stack. A schematic of the process and stack sampling location is included in Appendix 3 "Figures".

5.0 Sampling Procedures

EPA testing protocols utilized during this test program include the following:

EPA Method 1	Sample and Velocity Traverse for Stationary Sources
EPA Method 2	Determination of Stack Gas Velocity and Volumetric Flow Rate
EPA Method 3	Gas Analysis for CO ₂ , O ₂ , Excess Air and Dry Molecular Weight
EPA Method 4	Determination of Moisture Content in Stack Gas
EPA Method 5B	Determination of Nonsulfuric Acid Particulate Matter From Stationary Sources

The test runs were conducted in triplicate for all parameters with each being 120 minutes in duration.

5.1 Particulate – EPA Method 5B

This method of analysis is similar to EPA Method 5 except where specifically modified for the determination of nonsulfuric acid particulate matter from stationary sources. Emissions were determined in accordance with procedures outlined in EPA Method 5B. Specifically, while maintaining the probe liner and filter heater box to 320 ± 25 °F a sample of flue gas is isokinetically extracted from the stack gas stream and the particulate emissions are calculated by gravimetrically determining the amount of particulate matter collected in the glass nozzle, glass probe liner and glass fiber filter.

Gas sample volume is measured by passing the gas through a set of weighed impingers used to determine moisture content then through a calibrated dry gas meter. An S-type pitot tube is attached to the probe to simultaneously measure stack gas velocity and is used to maintain an isokinetic sampling profile. A "K-type" thermocouple, integral with the probe is used to measure the flue gas temperature.

Following each run, the nozzle, probe liner and filter holder upstream of the filter are brushed and rinsed with acetone and stored in a leak free container for transport to the laboratory. The total impinger content is weighed and compared to pretest weights to calculate the increase in grams of moisture used in determining flue gas water content.

Particulate matter is determined by drying each filter at 320 °F for six hours, desiccated to a final weight and results are recorded to within +/- 0.1 mg. Evaporate the acetone rinse in a tared beaker, desiccate to a final weight and record results to within +/- 0.1 mg.

Testing was conducted in a vertical section of the stack which is 247.4 inches in diameter. There are four test ports orientated 90 degrees apart. The test ports are located greater

than 8 duct diameters downstream and greater than 2 duct diameters upstream from the nearest flow disturbance. The sampling was performed at three (3) traverse points for each port, 12 total points. Each test point was sampled for 10 minutes for a total sample time of 120 minutes.

6.0 Operating Conditions

Orlando Utilities Commission personnel monitored operating conditions throughout the duration of the sampling program. The unit was operating under normal conditions at an approximate output of 458 MW (gross).

7.0 Quality Assurance Procedures

Quality assurance procedures followed during these testing activities were applied consistent with the requirements outlined by the EPA methods referenced in 40 CFR Part 60. The specific procedures for this test program are listed below.

7.1 Isokinetic Equipment

- Nozzles - Inspected and measured across three different diameters to ensure uniformity determine the appropriate nozzle diameter.
- S-type pitot tubes were visually inspected and measured to meet the design specifications of EPA Method 2 for a 0.84 pitot coefficient.
- Both legs of the pitot tube were leaked checked before and after each sample run.
- Thermocouples were calibrated prior to the testing and a post-test check to ensure as found and as left consistency is performed after each testing project.
- Manometers are leveled and zeroed before each sample run.
- Dry gas meters are fully calibrated on a semi-annual schedule using a set of EPA critical orifices.
- Post-test dry gas meter checks were completed to verify the accuracy of the meter Y values.
- Pre-test and post-test leak checks were completed and were less than 0.02 cfm at the highest sampling vacuum.

7.2 Chain of Custody

All the field samples were collected, sealed and transported to the Coastal office in DeLand, FL under the supervision of Steve Webb.

ATTACHMENT SEC-EU4-I1
Compliance Demonstration Reports/Records



1531 Wyngate Drive DeLand, FL 32729

Phone (386) 451-0241 Cell (386) 451-2160 Fax (386) 451-9212

COMPLETE EMISSIONS TESTING SERVICES • PERMITTING ASSISTANCE • CEMS CERTIFICATION • AMBIENT AIR MONITORING

Emissions Test Report

No. 109-034

ORLANDO UTILITIES COMMISSION

VISIBLE EMISSIONS EVALUATIONS

Prepared for.

OUC
5100 South Alafaya Trail
Orlando, FL 32831

Prepared by.

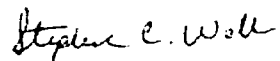
Coastal Air Consulting, Inc.
1531 Wyngate Dr.
DeLand, FL 32724
(386) 451-0169

July 1, 2008

STATEMENT OF VALIDITY

All testing activities and results represented herein were conducted and obtained in accordance with the approved EPA protocols listed in 40 CFR Part 60. The contents have been reviewed and verified to be true and correct.

Stephen C. Webb



President

Coastal Air Consulting, Inc.

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DeLand, FL 32724

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- 3 Results of Testing
- 4 Description of Source
- 5 Sampling Procedures

APPENDICES

- 1 Field Data
- 2 VE Certification

PROJECT STATISTICS

Client: Orlando Utilities Commission

Facility: Stanton Energy Center

Location: 5100 South Alafaya Trail
Orlando, FL 32831

Test Protocols Performed: Opacity-EPA Method 9

Testing Firm: Coastal Air Consulting, Inc.
1531 Wyngate Dr.
DeLand, FL 32724

Test Personnel: Stephen Webb

Test Dates: June 2-13, 2008

Client Representative: David Baez

Observers: None

1.0 Introduction

Coastal Air Consulting, Inc. (Coastal) was contracted by JEA to perform Visual Emissions Evaluations at the OUC Stanton Energy Center in Orlando, Florida.

The Visual Emissions Evaluations were conducted the weeks of June 2 and June 9, 2008. The testing was performed by Coastal personnel. Mr. David Baez coordinated plant operations during testing activities.

2.0 Test Program Summary

A summary of the Visible Emissions Evaluations results are presented in Table 1.

TABLE 1
Summary of Visual Emissions

Source	Emissions #	Allowable	Actual	6Min.Avg.
Coal Silo Baghouse U1	006	5 %	0.0%	0.0 %
Foal Silo Baghouse U2	007	5 %	0.0%	0.0 %
Pebble Lime Hopper	009	5 %	0.0%	0.0 %
Flyash Silo Baghouse	029	5 %	0.0%	0.0 %
Flyash Baghouse 2A	013	5 %	0.0%	0.0 %
Flyash Baghouse 2B	014	5 %	0.0%	0.0 %
Flyash Silo Baghouse	015	5 %	0.0%	0.0 %
Flyash Baghouse 1A	011	5 %	0.0%	0.0 %
Flyash Baghouse 1B	012	5 %	0.0%	0.0 %
Coal Transfer	004	5 %	0.0%	0.0 %
Coal Crusher	005	5 %	0.0%	0.0 %
Emergency Reclaim Baghouse	010	5 %	0.0%	0.0 %
Day Bin Lime Baghouse	008	5 %	0.0%	0.0 %

3.0 Results of Testing

These results indicate that the visible emissions sources were in compliance at the time of testing under normal operating conditions. The individual test runs are tabulated in Appendix 1.

4.0 Description of Source

The Stanton Energy Center Units 1 and 2 are coal fired utility steam generators. These units are located in Orlando, Florida.

5.0 Sampling Procedures

EPA testing protocols utilized during this test program include the following:

EPA Method 9 Visual Determination of the Opacity of Emissions From Stationary Sources

APPENDIX 1
Field Data

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One)
 Method 9 200A 200B Other

Company Name: Orlando Utilities Commission
 Facility Name: Stanton Energy Center
 Street Address: 5100 S. W. Faya Trail
 City: Orlando FL 32831

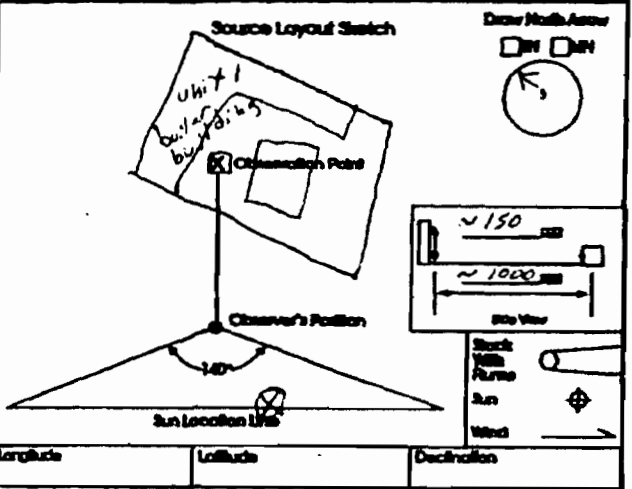
Process: Coal Silo Baghouse Unit # 006 Operating Mode: Continuous
 Control Equipment: Fabric dust collector Operating Mode: Continuous

Describe Emission Point:
 rectangular stack, north of baghouse
 on top of Unit 1 boiler building
 Height of Stack, Ft. Start ~150' End ~174'
 Height of Emission Pt. Rel. to Observer Start ~174' End ~174'
 Distance to Emission Pt. Start ~1000' End 11' Distance to Emission Pt. (Degrees) Start ~72° End 11'

Vertical Angle to Obs. Pt. Start <18° End 11'
 Direction to Obs. Pt. (Degrees) Start ~72° End 11'
 Distance and direction to Observation Point from Emission Point Start ~1' above End ~1' above

Describe Emission:
 Start None End None
 Emission Color Start NA End NA
 Attached Detached None

Describe Plume Background:
 Start white metal siding End white metal siding
 Background Color Start White metal siding End White metal siding
 Sky Conditions Start Scattered End Scattered
 Wind Speed Start 0 End 11
 Wind Direction Start NA End N
 Ambient Temp. Start ~92°F End 11
 Wind Rel. Temp. Start 11 End 11



Additional Information

Form Number _____ Page 1 of 1
 Continued on VEO Form Number _____

OBSERVATION DATE					START TIME					STOP TIME				
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29	0	0	0	0	59	0	0	0	0					
30	0	0	0	0	60	0	0	0	0					

AVERAGE OPACITY FOR HIGHEST PERIOD: 0
 NUMBER OF READINGS ABOVE 5% WERE: 0
 RANGE OF OPACITY READINGS: MINIMUM 0 MAXIMUM 0
 OBSERVER'S NAME (PRINT): Stephen C. Webb
 OBSERVER'S SIGNATURE: Stephen C. Webb DATE: 6-3-08
 ORGANIZATION: Coastal Air Consulting, Inc.
 CERTIFIED BY: Whitlow Enterprises DATE: 1-11-08
 VERIFIED BY: _____ DATE: _____

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One)
 Method 9 200A 200B Other _____

Company Name
Orlando Utilities Commission

Facility Name
Stanton Energy Center

Street Address
3100 S. Alafaya Trail

City
Orlando

State
FL

Zip
32831

Process
Coal Silo Raaghouse ^{U2} Unit # 0A7 Operating Mode Continuous

Control Equipment
Fabric dust collector Operating Mode Continuous

Describe Emission Point
rectangular stack east of baghouse structure on top of U2 boiler building

Height of Emis. Pt.
Stack ~150' End 11' Height of Emis. Pt. Rel. to Observer Stack ~144' End 11'

Distance to Emis. Pt.
Stack ~1700' End 11' Direction to Emis. Pt. (Degrees) Stack ~52° End 11'

Vertical Angle to Obs. Pt.
Stack ~18° End 11' Direction to Obs. Pt. (Degrees) Stack ~52° End 11'

Distance and Direction to Observation Point from Emission Point
Stack ~1' in front of End 11'

Describe Emission
Stack None

Emission Color
Stack NA

Attached Detached None

Describe Plume Background
Stack White Metal Silos

Background Color
Stack White

Wind Speed
Stack 0

Ambient Temp.
Stack ~92°F

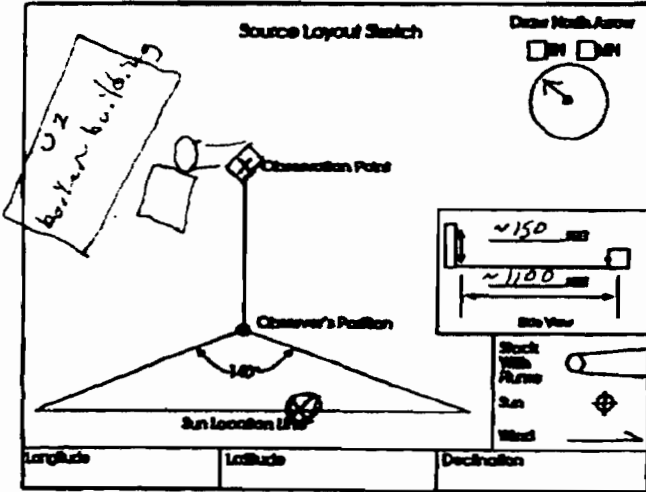
End 90°F

Sky Conditions
Stack Scattered

Wind Direction
Stack NA

Wind Sub Temp.
Stack NA

Wind Percent
Stack NA



Additional Information

Form Number _____ Page 1 of 1

Continued on VEO Form Number _____

OBSERVATION DATE					START TIME				STOP TIME			
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30	0	0	0	0	60	0	0	0	0			

AVERAGE OPACITY FOR HIGHEST PERIOD 0

NUMBER OF READINGS ABOVE 5 % WERE 0

RANGE OF OPACITY READINGS MINIMUM 0 MAXIMUM 0

OBSERVER'S NAME (PRINT)
Stephen C. Webb

OBSERVER'S SIGNATURE
Stephen C. Webb

DATE
6-3-08

ORGANIZATION
Coastal Air Consulting, Inc.

CERTIFIED BY
Whitlaw Enterprises

DATE
7-11-08

VERIFIED BY _____

DATE _____

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One)
 Method 200A 200B Other _____

Occupancy Name
Orlando Utilities Commission
 Facility Name
Stanton Plant
 Street Address
5100 S. Alafaya Trail
 City Orlando State FL Zip 32831

Process
Pebble Lime Hopper Unit # 009 Operating Mode
Continuous
 Control Equipment
Baghouse Operating Mode
Continuous

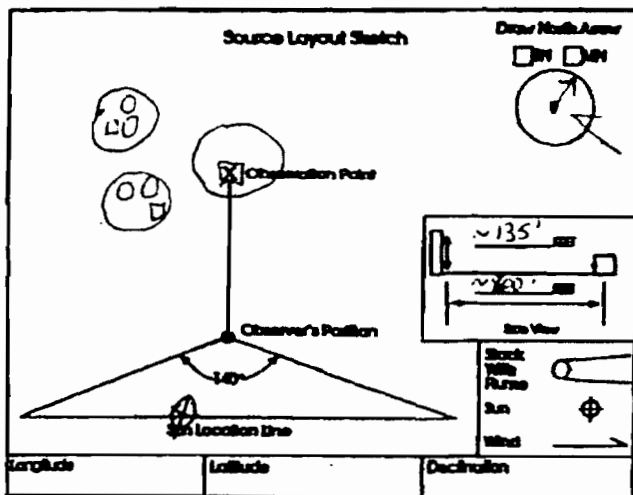
Describe Emission Point
Square Stack on top of Silo

Height of Emis. Pt. to Observer
 Street N 135' End "
 Distance to Emis. Pt.
 Street ~ 320' End "

Vertical Angle to Obs. Pt.
 Street < 18° End "
 Direction to Emis. Pt. (Degrees)
 Street ~ 320° End "

Describe Emissions
 Street Name
None End "
 Emission Color
None End "
 Street None End "

Describe Plume Background
 Street SKY End "
 Background Color
 Street Blue End "
 Sky Conditions
 Street Scattered End "
 Wind Speed
 Street 0-3 MPH End "
 Wind Direction
 Street E End "
 Ambient Temp.
 Street ~ 90°F End "
 Wind Sub Temp.
 Street _____ End "
 RH Percent
 Street _____ End "



Additional Information

Form Number _____ Page 1 of 1
 Certified on VSO Form Number _____

OBSERVATION DATE					START TIME					STOP TIME				
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AVERAGE OPACITY FOR HIGHEST PERIOD 0 NUMBER OF READINGS ABOVE 5% WERE 0

RANGE OF OPACITY READINGS
 MINIMUM 0 MAXIMUM 0

OBSERVER'S NAME (PRINT)
Stephen E. Webb

OBSERVER'S SIGNATURE
Stephen E. Webb DATE 6-7-08

ORGANIZATION
Coastal Air Consulting, Inc.

CERTIFIED BY
Whitlow Enterprises DATE 1-11-08

VERIFIED BY _____ DATE _____

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One) 298A 298B Other _____

Company Name Orlando Utilities Commission
 Facility Name Stanton Energy Center
 Street Address 5900 S. Alayata Trail
 City Orlando State FL Zip 32834

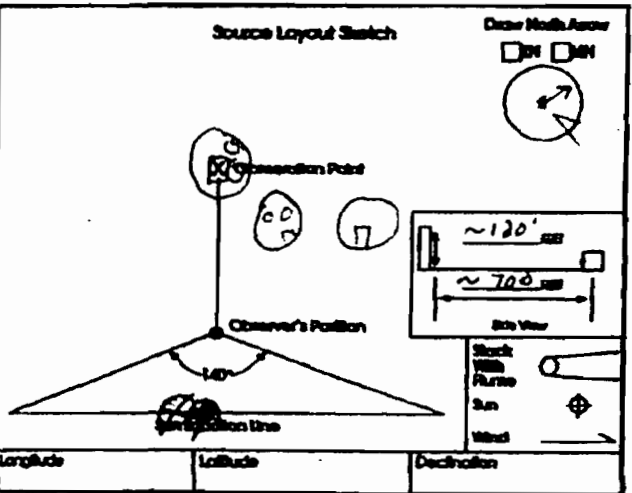
Process Fly-ash Silo baggers Unit # 029 Operating Mode Normal Continuous
 Control Equipment Fabric Dust Collector Operating Mode Normal Continuous

Describe Emission Point
Rectangular outlet on rectangular structure on top of western most Fly-ash Silo
 Height of Emit. Pt. ~120' Distance to Emit. Pt. ~700'
 Height of Emit. Pt. Rel. to Observer ~114' Distance to Emit. Pt. ~290'

Vertical Angle to Emit. Pt. < 18° Direction to Emit. Pt. (Degree) ~290'
 Distance and Direction to Observation Point from Emission Point
~1' in front of

Describe Emission
 Emit. None Emit. Color NA
 Stack Designation None Attached Detached None

Describe Plume Background
 Sky Blue Sky Conditions Scattered
 Wind Speed 0-3 mph Wind Direction East
 Ambient Temp. ~90° Wet Bulb Temp. _____ RH Percent _____



Longitude _____ Latitude _____ Declination _____
 Additional Information _____

Form Number _____ Page 1 of 1
 Continued on WFO Form Number _____

OBSERVATION DATE					START TIME					STOP TIME				
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24	0	0	0	0	54	0	0	0	0	0	0	0	0	
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29	0	0	0	0	59	0	0	0	0	0	0	0	0	
30	0	0	0	0	60	0	0	0	0	0	0	0	0	

AVERAGE OPACITY FOR HIGHEST PERIOD 0 NUMBER OF READINGS ABOVE 5% WERE 0
 RANGE OF OPACITY READINGS MINIMUM 0 MAXIMUM 0
 OBSERVER'S NAME (PRINT) Stephen C. Webb
 OBSERVER'S SIGNATURE Stephen C. Webb DATE 6-7-08
 ORGANIZATION Coastal Air Consulting
 CERTIFIED BY Whitlow Enterprises DATE 1-11-08
 VERIFIED BY _____ DATE _____

EPA

VISIBLE EMISSION OBSERVATION FORM I

Method (Use Only One) Method 9 200A 200B Other

Company Name: Orlando Utilities Commission
 Facility Name: Stanton Energy Center
 Street Address: 5800 S. Alafaya Trail
 City: Orlando FL Zip: 32831

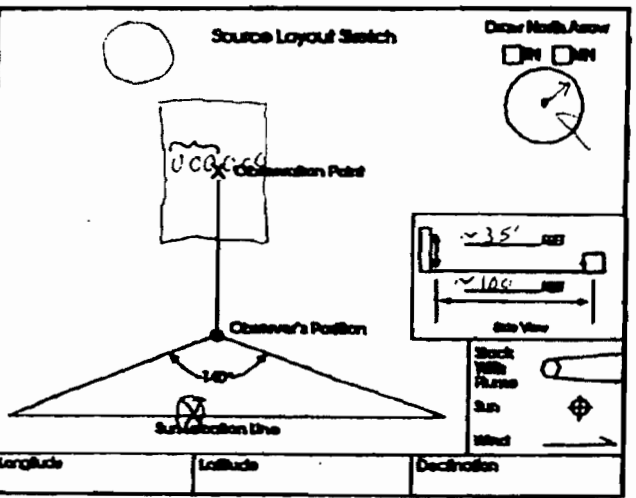
Process: Flyash Baghouse 2A Unit #: 013 Operating Mode: Continuous
 Control Equipment: Baghouse Operating Mode: Continuous

Describe Emission Point: 3x found outlets on side of baghouse (3 Southern most)
 Height of Stack, Ft.: ~35' End ''
 Distance to Emission Pt.: ~100' End ''
 Height of Observer, Ft. Rel. to Observer: ~29' End ''
 Direction to Emission Pt. (Measured from Emission Point): ~300° End ''

Vertical Angle to Obs. Pt.: < 18° End ''
 Direction to Obs. Pt. (Measured from Emission Point): ~300° End ''
 Distance and Direction to Observation Point from Emission Point: ~1' adjacent Front of End in front of

Describe Emissions: None End ''
 Emission Color: NA End '' Attached Detached Plume

Describe Plume Background: Metal Siding End ''
 Background Color: Gray End '' Sky Conditions: Scattered ''
 Wind Speed: 0-3 mph End '' Wind Direction: East End ''
 Ambient Temp.: ~78°F End '' Wet Bulb Temp.: End '' RH Percent: End ''



Longitude: Latitude: Direction:

Form Number: Page: 1 of 1
 Continued on VED Form Number:

OBSERVATION DATE					START TIME					STOP TIME				
6-7-08					0950					1050				
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8	0	0	0	0	38	0	0	0	0	0	0	0	0	
9	0	0	0	0	39	0	0	0	0	0	0	0	0	
10	0	0	0	0	40	0	0	0	0	0	0	0	0	
11	0	0	0	0	41	0	0	0	0	0	0	0	0	
12	0	0	0	0	42	0	0	0	0	0	0	0	0	
13	0	0	0	0	43	0	0	0	0	0	0	0	0	
14	0	0	0	0	44	0	0	0	0	0	0	0	0	
15	0	0	0	0	45	0	0	0	0	0	0	0	0	
16	0	0	0	0	46	0	0	0	0	0	0	0	0	
17	0	0	0	0	47	0	0	0	0	0	0	0	0	
18	0	0	0	0	48	0	0	0	0	0	0	0	0	
19	0	0	0	0	49	0	0	0	0	0	0	0	0	
20	0	0	0	0	50	0	0	0	0	0	0	0	0	
21	0	0	0	0	51	0	0	0	0	0	0	0	0	
22	0	0	0	0	52	0	0	0	0	0	0	0	0	
23	0	0	0	0	53	0	0	0	0	0	0	0	0	
24	0	0	0	0	54	0	0	0	0	0	0	0	0	
25	0	0	0	0	55	0	0	0	0	0	0	0	0	
26	0	0	0	0	56	0	0	0	0	0	0	0	0	
27	0	0	0	0	57	0	0	0	0	0	0	0	0	
28	0	0	0	0	58	0	0	0	0	0	0	0	0	
29	0	0	0	0	59	0	0	0	0	0	0	0	0	
30	0	0	0	0	60	0	0	0	0	0	0	0	0	

AVERAGE OPACITY FOR HIGHEST PERIOD: 0 NUMBER OF READINGS ABOVE 5% WERE 0
 RANGE OF OPACITY READINGS: MINIMUM 0 MAXIMUM 0
 OBSERVER'S NAME (PRINT): Stephen C. Webb
 OBSERVER'S SIGNATURE: Stephen C. Webb DATE: 6-7-08
 ORGANIZATION: Coastal Air Consulting, Inc.
 CERTIFIED BY: Whitlow Enterprises DATE: 1-11-08
 VERIFIED BY: DATE: -

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method Method 9 205A 205B Other _____

Company Name Orlando Utilities Commission
 Facility Name Stantec Energy Center
 Street Address 5100 S. Alafaya Trail
 City Orlando State FL Zip 32831

Process Flue Gas Recycle 2B Unit # 014 Operating Mode Continuous
 Control Equipment Baghouse Operating Mode Continuous

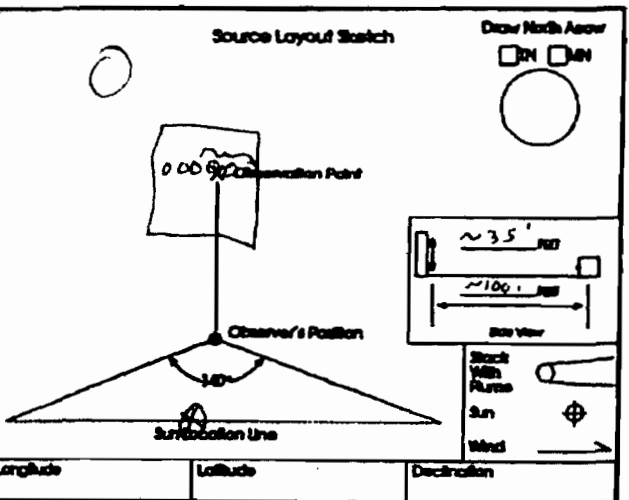
Describe Emission Point
round outlets on side of baghouse
(3 north-most)

Height of Emiss. Pt. Start ~35' End " Height of Emiss. Pt. Rel. to Observer Start ~29' End "
 Distance to Emiss. Pt. Start ~100' End " Direction to Emiss. Pt. (Degrees) Start ~300° End "

Vertical Angle to Obs. Pt. Start 278° End " Direction to Obs. Pt. (Degrees) Start ~300° End "
 Distance and Direction to Observation Point from Emission Point Start ~1' in front of End "

Describe Emission
 Start NOx End " Molar Weight of Puff Start NA End "
 Emission Color Attached Detached None

Describe Puff Background
 Start metal silos End " Sky Conditions Start Scattered End "
 Background Color Start Gray End " Wind Speed Start 0-3 MPH End " Wind Direction Start East End "
 Ambient Temp. Start ~78% End " Wet Bulb Temp. " RH Percent "



Additional Information

Form Number _____ Page 1 of 1
 Continued on V80 Form Number _____

OBSERVATION DATE		START TIME				STOP TIME			
6-7-08		0950				1050			
MIN	SEC	MIN	SEC	MIN	SEC	MIN	SEC	MIN	SEC
	0		15		30		45		0
1	0	0	0	0	31	0	0	0	0
2	0	0	0	0	32	0	0	0	0
3	0	0	0	0	33	0	0	0	0
4	0	0	0	0	34	0	0	0	0
5	0	0	0	0	35	0	0	0	0
6	0	0	0	0	36	0	0	0	0
7	0	0	0	0	37	0	0	0	0
8	0	0	0	0	38	0	0	0	0
9	0	0	0	0	39	0	0	0	0
10	0	0	0	0	40	0	0	0	0
11	0	0	0	0	41	0	0	0	0
12	0	0	0	0	42	0	0	0	0
13	0	0	0	0	43	0	0	0	0
14	0	0	0	0	44	0	0	0	0
15	0	0	0	0	45	0	0	0	0
16	0	0	0	0	46	0	0	0	0
17	0	0	0	0	47	0	0	0	0
18	0	0	0	0	48	0	0	0	0
19	0	0	0	0	49	0	0	0	0
20	0	0	0	0	50	0	0	0	0
21	0	0	0	0	51	0	0	0	0
22	0	0	0	0	52	0	0	0	0
23	0	0	0	0	53	0	0	0	0
24	0	0	0	0	54	0	0	0	0
25	0	0	0	0	55	0	0	0	0
26	0	0	0	0	56	0	0	0	0
27	0	0	0	0	57	0	0	0	0
28	0	0	0	0	58	0	0	0	0
29	0	0	0	0	59	0	0	0	0
30	0	0	0	0	60	0	0	0	0

AVERAGE OPACITY FOR HIGHEST PERIOD 0 NUMBER OF READINGS ABOVE 5 % WERD

RANGE OF OPACITY READINGS
 MINIMUM 0 MAXIMUM 0

OBSERVER'S NAME (PRINT) Stephen C. Webb

OBSERVER'S SIGNATURE Stephen C. Webb DATE 6-7-08

ORGANIZATION Coastal Air Consulting, Inc.

CERTIFIED BY Whitlow Enterprises DATE 1-11-08

VERIFIED BY _____ DATE _____

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Check One)
 Method 9 200A 200B Other _____

Company Name
 Orlando Utilities Commission
 Facility Name
 Stanton Energy Center
 Street Address
 5700 S. Alayaga Trail
 City
 Orlando State
 FL Zip
 32831

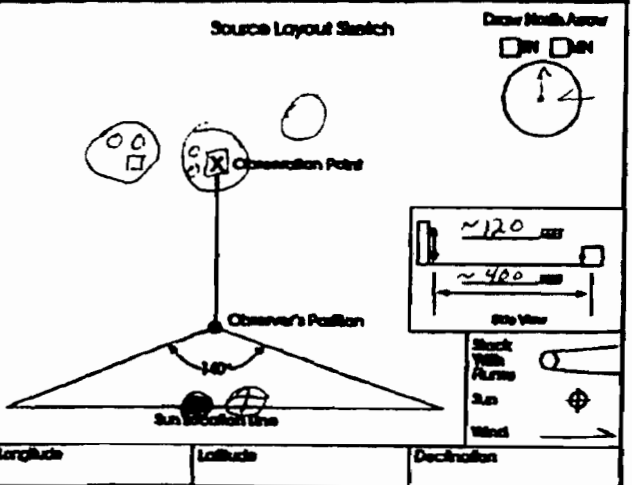
Process
 Flyash Silo baskhouse Unit #015 Operating Mode
 Normal cont.
 Control Equipment
 fabric baghouse dustcell Operating Mode
 Normal cont.

Describe Emission Point
 rectangular outlet on rectangular structure
 on top of eastern most flyash Silo
 Height of Emit. Pt.
 Start ~120' End "
 Height of Emit. Pt. Rel. to Observer
 Start ~124' End ~114'
 Distance to Emit. Pt.
 Start ~400' End "
 Distance to Emit. Pt. (Degrees)
 Start ~0' End "

Vertical Angle to Obs. Pt.
 Start <18° End "
 Direction to Obs. Pt. (Degrees)
 Start ~0° End "
 Distance and Direction to Observation Point from Emission Point
 Start ~1' below vent End "

Describe Emission
 Start None End "
 Emission Color
 Start NA End "
 Attached Detached Flare

Describe Plume Background
 Start Sky End "
 Background Color
 Start blue/white End "
 Sky Conditions
 Start Scattered End "
 Wind Speed
 Start 3-5 mph End "
 Wind Direction
 Start East End "
 Ambient Temp.
 Start ~90°F End "
 Wet Bulb Temp. RH Percent



Additional Information

Form Number _____ Page 1 of 1
 Continued on VEO Form Number _____

OBSERVATION DATE					START TIME					STOP TIME				
6-7-08					1230					1330				
MIN	SEC				MIN	SEC				MIN	SEC			
	0	15	30	45		0	15	30	45		0	15	30	45
1	0	0	0	0	31	0	0	0	0	0	0	0	0	
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3	0	0	0	0	33	0	0	0	0	0	0	0	0	
4	0	0	0	0	34	0	0	0	0	0	0	0	0	
5	0	0	0	0	35	0	0	0	0	0	0	0	0	
6	0	0	0	0	36	0	0	0	0	0	0	0	0	
7	0	0	0	0	37	0	0	0	0	0	0	0	0	
8	0	0	0	0	38	0	0	0	0	0	0	0	0	
9	0	0	0	0	39	0	0	0	0	0	0	0	0	
10	0	0	0	0	40	0	0	0	0	0	0	0	0	
11	0	0	0	0	41	0	0	0	0	0	0	0	0	
12	0	0	0	0	42	0	0	0	0	0	0	0	0	
13	0	0	0	0	43	0	0	0	0	0	0	0	0	
14	0	0	0	0	44	0	0	0	0	0	0	0	0	
15	0	0	0	0	45	0	0	0	0	0	0	0	0	
16	0	0	0	0	46	0	0	0	0	0	0	0	0	
17	0	0	0	0	47	0	0	0	0	0	0	0	0	
18	0	0	0	0	48	0	0	0	0	0	0	0	0	
19	0	0	0	0	49	0	0	0	0	0	0	0	0	
20	0	0	0	0	50	0	0	0	0	0	0	0	0	
21	0	0	0	0	51	0	0	0	0	0	0	0	0	
22	0	0	0	0	52	0	0	0	0	0	0	0	0	
23	0	0	0	0	53	0	0	0	0	0	0	0	0	
24	0	0	0	0	54	0	0	0	0	0	0	0	0	
25	0	0	0	0	55	0	0	0	0	0	0	0	0	
26	0	0	0	0	56	0	0	0	0	0	0	0	0	
27	0	0	0	0	57	0	0	0	0	0	0	0	0	
28	0	0	0	0	58	0	0	0	0	0	0	0	0	
29	0	0	0	0	59	0	0	0	0	0	0	0	0	
30	0	0	0	0	60	0	0	0	0	0	0	0	0	

AVERAGE OPACITY FOR HIGHEST PERIOD 0 NUMBER OF READINGS ABOVE 5% WERE 0

RANGE OF OPACITY READINGS
 MINIMUM 0 MAXIMUM 0

OBSERVER'S NAME (PRINT)
 Stephen C. Webb

OBSERVER'S SIGNATURE
 Stephen C. Webb DATE 6-7-08

ORGANIZATION
 Coastal Air Consulting, Inc.

CERTIFIED BY
 Whitlow Enterprises DATE 1-11-08

VERIFIED BY _____ DATE _____

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Check One)
 Method 9 200A 200B Other _____

Company Name
 Orlando Utilities Commission
 Facility Name
 Stanton Energy Center
 Street Address
 5900 S. Alayafa Trail
 City
 Orlando FL Zip
 32831

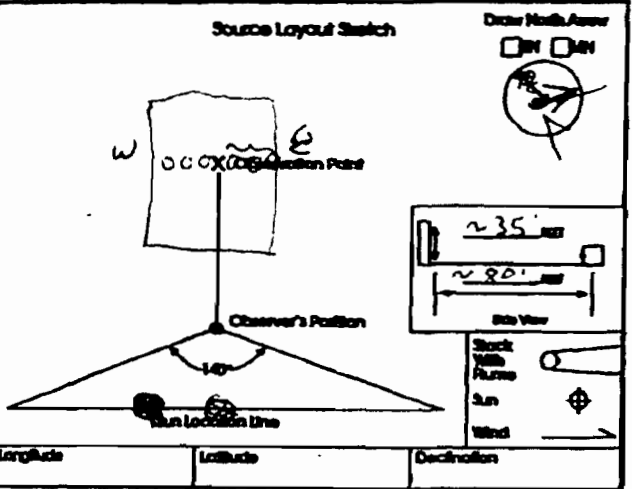
Process
 Flyash baghouse IA Oil
 Unit #
 011
 Operating Mode
 Normal cont.
 Control Equipment
 Operating Mode
 Normal cont.

Describe Emission Point
 3 round outlets on the side of
 baghouse (3 Eastern most)
 Height of Emis. Pt.
 Start ~35' End ''
 Height of Emis. Pt. Rel. to Observer
 Start ~29' End ''
 Distance to Emis. Pt.
 Start ~80' End ''
 Direction to Emis. Pt. (Degrees)
 Start ~288° End ''

Method Angle to Obs. Pt.
 Start 519° End ''
 Direction to Obs. Pt. (Degrees)
 Start ~288° End ''
 Distance and Direction to Observation Point from Emission Point
 Start ~1' in front of End ''

Describe Emission
 Start None End ''
 Emission Color
 Start NA End ''
 Attached Detached None

Describe Plume Background
 Start Metal Sidings End ''
 Background Color
 Start Gray End ''
 Wind Speed
 Start ~0-3 mph End ''
 Ambient Temp.
 Start ~92°F End 75°F
 Sky Conditions
 Start Scattered End ''
 Wind Direction
 Start East End ''
 Air Temp.
 Start '' End ''
 RH Percent
 Start '' End ''



Additional Information

Form Number _____ Page 1 of 1
 Continued on VEO Form Number _____

OBSERVATION DATE 6-8-08					START TIME 0800					STOP TIME 0900				
MIN	SEC				MIN	SEC								
	0	15	30	45		0	15	30	45					
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2	0	0	0	0	32	0	0	0	0					
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5	0	0	0	0	35	0	0	0	0					
6	0	0	0	0	36	0	0	0	0					
7	0	0	0	0	37	0	0	0	0					
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13	0	0	0	0	43	0	0	0	0					
14	0	0	0	0	44	0	0	0	0					
15	0	0	0	0	45	0	0	0	0					
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17	0	0	0	0	47	0	0	0	0					
18	0	0	0	0	48	0	0	0	0					
19	0	0	0	0	49	0	0	0	0					
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23	0	0	0	0	53	0	0	0	0					
24	0	0	0	0	54	0	0	0	0					
25	0	0	0	0	55	0	0	0	0					
26	0	0	0	0	56	0	0	0	0					
27	0	0	0	0	57	0	0	0	0					
28	0	0	0	0	58	0	0	0	0					
29	0	0	0	0	59	0	0	0	0					
30	0	0	0	0	60	0	0	0	0					

AVERAGE OPACITY FOR HIGHEST PERIOD 0 NUMBER OF READINGS ABOVE 5% WERE 0

RANGE OF OPACITY READINGS
 MINIMUM 0 MAXIMUM 0

OBSERVER'S NAME (PRINT)
 Stephen C. Webb

OBSERVER'S SIGNATURE
 Stephen C. Webb DATE 6-8-08

ORGANIZATION
 Coastal Air Consulting, Inc.

CERTIFIED BY
 Whitlow Enterprises DATE 7-11-08

VERIFIED BY _____ DATE _____

EPA

VISIBLE EMISSION OBSERVATION FORM I

Method Used (Circle One)
 Method 9 200A 200B Other _____

Company Name
 Orlando Utilities Commission
 Facility Name
 Stanton Energy Center
 Street Address
 5100 S. Alafaya Trail
 City
 Orlando State FL Zip 32831

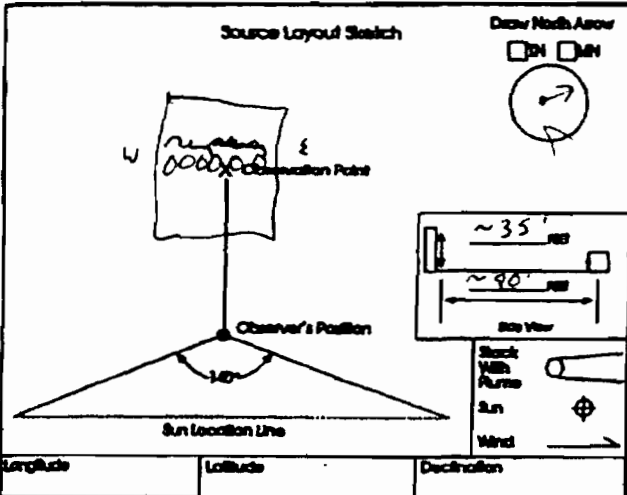
Process
 Flyash baghouse B Unit # 012 Operating Mode Continuous
 Control Equipment
 baghouse Operating Mode Continuous

Describe Emission Point
 Round outlets on the side of baghouse
 306 Eastern most
 Height of Emiss. Pt.
 Start ~35' End " Height of Emiss. Pt. Rel. to Observer
 Start ~29' End " Distance to Emiss. Pt. (Degrees)
 Start ~90' End " Start ~288° End "

Vertical Angle to Obs. Pt.
 Start <18° End " Direction to Obs. Pt. (Degrees)
 Start ~288° End " Distance and Direction to Observation Point from Emission Point
 Start ~1' in front of End "

Describe Emission
 Start None End " Molar Droplet Purne
 Emission Color
 Start NA End " Attached Detached None

Describe Plume Background
 Start Metal Siding End " Sky Conditions
 Background Color
 Start Gray End " Start Scattered End " Wind Direction
 Start ~0.3 mph End " Start East End " Ambient Temp.
 Start ~72°f End ~75°f Wet Bulb Temp. RH Percent



Additional Information

Form Number _____ Page 1 of 1
 Continued on VEO Form Number _____

OBSERVATION DATE 6-8-08				START TIME 0900				STOP TIME 0900			
MIN	SEC	MIN	SEC	MIN	SEC	MIN	SEC	MIN	SEC	MIN	SEC
1	0	0	0	0	31	0	0	0	0	0	0
2	0	0	0	0	32	0	0	0	0	0	0
3	0	0	0	0	33	0	0	0	0	0	0
4	0	0	0	0	34	0	0	0	0	0	0
5	0	0	0	0	35	0	0	0	0	0	0
6	0	0	0	0	36	0	0	0	0	0	0
7	0	0	0	0	37	0	0	0	0	0	0
8	0	0	0	0	38	0	0	0	0	0	0
9	0	0	0	0	39	0	0	0	0	0	0
10	0	0	0	0	40	0	0	0	0	0	0
11	0	0	0	0	41	0	0	0	0	0	0
12	0	0	0	0	42	0	0	0	0	0	0
13	0	0	0	0	43	0	0	0	0	0	0
14	0	0	0	0	44	0	0	0	0	0	0
15	0	0	0	0	45	0	0	0	0	0	0
16	0	0	0	0	46	0	0	0	0	0	0
17	0	0	0	0	47	0	0	0	0	0	0
18	0	0	0	0	48	0	0	0	0	0	0
19	0	0	0	0	49	0	0	0	0	0	0
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21	0	0	0	0	51	0	0	0	0	0	0
22	0	0	0	0	52	0	0	0	0	0	0
23	0	0	0	0	53	0	0	0	0	0	0
24	0	0	0	0	54	0	0	0	0	0	0
25	0	0	0	0	55	0	0	0	0	0	0
26	0	0	0	0	56	0	0	0	0	0	0
27	0	0	0	0	57	0	0	0	0	0	0
28	0	0	0	0	58	0	0	0	0	0	0
29	0	0	0	0	59	0	0	0	0	0	0
30	0	0	0	0	60	0	0	0	0	0	0

AVERAGE OPACITY FOR HIGHEST PERIOD 0 NUMBER OF READINGS ABOVE 5% WERE 0
 RANGE OF OPACITY READINGS 0 MINIMUM 0 MAXIMUM
 OBSERVER'S NAME (PRINT)
 Stephen C. Webb
 OBSERVER'S SIGNATURE
 Stephen C. Webb DATE 6-8-08
 ORGANIZATION
 Coastal Air Consulting, Inc.
 CERTIFIED BY
 Whitlow Enterprises DATE 1-11-08
 VERIFIED BY _____ DATE _____

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One)
 Method 9 200A 200B Other _____

Company Name
Orlando Utilities Commission

Facility Name
Stanton Energy Center

Street Address
5900 S. Alafaya Trail

City
Orlando

State
FL

Zip
32831

Process
Coal Transfer

Unit #
004

Operating Mode
Normal conf.

Control Equipment
Fabric Baghouse

Operating Mode
Normal conf.

Describe Emission Point
Rectangular outlet North side of baghouse

Height of Emit. Pt.
Emit. ~ 6' End "

Height of Emit. Pt. Rel. to Observer
Emit. ~ eye level End "

Distance to Emit. Pt.
Emit. ~ 30' End ~ 30'

Distance to Emit. Pt. (Degrees)
Emit. ~ 118' End "

Method Angle to Obs. Pt.
Emit. ~ 180' End "

Direction to Obs. Pt. (Degrees)
Emit. ~ 118' End "

Distance and Direction to Observation Point from Emission Point
Emit. ~ 1' above outlet End "

Describe Emission
Emit. None

Emission Color
Emit. NA End NA

Water Droplet Phase
Attached Detached None

Describe Plume Background
Emit. Metal structure

Background Color
Emit. Green End "

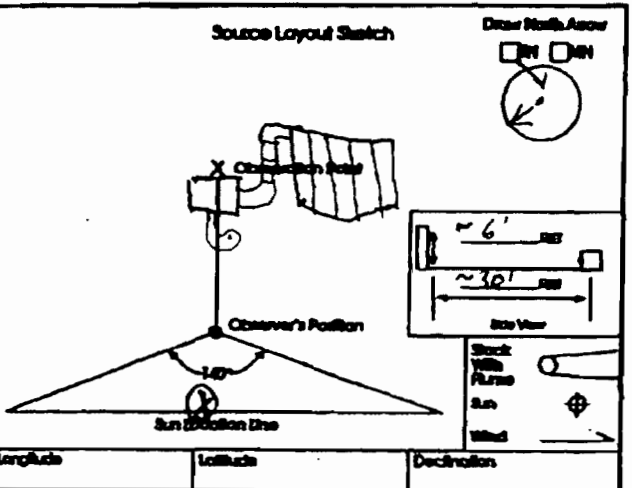
Wind Speed
Emit. 10-12 MPH End "

Ambient Temp.
Emit. ~ 85°F End "

Sky Conditions
Emit. overcast End "

Wind Direction
Emit. SE End SE

Wind Gust Temp.
Emit. End "



Additional Information

Form Number _____ Page _____ of _____

Continued on VEO Form Number _____

OBSERVATION DATE				START TIME				STOP TIME			
6-10-08				1438				1538			
MIN	SEC			MIN	SEC			MIN	SEC		
0	15	30	45	0	15	30	45	0	15	30	45
1	0	0	0	0	31	0	0	0	0	0	0
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4	0	0	0	0	34	0	0	0	0	0	0
5	0	0	0	0	35	0	0	0	0	0	0
6	0	0	0	0	36	0	0	0	0	0	0
7	0	0	0	0	37	0	0	0	0	0	0
8	0	0	0	0	38	0	0	0	0	0	0
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11	0	0	0	0	41	0	0	0	0	0	0
12	0	0	0	0	42	0	0	0	0	0	0
13	0	0	0	0	43	0	0	0	0	0	0
14	0	0	0	0	44	0	0	0	0	0	0
15	0	0	0	0	45	0	0	0	0	0	0
16	0	0	0	0	46	0	0	0	0	0	0
17	0	0	0	0	47	0	0	0	0	0	0
18	0	0	0	0	48	0	0	0	0	0	0
19	0	0	0	0	49	0	0	0	0	0	0
20	0	0	0	0	50	0	0	0	0	0	0
21	0	0	0	0	51	0	0	0	0	0	0
22	0	0	0	0	52	0	0	0	0	0	0
23	0	0	0	0	53	0	0	0	0	0	0
24	0	0	0	0	54	0	0	0	0	0	0
25	0	0	0	0	55	0	0	0	0	0	0
26	0	0	0	0	56	0	0	0	0	0	0
27	0	0	0	0	57	0	0	0	0	0	0
28	0	0	0	0	58	0	0	0	0	0	0
29	0	0	0	0	59	0	0	0	0	0	0
30	0	0	0	0	60	0	0	0	0	0	0

AVERAGE OPACITY FOR HIGHEST PERIOD NUMBER OF READINGS ABOVE 5% WERE

RANGE OF OPACITY READINGS
 MINIMUM MAXIMUM

OBSERVER'S NAME (PRINT)
Stephen C. Webb

OBSERVER'S SIGNATURE
Stephen C. Webb

DATE
6-10-08

ORGANIZATION
Coastal Air Consulting, Inc.

CERTIFIED BY
Whitlow Enterprises

DATE
1-11-08

VERIFIED BY _____ DATE _____

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method 9
 Method 9 200A 200B Other

Company Name
 Orlando Utilities Commission
 Facility Name
 Stanton Energy Center
 Street Address
 5900 S. Alafaya Trail
 City
 Orlando FL Zip
 32831

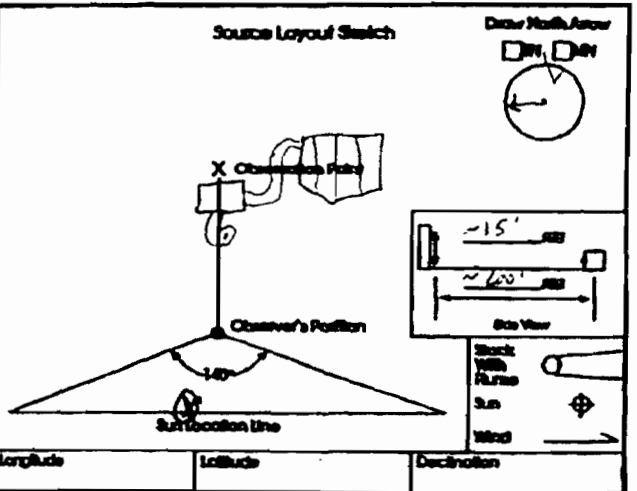
Process
 Coal Crusher Unit #
 685 Operating Mode
 Normal cont.
 Control Equipment
 Fabric baghouse Operating Mode
 Normal cont.

Describe Emission Point
 rectangular outlet north side of
 baghouse
 Height of Emission Pt.
 Start ~ 15' End ''
 Distance to Emission Pt.
 Start ~ 600' End ''
 Height of Emission Pt. Rel. to Observer
 Start ~ 15' End ''
 Direction to Emission Pt. (Degrees)
 Start ~ 90° End ''

Vertical Angle to Obs. Pt.
 Start < 18° End ''
 Direction to Obs. Pt. (Degrees)
 Start ~ 90° End ''
 Distance and Direction to Observation Point from Emission Point
 Start ~ 1' above outlet End ''

Describe Emission
 Start None End ''
 Emission Color
 Start NA End ''
 Attached Detached Other

Describe Plume Background
 Start Concrete Siding End ''
 Background Color
 Start Gray End ''
 Wind Speed
 Start 10-12 MPH End 10-15 MPH
 Wind Direction
 Start SE End E
 Ambient Temp.
 Start ~ 85°F End ''
 Wet Bulb Temp.
 Start - End -
 RH Percent
 Start - End -



Longitude Latitude Declination
 Additional Information

Form Number Page 1 of 1
 Continued on VED Form Number

OBSERVATION DATE 6-10-08					START TIME 1438					STOP TIME 1538				
SEC					SEC					SEC				
MIN	0	15	30	45	MIN	0	15	30	45	MIN	0	15	30	45
1	0	0	0	0	31	0	0	0	0					
2	0	0	0	0	32	0	0	0	0					
3	0	0	0	0	33	0	0	0	0					
4	0	0	0	0	34	0	0	0	0					
5	0	0	0	0	35	0	0	0	0					
6	0	0	0	0	36	0	0	0	0					
7	0	0	0	0	37	0	0	0	0					
8	0	0	0	0	38	0	0	0	0					
9	0	0	0	0	39	0	0	0	0					
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17	0	0	0	0	47	0	0	0	0					
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19	0	0	0	0	49	0	0	0	0					
20	0	0	0	0	50	0	0	0	0					
21	0	0	0	0	51	0	0	0	0					
22	0	0	0	0	52	0	0	0	0					
23	0	0	0	0	53	0	0	0	0					
24	0	0	0	0	54	0	0	0	0					
25	0	0	0	0	55	0	0	0	0					
26	0	0	0	0	56	0	0	0	0					
27	0	0	0	0	57	0	0	0	0					
28	0	0	0	0	58	0	0	0	0					
29	0	0	0	0	59	0	0	0	0					
30	0	0	0	0	60	0	0	0	0					

AVERAGE OPACITY FOR HIGHEST PERIOD 0 NUMBER OF READINGS ABOVE 5% WERE 0
 RANGE OF OPACITY READINGS MINIMUM 0 MAXIMUM 0
 OBSERVER'S NAME (PRINT)
 Stephen C. Webb
 OBSERVER'S SIGNATURE
 Stephen C. Webb DATE
 6-10-08
 ORGANIZATION
 Coastal Air Consulting, Inc.
 CERTIFIED BY
 Whitlow Enterprises DATE
 1-11-08
 VERIFIED BY
 DATE

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method (Check/Write Circle) Method 9 200A 200B Other _____

Company Name
Orlando Utilities Commission

Facility Name
Stanton Energy Center

Street Address
5700 S. Alafaya trail

City Orlando State FL Zip 32831

Process
Emergency Reclaim Pkg Unit # 010 Operating Mode Normal cont.

Control Equipment
Fabric Baghouse Operating Mode Normal cont.

Describe Emission Point
Rectangular outlet South side of baghouse

Height of Emis. Pt.
Start ~15' End ''

Distance to Emis. Pt.
Start ~50' End ''

Height of Emis. Pt. Rel. to Observer
Start ~9' End ''

Direction to Emis. Pt. (Degrees)
Start ~74° End ''

Vertical Angle to Obs. Pt.
Start '' End ''

Direction to Obs. Pt. (Degrees)
Start ~74° End ''

Distance and Direction to Observation Point from Emission Point
Start ~1' above End ''

Describe Emitters
Start None End ''

Emission Color
Start NA End ''

Stack Disposal Flare
Attached Detached None

Describe Plume Background
Start Sky End ''

Background Color
Start Gray End ''

Wind Speed
Start 15-18 MPH End ''

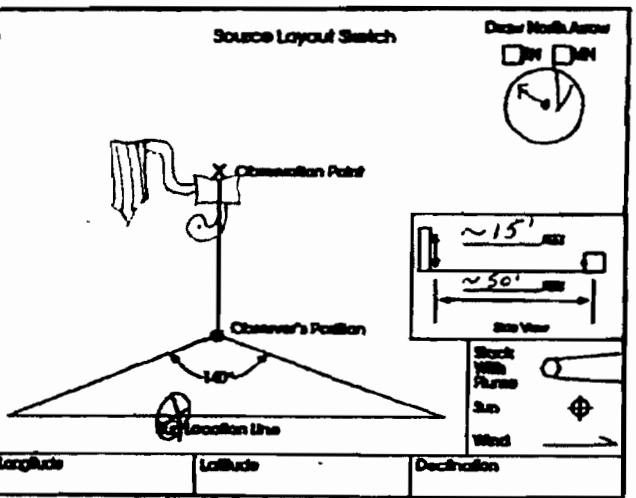
Ambient Temp.
Start ~80°F End ''

Sky Conditions
Start overcast End ''

Wind Direction
Start NE End ''

Air Bulb Temp.
Start '' End ''

Rel. Humid.
Start '' End ''



Additional Information

Form Number _____ Page 1 of 1

Continued on VBO Form Number _____

OBSERVATION DATE					START TIME					STOP TIME				
6-10-08					1540					1640				
MIN	SEC				MIN	SEC				MIN	SEC			
0	15	30	45	0	15	30	45	0	15	30	45			
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2	0	0	0	0	32	0	0	0	0	0	0	0		
3	0	0	0	0	33	0	0	0	0	0	0	0		
4	0	0	0	0	34	0	0	0	0	0	0	0		
5	0	0	0	0	35	0	0	0	0	0	0	0		
6	0	0	0	0	36	0	0	0	0	0	0	0		
7	0	0	0	0	37	0	0	0	0	0	0	0		
8	0	0	0	0	38	0	0	0	0	0	0	0		
9	0	0	0	0	39	0	0	0	0	0	0	0		
10	0	0	0	0	40	0	0	0	0	0	0	0		
11	0	0	0	0	41	0	0	0	0	0	0	0		
12	0	0	0	0	42	0	0	0	0	0	0	0		
13	0	0	0	0	43	0	0	0	0	0	0	0		
14	0	0	0	0	44	0	0	0	0	0	0	0		
15	0	0	0	0	45	0	0	0	0	0	0	0		
16	0	0	0	0	46	0	0	0	0	0	0	0		
17	0	0	0	0	47	0	0	0	0	0	0	0		
18	0	0	0	0	48	0	0	0	0	0	0	0		
19	0	0	0	0	49	0	0	0	0	0	0	0		
20	0	0	0	0	50	0	0	0	0	0	0	0		
21	0	0	0	0	51	0	0	0	0	0	0	0		
22	0	0	0	0	52	0	0	0	0	0	0	0		
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25	0	0	0	0	55	0	0	0	0	0	0	0		
26	0	0	0	0	56	0	0	0	0	0	0	0		
27	0	0	0	0	57	0	0	0	0	0	0	0		
28	0	0	0	0	58	0	0	0	0	0	0	0		
29	0	0	0	0	59	0	0	0	0	0	0	0		
30	0	0	0	0	60	0	0	0	0	0	0	0		

AVERAGE OPACITY FOR HIGHEST PERIOD 0

NUMBER OF READINGS ABOVE 5% WERE 0

RANGE OF OPACITY READINGS
MINIMUM 0 MAXIMUM 0

OBSERVER'S NAME (PRINT)
Stephen C. Webb

OBSERVER'S SIGNATURE
Stephen C. Webb

DATE
6-10-08

ORGANIZATION
Coastal Air Consulting, Inc.

CERTIFIED BY
Whitlow Enterprises

DATE
7-11-08

VERIFIED BY

DATE

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One)
 Method 9 200A 200B Other

Company Name
 Orlando Utilities Commission
 Facility Name
 Stanton Energy Center
 Street Address
 5900 S. Alafaya Trail
 City Orlando State FL Zip 32831

Process dry bin Lime baghouse Unit # 008 Operating Mode Normal
 Control Equipment Fabric baghouse Operating Mode Normal

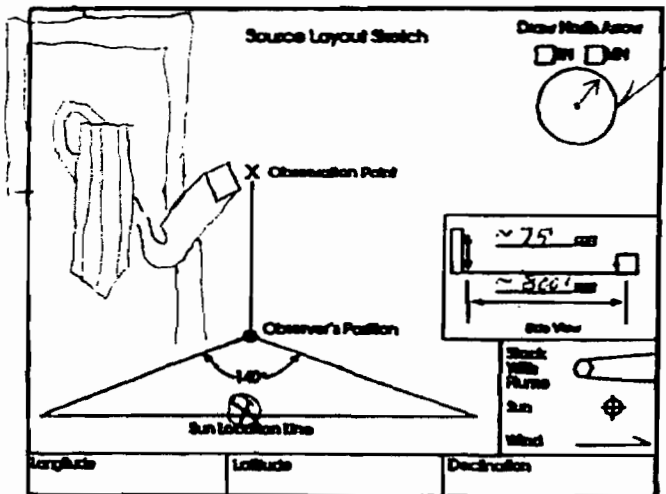
Describe Emission Point
 rectangular outlet East of baghouse

Height of Stack, Ft. ~75' End ''
 Distance to Stack, Ft. ~800' End ''
 Height of Obs. Pt. Rel. to Observer ~69' End ''
 Distance to Obs. Pt. Rel. to Observer ~339' End ''

Vertical Angle to Obs. Pt. ~18° End ''
 Direction to Obs. Pt. (Degrees) ~333 End ''
 Distance and Direction to Observation Point from Emission Point ~1' above End ''

Describe Emission
 None End ''
 Emission Color NA End ''
 Attached Detached From

Describe Plume Background
 Metal siding End ''
 Background Color Gray End ''
 Sky Conditions Scattered End ''
 Wind Speed 5-8 mph End 8-10 mph
 Wind Direction NE End ''
 Ambient Temp. ~83°F End ~85°F
 Wind Dir. Perceived



Additional Information

Form Number Page 1 of 1
 Continued on VEO Form Number

OBSERVATION DATE					START TIME					STOP TIME				
6-12-08					1133					1233				
MIN	SEC				MIN	SEC				MIN	SEC			
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4	0	0	0	0	34	0	0	0	0	0	0	0		
5	0	0	0	0	35	0	0	0	0	0	0	0		
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8	0	0	0	0	38	0	0	0	0	0	0	0		
9	0	0	0	0	39	0	0	0	0	0	0	0		
10	0	0	0	0	40	0	0	0	0	0	0	0		
11	0	0	0	0	41	0	0	0	0	0	0	0		
12	0	0	0	0	42	0	0	0	0	0	0	0		
13	0	0	0	0	43	0	0	0	0	0	0	0		
14	0	0	0	0	44	0	0	0	0	0	0	0		
15	0	0	0	0	45	0	0	0	0	0	0	0		
16	0	0	0	0	46	0	0	0	0	0	0	0		
17	0	0	0	0	47	0	0	0	0	0	0	0		
18	0	0	0	0	48	0	0	0	0	0	0	0		
19	0	0	0	0	49	0	0	0	0	0	0	0		
20	0	0	0	0	50	0	0	0	0	0	0	0		
21	0	0	0	0	51	0	0	0	0	0	0	0		
22	0	0	0	0	52	0	0	0	0	0	0	0		
23	0	0	0	0	53	0	0	0	0	0	0	0		
24	0	0	0	0	54	0	0	0	0	0	0	0		
25	0	0	0	0	55	0	0	0	0	0	0	0		
26	0	0	0	0	56	0	0	0	0	0	0	0		
27	0	0	0	0	57	0	0	0	0	0	0	0		
28	0	0	0	0	58	0	0	0	0	0	0	0		
29	0	0	0	0	59	0	0	0	0	0	0	0		
30	0	0	0	0	60	0	0	0	0	0	0	0		

AVERAGE OPACITY FOR HIGHEST PERIOD 0 NUMBER OF READINGS ABOVE 5 % WERE 0

RANGE OF OPACITY READINGS MINIMUM 0 MAXIMUM 0

OBSERVER'S NAME (PRINT) Stephen C. Webb

OBSERVER'S SIGNATURE Stephen C. Webb DATE 6-12-08

ORGANIZATION Coastal Air Consulting, Inc.

CERTIFIED BY Whitlow Superprizes DATE 1-11-08

VERIFIED BY DATE

APPENDIX 2
VE Certification



Whitlow Enterprises, LLC

www.smokeschool.net

Certifies that

Steve Webb of Coastal Air Consulting

**Has passed the certification test required by 40 CFR 60Appendix A
and is qualified as a visible emissions evaluator**

Certification Date: January 11, 2008

Location: Tampa, Fl

George Whitlow

President



TFL011108-25



Whitlow Enterprises

www.smokeschool.net

Certifies that

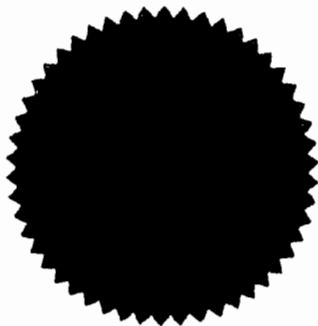
Steve Webb of Costal Air Consulting

Has attended the lecture portion of EPA Reference Method 9 and 22,
Visible Emissions Workshop and met the requirements of Method 22

Date: January 09, 2006

George Artie "Butch" Whitlow

President



Certificate Number 3470

**ATTACHMENT SEC-EU17-I2
Fuel Analysis or Specification**

The primary fuel for the Project is natural gas and the backup fuel is low sulfur (0.05 percent) No. 2 fuel oil. Operation on oil is proposed to be limited to 1,000 hours per year, per unit. Tables E-1 and E-2 present typical property values for the primary and backup fuels, respectively.

Table E-1
Natural Gas Properties

Parameter	Mole, percent	Gal/Mcf**	Btu*	Rel Den*
C6+	0.075	0.029	60.0	0.00015
Propane	0.665	0.182	342.0	0.00077
I-Butane	0.152	0.049	101.0	0.00023
N-Butane	0.130	0.041	87.0	0.00020
I-Pentane	0.040	0.015	33.0	0.00008
N-Pentane	0.020	0.007	16.0	0.00004
Nitrogen	0.309	0.000	0.0	0.00023
Methane	95.067	0.000	1,9209.0	0.04006
CO ₂	0.881	0.000	0.0	0.00102
Ethane	2.661	0.708	957.0	0.00210
Totals	100.0	1.031	2,0798.0	0.04488

*The component C6+ is assumed to be C6H6 only.
**The density for each component is evaluated under a pressure of 14.64 psia.

Table E-2
Typical No. 2 Fuel Oil Properties

Parameter	Value
Ash Content, percent wt	0.001
Sulfur Content by XRF, percent wt	<0.05
Water Content KF, percent wt	<0.50 percent
Density, kg/l at 15 C	0.8422
Gross Heat Value, Btu/gal	138,000
Net Heat Value, Btu/gal	129,575
Gross Heat Value, Btu/lb	19,756
Net Heat Value, Btu/lb	18,550
Arsenic, ppm	<0.05
Beryllium, ppm	<0.05
Mercury, ppm	<0.05
Lead, ppm	0.07

ATTACHMENT SEC-EU17-I3
Detailed Description of Control Equipment

3.0 Best Available Control Technology

A summary of the best available control technology (BACT) analysis for the Project has been included below. Additionally, the detailed BACT for the Project has been included as Attachment 4.

The following is a summary of the BACT determination and associated emission rates for two GE PG7241(FA) combustion turbines operating with duct burners in combined cycle mode and one cooling tower to be installed for the project. The combustion turbines will fire natural gas and No. 2 fuel oil. The duct burners will fire only natural gas. Emissions for the BACT analysis are based on each CCCT/HRSG unit operating at three different operating conditions. These three conditions are 1) natural gas operation at full load with duct burner firing for 6,760 hours per year at an ambient temperature of 70°F, 2) natural gas firing with power augmentation for 1,000 hours per year at an ambient temperature of 70°F with the combustion turbine and duct burner firing at full load, 3) fuel oil firing of the combustion turbine-generator (CTG) unit at full load operation without duct firing for 1,000 hours per year at an ambient temperature of 70°F.

GE PG7241(FA) CCCT/HRSG Units:

Nitrogen oxides (NO_x) emissions -- BACT was determined to be the use of dry low NO_x burners with selective catalytic reduction (SCR) during natural gas firing and water injection with an SCR for fuel oil firing to achieve the following emission limits.

Burning natural gas at full load (with and without power augmentation) and duct firing, an emission limit of 3.5 ppmvd at 15 percent O₂.

Burning fuel oil at full load, an emission limit of 10 ppmvd at 15 percent O₂.

Carbon monoxide (CO) emissions -- BACT was determined to be good combustion controls to achieve a CO emission limit of 18.1 ppmvd at 15 percent O₂ (without power augmentation) and 26.3 ppmvd at 15 percent O₂ (with power augmentation) during natural gas firing. BACT was determined to be good combustion controls to achieve a CO emission limit of 14.3 ppmvd at 15 percent O₂ during fuel oil firing.

Particulate (PM/PM₁₀) emissions -- BACT was determined to be good combustion controls during natural gas and fuel oil firing.

Volatile Organic Compounds (VOC) emissions -- BACT was determined to be good combustion controls to achieve a VOC emission limit of 3.6 ppmvd at 15 percent O₂

(without power augmentation) and 6.3 ppmvd at 15 percent O₂ (with power augmentation) during natural gas firing. BACT was determined to be good combustion controls to achieve a VOC emission limit of 2.7 ppmvd at 15 percent O₂ during fuel oil firing.

Sulfur Dioxide (SO₂) emissions -- BACT was determined to be good combustion controls using natural gas and fuel oil with less than 0.05 percent sulfur.

Cooling Tower:

Particulate (PM/PM₁₀) emissions -- BACT is determined to be the use of drift eliminators with a control efficiency of 0.002 percent.

ATTACHMENT SEC-EU17-I4
Procedures for Startup and Shutdown

May 16, 2003

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Robert G. Moore, Senior Vice President
Southern Company Services
One Energy Place
Pensacola, FL 32520

Re: DEP File No. 0950137-002-AC, PSD-FL-313
Stanton Unit A Permit Revisions

Dear Mr. Moore:

The Department has reviewed your request to modify the PSD Permit relative to start-up emissions and CEMS span values. As a result of this review, the Department has concluded that a permit modification may be granted. Accordingly, this request is acceptable as indicated herein.

Permit PSD-FL-313 is hereby modified as follows:

26. Excess emissions resulting from startup, shutdown, fuel switching or malfunction shall be permitted provided that best operational practices are adhered to and the duration of excess emissions shall be minimized. Excess emissions occurrences shall in no case exceed two hours in any 24-hour period ~~except during a "cold start-up" to combined cycle plant operation. During cold start-up to combined cycle operation, up to four hours of excess emissions are allowed. Cold start-up is defined as a startup to combined cycle operation following a complete shutdown lasting at least 72 hours. During any 24-hour period in which an hour of start-up or shutdown occurs, the following alternative emission limits shall apply on the basis of a 24-hour rolling average:~~

- a) An alternative NO_x limit of 127 lb/hr shall apply if natural gas is the exclusively fired fuel
- b) An alternative NO_x limit of 370 lb/hr shall apply if any fuel oil is fired
- c) An alternative CO limit of 155 lb/hr firing either natural gas or fuel oil

The 24-hour averages shall be based on all available data excluding calibration data. Operation below 50% output per turbine shall otherwise be limited to 2 hours in any 24-hour period. [BACT, Applicant Request and Rule 62-210.700, F.A.C.].

41. Continuous Monitoring System: The permittee shall install, calibrate, maintain, and operate a continuous emission monitor in the stack to measure and record the emissions of NO_x and CO from these emissions units, and the Carbon Dioxide (CO₂) content of the flue gas at the location where NO_x and CO are monitored, in a manner sufficient to demonstrate compliance with the emission limits of this permit. The CEM system shall be used to demonstrate compliance with the emission limits for NO_x and CO established in this permit. Compliance with the emission limits for NO_x shall be based on a 3-hour block average. The 3-hour block average shall be calculated from 3 consecutive hourly average emission rate values. Compliance with the emission limits for CO shall be based on a 24-hour block average starting at midnight of each operating day. The 24-hour block average shall be calculated from 24 consecutive hourly average emission rate values. Each hourly value shall be computed using at least one data point in each fifteen-minute quadrant of an hour, where the unit

Appendix 'J'

2003 Commercial Operation Combined Cycle Units Cold Start Approximated Heat Balance Information

Rev. F
2/21/2003

	CASES								
	Temp. Matching			Ramp up to full CT Load				Sliding Pressure	
	1	2	2A	3A	4	5	6	7	AU02
CT Load (mw)	17	17	17	17	33.9	84.7	168	168	171
% CT Load	10	10	10	10	20	50	100	100	100
ST Load (mw)	9,452	10.7	23.24	25.49	37.56	60.95	88.47	91.1	91.9
CT Exh. Gas Temp. (F)	790	900	900	946	1049.6	1196.6	1130.3	1130.3	1125.8
CT Exh. Gas Flow (MMlb/hr)	2.25	1.96	1.96	1.84	2.11	2.37	3.49	3.49	3.54
MS Temp (F)	751	841	848	905	930	1027	1043	1050	1050
MS Press. @ ST (psia)	565	565	565	565	565	565	565	592	598
CRH Press. @ ST (psia)	153.5	152.1	151.8	153.3	157	146	199	202	204
CRH Temp. @ ST (F)	652	738	709	746	743	760	765	758	757
HP Stm Attemp. Spray Flow (lb/hr)	0	0	0	0	25,091	41,417	0	7,257	4,402
% Spray (as % of total module flow)									
MS Flow, Total (lb/hr)	168,194	174,765	170,495	189,299	227,923	291,921	422,518	454,919	459,978
MS Flow to ST (lb/hr)	128,000	128,000	170,495	189,299	227,923	291,921	422,518	454,919	459,978
MS Flow to BYP (lb/hr)	40,194	46,765	0	0	0	0	0	0	0
HRH Stm Temp. (F)	753	821	819	898	910	980	1001	1050	1050
HRH Stm Press. @ ST (psia)	146	144	144	144	144	123	164	162	163
HRH Stm Attemp. Spray Flow (lb/hr)	0	17,036	16,841	0	30,972	61,248	48,419	3,327	1,074
% Spray (as % of total module flow)									
HRH Stm Flow, Total (lb/hr)	205,179	222,018	217,692	215,061	290,334	389,509	514,991	501,489	504,982
HRH Stm Flow to ST (lb/hr)	127,000	127,000	217,692	215,061	290,334	389,509	514,991	501,489	504,982
HRH Stm Flow to BYP (lb/hr)	78,179	95,017	0	0	0	0	0	0	0

NOTES

Case 1- First load steam turbine to minimum load.

Case 2-CT at 10%, at beginning of "SOAK" period (control steam temp. to 850F/820F), bypasses open, some RH spray required.

Case 2A-CT at 10%, at end of "SOAK" period (control steam temp. to 850F/820F, bypasses just closed, some RH spray required.

Case 3A- CT at 10% Load- No bypasses, just out of CT temp..match, No sprays.

Case 4- CT at 20% Load- No bypasses, out of CT temp. match, spray to 930F/910F to match Alstom temperature requirements.

Case 5-Assumes IP turbine Intercept valve is in sliding pressure. Alstom has a standard minimum of 145 PSIA (130 PSIG) to maintain Gland Seal Steam supply header pressure.

Case 6- 100% CT Load, 1026F/980F Spray Main Steam and HRH to Alstom temperature limits. (Earliest you can get to full CT load).

Case 7- 100 CT Load, 1050F/1050F No Evaporative Cooling

Case AU02- 100 CT Load, 1050F/1050F with Evaporative Cooling

ATTACHMENT SEC-EU17-I5
Compliance Demonstration Reports/Records

Southern Company - Florida Plant Stanton A Unit 25

**Annual Emissions Report
Permit# 0950137-006-AV**

June 17 2008



Southern Company– Florida, LLC
Annual Emissions Test Results
Permit Number 0950137-006-AV
Plant Stanton
Unit 25
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Southern Company– Florida, LLC
Annual Emissions Test Results
Permit Number 0950137-006-AV
Plant Stanton

(Stanton A)
Unit 25

Introduction

This report documents the permit mandated air emission testing performed at Stanton Energy Complex, Plant Stanton A located in Orlando, Florida. This combined cycle unit consists of two gas fired combustion turbines and a steam turbine. The effluent exhaust from the turbine and duct burner stages of the process pass through a selective catalytic reduction (SCR) emission control device, which greatly reduces the emission of oxides of nitrogen (NO_x). Each of the gas turbines has its own stack from which the gases are released into the ambient air. For this reason each has its own continuous emissions monitoring system (CEMS). The following emissions test report is for the unit designated as 25.

The continuous emission monitoring equipment, which consists of NO_x, CO₂, CO and O₂ analyzers were installed in April 2003. The emission testing for this report was conducted on June 17, 2008. The testing was conducted according to the Environmental Protection Agency's (EPA) 40 CFR Part 60. This report documents the test reports and supporting data.

NO_x and CO emissions were measured by use of a fully extractive or dry basis system. The NO_x and CO parts-per-million (ppm) dry basis measurements were corrected to 15% oxygen and standard conditions of temperature, pressure and humidity (International Organization for Standardization (ISO)). In addition to NO_x and CO, the emission tests included Ammonia, Stack Moisture, and Visible Emissions. This test report will document that all emissions tests demonstrated compliance with the applicable permitted limits.

Please note that the hours of operation on oil for Stanton Units 25 and 26 were less than 400 hours. Therefore, a compliance stack test on oil was not performed.

Summary of Results

The results of the emissions testing performed on Southern Power Plant Stanton A Unit 25 are presented in the following table. The results are based on test data obtained from the facility during normal operation. These test results show that Plant Stanton A Unit 25 is in compliance with the emissions limits specified in the permit.

Table I. Summary of Emissions Results

Unit	25		PERMIT EMISSION LIMIT
Test Date	6/17/08	6/17/08	----
Mode	Power Augmentation	Turbine	----
Heat Input	2233 MMBtu/hr	1721 MMBtu/hr	2068 MMBtu/hr (Turbine Mode) 2402 MMBtu/hr (Power Aug Mode)
Total NOx ppmvd @ 15% O ₂	2.66 ppm N/A	2.62 ppm N/A	3.5 ppm (gas) 10 ppm (fuel oil)
CO Emissions ppmvd @ 15% O ₂	7.94 ppm N/A	0.55 ppm N/A	17 ppm (gas) 14 ppm (fuel oil)
Ammonia Slip ppmvd @ 15% O ₂	0.88 ppm	N/A	5 ppm
Sulfur Content	0.27 grains/hcf N/A	0.27 grains/hcf N/A	<1.5 grains/hcf* (gas) 0.05% sulfur, by weight (oil)
VE Test Results	0%	0%	10%

Source Description

Plant Stanton Unit 25 is a combustion turbine that produces steam used to generate electricity. This combined cycle unit consists of two gas fired combustion turbines and a steam turbine. The effluent exhaust from the turbine and duct burner stages of the process pass through a selective catalytic reduction (SCR) emission control device, which greatly reduces the emission of oxides of nitrogen (NO_x). Each of the gas turbines has its own stack from which the gases are released into the ambient air. For this reason each has its own continuous emissions monitoring system (CEMS). The CEM system gas probes are located on the stack. The probe locations meet all of the siting criteria specified in 40 CFR Part 75, Appendix A. The CEM system monitors, controllers, and data acquisition system is located in an environmentally controlled shelter located near the base of the stack.

Reference Method Equipment

The reference method testing equipment is housed in a mobile continuous emission monitoring system. The test trailer is equipped with both dilution extractive (wet basis) and fully extractive (dry basis) systems to analyze the stack emission concentrations. During this testing, the fully extractive system was used.

The fully extractive system measures NO_x, CO and Oxygen. The NO_x monitor is a ThermoEnvironmental Model 42 CHL (serial number 42CHL-72771-372), the CO monitor is a ThermoEnvironmental Model 48C (serial number 48C-73019-373), and the O₂ monitor is a ServoMax Model 1400 (serial number 14200/3116).

The monitor span and full scale are as follows:

NO_x Span = 20.02 ppm
O₂ Span = 20.9 %
CO Span = 50.7 ppm

The fully extractive system utilizes a 200 foot unheated TEFLON umbilical. The sample passes through a heated probe through a heated self regulating @ 250°F 10 foot TEFLON umbilical to a set of impingers in an ice bath. The impingers are continuously drained by an automatic peristaltic pump unit. The unheated conditioned sample is brought down to the trailer into a KWW digitally controlled cooler assembly which serves as a safety check to eliminate the introduction of moisture into the analyzers if the stack conditioning system fails. This system is plumbed with a network of stainless steel shut-off valves for purposes of specific leak checking.

Any additional information regarding instrument operation or capabilities can be obtained from the manufacturer or from Gulf Power Company by request.

The sample system is controlled via personal computer using the Spectrum Systems SpectraTest Software to interface with a SpectraPak Ioplex controller. This interface enables the tester to manually initiate calibration gases to the probe, blowback of the system, and start all data collection.

All calibration gases that are used in the certification process are Certified Protocol 1 Calibration Gases. All certificates are included in Appendix D.

These emission tests utilized reference methods from CFR 40, Part 60, including NO_x measurement by Method 7E, CO measurement by Method 10, O₂ measurement by Method 3A, VE measurement by Method 9, and Ammonia measurement by EPA Method 320.

Test Procedures

All tests used in the certification process are performed in accordance with EPA Methods 3A, 10 and 7E. The Methods are found in 40 CFR Part 60.

The O₂ diluent; CO and NO_x pollutant concentrations were determined by EPA Method 7E and Method 3A requires that the tester: 1) select appropriate apparatus meeting the applicable equipment specifications of the methods; 2) conduct an interference response test prior to the testing program; and 3) conduct various measurements during the testing program to demonstrate conformance with the measurement system performance specifications. The system calibration error is limited to +/- 2%.

The following is a brief outline of the procedures followed during the gas testing. Initially, the measurement system was calibrated. Next, a zero, mid, and high level gas was introduced to determine the system calibration error. After allowing twice the system response times sixty (60) minutes of stack gas data was collected. At the conclusion of the run data collection, a zero and upscale calibration gas for each analyzer was introduced. The upscale gas that most closely approximated the stack gas was used to perform the system bias checks and system drifts. As long as no significant drifts occurred, the calibration checks between runs served as both the post check for the previous run and the pre check for the next run. A summary of the drifts and biases are included in Appendix A. The gas averages for each run were adjusted to correct for any drift that occurred. The system's recovery time was set to be in excess of twice the established response time for the slowest instrument.

A pretest stratification study was performed to locate the reference sample points according to procedures set by 40 CFR part 75 section 6.5.6. The fully extractive probes collected the reference method measurements from a single point on the measurement line 1.0 meters from the duct wall. All data used to compile this report is supplied in the appendices.

No unusual deviations occurred during the reference method sampling. All field testing was routine in nature.

NH₃ Measurement Description: Method 320 (FTIR)

Gulf Power Field services utilized the Temet GASMET Model 4000 FTIR instrument to make the ammonia slip measurements during these emission tests. The following is a brief summary of the Fourier Transform Infrared (FTIR) analyzer and description of the test set-up and procedure. The technical specifications of the Temet GASMET Model 4000 FTIR are listed in Table 1 of this report.

Fourier Transform Infrared is a system of vibrational spectroscopy that enables the instantaneous measurement of multiple gases (exceptions are diatomic gases, O₂, N₂, etc.).

Principles of Infrared Spectroscopy

When IR radiation is passed through a sample of gaseous molecules, it can be observed that certain wavelengths are not transmitted through the gas very well. That is, the gas absorbs some specific wavelengths of the IR radiation. The radiation reacts with the molecules, the molecules receive energy from the reaction and start to vibrate and/or rotate with increasing amplitude. This energy transfer can be seen as a decreased intensity of some wavelengths of the transmitted IR radiation. If the source sends a broad band of wavelengths through the sample, some of the wavelengths will be partially absorbed by the gas sample.

An absorption spectrum is used to graphically show to what extent the different wavelengths of IR radiation are absorbed by the sample gas. The spectrum shows the transmission of the IR radiation through the gas as a function of wavelength. This transmittance is expressed as:

$$T = I / I_0$$

where: T = transmittance
I = intensity entering the sample
I₀ = intensity that has passed through the sample

The actual absorbance is then expressed as:

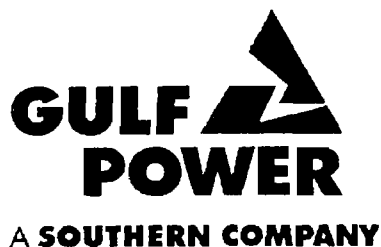
$$A = \log_{10} (1/T)$$

where: A = absorbance
T = transmittance

Southern Company - Florida Plant Stanton A Unit 26

**Annual Emissions Report
Permit# 0950137-006-AV**

June 18 2008



Southern Company– Florida, LLC
Annual Emissions Test Results
Permit Number 0950137-006-AV
Plant Stanton
Unit 26
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Southern Company– Florida, LLC
Annual Emissions Test Results
Permit Number 0950137-006-AV
Plant Stanton

(Stanton A)
Unit 26

Introduction

This report documents the permit mandated air emission testing performed at Stanton Energy Complex, Plant Stanton A located in Orlando, Florida. This combined cycle unit consists of two gas fired combustion turbines and a steam turbine. The effluent exhaust from the turbine and duct burner stages of the process pass through a selective catalytic reduction (SCR) emission control device, which greatly reduces the emission of oxides of nitrogen (NO_x). Each of the gas turbines has its own stack from which the gases are released into the ambient air. For this reason each has its own continuous emissions monitoring system (CEMS). The following emissions test report is for the unit designated as 26.

The continuous emission monitoring equipment, which consists of NO_x, CO₂, CO and O₂ analyzers were installed in April 2003. The emission testing for this report was conducted on June 18, 2008. The testing was conducted according to the Environmental Protection Agency's (EPA) 40 CFR Part 60. This report documents the test reports and supporting data.

NO_x and CO emissions were measured by use of a fully extractive or dry basis system. The NO_x and CO parts-per-million (ppm) dry basis measurements were corrected to 15% oxygen and standard conditions of temperature, pressure and humidity (International Organization for Standardization (ISO)). In addition to NO_x and CO, the emission tests included Ammonia, Stack Moisture, and Visible Emissions. This test report will document that all emissions tests demonstrated compliance with the applicable permitted limits.

Please note that the hours of operation on oil for Stanton Units 25 and 26 were less than 400 hours. Therefore, a compliance stack test on oil was not performed.

Summary of Results

The results of the emissions testing performed on Southern Power Plant Stanton A Unit 26 are presented in the following table. The results are based on test data obtained from the facility during normal operation. These test results show that Plant Stanton A Unit 26 is in compliance with the emissions limits specified in the permit.

Table I. Summary of Emissions Results

Unit	26		PERMIT EMISSION LIMIT
Test Date	6/18/08	6/18/08	-----
Mode	Power Augmentation	Turbine	-----
Heat Input	2241Btu/hr	1711MBtu/hr	2068 MMBtu/hr (Turbine Mode) 2402 MMBtu/hr (Power Aug Mode)
Total NOx ppmvd @ 15% O ₂	3.36 ppm N/A	3.29 N/A	3.5 ppm (gas) 10 ppm (fuel oil)
CO Emissions ppmvd @ 15% O ₂	4.34 ppm N/A	0.41pm N/A	17 ppm (gas) 14 ppm (fuel oil)
Ammonia Slip ppmvd @ 15% O ₂	1.02	N/A	5 ppm
Sulfur Content	0.24 grains/hcf N/A	0.24rains/hcf N/A	<1.5 grains/hcf* (gas) 0.05% sulfur, by weight (oil)
VE Test Results	0%	0%	10%

Source Description

Plant Stanton Unit 26 is a combustion turbine that produces steam used to generate electricity. This combined cycle unit consists of two gas fired combustion turbines and a steam turbine. The effluent exhaust from the turbine and duct burner stages of the process pass through a selective catalytic reduction (SCR) emission control device, which greatly reduces the emission of oxides of nitrogen (NO_x). Each of the gas turbines has its own stack from which the gases are released into the ambient air. For this reason each has its own continuous emissions monitoring system (CEMS). The CEM system gas probes are located on the stack. The probe locations meet all of the siting criteria specified in 40 CFR Part 75, Appendix A. The CEM system monitors, controllers, and data acquisition system is located in an environmentally controlled shelter located near the base of the stack.

Reference Method Equipment

The reference method testing equipment is housed in a mobile continuous emission monitoring system. The test trailer is equipped with both dilution extractive (wet basis) and fully extractive (dry basis) systems to analyze the stack emission concentrations. During this testing, the fully extractive system was used.

The fully extractive system measures NO_x, CO and Oxygen. The NO_x monitor is a ThermoEnvironmental Model 42 CHL (serial number 42CHL-72771-372), the CO monitor is a ThermoEnvironmental Model 48C (serial number 48C-73019-373), and the O₂ monitor is a ServoMax Model 1400 (serial number 14200/3116).

The monitor span and full scale are as follows:

NO_x Span = 20.02 ppm
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CO Span = 50.7 ppm

The fully extractive system utilizes a 200 foot unheated TEFLON umbilical. The sample passes through a heated probe through a heated self regulating @ 250°F 10 foot TEFLON umbilical to a set of impingers in an ice bath. The impingers are continuously drained by an automatic peristaltic pump unit. The unheated conditioned sample is brought down to the trailer into a KWW digitally controlled cooler assembly which serves as a safety check to eliminate the introduction of moisture into the analyzers if the stack conditioning system fails. This system is plumbed with a network of stainless steel shut-off valves for purposes of specific leak checking.

Any additional information regarding instrument operation or capabilities can be obtained from the manufacturer or from Gulf Power Company by request.

The sample system is controlled via personal computer using the Spectrum Systems SpectraTest Software to interface with a SpectraPak Ioplex controller. This interface enables the tester to manually initiate calibration gases to the probe, blowback of the system, and start all data collection.

All calibration gases that are used in the certification process are Certified Protocol 1 Calibration Gases. All certificates are included in Appendix D.

These emission tests utilized reference methods from CFR 40, Part 60, including NO_x measurement by Method 7E, CO measurement by Method 10, O₂ measurement by Method 3A, VE measurement by Method 9, and Ammonia measurement by EPA Method 320.

Test Procedures

All tests used in the certification process are performed in accordance with EPA Methods 3A, 10 and 7E. The Methods are found in 40 CFR Part 60.

The O₂ diluent; CO and NO_x pollutant concentrations were determined by EPA Method 7E and Method 3A requires that the tester: 1) select appropriate apparatus meeting the applicable equipment specifications of the methods; 2) conduct an interference response test prior to the testing program; and 3) conduct various measurements during the testing program to demonstrate conformance with the measurement system performance specifications. The system calibration error is limited to +/- 2%.

The following is a brief outline of the procedures followed during the gas testing. Initially, the measurement system was calibrated. Next, a zero, mid, and high level gas was introduced to determine the system calibration error. After allowing twice the system response times sixty (60) minutes of stack gas data was collected. At the conclusion of the run data collection, a zero and upscale calibration gas for each analyzer was introduced. The upscale gas that most closely approximated the stack gas was used to perform the system bias checks and system drifts. As long as no significant drifts occurred, the calibration checks between runs served as both the post check for the previous run and the pre check for the next run. A summary of the drifts and biases are included in Appendix A. The gas averages for each run were adjusted to correct for any drift that occurred. The system's recovery time was set to be in excess of twice the established response time for the slowest instrument.

A pretest stratification study was performed to locate the reference sample points according to procedures set by 40 CFR part 75 section 6.5.6. The fully extractive probes collected the reference method measurements from a single point on the measurement line 1.0 meters from the duct wall. All data used to compile this report is supplied in the appendices.

No unusual deviations occurred during the reference method sampling. All field testing was routine in nature.

NH₃ Measurement Description: Method 320 (FTIR)

Gulf Power Field services utilized the Temet GASMET Model 4000 FTIR instrument to make the ammonia slip measurements during these emission tests. The following is a brief summary of the Fourier Transform Infrared (FTIR) analyzer and description of the test set-up and procedure. The technical specifications of the Temet GASMET Model 4000 FTIR are listed in Table 1 of this report.

Fourier Transform Infrared is a system of vibrational spectroscopy that enables the instantaneous measurement of multiple gases (exceptions are diatomic gases, O₂, N₂, etc.).

Principles of Infrared Spectroscopy

When IR radiation is passed through a sample of gaseous molecules, it can be observed that certain wavelengths are not transmitted through the gas very well. That is, the gas absorbs some specific wavelengths of the IR radiation. The radiation reacts with the molecules, the molecules receive energy from the reaction and start to vibrate and/or rotate with increasing amplitude. This energy transfer can be seen as a decreased intensity of some wavelengths of the transmitted IR radiation. If the source sends a broad band of wavelengths through the sample, some of the wavelengths will be partially absorbed by the gas sample.

An absorption spectrum is used to graphically show to what extent the different wavelengths of IR radiation are absorbed by the sample gas. The spectrum shows the transmission of the IR radiation through the gas as a function of wavelength. This transmittance is expressed as:

$$T = I / I_0$$

where: T = transmittance
I = intensity entering the sample
I₀ = intensity that has passed through the sample

The actual absorbance is then expressed as:

$$A = \log_{10} (1/T)$$

where: A = absorbance
T = transmittance

FTIR Test Set-up and Description

The measuring system is composed of four main components: the probe/probe box assembly; the heated umbilical; the pump module; and the analyzer. Because it is essential to keep the sample temperature extremely hot to prevent wall effects from compromising the sample, all components are heated to approximately 180 degrees centigrade, (C°). The high sample flow rate of approximately 8 liters/min allows the sample to be brought through the system quickly with minimum wall effect. Filtering of the sample using a 5 micron Teflon particulate filter is accomplished in the probe box heated filter assembly. The filter assembly is heated to 200 degrees C° to eliminate any possible problems with condensation. The probe itself is also heated to reduce temperature variation from probe inlet to the filter assembly. The filter assembly attaches to one end of the umbilical, while the other end of the umbilical is attached to the pump module. The pump sends the sample gas in and out of the analyzer assembly which contains the reaction chamber. The umbilical, pump assembly, and reaction chamber are all heated to 180 degrees C° during testing.

During instrument operation the sample cell is continually purged with instrument zero grade nitrogen. Nitrogen is also used to flood the sample cell via the umbilical and sample inlet for purposes of establishing the "ZERO calibration" and to perform periodic zero baseline checks before and after each stack gas measurement.

Prior to sampling the system undergoes a leak check. This involves capping the sample inlet and observing sample system vacuum. An acceptable leak check is accomplished when the system is able to maintain greater than 19 in/Hg while operating at <10 in/Hg during sampling mode. In addition to the leak check the system undergoes various hardware and software checks to establish its proper operation. The sample control module (or pump box) contains real time temperature measurement displays for umbilical and pump temperature. The computer also allows real time display of the analyzer reaction chamber temperature as well as the analyzer chassis or internal ambient temperature. Acceptable internal analyzer temperature is < 60 degrees C°. In normal ambient environments the analyzer typically measures 45 to 50 degrees C°. Figure 1-1 summarizes the various initial recordings of system parameters. During the Stanton 25 testing all initial checks fell within acceptable parameter tolerances.

The system received a Calibration Transfer Standard (CTS), or span check, prior to testing. During this test, the CTS was introduced into the system and the stable response was recorded. Acceptable deviation for this test was <5%. The analyzer was challenged directly with a certified cylinder of calibration gas with a concentration of 50.5 ppm. The response to this direct gas challenge was 49.1 ppm or a percent difference of 3.0%.

Before and after each test run the system received a baseline check. This was accomplished by flooding the sample system with Ultra Pure (Instrument grade) nitrogen. In addition, a dynamic spike calibration was performed by injecting approximately 10% of the relative instrument sample flow with certified calibration gas (in this case NH₃ gas) in a balance of nitrogen. The target concentration of the dynamic spike was calculated by a gas dilution calculation. This was accomplished by observing the relative change in a stable indicator parameter (in this case H₂O vapor) throughout the sampling. By observing the percent change in the H₂O vapor measurement during

spiking, the amount of displacement of spike gas relative to sample flow was calculated. The target injection rate of spike gas was 10% of the flow. The exact percent change in the indicator parameter (H₂O vapor) was calculated for each dynamic spike and an expected value for NH₃ response was determined. This method allowed for a passing spike check if the actual measured response of three spectra fall inside of 70% to 130% of the target injection. Other compounds were also checked to correlate the apparent dilution ratio during the dynamic spiking. A summary of the calibration results are included in the Appendix B this report.

Prior to testing, the system underwent a determination of the sample response time both directly to the analyzer and through the entire sampling system. In order to minimize response time and also to avoid any potential compromise or bias of the NH₃ measurement, the test equipment was located in the Gulf Power sample trailer. An umbilical length of 100 feet was used. The direct analyzer response was documented to be approximately one minute, and the response through the complete sampling system was approximately 3-4 minutes. This response time met the requirements of EPA Method 320.

This test consisted of three runs in which 6 sample spectra of stack gas were captured. Each block of NH₃ measurement data is bracketed by baseline checks and dynamic spike calibrations. Total test time was approximately three and a half hours.

Performance Test Report

**in accordance with the
40CFR60**

**Southern Power Company
Atlanta, GA**

**Plant Stanton
Units 25 and 26
Orlando, Florida**

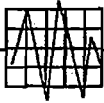
April 2009

**Prepared By:
Spectrum Systems, Inc.
Pensacola, Florida**



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I. INTRODUCTION

Southern Power Company contracted Spectrum Systems, Inc. of Pensacola, Florida to conduct performance testing to quantify the nitrogen oxides emissions as NO_x ppm at 15% oxygen, carbon monoxide emissions as CO ppm at 15% oxygen, and volatile organic compounds emission as VOC ppm at 15% oxygen in the gaseous effluent from the gas and oil fired Units 25 and 26 boilers at the Southern Power Company Stanton facility located in Orlando, Florida.

Emissions performance testing was conducted in April 2009 by James Garrett, Randy Hinton, Rick Artybridge, Keith Duck and John Dedeaux of Spectrum Systems, Inc. Randy Alexander of Southern Power Company coordinated and observed the testing.

Emissions performance testing was conducted according to the procedures in the Code of Federal Regulations, Title 40, Part 60 (40CFR60), Appendix B. This report contains the results of that testing.

Section II of this report, titled Installation and Source Description, gives a brief description of the Stanton plant source for emissions and how it was operated during the test program.

Section III of this report, titled Summary of Results, presents a discussion of the test results. A summary of the performance test results appears in Appendix A.

Section IV of this report contains the certification of authenticity for the testing.

Section V of this report describes the test methods and procedures used during the testing.

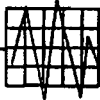
Section VI of this report gives a description of the Spectrum Systems, Inc. Transportable Continuous Emission Monitoring System (TCEMS) used as the reference method system for the testing.

Section VII contains the mathematical equations used in the data analysis.

Actual test data, materials, and test results are presented in the different appendices of this report. A summary of all test results appears in Appendix A.

Sampling System Bias Drift is in Appendix B of this report.

The actual run emission calculation results in NO_x, CO, and VOC ppm at 15 % Oxygen and calibration drift is located in Appendix C



All the Reference Method Raw DAHS printouts are placed in Appendix D. This includes the gas calibration data and the gas run one minute data and run averages. Included also is the run moisture data.



II. INSTALLATION and SOURCE DESCRIPTION

The Southern Power Company Stanton facility Units 25 and 26 boilers are capable of burning natural gas and fuel oil. The boilers were operated at loads of 100% with Power Augmentation and duct burners, full load on gas and full load while burning fuel load.



III. SUMMARY OF RESULTS

Spectrum Systems, Inc. conducted performance testing for nitrogen oxides (NO_x) emissions as NO_x ppm at 15% oxygen, carbon monoxide emissions as CO ppm at 15% oxygen, and volatile organic compounds emission as VOC ppm at 15% oxygen. The required emissions testing were performed on the Southern Power Company Stanton facility Units 25 and 26 in Orlando, Florida.

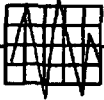
The testing was conducted according to the procedures in the Code of Federal Regulations, Title 40, Part 60 (40CFR60), Appendix A, Reference Methods 3A, 4, 10, 7E, and 25A for oxygen (O₂), carbon monoxide (CO), nitrogen oxide (NO_x) and volatile organic compounds (VOC), respectively. Sample point selection was made using Reference Method 1. Emission data analysis was performed according to 40 CFR 60 Appendix A.

The Spectrum Systems sampling probe was inserted into each stack of the Southern Power Company Stanton Units 25 and 26. The probe was then connected to the Spectrum Systems, Inc.'s Transportable Continuous Emission Monitoring System (TCEMS). Sampling and analysis of the stack effluent stream was performed by the TCEMS Reference Method analyzer system. NO_x, CO, O₂ and THC in-line analyzers measured NO_x, CO, O₂ and THC concentrations. Moisture was measured. Initial calibrations of the analyzers with EPA Protocol I gases were conducted. Appropriate analyzer calibrations and analyzer bias and drift measurements were performed as required before, during, and after testing.

Three one-hour runs of NO_x, CO, O₂ and THC concentration measurements were performed at each load condition. Reference Method NO_x, CO, O₂ and THC analyzer measurements were recorded on a one-minute continuous basis by the Reference Method TCEMS. An average of the NO_x, CO, O₂ and THC concentrations is calculated for each run. VOC calculations were adjusted for moisture.

A summary of the final emissions results is presented in Appendix A of this report. Each page displays data at each load condition for one unit. Each summary page displays results for each run as well as calculates the overall CO, NO_x and VOC emissions as ppm at 15% oxygen. Average overall results are calculated by averaging the run averages of each parameter.

This report contains a summary of all the testing performed and the supporting data for all tests. Detailed test material is presented in the different appendices of this report. Within each appendix Unit 25 data is presented before Unit 26 data. Within a unit, the data is sequenced by load condition.



Gas analyzer sampling system bias and drift results are placed into Appendix B of this report. These sheets contain the before and after calibration drift data obtained by introducing EPA Protocol 1 gases to the TCEMS analyzers between runs. This verifies that the TCEMS analyzers stay calibrated and operable during each run. This data is transferred to the Calculation of Average Emissions sheets and is used to correct the gas ppm concentrations.

Run emission results are located in Appendix C of this report. There is a Calculation of Average Emissions sheet for each run. Each sheet contains the calibration and drift data and both the uncorrected and corrected the gas concentrations for the run.

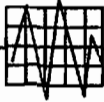
Reference Method Raw DAHS data printouts are supplied in this report in Appendix D. This includes raw gas calibration data, raw one-minute Reference Method TCEMS analyzer data readings, raw moisture data and calculated gas run average concentrations.

Reference Method Quality Assurance Data is found in Appendix E of this report. This includes the analyzer calibration error results, the gas interference tests, and the NOx converter efficiency test. Before any set of TCEMS analysis, the analyzers are calibrated with EPA Protocol 1 Gases and the Analyzer Calibration error is determined and verified to within specific limits. NOx Converter efficiency tests were conducted on analyzers at the end of the final test and are found in the last calibration entry.

Visual emissions data is reported in Appendix F of this report.

All plant Stanton's process data is supplied in Appendix G of this report.

Appendix H of this report contains copies of the EPA Protocol Gas Certificates for the calibration gases used during calibration bias drift checks during testing.



IV. STATEMENT OF AUTHENTICITY

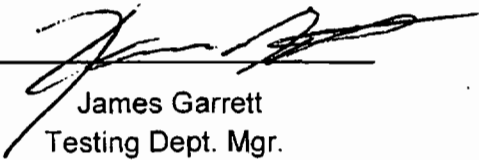
The sampling and analysis for this report was carried out under the direction of

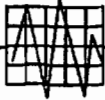
James Garrett (Testing Department).

I have reviewed the testing details and results of this report and hereby certify that the data contained within is authentic and accurate to the best of my knowledge.

Date: May 6, 2009

Signature :


James Garrett
Testing Dept. Mgr.



V. TEST PROCEDURES

Initial Analyzer Calibrations

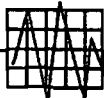
Analyzer calibrations are required prior to a set of analysis or when conditions change or when sampling bias and drift (performed between analysis runs) drifts out of spec. The reference method analyzers are calibrated by introducing zero, mid, and high range EPA Protocol 1 gases into the analyzers to verify the accuracy of the reference method analyzers.

Sampling Bias and Drift

There is a difference in injecting gases directly into the TCEMS analyzer inlet and injecting gases at the stack connected by a long sampling umbilical cord to the TCEMS inlet. This difference is measured by performing the Sampling System Bias and Drift checks. This sampling system bias is then applied to correct the analyzer reading values.

Prior to pollutant emission sample analysis, a Sampling System Bias Check is performed by injecting both a zero gas and a higher range gas with a concentration close to the sample effluent concentration. Each EPA Protocol 1 gas is introduced at the outlet of the sampling probe in the stack and directly to the inlet of the reference gas analyzers. Their concentration is recorded once the system stabilizes. The sampling system bias must stay within 5% of the span throughout the test to ensure the sampling system conditions do not change during the test. Sampling System Bias checks are performed before and after each run.

To verify that the reference method analyzers continue to stay within their calibration, zero and mid Calibration Drift checks are conducted by introducing zero and mid range gases between each test run. Each final zero and calibration value also serves as the initial zero and calibration value for the following run. The difference between the pre run values and the post run values are calculated and the error in percent is calculated for each run. The zero and calibration drift error must stay within 3% of the span or the system is recalibrated.



VI. REFERENCE METHOD TCEMS

The following descriptions briefly outline the operational principles of the reference method train of Analyzers called a Transportable Continuous Emission Monitoring System or TCEMS. See Figure 1 for a simplified diagram of the TCEMS arrangement and layout. Additional information on instrument operation may be found in the individual instrument manuals provided by the manufacturers.

Thermo Environmental Model 42C Chemiluminescence Analyzer

The system uses a Thermo Environmental Model 42D Chemiluminescence Analyzer. Chemiluminescence results when light is produced in a chemical reaction. NO and ozone produce infrared radiation from about 500-3000 NM. NO₂ does not undergo this reaction and must be reduced to NO before chemiluminescent radiation can be measured.

Servomex Model 1420 O₂ Analyzer

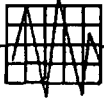
The Servomex Model 1420 Oxygen Analyzer determines the concentration of oxygen in the extracted sample by taking advantage of the paramagnetic properties of the oxygen molecule. A measuring cell or dumb-bell containing the gas in question is suspended in a strong, non-linear, magnetic field. The dumb-bell is deflected in proportion to the concentration of the oxygen present in the sample. This deflection is detected by an optical system containing twin photo cells and an amplifier. A coil of wire surrounding the dumb-bell is utilized to pass a controlled current. The necessary amperage required to return the dumb-bell to its rest position provides an accurate measure of the oxygen. Quality is assured by utilization of a combination automatic flow control device and particulate filter.

THERMO ENVIRONMENTAL MODEL 48 CO ANALYZER

The TECO Model 48 is a gas filter correlation non-dispersive infrared ambient level analyzer. The system utilizes a folded path white cell using surface silvered mirrors to fold an infrared beam 34 times producing an equivalent light path of 12 meters.

Chopped infrared energy is passed through a rotating gas filled wheel. The wheel is divided into two sections, one containing nitrogen and the other pure carbon monoxide. The difference in 100% absorption and CO absorption due to sample only produces a thorough output of infrared energy. This pulsates in varying amplitude proportionally to the CO concentration in the sample chamber.

Synchronized detection of infrared energy versus filter wheel location produces an extremely stable and linear output with little or no interference from other gases.



California Analytical Total Hydrocarbon Analyzer

Volatile organic compound concentrations are measured with a California Analytical Total Hydrocarbon Model 300 Flame Ionization Analyzer (FIA).

Data Acquisition Handling System or DAHS (Recorder)

The data acquisition handling system (DAHS) used by Spectrum is a Spectra-Pak connected to a Dell Personal computer over a RS-232 line. The software is written by Spectrum System's software department. All data is captured and one (1) minute averages are calculated and printed out as well as stored to disk. All data captured is included in this report. Data reduction is automatically completed in accordance with 40 CFR 60, Appendix B, Performance Specification 2.

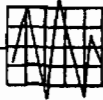
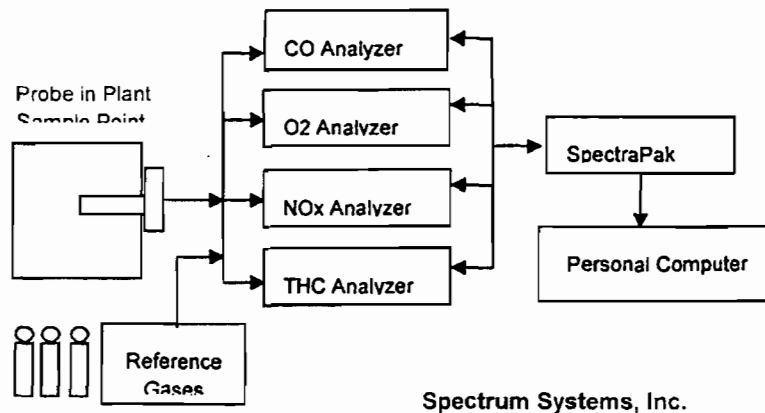


FIGURE 1

Spectrum Systems, Inc. Transportable CEMS (TCEMS)



Spectrum Systems, Inc.



VII. REFERENCE METHODS AND CALCULATIONS

Emission Calculations

Reference method testing data analysis is performed using Title 40 of the Code of Federal Regulations, Part 60, Appendix A, Method 19. Measurements of pollutants and diluent gases in any combination of wet and dry instrument responses are detailed. "F" factor analysis techniques are used on both the CEMS and the TCEMS wherever possible. Plug values for moisture are applied when necessary, to compensate for ambient or added moisture gas phase dilution.

Emission Calculation

For NO_x measured by the CEMS and the Reference Method TCEMS with a dry O₂ measurement, the following formula is used:

$$\text{Emission in ppm @ 15\% O}_2 = \text{PPM} \times 5.9 / (20.9 - \% \text{O}_2)$$

Where:

PPM	=	Pollutant (NO _x) Concentration in dry ppm
5.9	=	Correction to 15% O ₂ using O ₂
%O ₂	=	Oxygen fraction in Flue Gas in % by volume dry

All PPM values entered into the above formulas are corrected values (see below), dry basis.



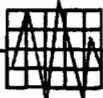
Corrected Gas Pollutant Concentration in PPM

Calculate the correction for the gas analyzer measured gas concentrations in ppm, using sampling bias and drift measurements of EPA Protocol 1 zero and higher calibration gas concentrations.

$$C_{\text{gas}} = C_{\text{ma}} * (C_{\text{avg}} - C_{\text{o}}) / (C_{\text{m}} - C_{\text{o}})$$

Where:

- C_{gas} = Corrected effluent gas concentration in ppm
- C_{ma} = Actual upscale calibration gas concentration in ppm
- C_{avg} = Gas analyzer reading in ppm
- C_o = Average of initial and final system calibration bias check response for the zero gas
- C_m = Average of initial and final system calibration bias check response for the upscale gas



APPENDIX A

Testing Results Summary

Summary of Test Results - Unit 25

Date	4/29/2009	4/30/2009	4/28/2009	
Mode	Gas Full Load	Gas Power Augmentation	Oil Full Load	Permit Limit
Generation (MW)	257	335	258	
NOx ppmvd @ 15% O2	2.844	2.908	8.587	3.5 ppm (gas) 10.0 ppm (oil)
CO ppmvd @ 15% O2	0.659	5.632	0.768	17 ppm (gas) 14 ppm (oil)
VOC ppmvd @ 15% O2	0.198	3.831	0.409	6.3 ppm (gas) 2.7 ppm (oil)
VE (%)	0	0	0	10%

Plant Stanton
Summary of Test Results - Unit 26

Date	4/29/2009	5/1/2009	3/18/2009	
Mode	Gas Full Load	Gas Power Augmentation	Oil Full Load	Permit Limit
Generation (MW)	256	333	273	
NOx ppmvd @ 15% O2	2.602	2.743	9.017	3.5 ppm (gas) 10.0 ppm (oil)
CO ppmvd @ 15% O2	1.659	4.439	0.951	17 ppm (gas) 14 ppm (oil)
VOC ppmvd @ 15% O2	0.855	2.070	0.518	6.3 ppm (gas) 2.7 ppm (oil)
VE (%)	0	0	0	10%

ATTACHMENT SEC-EU17-I6
Other Information Required by Rule or Statute

Table 1
Hourly Emission Rates (Per CCCT/HRSG)

Case	Ambient Temperature (°F)	Load (%)	NOx (lb/hr)	CO (lb/hr)	PM/PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	VOC (lb/hr)
Natural Gas							
1	19	100	24.13	31.00	9.00	2.77	3.00
2	19	75	19.23	25.00	9.00	2.23	2.40
3	19	50	15.18	20.00	9.00	1.78	2.00
4	19	100	30.38	75.90	11.49	3.50	10.98
5	45	100	23.21	50.00	9.00	2.67	3.00
6	45	75	18.54	40.00	9.00	2.15	2.40
7	45	50	14.70	33.00	9.00	1.73	2.00
8	45	100	29.76	97.13	11.62	3.43	11.38
9	60	100	29.04	129.50	11.26	3.35	17.49
10	70	100	22.26	48.00	9.00	2.56	2.80
11	70	75	17.86	38.00	9.00	2.07	2.20
12	70	50	14.15	32.00	9.00	1.66	1.80
13	70	100	27.76	87.51	11.20	3.20	9.82
14	95	100	21.47	45.00	9.00	2.47	2.80
15	95	75	17.29	38.00	9.00	2.01	2.20
16	95	50	13.65	32.00	9.00	1.60	1.80
17	95	100	28.56	130.12	11.36	3.29	17.93
18	95	100	29.42	142.51	11.71	3.39	20.13
19	95	100	26.63	82.14	11.06	3.07	9.40
Maximum Emission Rate			30.38	142.51	11.71	3.50	20.13
Distillate Fuel Oil							
20	19	100	79.69	71.00	17.00	107.00	8.00
21	19	75	63.58	59.00	17.00	86.00	6.00
22	19	50	49.27	66.00	17.00	68.00	5.00
23	45	100	76.70	67.00	17.00	103.00	7.50
24	70	100	73.70	64.00	17.00	99.00	7.00
25	95	100	71.01	61.00	17.00	96.00	7.00
Maximum Emission Rate			79.69	71.00	17.00	107.00	8.00

Table 2
Annual Emission Rates

Cases ^d	No. of CCCT/HRSGs	Annual Operation (hrs/yr)	Emission Rates									
			NO _x		CO		PM/PM ₁₀		SO ₂		VOC	
			(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)
4, 8, 8, 4, 8	2	6,760 ^a	60.76	205.37	194.26	656.60	23.24	78.55	7.00	23.66	22.76	76.93
18, 18, 18, 18, 18	2	1,000 ^b	58.84	29.42	285.02	142.51	23.42	11.71	6.78	3.39	40.26	20.13
20, 20, 20, 20, 20	2	1,000 ^c	159.38	79.69	142.00	71.00	34.00	17.00	214.00	107.00	16.00	8.00
Totals	2	8,760	N/A	314.48	N/A	870.11	N/A	107.26	N/A	134.05	N/A	105.06

^aAssumes operation on natural gas (including duct burning) for 6,760 hour per year at 100% load.

^bAssumes operation on natural gas (including duct burning and power augmentation) for 1,000 hours per year at 100% load.

^cAssumes operation on distillate fuel oil for 1,000 hours per year at 100% load.

^dCases are listed respectively for the pollutants as they are listed across the top of the table.

Stanton Energy Center

Heat Input

Revised

9/25/00

Printed

1/17/01 8:29 AM

Combined Cycle Operation - Natural Gas

Combined Cycle Operation - Fuel Oil

NOTE

Ref. 11/16/01 performance data

Load 100 percent

GE7FA

Case Name	Case 1	Case 4	Case 5	Case 8	Case 9	Case 10	Case 13	Case 14	Case 17	Case 18	Case 19
Ambient Temp (F)	19	19	45	45	60	70	70	95	95	95	95
Evap Cooler					X	X	X	X	X	X	X
Power Augmentation (Steam Inj.)					X				X	X	
CTG Heat Input HHV (Btu/hr)	1.90E+09	1.90E+09	1.83E+09	1.83E+09	1.84E+09	1.75E+09	1.75E+09	1.69E+09	1.76E+09	1.76E+09	1.69E+09
Duct Burner Heat Input HHV (Btu/hr)	0	4.99E+08	0	5.24E+08	4.53E+08	0	4.39E+08	0	4.73E+08	5.42E+08	4.13E+08
Total Heat Input HHV (Btu/hr)	1.90E+09	2.40E+09	1.83E+09	2.35E+09	2.30E+09	1.75E+09	2.19E+09	1.69E+09	2.26E+09	2.33E+09	2.11E+09
Fuel Rate (cu ft/hr)	1.94E+06	2.45E+06	1.87E+06	2.40E+06	2.34E+06	1.79E+06	2.24E+06	1.73E+06	2.30E+06	2.37E+06	2.15E+06

Load 75 percent

Case Name	Case 2	Case 6	Case 11	Case 15
Ambient Temp (F)	19	45	70	95

Evap Cooler

Power Augmentation (Steam Inj.)

CTG Heat Input HHV (Btu/hr)	1.53E+09	1.48E+09	1.42E+09	1.38E+09
Duct Burner Heat Input HHV (Btu/hr)	0	0	0	0
Total Heat Input HHV (Btu/hr)	1.53E+09	1.48E+09	1.42E+09	1.38E+09
Fuel Rate (cu ft/hr)	1.56E+06	1.51E+06	1.45E+06	1.41E+06

Load 50 percent

Case Name	Case 3	Case 7	Case 12	Case 16
Ambient Temp (F)	19	45	70	95

Evap Cooler

Power Augmentation (Steam Inj.)

CTG Heat Input HHV (Btu/hr)	1.22E+09	1.18E+09	1.14E+09	1.10E+09
Duct Burner Heat Input HHV (Btu/hr)	0	0	0	0
Total Heat Input HHV (Btu/hr)	1.22E+09	1.18E+09	1.14E+09	1.10E+09
Fuel Rate (cu ft/hr)	1.25E+06	1.21E+06	1.18E+06	1.12E+06

NOTE

Ref. 11/16/01 performance data

Load 100 percent

GE7FA

Case Name	Case 20	Case 23	Case 24	Case 25
Ambient Temp (F)	19	45	70	95
Evap Cooler			X	X
Power Augmentation (Steam Inj.)				
CTG Heat Input HHV (Btu/hr)	2.07E+09	1.99E+09	1.91E+09	1.84E+09
Duct Burner Heat Input HHV (Btu/hr)	0	0	0	0
Total Heat Input HHV (Btu/hr)	2.07E+09	1.99E+09	1.91E+09	1.84E+09
Fuel Rate (gal/hr)	1.44E+04	1.39E+04	1.33E+04	1.29E+04

Case Name	Case 21
Ambient Temp (F)	19

Evap Cooler

Power Augmentation (Steam Inj.)

CTG Heat Input HHV (Btu/hr)	1.66E+09
Duct Burner Heat Input HHV (Btu/hr)	0
Total Heat Input HHV (Btu/hr)	1.66E+09
Fuel Rate (gal/hr)	1.18E+04

Case Name	Case 22
Ambient Temp (F)	19

Evap Cooler

Power Augmentation (Steam Inj.)

CTG Heat Input HHV (Btu/hr)	1.30E+09
Duct Burner Heat Input HHV (Btu/hr)	0
Total Heat Input HHV (Btu/hr)	1.30E+09
Fuel Rate (gal/hr)	9.10E+03

Stanton Energy Center

Revised 11/15/00
Printed 1/17/01 9:22 AM

Enveloped Representative Pollutant Emission and Stack Parameters

Combined Cycle Operation - Natural Gas													Combined Cycle Operation - Fuel Oil																																																																																																																																																																																																																								
<p>NOTE Ref. 01/16/01 performance data.</p> <p>Load 100 percent GETFA</p> <table border="1"> <thead> <tr> <th>Case Name</th> <th>Case 1</th> <th>Case 4</th> <th>Case 5</th> <th>Case 8</th> <th>Case 9</th> <th>Case 10</th> <th>Case 13</th> <th>Case 14</th> <th>Case 17</th> <th>Case 18</th> <th>Case 19</th> </tr> </thead> <tbody> <tr> <td>Ambient Temp (F)</td> <td>19</td> <td>19</td> <td>45</td> <td>45</td> <td>60</td> <td>70</td> <td>70</td> <td>95</td> <td>95</td> <td>95</td> <td>95</td> </tr> <tr> <td>Evap Cooler</td> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> </tr> <tr> <td>Power Aug. (Steam In.)</td> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td></td> <td></td> <td></td> <td>X</td> <td>X</td> <td></td> </tr> <tr> <td>Exit Temp (F)</td> <td>185</td> <td>178</td> <td>181</td> <td>175</td> <td>178</td> <td>178</td> <td>172</td> <td>178</td> <td>169</td> <td>168</td> <td>170</td> </tr> <tr> <td>Exit Velocity (ft/s)</td> <td>62.29</td> <td>62.21</td> <td>59.49</td> <td>59.55</td> <td>61.00</td> <td>56.85</td> <td>56.84</td> <td>54.88</td> <td>57.87</td> <td>57.65</td> <td>54.94</td> </tr> <tr> <td>Emissions (lb/h)</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>NOX (e)</td> <td>24.13</td> <td>30.38</td> <td>23.21</td> <td>29.76</td> <td>29.04</td> <td>22.26</td> <td>27.76</td> <td>21.47</td> <td>28.56</td> <td>29.42</td> <td>26.63</td> </tr> <tr> <td>CO</td> <td>31.00</td> <td>75.90</td> <td>50.00</td> <td>97.13</td> <td>129.50</td> <td>48.00</td> <td>87.51</td> <td>45.00</td> <td>130.12</td> <td>142.51</td> <td>82.14</td> </tr> <tr> <td>PM/PM10</td> <td>9.00</td> <td>11.46</td> <td>9.00</td> <td>11.62</td> <td>11.26</td> <td>9.00</td> <td>11.20</td> <td>9.00</td> <td>11.36</td> <td>11.71</td> <td>11.06</td> </tr> <tr> <td>SO2 (c)</td> <td>2.77</td> <td>3.50</td> <td>2.67</td> <td>3.43</td> <td>3.35</td> <td>2.56</td> <td>3.20</td> <td>2.47</td> <td>3.29</td> <td>3.38</td> <td>3.07</td> </tr> <tr> <td>VOC</td> <td>3.00</td> <td>10.98</td> <td>3.00</td> <td>11.38</td> <td>17.49</td> <td>2.80</td> <td>9.82</td> <td>2.80</td> <td>17.93</td> <td>20.13</td> <td>9.40</td> </tr> </tbody> </table>													Case Name	Case 1	Case 4	Case 5	Case 8	Case 9	Case 10	Case 13	Case 14	Case 17	Case 18	Case 19	Ambient Temp (F)	19	19	45	45	60	70	70	95	95	95	95	Evap Cooler					X	X	X	X	X	X	X	Power Aug. (Steam In.)					X				X	X		Exit Temp (F)	185	178	181	175	178	178	172	178	169	168	170	Exit Velocity (ft/s)	62.29	62.21	59.49	59.55	61.00	56.85	56.84	54.88	57.87	57.65	54.94	Emissions (lb/h)												NOX (e)	24.13	30.38	23.21	29.76	29.04	22.26	27.76	21.47	28.56	29.42	26.63	CO	31.00	75.90	50.00	97.13	129.50	48.00	87.51	45.00	130.12	142.51	82.14	PM/PM10	9.00	11.46	9.00	11.62	11.26	9.00	11.20	9.00	11.36	11.71	11.06	SO2 (c)	2.77	3.50	2.67	3.43	3.35	2.56	3.20	2.47	3.29	3.38	3.07	VOC	3.00	10.98	3.00	11.38	17.49	2.80	9.82	2.80	17.93	20.13	9.40	<p>NOTE Ref. 01/16/01 performance data.</p> <p>Load 100 percent GETFA</p> <table border="1"> <thead> <tr> <th>Case Name</th> <th>Case 20</th> <th>Case 23</th> <th>Case 24</th> <th>Case 25</th> </tr> </thead> <tbody> <tr> <td>Ambient Temp (F)</td> <td>19</td> <td>45</td> <td>70</td> <td>95</td> </tr> <tr> <td>Evap Cooler</td> <td></td> <td></td> <td>X</td> <td>X</td> </tr> <tr> <td>Power Aug. (Steam In.)</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Exit Temp (F)</td> <td>267</td> <td>281</td> <td>278</td> <td>272</td> </tr> <tr> <td>Exit Velocity (ft/s)</td> <td>75.25</td> <td>71.45</td> <td>67.9</td> <td>65.28</td> </tr> <tr> <td>Emissions (lb/h)</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>NOX (e)</td> <td>79.69</td> <td>76.70</td> <td>73.70</td> <td>71.01</td> </tr> <tr> <td>CO</td> <td>71.00</td> <td>67.00</td> <td>64.00</td> <td>61.00</td> </tr> <tr> <td>PM/PM10</td> <td>17.00</td> <td>17.00</td> <td>17.00</td> <td>17.00</td> </tr> <tr> <td>SO2 (d)</td> <td>107.00</td> <td>103.00</td> <td>99.00</td> <td>96.00</td> </tr> <tr> <td>VOC</td> <td>8.00</td> <td>7.50</td> <td>7.00</td> <td>7.00</td> </tr> </tbody> </table>													Case Name	Case 20	Case 23	Case 24	Case 25	Ambient Temp (F)	19	45	70	95	Evap Cooler			X	X	Power Aug. (Steam In.)					Exit Temp (F)	267	281	278	272	Exit Velocity (ft/s)	75.25	71.45	67.9	65.28	Emissions (lb/h)					NOX (e)	79.69	76.70	73.70	71.01	CO	71.00	67.00	64.00	61.00	PM/PM10	17.00	17.00	17.00	17.00	SO2 (d)	107.00	103.00	99.00	96.00	VOC	8.00	7.50	7.00	7.00
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PM/PM10	9.00	11.46	9.00	11.62	11.26	9.00	11.20	9.00	11.36	11.71	11.06																																																																																																																																																																																																																										
SO2 (c)	2.77	3.50	2.67	3.43	3.35	2.56	3.20	2.47	3.29	3.38	3.07																																																																																																																																																																																																																										
VOC	3.00	10.98	3.00	11.38	17.49	2.80	9.82	2.80	17.93	20.13	9.40																																																																																																																																																																																																																										
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Exit Temp (F)	267	281	278	272																																																																																																																																																																																																																																	
Exit Velocity (ft/s)	75.25	71.45	67.9	65.28																																																																																																																																																																																																																																	
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NOX (e)	79.69	76.70	73.70	71.01																																																																																																																																																																																																																																	
CO	71.00	67.00	64.00	61.00																																																																																																																																																																																																																																	
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SO2 (d)	107.00	103.00	99.00	96.00																																																																																																																																																																																																																																	
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<p>Notes</p> <p>a Combined Total Reduced Sulfur Compounds (including H2S) and Total Reduced Sulfur (including H2S)</p> <p>b H2SO4 based on a 10% conversion of SO2 to SO3 and a molecular ratio of 1.22 from SO2 to H2SO4 (in the stack and SCR).</p> <p>c Sulfur content assumed for the Natural Gas = 0.6 grains of sulfur/100 SCF</p> <p>d Sulfur content assumed for the fuel oil = 0.05% sulfur.</p> <p>e Natural Gas NOx emissions at 3.5 ppmvd @ 15% O2. Fuel Oil NOx emissions at 10 ppmvd @ 15% O2.</p> <p>f Assumed 100% conversion of Sulfur to SO2 for natural gas.</p>																																																																																																																																																																																																																																					

Table 3
Fuel Flow Rates Per CTG/HRSG

Case	Ambient Temperature (°F)	Load (%)	Heat Input HHV (Btu/hr)	Fuel Rate Gas (ft ³ /hr) Oil (gal/hr)
Natural Gas^a (ft ³ /hr)				
1	19	100	1.90E+09	1.94E+06
2	19	75	1.53E+09	1.56E+06
3	19	50	1.22E+09	1.25E+06
4	19	100	2.40E+09	2.45E+06
5	45	100	1.83E+09	1.87E+06
6	45	75	1.48E+09	1.51E+06
7	45	50	1.18E+09	1.21E+06
8	45	100	2.35E+09	2.40E+06
9	60	100	2.30E+09	2.34E+06
10	70	100	1.75E+09	1.79E+06
11	70	75	1.42E+09	1.45E+06
12	70	50	1.14E+09	1.16E+06
13	70	100	2.19E+09	2.24E+06
14	95	100	1.69E+09	1.73E+06
15	95	75	1.38E+09	1.41E+06
16	95	50	1.10E+09	1.12E+06
17	95	100	2.26E+09	2.30E+06
18	95	100	2.33E+09	2.37E+06
19	95	100	2.11E+09	2.15E+06
Distillate Fuel Oil^b (gal/hr)				
20	19	100	2.07E+09	1.44E+04
21	19	75	1.66E+09	1.16E+04
22	19	50	1.30E+09	9.10E+03
23	45	100	1.99E+09	1.39E+04
24	70	100	1.91E+09	1.33E+04
25	95	100	1.84E+09	1.29E+04

^aBased on a natural gas heat content of 23,325 Btu/lb (HHV) and density of 23.8 ft³/lb.

^bBased on a distillate oil heat content of 20,306 Btu/lb (HHV) and a density of 1 gal/7.05 lb.

COOLING TOWER EMISSION RATE ESTIMATES

Particulate matter (PM/PM₁₀) emissions from the induced draft mechanical cooling tower were estimated using procedures found in AP42, Section 13.4, Wet Cooling Towers.

A. Cooling Tower Data

Total Liquid Drift = 0.002% of recirculation water flow rate

Total Liquid Drift = 0.002 gal/100 gal recirculation water flow rate

Recirculation Water Flow Rate = 125,000 gal/min

Recirculation Water Total Dissolved Solids (TDS) = 3,704

B. PM/PM₁₀ Emission Rate Calculations

$$\text{PM/PM}_{10} = (125,000 \text{ gal / min}) \times (0.002 \text{ gal / 100 gal H}_2\text{O}) \times (8.345 \text{ lb / gal H}_2\text{O}) \\ \times (3,704 \text{ lb PM/PM}_{10} / 10^6 \text{ lb water}) \times (60 \text{ min / hr})$$

$$\text{PM/PM}_{10} = 4.64 \text{ lb/hr}$$

$$\text{PM/PM}_{10} = 20.32 \text{ ton/yr (8,760 hours/year operation)}$$



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Governor

Department of Environmental Protection

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

May 16, 2003

David B. Struhs
Secretary

ENG 10-5-2
Stanton A

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Robert G. Moore, Senior Vice President
Southern Company Services
One Energy Place
Pensacola, FL 32520

Re: DEP File No. 0950137-002-AC, PSD-FL-313
Stanton Unit A Permit Revisions

Dear Mr. Moore:

The Department has reviewed your request to modify the PSD Permit relative to start-up emissions and CEMS span values. As a result of this review, the Department has concluded that a permit modification may be granted. Accordingly, this request is acceptable as indicated herein.

Permit PSD-FL-313 is hereby modified as follows:

26. Excess emissions resulting from startup, shutdown, fuel switching or malfunction shall be permitted provided that best operational practices are adhered to and the duration of excess emissions shall be minimized. Excess emissions occurrences shall in no case exceed two hours in any 24-hour period ~~except during a "cold start-up" to combined cycle plant operation. During cold start-up to combined cycle operation, up to four hours of excess emissions are allowed. Cold start-up is defined as a startup to combined cycle operation following a complete shutdown lasting at least 72 hours.~~ During any 24-hour period in which an hour of start-up or shutdown occurs, the following alternative emission limits shall apply on the basis of a 24-hour rolling average:

a) An alternative NO_x limit of 127 lb/hr shall apply if natural gas is the exclusively fired fuel

b) An alternative NO_x limit of 370 lb/hr shall apply if any fuel oil is fired

c) An alternative CO limit of 155 lb/hr firing either natural gas or fuel oil

The 24-hour averages shall be based on all available data excluding calibration data. Operation below 50% output per turbine shall otherwise be limited to 2 hours in any 24-hour period. [BACT, Applicant Request and Rule 62-210.700, F.A.C.].

41. Continuous Monitoring System: The permittee shall install, calibrate, maintain, and operate a continuous emission monitor in the stack to measure and record the emissions of NO_x and CO from these emissions units, and the Carbon Dioxide (CO₂) content of the flue gas at the location where NO_x and CO are monitored, in a manner sufficient to demonstrate compliance with the emission limits of this permit. The CEM system shall be used to demonstrate compliance with the emission limits for NO_x and CO established in this permit. Compliance with the emission limits for NO_x shall be based on a 3-hour block average. The 3-hour block average shall be calculated from 3 consecutive hourly average emission rate values. Compliance with the emission limits for CO shall be based on a 24-hour block average starting at midnight of each operating day. The 24-hour block average shall be calculated from 24 consecutive hourly average emission rate values. Each hourly value shall be computed using at least one data point in each fifteen-minute quadrant of an hour, where the unit

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Mr. Robert G. Moore
May 13, 2003

combusted fuel during that quadrant of an hour. Notwithstanding this requirement, an hourly value shall be computed from at least two data points separated by a minimum of 15 minutes (where the unit operates for more than one quadrant of an hour). The owner or operator shall use all valid measurements or data points collected during an hour to calculate the hourly averages. All data points collected during an hour shall be, to the extent practicable, evenly spaced over the hour. The permittee may use the inlet SCR NO_x monitor as a backup analyzer in determining excess emissions during startup. If the CEM system measures concentration on a wet basis, the CEM system shall include provisions to determine the moisture content of the exhaust gas and an algorithm to enable correction of the monitoring results to a dry basis (0% moisture). Alternatively, the owner or operator may develop through manual stack test measurements a curve of moisture contents in the exhaust gas versus load for each allowable fuel, and use these typical values in an algorithm to enable correction of the monitoring results to a dry basis (0% moisture). Final results of the CEM system shall be expressed as ppmvd, corrected to 15% oxygen.

The NO_x monitor shall be certified and operated in accordance with the following requirements. The NO_x monitor shall be certified pursuant to 40 CFR Part 75 and shall be operated and maintained in accordance with the applicable requirements of 40 CFR Part 75, Subparts B and C. For purposes of determining compliance with the emission limits specified within this permit, missing data shall not be substituted. Instead the block average shall be determined using the remaining hourly data in the 3-hour block. However, in the event that the permittee maintains 95% or greater availability of the continuous emission monitoring systems used for determining NO_x emissions compliance for the previous quarter, then compliance with the emission limits for NO_x shall be based on 3 valid consecutive hours of data for a 3-hour block average. Record keeping and reporting shall be conducted pursuant to 40 CFR Part 75, Subparts F and G. The RATA tests required for the NO_x monitor shall be performed using EPA Method 20 or 7E, of Appendix A of 40 CFR 60. The NO_x monitor shall be a dual range monitor. The span for the lower range shall ~~not be greater than~~ be between or inclusive of the values of 10 and 20 ppm, and the span for the upper range shall ~~not be greater than 30~~ be between or inclusive of the values of 200 and 250 ppm, as corrected to 15% O₂. The CO monitor and CO₂ monitor shall be certified and operated in accordance with the following requirements. The CO monitor shall be certified pursuant to 40 CFR 60, Appendix B, Performance Specification 4. The CO₂ monitor shall be certified pursuant to 40 CFR 60, Appendix B, Performance Specification 3. Quality assurance procedures shall conform to the requirements of 40 CFR 60, Appendix F, and the Data Assessment Report of section 7 shall be made each calendar quarter, and reported semi-annually to the Department's Central District Office. The RATA tests required for the CO monitor shall be performed using EPA Method 10, of Appendix A of 40 CFR 60. The Method 10 analysis shall be based on a continuous sampling train, and the ascarite trap may be omitted or the interference trap of section 10.1 may be used in lieu of the silica gel and ascarite traps. The CO monitor shall be a dual range monitor. The span for the lower range shall ~~not be greater than~~ be between or inclusive of the values of 20 and 30 ppm, and the span for the upper range shall ~~not be greater than 100~~ be between or inclusive of the values of 500 and 1000 ppm, as corrected to 15% O₂. The RATA tests required for the CO₂ monitor shall be performed using EPA Method 3B, of Appendix A of 40 CFR 60.

NO_x, CO and CO₂ emissions data shall be recorded by the CEM system during episodes of startup, shutdown and malfunction. NO_x and CO emissions data recorded during ~~these episodes~~ malfunctions may be excluded from the block average calculated to demonstrate compliance with the emission limits specified within this permit. ~~Periods of data excluded for startup shall not exceed two hours in any block 24-hour period except for "cold startup." A cold startup is defined as a startup following a complete shutdown lasting a minimum of 72 hours. Periods of data excluded for cold startup shall not exceed four hours in any 24-hour block period. Periods of data excluded for shutdown shall not exceed two hours in any 24-hour block period. Periods of data excluded for malfunctions shall not exceed two hours in any 24-hour block period. All periods of data excluded for any startup, shutdown or malfunction episode shall be consecutive for each episode. Periods of data excluded for all startup,~~

Mr. Robert G. Moore
May 13, 2003

~~shutdown or malfunction episodes shall not exceed four hours in any 24-hour block period. The owner or operator shall minimize the duration of data excluded for startup, shutdown and malfunctions, to the extent practicable. Data recorded during startup, shutdown or malfunction events shall not be excluded if the startup, shutdown or malfunction episode was caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure, which may reasonably be prevented.~~

Best operational practices shall be used to minimize hourly emissions that occur during episodes of startup, shutdown and malfunction. Emissions of any quantity or duration that occur entirely or in part from poor maintenance, poor operation, or any other equipment or process failure, which may reasonably be prevented, shall be prohibited.

A summary report of duration of data excluded from the block average calculation, and all instances of missing data from monitor downtime, shall be reported to the Department's Central District office semi-annually, and shall be consolidated with the report required pursuant to 40 CFR 60.7. For purposes of reporting "excess emissions" pursuant to the requirements of 40 CFR 60.7, excess emissions shall be defined as the hourly emissions which are recorded by the CEM system during periods of data excluded for episodes of startup, shutdown and malfunction, allowed above. The duration of excess emissions shall be the duration of the periods of data excluded for such episodes. Reports required by this paragraph and by 40 CFR 60.7 shall be submitted no less than semi-annually, including semi-annual periods in which no data is excluded or no instances of missing data occur. Upon request from the Department, the CEMS emission rates shall be corrected to ISO conditions to demonstrate compliance with the applicable standards of 40 CFR 60.332. [Rules 62-4.070(3) and 62-212.400., F.A.C., and BACT]

[Note: Compliance with these requirements will ensure compliance with the other CEM system requirements of this permit to comply with Subpart GG requirements, as well as the applicable requirements of Rule 62-297.520, F.A.C., 40 CFR 60.7(a)(5) and 40 CFR 60.13, and with 40 CFR Part 51, Appendix P, 40 CFR 60, Appendix B, Performance Specifications and 40 CFR 60, Appendix F, Quality Assurance Procedures].

No other changes to the permit are authorized by this action.

A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permit modification is issued pursuant to Chapter 403, Florida Statutes. Any party to this order (permit modification) has the right to seek judicial review of it under Section 120.68, F.S., by the filing of a Notice of Appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the Clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station 35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, 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 (thirty) days after this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

Sincerely,



Howard L. Rhodes, Director
Division of Air Resources
Management

Mr. Robert G. Moore
May 13, 2003

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final PSD Permit Modification was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 5/20/03 to the person(s) listed:

Mr. Robert G. Moore, Southern Company *
Mr. Glenn D. Waters, Gulf Power
Mr. Gregg Worley, EPA
Mr. John Bunyak, NPS
Mr. Len Kozlov, CD
Mr. Buck Oven, DEP
Ms. Marie Driscoll, Orange County EPD

Clerk Stamp

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

Victoria Gibson May 20, 2003
(Clerk) (Date)

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF PERMIT

In the Matter of an
Application for Permit by:

Mr. Robert G. Moore, VP Gulf Power Company
OUC/KUA/FMPA/Southern Company – Florida, LLC
One Energy Place
Pensacola, FL 32520-0328

DEP File 0950137-002-AC (PSD-313)
Curtis H. Stanton Energy Center
Orange County

Enclosed is the Final Permit Number PSD-FL-313. This permit authorizes the applicants to construct a natural-gas fired combined cycle unit known as Stanton Combined Cycle Unit A at the existing Curtis H. Stanton Energy Center in Orange County. This permit is issued pursuant to Chapter 403, Florida Statutes and 40CFR52.21.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

In addition to the appeal process described above, federal appeals procedures concerning this PSD permit are outlined in 40CFR 124.19, which is attached. Any person who filed comments on the draft permit may petition the Environmental Appeals Board to review any condition of the permit decision. Any person who failed to file comments on the draft permit may petition for administrative review only to the extent of the changes from the draft to the final permit decision.

The petition must be filed with the Environmental Appeals Board within 30 days of issuance of this Notice. Petitions may be addressed to the Environmental Appeals Board, MC 1103B, U.S. Environmental Protection Agency, 401 M Street, Washington, D.C. 20460. Further details are available at www.epa.gov/eab.

Executed in Tallahassee, Florida.



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

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT (including the FINAL permit) was sent by certified mail* and copies were mailed by U.S. Mail before the close of business on 9/26/01 to the person(s) listed:

Robert G. Moore, Gulf Power *
Chair of County Commission, Orange County *
James O. Vick, Gulf Power ↓
Rodney I. Unruh, P.E. (Black & Veatch)
Gregg Worley, EPA
John Bunyak, NPS
Len Kozlov, DEP-Central District
Marie Driscoll, Orange County EPD
Tasha O. Buford, E., Attorney
Mr. Hamilton S. Oven, DEP-Siting

Clerk Stamp

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

Victoria Gibson 9/26/01
(Clerk) (Date)

FINAL DETERMINATION

OUC/KUA/FMPA/Southern Company – Florida, LLC
Stanton Energy Center Combined Cycle Unit A
DEP File No. PA 81-14SA2, PSD-FL-313

The Department distributed a public notice package on May 17, 2001 to allow the applicant to make a combined cycle unit addition at the existing Curtis H. Stanton Energy Center located in Orlando, Orange County. The Public Notice of Intent to Issue was published in the Orlando Sentinel on May 27, 2001.

COMMENTS/CHANGES

Comments were received from the EPA dated May 17 and June 18, 2001.

Comments were received from the Fish & Wildlife Service dated February 9, 2001.

Comments on the draft permit were received from the applicant by letter dated April 25, 2001.

Comments were reviewed and incorporated into the Draft Conditions of Certification.

Pursuant to notice, the Division of Administrative Hearings, by its duly designated Administrative Law Judge, C. A. Stampelos, conducted a formal site certification hearing (Case No. 01-0416EPP) in this proceeding on June 26, 2001 in Orange County, Florida. On July 23, 2001, it was recommended that the Siting Board grant full and final certification to the Orlando Utilities Commission, Kissimmee Utility Authority, Florida Municipal Power Agency, and Southern-Florida, LLC, under Section 403, Part II, Florida Statutes, for the location, construction, and operation of Stanton Unit A and its associated facilities, as described in the Supplemental Site Certification Application and the evidence presented at the certification hearing.

On September 11, 2001 the Siting Board concurred with the Administrative Law Judge's recommendation and authorized issuance of related permits via its Final Order.

CONCLUSION

The final action of the Department is to issue the permit consistent with changes described above.



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

PERMITTEE:

OUC/KUA/FMPA/Southern Company – Florida, LLC
One Energy Place
Pensacola, FL 32520-0328

File No.	PSD-FL-313 (PA81-14SA2)
FID No.	0950137
SIC No.	4911
Expires:	December 31, 2004

Authorized Representative:

Mr. Robert G. Moore, VP of Power Generation and
Transmission, Gulf Power Company

PROJECT AND LOCATION:

Permit pursuant to the requirements for the Prevention of Significant Deterioration of Air Quality (PSD Permit) for the construction of a nominal 640 megawatt (MW) Combined Cycle unit consisting of: two nominal 170 MW, General Electric "F" Class (PG7241FA) combustion turbine-electrical generators, fired with pipeline natural gas or diesel and equipped with evaporative coolers on the inlet air system; two supplementally fired heat recovery steam generators (HRSGs), each with a 160 ft. stack; one steam turbine-electrical generator rated at approximately 300 MW; one fresh water cooling tower; one distillate fuel storage tank and ancillary equipment. The combined cycle unit will achieve approximately 700 megawatts during extreme winter peaking conditions. The unit is to be installed at the existing OUC Stanton Energy Center, located at 5100 South Alafaya Trail, Orlando, Orange County. UTM coordinates are: Zone 17; 483.61 km E, 3151.1 km N.

STATEMENT OF BASIS:

This PSD permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.) and 40CFR52.21. The above named permittee is authorized to modify the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection.

The attached Appendices are made a part of this permit:

Appendix GC	Construction Permit General Conditions
Appendix GG	Subpart GG, Standards of Performance for Stationary Gas Turbines
Appendix XS	Semi-Annual Continuous Emission Monitor Systems Report

Howard L. Rhodes, Director
Division of Air Resources
Management

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PREVENTION OF SIGNIFICANT DETERIORATION PERMIT PSD-FL-313

SECTION I - FACILITY INFORMATION

FACILITY DESCRIPTION

OUC Stanton Energy Center consists of two fossil fuel fired steam electric generating stations, E.U. ID No. -001 (Unit No. 1) and -002 (Unit No. 2); also, there are storage and handling facilities for solid fuels, fly ash, limestone, gypsum, slag, and bottom ash. This project includes: two nominal 170 MW, General Electric "F" Class (PG7241FA) combustion turbine-electrical generators, fired with pipeline natural gas or diesel and equipped with evaporative coolers on the inlet air system; two supplementally fired heat recovery steam generators (HRSGs), each with a 160 ft. stack; one steam turbine-electrical generator rated at approximately 300 MW; one fresh water cooling tower; one distillate fuel storage tank and ancillary equipment.

The turbines will be equipped with Dry Low NO_x combustors as well as an SCR in order to control NO_x emissions to 3.5 ppmvd at 15% O₂ while firing natural gas. During fuel oil firing, emissions will be held to 10 ppmvd at 15% O₂ using SCR plus water injection. Pipeline quality natural gas, 0.05% sulfur oil and good combustion practices will be employed to control all pollutants.

EMISSIONS UNITS

This permit addresses the following emissions units:

EMISSION UNIT	SYSTEM	EMISSION UNIT DESCRIPTION
025	Power Generation	One nominal 170 Megawatt Gas Combustion Turbine-Electrical Generator configured as a combined cycle unit, complete with supplementary fired HRSG
026	Power Generation	One nominal 170 Megawatt Gas Combustion Turbine-Electrical Generator configured as a combined cycle unit, complete with supplementary fired HRSG
027	Water Cooling	One 10 cell Mechanical Draft Cooling Tower
028	Fuel Storage	One 1,680,000 Gallon Distillate Fuel Oil Storage Tank

REGULATORY CLASSIFICATION

The facility is classified as a Major or Title V Source of air pollution because emissions of at least one regulated air pollutant, such as particulate matter (PM/PM₁₀), sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), or volatile organic compounds (VOC) exceeds 100 tons per year (TPY).

This facility is within an industry (fossil fuel-fired steam electric plant) included in the list of the 28 Major Facility Categories per Table 62-212.400-1, F.A.C. Because emissions are greater than 100 TPY for at least one criteria pollutant, the facility is also a Major Facility with respect to Rule 62-212.400, Prevention of Significant Deterioration (PSD). Pursuant to Table 62-212.400-2, this facility modification results in emissions increases greater than 40 TPY of SO₂ and NO_x, 25/15 TPY of PM/PM₁₀, 100 TPY of CO and 40 TPY of VOC's. These pollutants require review per the PSD rules and a determination for Best Available Control Technology (BACT) per Rule 62-212.400, F.A.C.

This project is subject to the applicable requirements of Chapter 403, Part II, F.S., Electric Power Plant and Transmission Line Siting. [Chapter 403.503 (12), F.S., Definitions]

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SECTION I - FACILITY INFORMATION

Based on the Title V permit, this facility is not currently a major source of hazardous air pollutants (HAPs). This facility is subject to certain Acid Rain provisions of Title IV of the Clean Air Act.

PERMIT SCHEDULE

- 09/21/01 PSD Permit Issued
- 09/11/01 Site Certification Issued
- 05/27/01 Notice of Intent to Issue PSD Permit published in Orlando Sentinel
- 05/17/01 Distributed Intent to Issue Permit
- 05/01/01 Application Complete
- 01/22/01 Received PSD Application

RELEVANT DOCUMENTS:

The documents listed below are the basis of the permit. They are specifically related to this permitting action, but are not incorporated into this permit. These documents are on file with the Department.

- Application received on January 22, 2001.
- Letter from Fish & Wildlife Service dated February 9, 2001.
- Additional information received from applicant on May 1, 2001.
- Department's Intent to Issue and Public Notice Package dated May 17, 2001.
- Department's Draft Permit and Draft BACT determination dated May 17, 2001.
- Letters from EPA Region IV dated May 17 and June 18, 2001.
- Site Certification for the Stanton A Combined Cycle addition dated September 11, 2001.
- Department's Final Determination and Best Available Control Technology Determination issued concurrently with this Final Permit.

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SECTION II - ADMINISTRATIVE REQUIREMENTS

GENERAL AND ADMINISTRATIVE REQUIREMENTS

1. **Regulating Agencies:** All documents related to applications for permits to construct, operate or modify an emissions unit should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection (FDEP), at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 and phone number (850) 488-0114. All documents related to reports, tests, and notifications should be submitted to the DEP Central District Office, 3319 Maguire Boulevard, Suite 232, Orlando, Florida 32803-3767 and phone number 407/894-7555.
2. **General Conditions:** The owner and operator is subject to and shall operate under the attached *General Permit Conditions G.1 through G.15 listed in Appendix GC of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]*
3. **Terminology:** The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.
4. **Forms and Application Procedures:** The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. [Rule 62-210.900, F.A.C.]
5. **Modifications:** The permittee shall give written notification to the Department when there is any modification to this facility. This notice shall be submitted sufficiently in advance of any critical date involved to allow sufficient time for review, discussion, and revision of plans, if necessary. Such notice shall include, but not be limited to, information describing the precise nature of the change; modifications to any emission control system; production capacity of the facility before and after the change; and the anticipated completion date of the change. [Chapters 62-210 and 62-212, F.A.C.]
6. **Expiration:** Approval to construct shall become invalid if construction is not commenced within 18 months after receipt of such approval, or if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. The Department may extend the 18-month period upon a satisfactory showing that an extension is justified. [40 CFR 52.21(r)(2)]
7. **BACT Determination:** In accordance with paragraph (4) of 40 CFR 52.21 (j) and 40 CFR 51.166(j), the Best Available Control Technology (BACT) determination shall be reviewed and modified as appropriate in the event of a plant conversion. This paragraph states: "For phased construction projects, the determination of best available control technology shall be reviewed and modified as appropriate at the latest reasonable time which occurs no later than 18 months prior to commencement of construction of each independent phase of the project. At such time, the owner or operator of the applicable stationary source may be required to demonstrate the adequacy of any previous determination of best available control technology for the source." This reassessment will also be conducted for this project if there are any increases in heat input limits, hours of operation, oil firing, low or baseload operation, short-term or annual emission limits, annual fuel heat input limits or similar changes. [40 CFR 52.21(j), 40 CFR 51.166(j) and Rule 62-4.070 F.A.C.]
8. **Permit Extension:** The permittee, for good cause, may request that this PSD permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit. In conjunction with extension of the 18-month periods to commence or continue construction, or extension of the December 31, 2004 permit expiration date, the permittee may be required to demonstrate the adequacy of any previous determination of best available control technology for the source. [Rule 62-4.080, F.A.C.]

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SECTION II - ADMINISTRATIVE REQUIREMENTS

9. Application for Title IV Permit: An application for a Title IV Acid Rain Permit, must be submitted to the U.S. Environmental Protection Agency Region IV office in Atlanta, Georgia and a copy to the DEP's Bureau of Air Regulation in Tallahassee 24 months before the date on which the new unit begins serving an electrical generator (greater than 25 MW). [40 CFR 72]
10. Application for Title V Permit: An application for a Title V operating permit, pursuant to Chapter 62-213, F.A.C., must be submitted to the DEP's Bureau of Air Regulation, and a copy to the Department's Central District Office. [Chapter 62-213, F.A.C.]
11. New or Additional Conditions: Pursuant to Rule 62-4.080, F.A.C., for good cause shown 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. [Rule 62-4.080, F.A.C.]
12. Annual Reports: Pursuant to Rule 62-210.370(2), F.A.C., Annual Operation Reports, the permittee is required to submit annual reports on the actual operating rates and emissions from this facility. Annual operating reports shall be sent to the DEP's Central District Office by March 1st of each year.
13. Stack Testing Facilities: Stack sampling facilities shall be installed in accordance with Rule 62-297.310(6), F.A.C.
14. Quarterly Reports: Quarterly excess emission reports, in accordance with 40 CFR 60.7 (a)(7) (c) (1998 version), shall be submitted to the DEP's Central District Office.

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SECTION III - EMISSIONS UNIT(S) SPECIFIC CONDITIONS

APPLICABLE STANDARDS AND REGULATIONS

1. Unless otherwise indicated in this permit, the construction and operation of the subject emission unit(s) shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S. and Florida Administrative Code Chapters 62-4, 62-17, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296, and 62-297; and the applicable requirements of the Code of Federal Regulations Section 40, Parts 52, 60, 72, 73, and 75.
2. **NSPS Requirements:** Each combustion turbine (CT) shall comply with all applicable requirements of 40 CFR 60, adopted by reference in Rule 62-204.800(7)(b), F.A.C.
 - a. **Subpart A, General Provisions**, including: 40 CFR 60.7 (Notification and Record Keeping), 40 CFR 60.8 (Performance Tests), 40 CFR 60.11 (Compliance with Standards and Maintenance Requirements), 40 CFR 60.12 (Circumvention), 40 CFR 60.13 (Monitoring Requirements), and 40 CFR 60.19 (General Notification and Reporting Requirements).
 - b. **Subpart GG, Standards of Performance for Stationary Gas Turbines;** see attached *Appendix GG*.
3. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations. [Rule 62-210.300, F.A.C.]
4. These emission units shall comply with all applicable requirements of 40CFR60, Subpart A, General Provisions including:
 - 40CFR60.7, Notification and Recordkeeping
 - 40CFR60.8, Performance Tests
 - 40CFR60.11, Compliance with Standards and Maintenance Requirements
 - 40CFR60.12, Circumvention
 - 40CFR60.13, Monitoring Requirements
 - 40CFR60.19, General Notification and Reporting requirements
5. ARMS Emissions Units 025 and 026. Direct Power Generation, each consisting of a nominal 170 megawatt combustion turbine-electrical generator, shall comply with all applicable provisions of 40CFR60, Subpart GG, Standards of Performance for Stationary Gas Turbines, adopted by reference in Rule 62-204.800(7)(b), F.A.C. The Subpart GG requirement to correct test data to ISO conditions applies. However, such correction is not used for compliance determinations with the BACT standard(s). Additionally, each Emissions Unit consists of a supplementally fired heat recovery steam generator equipped with a natural gas fired 542 MMBTU/hr duct burner (HHV) and combined with a nominal 300 MW steam electrical generators. These shall comply with all applicable provisions of 40CFR60, Subpart Da, Standards of Performance for Electric Utility Steam Generating Units Which Construction is Commenced After September 18, 1978, adopted by reference in Rule 62-204.800(7), F.A.C.
6. ARMS Emission Unit 027. Cooling Tower, an unregulated emission unit. The Cooling Tower is not subject to a NESHAP because chromium-based chemical treatment is not used.
7. ARMS Emission Unit 028. Fuel Storage Tank, consisting of a 1,680,000 gallon distillate fuel storage tank. The storage tank is subject to 40 CFR 60, Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction or Modification Commenced After July 23, 1984.

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SECTION III - EMISSIONS UNIT(S) SPECIFIC CONDITIONS

8. All notifications and reports required by the above specific conditions shall be submitted to the DEP's Central District Office.

GENERAL OPERATION REQUIREMENTS

9. Fuels: Only pipeline natural gas or (up to) 1000 hours per year of 0.05% distillate fuel oil shall be fired in each CT emissions unit. Only natural gas shall be fired in each duct burner. [Applicant Request, Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)]
10. Combustion Turbine Capacity: The maximum heat input rates to each CT/HRSG shall not exceed 2,402 million Btu (HHV) per hour (MMBtu/hr) when firing natural gas with duct burner firing and power augmentation. The maximum heat input rates to each CT/HRSG shall not exceed 2,068 MMBtu/hr (HHV) when firing fuel oil. Manufacturer's curves corrected for ISO conditions shall be provided to the Department of Environmental Protection (DEP) within 45 days of completing the initial compliance testing. {Permitting note: The heat input limitations have been placed in the permit to identify the capacity of each emissions unit for purposes of confirming that emissions testing is conducted within 90-100 percent of the emissions unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate limits and to aid in determining future rule applicability} [Design, Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)]
11. Heat Recovery Steam Generator equipped with Duct Burner. The maximum heat input rate of the natural gas fired duct burner shall not exceed 533 MMBtu/hour (LHV) at any temperature or under any scenario. [Applicant Request, Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)]
12. Unconfined Particulate Emissions: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary.
13. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the owner or operator shall notify the DEP Central District office as soon as possible, but at least within (1) working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; the steps being taken to correct the problem and prevent future 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 the conditions of this permit and the regulations. [Rule 62-4.130, F.A.C.]
14. Operating Procedures: Operating procedures shall include good operating practices and proper training of all operators and supervisors. The good operating practices of pollution control equipment shall meet the guidelines and procedures as established by the equipment manufacturers. All operators (including supervisors) of air pollution control devices shall be properly trained in plant specific equipment. [Rule 62-4.070(3), F.A.C.]
15. Circumvention: The owner or operator shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rules 62-210.650, F.A.C.]
16. Maximum allowable hours of operation for each CT/HRSG Emissions Unit are 8760 hours per year while firing natural gas. Fuel oil firing is permitted for 1000 hours during any consecutive 12-month period in each CT. [Applicant Request, Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)]

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SECTION III - EMISSIONS UNIT(S) SPECIFIC CONDITIONS

17. Simple Cycle Operation: The plant may not be operated without the use of the SCR system except during periods of startup and shutdown.

CONTROL TECHNOLOGY

18. Dry Low NO_x (DLN) combustors and water injection capability shall be installed on each stationary combustion turbine. The permittee shall install a selective catalytic reduction system to comply with the NO_x and ammonia limits listed in Specific Condition 21. Additionally, space shall be provided for the installation of oxidation catalysts. [Design, Rules 62-4.070 and 62-212.400, F.A.C.]
19. The permittee shall design these units to accommodate adequate testing and sampling locations for compliance with the applicable emission limits (per each unit) listed in Specific Conditions No. 21 through 25. [Rule 62-4.070, Rule 62-204.800, F.A.C., and 40 CFR60.40a(b)]
20. Drift eliminators shall be installed on the cooling tower to reduce PM/PM₁₀ emissions. A certification letter, following installation (and prior to startup) shall be submitted that the drift eliminators were installed and that the installation is capable of meeting 0.002-gallons/100 gallons recirculation water flowrate.

EMISSION LIMITS AND STANDARDS

21. Nitrogen Oxides (NO_x) Emissions:

- The concentration of NO_x in the stack exhaust gas, with the combustion turbine operating on natural gas shall not exceed 3.5 ppmvd @15% O₂ on a 3-hr block average. This limit shall apply whether or not the unit is operating with duct burner on and/or in power augmentation mode. Compliance shall be determined by the continuous emission monitor (CEMS). [BACT Determination]
- The emissions of NO_x in the stack exhaust gas, with the combustion turbine operating on fuel oil shall not exceed 10.0 ppmvd @15% O₂ on a 3-hr block average. Compliance shall be determined by the continuous emission monitor (CEMS). [BACT Determination]
- Emissions of NO_x from the duct burner shall not exceed 0.1 lb/MMBtu, which is more stringent than the NSPS (see Specific Condition 30 for compliance procedures). [Applicant Request, Rule 62-4.070 and 62-204.800(7), F.A.C.]
- The concentration of ammonia in the exhaust gas from each CT/HRSG shall not exceed 5.0 ppmvd @15% O₂. The compliance procedures are described in Specific Conditions 29 and 45. [BACT, Rules 62-212.400 and 62-4.070, F.A.C.]

22. Carbon Monoxide (CO) Emissions: Emissions of CO in the stack exhaust gas (at ISO conditions) with the combustion turbine operating on natural gas shall not exceed 17 ppmvd @15% O₂ on a 24-hr block average to be demonstrated by CEMS; and neither 14 ppmvd @15% O₂ with the CT operating on fuel oil on a 24-hr block average to be demonstrated by CEMS. These limits shall also be demonstrated by annual stack test using EPA Method 10 or through annual RATA testing. Within 24 months of the date of completion of initial testing, the applicant shall either have installed oxidation catalyst in each CT/HRSG or forfeit its right to do so with the pre-determined (BACT) emission limits specified below. [BACT, Rule 62-212.400, F.A.C.]

- In the event that an oxidation catalyst is installed for any reason in either CT/HRSG pair within 24 months of the date of completion of initial testing, the limits for CO and VOC shall be 5 ppmvd

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and 3 ppmvd (respectively) to be demonstrated by stack testing during power augmentation and duct burner firing (I, A). [BACT]

23. **Volatile Organic Compounds (VOC) Emissions:** Emissions of VOC in the stack exhaust gas (baseline at ISO conditions) with the combustion turbine operating on gas shall exceed neither 2.7 ppmvd @15% O₂ with the CT firing fuel oil and neither 6.3 ppmvd @15% O₂ with the CT firing natural gas (with maximum duct burner firing and operating in power augmentation mode); to be demonstrated by initial stack tests using EPA Method 18, 25 or 25A. [BACT, Rule 62-212.400, F.A.C.]
24. **Sulfur Dioxide (SO₂) emissions:** SO₂ emissions shall be limited by firing pipeline natural gas (sulfur content not greater than 1.5 grains per 100 standard cubic foot) and up to 1000 hours per consecutive 12-month period of 0.05% sulfur fuel oil. Compliance with these fuel limits in conjunction with implementation of the attached Appendix GG will demonstrate compliance with the applicable NSPS SO₂ emissions limitations from the duct burner and the combustion turbine. Note: This will effectively limit the combined SO₂ emissions for EU-025 and EU-026 to approximately 134 tons per year. [BACT, 40CFR60 Subpart GG and Rules 62-4.070, 62-212.400, and 62-204.800(7), F.A.C.]
25. **PM/PM₁₀ and Visible emissions (VE):** VE emissions shall not exceed 10 percent opacity from the stack in use. [BACT, Rules 62-4.070, 62-212.400, and 62-204.800(7), F.A.C.]

EXCESS EMISSIONS

26. **Excess emissions** resulting from startup, shutdown, or malfunction shall be permitted provided that best operational practices are adhered to and the duration of excess emissions shall be minimized. Excess emissions occurrences shall in no case exceed two hours in any 24-hour period except during a "cold start-up" to combined cycle plant operation. During cold start-up to combined cycle operation, up to four hours of excess emissions are allowed. Cold start-up is defined as a startup to combined cycle operation following a complete shutdown lasting at least 72 hours. Operation below 50% output per turbine shall otherwise be limited to 2 hours in any 24-hour period. [BACT, Rule 62-210.700, F.A.C.].
27. **Excess emissions** entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction, shall be prohibited pursuant to Rule 62-210.700, F.A.C. These emissions shall be included in the 3-hr average for NO_x and the 24-hr average for CO.
28. **Excess Emissions Report:** If excess emissions occur for more than two hours due to malfunction, the owner or operator shall notify DEP's Central District office within (1) working day of: the nature, extent, and duration of the excess emissions; the cause of the excess emissions; and the actions taken to correct the problem. In addition, the Department may request a written summary report of the incident. Pursuant to the New Source Performance Standards, all excess emissions shall also be reported in accordance with 40 CFR 60.7, Subpart A. Following this format, 40 CFR 60.7, and using the monitoring methods listed in Specific Conditions 41 through 45, periods of startup, shutdown, malfunction, shall be monitored, recorded, and reported as excess emissions when emission levels exceed the permitted standards listed in Specific Condition No. 21 through 25. [Rules 62-4.130, 62-204.800, 62-210.700(6), F.A.C., and 40 CFR 60.7 (1998 version)].

COMPLIANCE DETERMINATION

29. Compliance with the allowable emission limiting standards shall be determined within 60 days after achieving the maximum production rate for each fuel, but not later than 180 days of initial operation of

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the unit, and annually thereafter as indicated in this permit, by using the following reference methods as described in 40 CFR 60, Appendix A (1998 version), and adopted by reference in Chapter 62-204.800, F.A.C.

30. Initial (I) performance tests shall be performed by the deadlines in Specific Condition 29. Initial tests shall also be conducted after any replacement of the major components of the air pollution control equipment (and shake down period not to exceed 100 days after re-starting the CT), such as replacement of SCR catalyst or addition of oxidation catalyst (or change of combustors, if specifically requested by the DEP on a case-by-case basis). Annual (A) compliance tests shall be performed during every federal fiscal year (October 1 - September 30) pursuant to Rule 62-297.310(7), F.A.C., on these units as indicated. The following reference methods shall be used. No other test methods may be used for compliance testing unless prior DEP approval is received in writing. Where initial tests only are indicated, these tests shall be repeated prior to renewal of each operation permit.
- EPA Reference Method 9, "Visual Determination of the Opacity of Emissions from Stationary Sources" (I, A).
 - EPA Reference Method 10, "Determination of Carbon Monoxide Emissions from Stationary Sources" (I, A).
 - EPA Reference Method 20, "Determination of Oxides of Nitrogen Oxide, Sulfur Dioxide and Diluent Emissions from Stationary Gas Turbines" (EPA reference Method 7E, "Determination of Nitrogen Oxides Emissions from Stationary Sources" or RATA test data may be used to demonstrate compliance for annual test requirement) shall be conducted a) while firing natural gas with maximum duct burner heat input as well as maximum power augmentation and b) while firing fuel oil at the maximum heat input; Initial test for compliance with 40CFR60 Subpart GG; Initial (only) NO_x compliance test for the duct burners (Subpart Da) shall be accomplished via testing with duct burners "on" as compared to "off" and computing the difference.
 - EPA Reference Method 18, 25 and/or 25A, "Determination of Volatile Organic Concentrations." Initial test only.
 - Method CTM-027 for ammonia slip (I, A) to be completed simultaneously with NO_x compliance testing.

The applicant shall calculate and report the ppmvd ammonia slip (@ 15% O₂) at the measured lb/hr NO_x emission rate as a means of compliance with the BACT standard. The applicant shall also be capable of calculating ammonia slip at the Department's request, according to Specific Condition 45.

31. Continuous compliance with the CO and NO_x emission limits: Continuous compliance with the CO and NO_x emission limits shall be demonstrated by the CEM system on the specified hour average basis. Based on CEMS data, a separate compliance determination is conducted at the end of each period and a new average emission rate is calculated from the **arithmetic average** of all valid hourly emission rates from the previous period. Specific Condition 41 further describes the CEM system requirements. Excess emissions periods shall be reported as required in Condition 28. [Rules 62-4.070 F.A.C., 62-210.700, F.A.C., 40 CFR 75 and BACT]
32. Compliance with the SO₂ and PM/PM₁₀ emission limits: For the purposes of demonstrating compliance with the 40 CFR 60.333 SO₂ standard, the applicant is responsible for ensuring that the procedures outlined in attached Appendix GG are complied with.

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33. **Compliance with CO emission limit:** An initial and annual test for CO shall be conducted at 100% capacity with the duct burners off. The NO_x and CO test results shall be the average of three valid one-hour runs. Annual RATA testing for the CO and NO_x CEMS shall be required pursuant to 40 CFR 75 and may substitute for the annual CO stack testing requirement.
34. **Compliance with the VOC emission limit:** An initial test is required to demonstrate compliance with the VOC emission limit. Thereafter, the CO emission limit will be employed as a surrogate and no annual testing is required [see Specific Condition 22 for exception].
35. **Testing procedures:** Unless otherwise specified, testing of emissions shall be conducted with the combustion turbine operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum heat input rate allowed by the permit, corrected for the average inlet air temperature during the test (with 100 percent represented by a curve depicting heat input vs. inlet temperature). Procedures for these tests shall meet all applicable requirements (i.e., testing time frequency, minimum compliance duration, etc.) of Chapters 62-204 and 62-297, F.A.C.
36. **Test Notification:** The DEP's Central District office shall be notified, in writing, at least 30 days prior to the initial performance tests and at least 15 days before annual compliance tests.
37. **Special Compliance Tests:** The DEP may request a special compliance test pursuant to Rule 62-297.310(7), F.A.C., when, after investigation (such as complaints, increased visible emissions, odors or questionable maintenance of control equipment), there is reason to believe that any applicable emission standard is being violated.
38. **Test Results:** Compliance test results shall be submitted to the DEP's Central District office no later than 45 days after completion of the last test run. [Rule 62-297.310(8), F.A.C.].

NOTIFICATION, REPORTING, AND RECORDKEEPING

39. **Records:** All measurements, records, and other data required to be maintained by the applicant shall be recorded in a permanent form and retained for at least five (5) years following the date on which such measurements, records, or data are recorded. These records shall be made available to DEP representatives upon request.
 - The applicant will be required to maintain records indicating the daily hours of operation of each CT/HRSG unit. These records shall specify which type of fuel is being combusted and the records shall be available for review at the site. Each calendar month, a compilation of the hours of operation for each CT/HRSG unit combusting fuel oil shall be made and totalized for the most recent consecutive 12-month period. Each AOR submitted by the applicant shall include a compilation of each consecutive 12-month period during the preceding calendar year.
40. **Compliance Test Reports:** The test report shall provide sufficient detail on the tested emission unit and the procedures used to allow the Department to determine if the test was properly conducted and if the test results were properly computed. At a minimum, the test report shall provide the applicable information listed in Rule 62-297.310(8), F.A.C.

MONITORING REQUIREMENTS

41. **Continuous Monitoring System:** The permittee shall install, calibrate, maintain, and operate a continuous emission monitor in the stack to measure and record the emissions of NO_x and CO from these emissions units, and the Carbon Dioxide (CO₂) content of the flue gas at the location where NO_x and CO are monitored, in a manner sufficient to demonstrate compliance with the emission limits of

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this permit. The CEM system shall be used to demonstrate compliance with the emission limits for NO_x and CO established in this permit. Compliance with the emission limits for NO_x shall be based on a 3-hour block average. The 3-hour block average shall be calculated from 3 consecutive hourly average emission rate values. Compliance with the emission limits for CO shall be based on a 24-hour block average starting at midnight of each operating day. The 24-hour block average shall be calculated from 24 consecutive hourly average emission rate values. Each hourly value shall be computed using at least one data point in each fifteen-minute quadrant of an hour, where the unit combusted fuel during that quadrant of an hour. Notwithstanding this requirement, an hourly value shall be computed from at least two data points separated by a minimum of 15 minutes (where the unit operates for more than one quadrant of an hour). The owner or operator shall use all valid measurements or data points collected during an hour to calculate the hourly averages. All data points collected during an hour shall be, to the extent practicable, evenly spaced over the hour. If the CEM system measures concentration on a wet basis, the CEM system shall include provisions to determine the moisture content of the exhaust gas and an algorithm to enable correction of the monitoring results to a dry basis (0% moisture). Alternatively, the owner or operator may develop through manual stack test measurements a curve of moisture contents in the exhaust gas versus load for each allowable fuel, and use these typical values in an algorithm to enable correction of the monitoring results to a dry basis (0% moisture). Final results of the CEM system shall be expressed as ppmvd, corrected to 15% oxygen.

The NO_x monitor shall be certified and operated in accordance with the following requirements. The NO_x monitor shall be certified pursuant to 40 CFR Part 75 and shall be operated and maintained in accordance with the applicable requirements of 40 CFR Part 75, Subparts B and C. For purposes of determining compliance with the emission limits specified within this permit, missing data shall not be substituted. Instead the block average shall be determined using the remaining hourly data in the 3-hour block. However, in the event that the permittee maintains 95% or greater availability of the continuous emission monitoring systems used for determining NO_x emissions compliance for the previous quarter, then compliance with the emission limits for NO_x shall be based on 3 valid consecutive hours of data for a 3-hour block average. Record keeping and reporting shall be conducted pursuant to 40 CFR Part 75, Subparts F and G. The RATA tests required for the NO_x monitor shall be performed using EPA Method 20 or 7E, of Appendix A of 40 CFR 60. The NO_x monitor shall be a dual range monitor. The span for the lower range shall not be greater than 10 ppm, and the span for the upper range shall not be greater than 30 ppm, as corrected to 15% O₂.

The CO monitor and CO₂ monitor shall be certified and operated in accordance with the following requirements. The CO monitor shall be certified pursuant to 40 CFR 60, Appendix B, Performance Specification 4. The CO₂ monitor shall be certified pursuant to 40 CFR 60, Appendix B, Performance Specification 3. Quality assurance procedures shall conform to the requirements of 40 CFR 60, Appendix F, and the Data Assessment Report of section 7 shall be made each calendar quarter, and reported semi-annually to the Department's Central District Office. The RATA tests required for the CO monitor shall be performed using EPA Method 10, of Appendix A of 40 CFR 60. The Method 10 analysis shall be based on a continuous sampling train, and the ascarite trap may be omitted or the interference trap of section 10.1 may be used in lieu of the silica gel and ascarite traps. The CO monitor shall be a dual range monitor. The span for the lower range shall not be greater than 20 ppm, and the span for the upper range shall not be greater than 100 ppm, as corrected to 15% O₂. The RATA tests required for the CO₂ monitor shall be performed using EPA Method 3B, of Appendix A of 40 CFR 60.

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NO_x, CO and CO₂ emissions data shall be recorded by the CEM system during episodes of startup, shutdown and malfunction. NO_x and CO emissions data recorded during these episodes may be excluded from the block average calculated to demonstrate compliance with the emission limits specified within this permit. Periods of data excluded for startup shall not exceed two hours in any block 24-hour period except for "cold startup." A cold startup is defined as a startup following a complete shutdown lasting a minimum of 72 hours. Periods of data excluded for cold startup shall not exceed four hours in any 24-hour block period. Periods of data excluded for shutdown shall not exceed two hours in any 24-hour block period. Periods of data excluded for malfunctions shall not exceed two hours in any 24-hour block period. All periods of data excluded for any startup, shutdown or malfunction episode shall be consecutive for each episode. Periods of data excluded for all startup, shutdown or malfunction episodes shall not exceed four hours in any 24-hour block period. The owner or operator shall minimize the duration of data excluded for startup, shutdown and malfunctions, to the extent practicable. Data recorded during startup, shutdown or malfunction events shall not be excluded if the startup, shutdown or malfunction episode was caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure, which may reasonably be prevented.

Best operational practices shall be used to minimize hourly emissions that occur during episodes of startup, shutdown and malfunction. Emissions of any quantity or duration that occur entirely or in part from poor maintenance, poor operation, or any other equipment or process failure, which may reasonably be prevented, shall be prohibited.

A summary report of duration of data excluded from the block average calculation, and all instances of missing data from monitor downtime, shall be reported to the Department's Central District office semi-annually, and shall be consolidated with the report required pursuant to 40 CFR 60.7. For purposes of reporting "excess emissions" pursuant to the requirements of 40 CFR 60.7, excess emissions shall be defined as the hourly emissions which are recorded by the CEM system during periods of data excluded for episodes of startup, shutdown and malfunction, allowed above. The duration of excess emissions shall be the duration of the periods of data excluded for such episodes. Reports required by this paragraph and by 40 CFR 60.7 shall be submitted no less than semi-annually, including semi-annual periods in which no data is excluded or no instances of missing data occur. Upon request from the Department, the CEMS emission rates shall be corrected to ISO conditions to demonstrate compliance with the applicable standards of 40 CFR 60.332. [Rules 62-4.070(3) and 62-212.400., F.A.C., and BACT]

[Note: Compliance with these requirements will ensure compliance with the other CEM system requirements of this permit to comply with Subpart GG requirements, as well as the applicable requirements of Rule 62-297.520, F.A.C., 40 CFR 60.7(a)(5) and 40 CFR 60.13, and with 40 CFR Part 51, Appendix P, 40 CFR 60, Appendix B, Performance Specifications and 40 CFR 60, Appendix F, Quality Assurance Procedures].

42. Continuous Monitoring System Reports: The monitoring devices shall comply with the certification and quality assurance, and any other applicable requirements of Rule 62-297.520, F.A.C., 40 CFR 60.13, including certification of each device in accordance with 40 CFR 60, Appendix B, Performance Specifications and 40 CFR 60.7(a)(5) or 40 CFR Part 75. Quality assurance procedures must conform to all applicable sections of 40 CFR 60, Appendix F or 40 CFR 75. The monitoring plan, consisting of data on CEM equipment specifications, manufacturer, type, calibration and maintenance needs, and its proposed location shall be provided to the DEP Bureau of Ambient Monitoring & Mobile Sources (BAMMS) as well as the EPA for review no later than 45 days prior to the first scheduled certification test pursuant to 40 CFR 75.62.

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43. Determination of Process Variables:

- The permittee shall operate and maintain equipment and/or instruments necessary to determine process variables, such as process weight input or heat input, when such data is needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards. No later than 90 days prior to operation, the permittee shall submit for the Department's approval a list of process variables that will be measured to comply with this permit condition.
- Equipment and/or instruments used to directly or indirectly determine such process variables, including devices such as belt scales, weigh 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]

44. Subpart Da Monitoring and Recordkeeping Requirements: The permittee shall comply with all applicable requirements of this Subpart [40CFR60, Subpart Da].

45. Selective Catalytic Reduction System (SCR) Compliance Procedures:

- An annual stack emission test for nitrogen oxides and ammonia from the CT/HRSG pair shall be simultaneously conducted while operating in the power augmentation mode with the duct burner on as defined in Specific Condition 21. The ammonia injection rate necessary to comply with the NO_x standard shall be established and reported during the each performance test.
- The SCR shall operate at all times that the turbine is operating, except during turbine start-up and shutdown periods, as dictated by manufacturer's guidelines and in accordance with this permit.
- The permittee shall install and operate an ammonia flow meter to measure and record the ammonia injection rate to the SCR system of the CT/HRSG set. It shall be maintained and calibrated according to the manufacturer's specifications.
- During the stack test, the permittee (at each tested load condition) shall determine and report the ammonia flow rate required to meet the emissions limitations. During NO_x CEM downtimes or malfunctions, the permittee shall operate at the ammonia flow rate, which was established during the last stack test.
- In the event of a complaint or concern by an inspector, the permittee shall be capable of making an instantaneous measurement using inlet and outlet NO_x concentrations from the SCR system and ammonia flow supplied to the SCR system to determine ammonia slip. This determination shall not be used as a compliance method but only as an indicator to determine if a special compliance test is needed to demonstrate NO_x and ammonia slip requirements of the permit. The calculation procedure shall be provided with the CEM monitoring plan required by 40CFR Part 75. The following calculation represents one means by which the permittee may demonstrate compliance with this condition:

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Ammonia slip @ 15%O₂ = (A-(BxC/1,000,000)) x (1,000,000/B) x D, where:

A = ammonia injection rate (lb/hr) / 17 (lb/lb.mol)

B = dry gas exhaust flow rate (lb/hr) / 29 (lb/lb.mol)

C = change in measured NO_x (ppmv@15%O₂) across catalyst

D = correction factor, derived annually during compliance testing by comparing actual to tested ammonia slip

[Note: exhaust gas flow rate may be back calculated using heat input and F factor]

- The calculation along with each newly determined correction factor shall be submitted with each annual compliance test. Calibration data ("as found" and "as left") shall be provided for each measurement device utilized to make the ammonia emission measurement and submitted with each annual compliance test.
- Upon specific request by the Department, a special re-test shall occur as described in the previous conditions concerning annual test requirements, in order to demonstrate that all NO_x and ammonia slip related permit limits can be complied with.

SECTION IV. APPENDIX GG

NSPS SUBPART GG REQUIREMENTS FOR GAS TURBINES

NSPS SUBPART GG REQUIREMENTS

[Note: Inapplicable provisions have been deleted in the following conditions, but the numbering of the original rules has been preserved for ease of reference to the original rules. The term "Administrator" when used in 40 CFR 60 shall mean the Department's Secretary or the Secretary's designee. Department notes and requirements related to the Subpart GG requirements are shown in bold immediately following the section to which they refer. The rule basis for the Department requirements specified below is Rule 62-4.070(3), F.A.C.]

Pursuant to 40 CFR 60.332 Standard for Nitrogen Oxides:

(a) On and after the date of the performance test required by § 60.8 is completed, every owner or operator subject to the provisions of this subpart as specified in paragraph (b) section shall comply with:

(1) No owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any stationary gas turbine, any gases which contain nitrogen oxides in excess of:

$$STD = 0.0075 \frac{(14.4)}{Y} + F$$

where:

STD = allowable NO_x emissions (percent by volume at 15 percent oxygen and on a dry basis).

Y = manufacturer's rated heat rate at manufacturer's rated load (kilojoules per watt hour) or, actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt-hour.

F = NO_x emission allowance for fuel-bound nitrogen as defined in paragraph (a)(3) of this section.

(3) F shall be defined according to the nitrogen content of the fuel as follows:

Fuel-bound nitrogen (percent by weight)	F (NO _x percent by volume)
N ≤ 0.015	0
0.015 < N ≤ 0.1	0.04(N)
0.1 < N ≤ 0.25	0.004 + 0.0067(N - 0.1)
N > 0.25	0.005

Where, N = the nitrogen content of the fuel (percent by weight).

Department requirement: While firing gas, the "F" value shall be assumed to be 0.

[Note: This is required by EPA's March 12, 1993 determination regarding the use of NO_x CEMS. The "Y" values are approximately 10.0 for natural gas and 10.6 for fuel oil. The equivalent emission standards are 108 and 102 ppmvd at 15% oxygen. The emissions standards of this permit are more stringent than this requirement.]

(b) Electric utility stationary gas turbines with a heat input at peak load greater than 107.2 gigajoules per hour (100 million Btu/hour) based on the lower heating value of the fuel fired shall comply with the provisions of paragraph (a)(1) of this section.

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Pursuant to 40 CFR 60.333 Standard for Sulfur Dioxide:

On and after the date on which the performance test required to be conducted by 40 CFR 60.8 is completed, every owner or operator subject to the provision of this subpart shall comply with:

- (b) No owner or operator subject to the provisions of this subpart shall burn in any stationary gas turbine any fuel, which contains sulfur in excess of 0.8 percent by weight.

Pursuant to 40 CFR 60.334 Monitoring of Operations:

- (b) The owner or operator of any stationary gas turbine subject to the provisions of this subpart shall monitor sulfur content and nitrogen content of the fuel being fired in the turbine. The frequency of determination of these values shall be as follows:

- (1) If the turbine is supplied its fuel from a bulk storage tank, the values shall be determined on each occasion that fuel is transferred to the storage tank from any other source.

Department requirement: The owner or operator is allowed to use vendor analyses of the fuel as received to satisfy the sulfur content monitoring requirements of this rule for fuel oil. Alternatively, if the fuel oil storage tank is isolated from the combustion turbines while being filled, the owner or operator is allowed to determine the sulfur content of the tank after completion of filling of the tank, before it is placed back into service.

[Note: This is consistent with guidance from EPA Region 4 dated May 26, 2000 to Ronald W. Gore of the Alabama Department of Environmental Management.]

- (2) If the turbine is supplied its fuel without intermediate bulk storage the values shall be determined and recorded daily. Owners, operators or fuel vendors may develop custom schedules for determination of the values based on the design and operation of the affected facility and the characteristics of the fuel supply. These custom schedules shall be substantiated with data and must be approved by the Administrator before they can be used to comply with paragraph (b) of this section.

(1) **Department requirement:** The requirement to monitor the nitrogen content of pipeline quality natural gas fired is waived. The requirement to monitor the nitrogen content of fuel oil fired is waived because a NO_x CEMS shall be used to demonstrate compliance with the NO_x limits of this permit. For purposes of complying with the sulfur content monitoring requirements of this rule, the owner or operator shall obtain a monthly report from the vendor indicating the sulfur content of the natural gas being supplied from the pipeline for each month of operation.

(2) [Note: This is consistent with EPA's custom fuel monitoring policy and guidance from EPA Region 4.]

- (c) For the purpose of reports required under 40 CFR 60.7(c), periods of excess emissions that shall be reported are defined as follows:

- (1) *Nitrogen oxides.* Any one-hour period during which the average water-to-fuel ratio, as measured by the continuous monitoring system, falls below the water-to-fuel ratio determined to demonstrate compliance with 40 CFR 60.332 by the performance test required in § 60.8 or any period during which the fuel-bound nitrogen of the fuel is greater than the maximum nitrogen content allowed by the fuel-bound nitrogen allowance used during the performance test required in § 60.8. Each report shall include the average water-to-fuel ratio, average fuel consumption, ambient conditions, gas turbine load, and nitrogen content of the fuel during the period of excess emissions, and the graphs or figures developed under 40 CFR 60.335(a).

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Department requirement: NO_x emissions monitoring by CEM system shall substitute for the requirements of paragraph (c)(1) because a NO_x monitor is required to demonstrate compliance with the standards of this permit. Data from the NO_x monitor shall be used to determine "excess emissions" for purposes of 40 CFR 60.7 subject to the conditions of the permit.

[Note: This is consistent with guidance from EPA Region 4 dated May 26, 2000 to Ronald W. Gore of the Alabama Department of Environmental Management.]

- (2) *Sulfur dioxide.* Any daily period during which the sulfur content of the fuel being fired in the gas turbine exceeds 0.8 percent.

Pursuant to 40 CFR 60.335 Test Methods and Procedures:

- (a) To compute the nitrogen oxides emissions, the owner or operator shall use analytical methods and procedures that are accurate to within 5 per-cent and are approved by the Administrator to determine the nitrogen content of the fuel being fired.
- (b) In conducting the performance tests required in 40 CFR 60.8, the owner or operator shall use as reference methods and procedures the test methods in appendix A of this part or other methods and procedures as specified in this section, except as provided for in 40 CFR 60.8(b). Acceptable alternative methods and procedures are given in paragraph (f) of this section.
- (c) The owner or operator shall determine compliance with the nitrogen oxides and sulfur dioxide standards in 40 CFR 60.332 and 60.333(a) as follows:
- (1) The nitrogen oxides emission rate (NO_x) shall be computed for each run using the following equation:

$$\text{NO}_x = (\text{NO}_{x0}) (\text{Pr}/\text{Po})^{0.5} e^{19(\text{Ho}-0.00633)} (288^\circ\text{K}/\text{Ta})^{1.53}$$

where:

- NO_x = emission rate of NO_x at 15 percent O₂ and ISO standard ambient conditions, volume percent.
- NO_{x0} = observed NO_x concentration, ppm by volume.
- Pr = reference combustor inlet absolute pressure at 101.3 kilopascals ambient pressure, mm Hg.
- Po = observed combustor inlet absolute pressure at test, mm Hg.
- Ho = observed humidity of ambient air, g H₂O/g air.
- e = transcendental constant, 2.718.
- Ta = ambient temperature, °K.

Department requirement: The owner or operator is not required to have the NO_x monitor continuously correct NO_x emissions concentrations to ISO conditions. However, the owner or operator shall keep records of the data needed to make the correction, and shall make the correction when required by the Department or Administrator.

[Note: This is consistent with guidance from EPA Region 4.]

- (2) The monitoring device of 40 CFR 60.334(a) shall be used to determine the fuel consumption and the water-to-fuel ratio necessary to comply with 40 CFR 60.332 at 30, 50, 75, and 100 percent of peak load or at four points in the normal operating range of the gas turbine, including the

SECTION IV. APPENDIX GG

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minimum point in the range and peak load. All loads shall be corrected to ISO conditions using the appropriate equations supplied by the manufacturer.

Department requirement: The owner or operator is allowed to conduct initial performance tests at a single load because a NO_x monitor shall be used to demonstrate compliance with the BACT NO_x limits of this permit.

[Note: This is consistent with guidance from EPA Region 4.]

- (3) Method 20 shall be used to determine the nitrogen oxides, sulfur dioxide, and oxygen concentrations. The span values shall be 300 ppm of nitrogen oxide and 21 percent oxygen. The NO_x emissions shall be determined at each of the load conditions specified in paragraph (c)(2) of this section.

Department requirement: The owner or operator is allowed to make the initial compliance demonstration for NO_x emissions using certified CEM system data, provided that compliance be based on a minimum of three test runs representing a total of at least three hours of data, and that the CEMS be calibrated in accordance with the procedure in section 6.2.3 of Method 20 following each run. Alternatively, initial compliance may be demonstrated using data collected during the initial relative accuracy test audit (RATA) performed on the NO_x monitor. The span value specified in the permit shall be used instead of that specified in paragraph (c)(3) above.

[Note: These initial compliance demonstration requirements are consistent with guidance from EPA Region 4. The span value is changed pursuant to Department authority and is consistent with guidance from EPA Region 4.]

- (d) The owner or operator shall determine compliance with the sulfur content standard in 40 CFR 60.333(b) as follows: ASTM D 2880-71 shall be used to determine the sulfur content of liquid fuels and ASTM D 1072-80, D 3031-81, D 4084-82, or D 3246-81 shall be used for the sulfur content of gaseous fuels (incorporated by reference – see 40 CFR 60.17). The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to the approval of the Administrator.

Department requirement: The permit specifies sulfur testing methods and allows the owner or operator to follow the requirements of 40 CFR 75 Appendix D to determine the sulfur content of liquid fuels.

[Note: This requirement establishes different methods than provided by paragraph (d) above, but the requirements are equally stringent and will ensure compliance with this rule.]

- (e) To meet the requirements of 40 CFR 60.334(b), the owner or operator shall use the methods specified in paragraphs (a) and (d) of this section to determine the nitrogen and sulfur contents of the fuel being burned. The analysis may be performed by the owner or operator, a service contractor retained by the owner or operator, the fuel vendor, or any other qualified agency.

[Note: The fuel analysis requirements of the permit meet or exceed the requirements of this rule and will ensure compliance with this rule.]

SECTION V. APPENDIX XS

SEMI-ANNUAL CONTINUOUS EMISSIONS MONITOR SYSTEMS REPORT

{Note: This form is referenced in 40 CFR 60.7, Subpart A, General Provisions.}

Pollutant (Circle One): Nitrogen Oxides (NO_x) Carbon Monoxide (CO)

Reporting period dates: From _____ to _____

Company: _____

Emission Limitation: _____

Address: _____

Monitor Manufacturer and Model No.: _____

Date of Latest CMS Certification or Audit: _____

Process Unit(s) Description: _____

Total source operating time in reporting period ^a: _____

Emission data summary ^a		CMS performance summary ^a	
1. Duration of Excess Emissions In Reporting Period Due To:		1. CMS downtime in reporting period due to:	
a. Startup/Shutdown		a. Monitor Equipment Malfunctions	
b. Control Equipment Problems		b. Non-Monitor Equipment Malfunctions	
c. Process Problems		c. Quality Assurance Calibration	
d. Other Known Causes		d. Other Known Causes	
e. Unknown Causes		e. Unknown Causes	
2. Total Duration of Excess Emissions		2. Total CMS Downtime	
3. $\frac{[\text{Total Duration of Excess Emissions}]}{[\text{Total Source Operating Time}]} \times (100\%)$ ^b		3. $\frac{[\text{Total CMS Downtime}]}{[\text{Total source operating time}]} \times (100\%)$	

^a For opacity, record all times in minutes. For gases, record all times in hours.

^b For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in 40 CFR 60.7(c) shall be submitted.

Note: On a separate page, describe any changes to CMS, process or controls during last 6 months.

I certify that the information contained in this report is true, accurate, and complete.

Name

Title

Signature

Date

OUC/KUA/FMPA/SO
Stanton A Combined Cycle Addition

Permit No. PSD-FL-313
PA81-14SA2

APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

- G.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.
- G.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 or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and 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 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.
- G.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.
- G.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.
- G.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.
- G.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 and records that must be kept under the 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 reasonably necessary to assure compliance with this permit or Department rules.

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

- G.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.

APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

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.

- G.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.
- G.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.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, 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.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- a) Determination of Best Available Control Technology (X)
 - b) Determination of Prevention of Significant Deterioration (X); and
 - c) Compliance with New Source Performance Standards (X).
- G.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 or 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:
 - 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.
- G.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.

APPENDIX BD
BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

STANTON UNIT A COMBINED CYCLE PROJECT
OUC/KUA/FMPA/Southern Co.
PSD-FL-313 and PA81-14SA2
Orange County, Florida

BACKGROUND

The applicants, Orlando Utilities Commission (OUC), the Kissimmee Utility Authority (KUA), the Florida Municipal Power Agency (FMPA) and the Southern Company – Florida, LLC (SO), propose to build a 700 MW (estimated maximum gross capability) combined cycle power plant at the existing Curtis H. Stanton Energy Center. The location of the facility is 5100 South Alafaya Trail, Orlando, Orange County. The proposed project will result in “significant increases” with respect to Table 62-212.400-2, Florida Administrative Code (F.A.C.) of emissions of particulate matter (PM and PM₁₀), sulfur dioxide (SO₂), sulfuric acid mist (SAM), carbon monoxide (CO), volatile organic compounds (VOC), and nitrogen oxides (NO_x). Therefore, the project is subject to review for the Prevention of Significant Deterioration (PSD) and a determination of Best Available Control Technology (BACT) in accordance with Rules 62-212.400, F.A.C.

The primary units to be installed are two nominal 170 MW, General Electric “F” Class (PG7241FA) combustion turbine-electrical generators, fired with pipeline natural gas or diesel and equipped with evaporative coolers on the inlet air system. The project includes two heat recovery steam generators (HRSGs), each with a 160 ft. stack and one steam turbine-electrical generator rated at approximately 300 MW. Duct burners will be installed in the HRSGs for supplemental firing and to achieve peak output. The project also includes one 10-cell linear mechanical draft cooling tower, and one diesel fuel storage tank (approximately 1,680,000 gallons). Descriptions of the process, project, air quality effects, and rule applicability are given in the Technical Evaluation and Preliminary Determination dated June 30, 2001, accompanying the Department’s Intent to Issue.

BACT APPLICATION:

The application was received on January 22, 2001 and included a proposed BACT proposal prepared by the applicant’s consultant, Black & Veatch. The proposal is summarized in the table below for each combustion turbine (MW loads are assumed to be at 50% or higher).

POLLUTANT	CONTROL TECHNOLOGY	BACT PROPOSAL
PM/PM ₁₀ , VE	Clean Fuels Good Combustion	10 Percent Opacity 5 ppmvd Ammonia Slip
SO ₂ / SAM	Clean Fuels	0.5 grains / 100 scf (gas) 0.05% Sulfur distillate oil – 1000 hours / year
CO	Pipeline Natural Gas Good Combustion	17 ppmvd (all operating modes) gas – 24 hr. avg. 14 ppmvd (all operating modes) oil – 24 hr. avg.
VOC	Pipeline Natural Gas Good Combustion	3.6 ppmvd / 2.7 ppmvd (gas / oil) 6.3 ppmvd during DB plus PA
NO _x	DLN & SCR	3.5 ppmvd @ 15% O ₂ (gas) – 24 hr. avg. 10 ppmvd @ 15% O ₂ (oil) – 24 hr. avg.
PM - cooling tower	High efficiency drift eliminators	0.002% drift loss

Based upon the applicant’s submittal, the maximum annual emissions that the facility has the potential to emit (PTE) are as follows: 134.1 TPY SO₂, 17.6 TPY SAM, 127.6 TPY PM/PM₁₀, 314.5 TPY NO_x, 372.4 TPY CO and 105.8 TPY of VOC.

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BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

BACT DETERMINATION PROCEDURE:

In accordance with Chapter 62-212, F.A.C., this BACT determination is based on the maximum degree of reduction of each pollutant emitted which the Department of Environmental Protection (Department), on a case by case basis, taking into account energy, environmental and economic impacts, and other costs, determines is achievable through application of production processes and available methods, systems, and techniques. In addition, the regulations state that, in making the BACT determination, the Department shall give consideration to:

- Any Environmental Protection Agency determination of BACT pursuant to Section 169, and any emission limitation contained in 40 CFR Part 60 - Standards of Performance for New Stationary Sources or 40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants.
- All scientific, engineering, and technical material and other information available to the Department.
- The emission limiting standards or BACT determination of any other state.
- The social and economic impact of the application of such technology.

The EPA currently stresses that BACT should be determined using the "top-down" approach. The first step in this approach is to determine, for the emission unit in question, the most stringent control available for a similar or identical emission unit or emission unit category. If it is shown that this level of control is technically or economically unfeasible for the emission unit in question, then the next most stringent level of control is determined and similarly evaluated. This process continues until the BACT level under consideration cannot be eliminated by any substantial or unique technical, environmental, or economic objections.

STANDARDS OF PERFORMANCE FOR NEW STATIONARY SOURCES:

The minimum basis for a BACT determination is 40 CFR 60, Subpart GG, Standards of Performance for Stationary Gas Turbines (NSPS). Subpart GG was adopted by the Department by reference in Rule 62-204.800, F.A.C. The key emission limits required by Subpart GG are 75 ppmvd NO_x @ 15% O₂. (assuming 25 percent efficiency) and 150 ppmvd SO₂ @ 15% O₂ (or <0.8% sulfur in fuel). The BACT proposed by the applicant is consistent with the NSPS, which allows NO_x emissions in the range of 110 ppmvd for the high efficiency units to be purchased. No National Emission Standard for Hazardous Air Pollutants exists for stationary gas turbines.

The duct burners required for supplementary gas-firing of the HRSGs are subject to 40 CFR 60, Subpart Da, Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978. The 0.1 lb/MW-hr NO_x emission rate proposed by the applicant is well below the revised Subpart Da output-based limit of 1.6 lb/MW-hr promulgated on September 3, 1998. No National Emission Standards for Hazardous Air Pollutants exist for stationary gas turbines or gas-fired duct burners.

The distillate fuel oil storage tank is subject to 40 CFR 60, Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction or Modification Commenced After July 23, 1984.

DETERMINATIONS BY EPA AND STATES:

The following table is a sample of information on some recent BACT determinations by states for combined cycle stationary gas turbine projects. These are projects incorporating large prime movers capable of producing more than 150 MW excluding the steam cycle. Such units are typically categorized as F or G Class Frame units. The applicant's proposed BACT is included for reference.

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TABLE 1
RECENT BACT LIMITS FOR NITROGEN OXIDES FOR LARGE STATIONARY GAS TURBINE COMBINED CYCLE PROJECTS

Project Location	Power Output Megawatts	NO _x Limit ppmvd @ 15% O ₂ and Fuel	Technology	Comments
Mobile Energy, AL	~250	~3.5 - NG (CT&DB) ~11 - FO (CT&DB)	DLN & SCR	178 MW GE 7FA CT 1/99 585 mmBtu Duct Burner
KUA Cane Island 3	250	3.5 - (CT&DB)	DLN/SCR	170 MW GE 7FA. 11/99 Ammonia slip = 5 ppmvd
Calpine BHEC	1080	3.5 - (CT & DB)	DLN/SCR	Ammonia slip = 5 ppm
Calpine Delta	880	2.5 - (CT & DB) 1 hour average (LAER)	DLN/CSR	3 GE 7FA's or 3 WH 501FD's; 10 ppm max ammonia slip
Calpine Bullhead City	545	3.0 - (CT&DB)	DLN/SCR	Nearly identical to Osprey; Replace SCR catalyst after 36 mo.
Calpine Osprey	545	3.5 - (CT & DB)	DLN/SCR	Ammonia slip = 9 ppm
Stanton A (proposed)	700	3.5 - NG (CT & DB & PA) 10 - FO	DLN/SCR	Ammonia slip = 5 ppm

DB = Duct Burner DLN = Dry Low NO_x Combustion CT = Comb. Turbine PA = Power Augmentation
 NG = Natural Gas SCR = Selective Catalytic Reduction DB = Duct Burner WH = Westinghouse
 FO = Fuel Oil WI = Water or Steam Injection PA = Pwr. Augmentation GE = General Electric

TABLE 2
RECENT BACT LIMITS FOR CARBON MONOXIDE, VOLATILE ORGANIC COMPOUNDS, PARTICULATE MATTER, AND VISIBILITY FOR LARGE STATIONARY GAS TURBINE COMBINED CYCLE PROJECTS

Project Location	CO - ppmvd (or lb/mmBtu)	VOC - ppm (or lb/mmBtu)	PM - lb/mmBtu (or gr/dscf or lb/hr)	Technology and Comments
Mobile Energy, AL	~18 - NG (CT&DB) ~26 - FO (CT&DB)	~5 - NG ~6 - FO	10% Opacity	Clean Fuels Good Combustion
KUA Cane Island	10 - NG (CT) 20 - NG (CT&DB) 30 - FO	1.4 - NG (CT) 4 - NG (CT&DB) 10 - FO	10% Opacity	Clean Fuels Good Combustion
Calpine BHEC	10 - NG (CT only) 17 - NG (off-normal)	1.2 - NG (CT) 6.6 - NG (DB & PA)	10% Opacity 26.0 lb/hr (CT & DB)	Clean Fuels Good Combustion
Calpine Delta	10 - NG (CT & DB) 10 - NG (DB & PA) 3 hr avg. - No Ox. Cat.	2 - NG	0.25 gr.S/100 scf Nat. Gas	Clean Fuels Good Combustion
Calpine Bullhead City	10 - NG (CT & DB) 33.9 - NG (DB & PA) 3 hour rolling average	1.5 - NG	18.3 lb/hr (CT) 22.8 lb/hr (DB & PA)	Clean Fuels Good Combustion
Calpine Osprey	10 - NG (CT only) 17 - NG (off-normal)	2.3 - NG (CT) 4.6 - NG (DB & PA)	10% Opacity 24.1 lb/hr (CT & DB)	Clean Fuels Good Combustion
Stanton A (proposed)	14 - FO (CT only) 17 - NG (all gas modes)	2.7 - FO 6.3 - NG (DB & PA)	10% Opacity 11.7 / 17 lb/hr (NG / FO)	Clean Fuels Good Combustion

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OTHER INFORMATION AVAILABLE TO THE DEPARTMENT:

Besides the initial information submitted by the applicant, the summary above, and the references at the end of this document, key information reviewed by the Department includes:

- Master Overview for Alabama Power Plant Barry Project received in 1998
- Letters from EPA Region IV dated February 2, and November 8, 1999 regarding KUA Cane Island 3
- Presentations by Black & Veatch and General Electric at EPA Region IV on March 4, 1999
- Letter from Black & Veatch to EPA Region IV dated March 10, 1999
- Letter from Black & Veatch to the Department and EPA Region IV dated March 24, 1999
- Texas Natural Resource Conservation Commission Draft Tier I BACT for August, 1999
- Texas Natural Resource Conservation Commission Website – www.tnrcc.state.tx.us
- DOE website information on Advanced Turbine Systems Project
- Alternative Control Techniques Document - NO_x Emissions from Stationary Gas Turbines
- General Electric 39th Turbine State-of-the-Art Technology Seminar Proceedings
- GE Guarantee for Jacksonville Electric Authority Kennedy Plant Project
- GE Power Generation - Speedtronic™ Mark V Gas Turbine Control System
- GE Combined Cycle Startup Curves
- Coen website information and brochure on Duct Burners

REVIEW OF NITROGEN OXIDES CONTROL TECHNOLOGIES:

Some of the discussion in this section is based on a 1993 EPA document on Alternative Control Techniques for NO_x Emissions from Stationary Gas Turbines. Project-specific information is included where applicable.

Nitrogen Oxides Formation

Nitrogen oxides form in the gas turbine combustion process as a result of the dissociation of molecular nitrogen and oxygen to their atomic forms and subsequent recombination into seven different oxides of nitrogen. Thermal NO_x forms in the high temperature area of the gas turbine combustor. Thermal NO_x increases exponentially with increases in flame temperature and linearly with increases in residence time. Flame temperature is dependent upon the ratio of fuel burned in a flame to the amount of fuel that consumes all of the available oxygen.

By maintaining a low fuel ratio (lean combustion), the flame temperature will be lower, thus reducing the potential for NO_x formation. Prompt NO_x is formed in the proximity of the flame front as intermediate combustion products. The contribution of Prompt to overall NO_x is relatively small in near-stoichiometric combustors and increases for leaner fuel mixtures. This provides a practical limit for NO_x control by lean combustion.

Fuel NO_x is formed when fuels containing bound nitrogen are burned. This phenomenon is not important when combusting natural gas. Although low sulfur fuel oil has more fuel-bound nitrogen than natural gas,

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its use is minimized (1000 hours) for this project and control of NO_x emissions are proposed to be with SCR.

Uncontrolled emissions range from about 100 to over 600 parts per million by volume, dry, corrected to 15 percent oxygen (ppmvd @15% O₂). The Department estimates uncontrolled emissions at approximately 200 ppmvd @15% O₂ for the proposed turbines. The proposed NO_x controls will reduce these emissions significantly.

NO_x Control Techniques

Wet Injection

Water or steam is injected into the primary combustion zone to reduce the flame temperature, resulting in lower NO_x emissions. Water injected into this zone acts as a heat sink by absorbing heat necessary to vaporize the water and raise the temperature of the vaporized water to the temperature of the exhaust gas stream. Steam injection uses the same principle, excluding the heat required to vaporize the water. Therefore, much more steam is required (on a mass basis) than water to achieve the same level of NO_x control. However, there is a physical limit to the amount of water or steam that may be injected before flame instability or cold spots in the combustion zone would cause adverse operating conditions for the combustion turbine. Standard combustor designs with wet injection can generally achieve NO_x emissions of 42/65 ppmvd for gas/oil firing. Advanced combustor designs generate lower NO_x emissions to begin with and can tolerate greater amounts of water or steam injection before causing flame instability. Advanced combustor designs with wet injection can achieve NO_x emissions of 25/42 ppmvd for gas/oil firing. Wet injection results in 60% to 80% control efficiencies.

Combustion Controls

The U.S. Department of Energy has provided millions of dollars of funding to a number of combustion turbine manufacturers to develop inherently lower pollutant-emitting units. Efforts over the last ten years have focused on reducing the peak flame temperature for natural gas fired units by staging combustors and premixing fuel with air prior to combustion in the primary zone. Typically, this occurs in four distinct modes: primary, lean-lean, secondary, and premix. In the primary mode, fuel is supplied only to the primary nozzles to ignite, accelerate, and operate the unit over a range of low- to mid-loads and up to a set combustion reference temperature. Once the first combustion reference temperature is reached, operation in the lean-lean mode begins when fuel is also introduced to the secondary nozzles to achieve the second combustion reference temperature. After the second combustion reference temperature is reached, operation in the secondary mode begins by shutting off fuel to the primary nozzle and extinguishing the flame in the primary zone. Finally, in the premix mode, fuel is reintroduced to the primary zone for premixing fuel and air. Although fuel is supplied to both the primary and secondary nozzles in the premix mode, there is only flame in the secondary stage. The premix mode of operation occurs between 50% to 100% of base load and provides the lowest NO_x emissions. Due to the intricate air and fuel staging necessary for dry low-NO_x combustor technology, the gas turbine control system becomes a very important component of the overall system. DLN systems result in control efficiencies of 80% to 95%.

Figure A (below) is an example of an in-line duct burner arrangement. Since duct burners operate at lower temperature and pressure than the combustion turbine, the potential for emissions is generally lower. Although the duct burners maximum heat input is 533 MMBtu/hr, it is relatively low when compared with the turbine that can accommodate a heat input greater than 2000 MMBtu/hr. The duct burners will be of a Low NO_x design and will be used to compensate for loss of capacity at high ambient temperatures.

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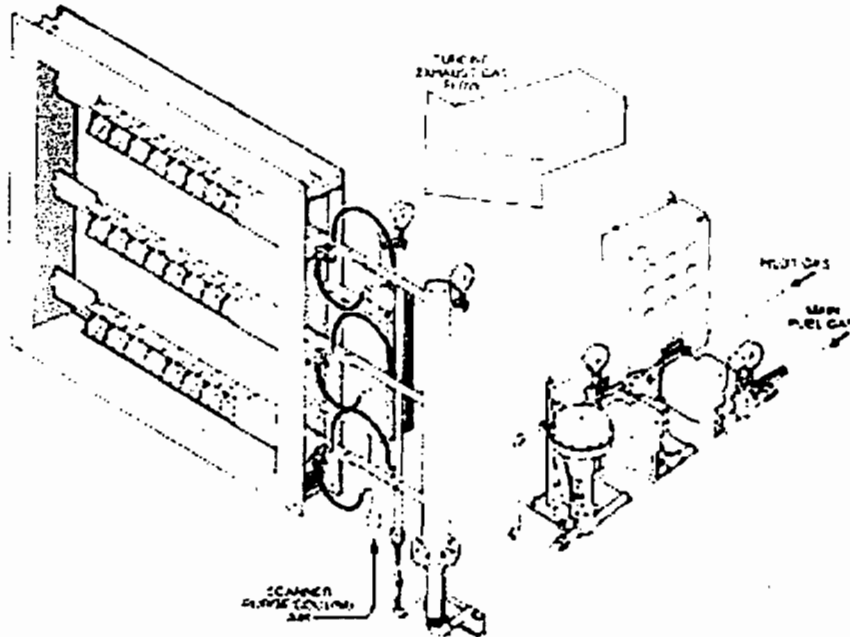


FIGURE A

Selective Catalytic Reduction

Selective catalytic reduction (SCR) is an add-on NO_x control technology that is employed in the exhaust stream within the HRSG. SCR reduces NO_x emissions by injecting ammonia into the flue gas in the presence of a catalyst. Ammonia reacts with NO_x in the presence of a catalyst and excess oxygen yielding molecular nitrogen and water. The catalysts used in combined cycle, low temperature applications (conventional SCR), are usually vanadium or titanium oxide and account for almost all installations. For high temperature applications (Hot SCR up to 1100 °F), such as simple cycle turbines, zeolite catalysts are available but used in few applications to-date. SCR units are typically used in combination with wet injection or DLN combustion controls.

In the past, sulfur was found to poison the catalyst material. Sulfur-resistant catalyst materials are now becoming commonplace and have recently been specified for CPV Gulf Coast (PSD-FL-300). In that review, the Department determined that SCR was cost effective for reducing NO_x emissions from 9 ppmvd to 3.5 ppmvd on a General Electric 7FA unit burning natural gas in combined cycle mode. This review additionally concluded that the unit would be capable of combusting 0.05%S diesel fuel oil for up to 30 days per year while emitting 10 ppmvd of NO_x. Catalyst formulation improvements have proven effective in resisting sulfur-induced performance degradation with fuel oil in Europe and Japan. These newer catalysts (versus the older alumina-based catalysts) are resistant to sulfur fouling at temperatures below 770°F (EPRI). In fact, Mitsubishi reports that as of 1998, SCR's were installed on 61 boilers which combust residual oil (40 of which are utility boilers) and another 70 industrial boilers, which fire diesel oil. Likewise, B & W reports satisfactory results with the installation of SCR to several large Taiwan Power Company utility boilers, which fire a wide range of coals, as well as heavy fuel oil with sulfur contents up to 2.0% and 50 ppm vanadium. Catalyst life in excess of 4 to 6 years has been achieved, while 8 to 10 years catalyst life has been reported with natural gas.

As of early 1992, over 100 gas turbine installations already used SCR in the United States. Only one combustion turbine project in Florida (FPC Hines Power Block 1) currently employs SCR. The equipment was installed on a temporary basis because Westinghouse had not yet demonstrated emissions as low as 12

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ppmvd by DLN technology at the time the units were to start up in 1998. Seminole Electric will install SCR on a previously permitted 501F unit at the Hardee Unit 3 project and Kissimmee Utility Authority will install SCR on newly permitted Cane Island Unit 3. New combined cycle combustion turbine projects in Florida are normally considered to be prime candidates for SCR.

Figure B is a photograph of FPC Hines Energy Complex. The magnitude of the installation can be appreciated from the relative size compared with nearby individuals and vehicles. Figure C below is a diagram of a HRSG including an SCR reactor with honeycomb catalyst and the ammonia injection grid. The SCR system lies between low and high-pressure steam systems where the temperature requirements for conventional SCR can be met.



Figure B

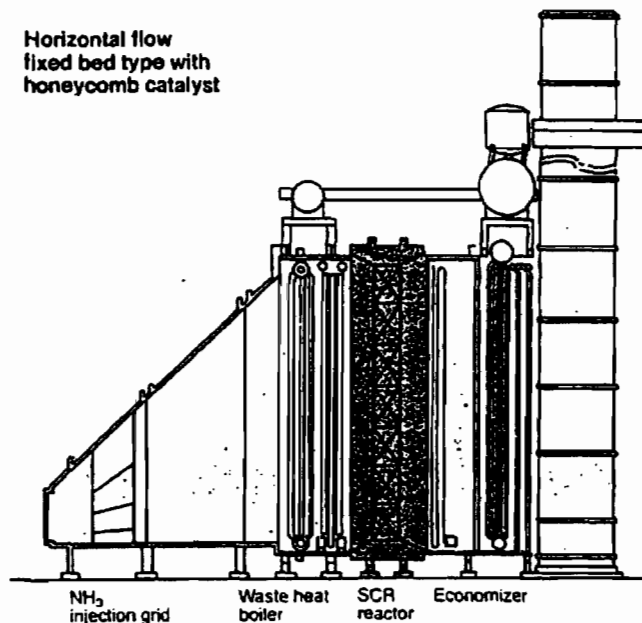


Figure C

Excessive ammonia use tends to increase emissions of CO, ammonia (slip), and particulate matter (when sulfur-bearing fuels are used). Permit limits as low as 2 to 3.5 ppmvd NO_x have been specified using SCR on combined cycle F Class projects throughout the country. Permit BACT limits of 3.5 ppmvd NO_x are being routinely specified using SCR for F Class projects (with large in-line duct burners) in the Southeast and even lower limits in the southwest.

Selective Non-Catalytic Reduction

Selective non-catalytic reduction (SNCR) reduction works on the same principle as SCR. The differences are that it is applicable to hotter streams than conventional or hot SCR, no catalyst is required, and urea can be used as a source of ammonia. Certain manufacturers, such as Engelhard, market an SCNR for NO_x control within the temperature ranges for which this project will operate (700 – 1400°F). However, the process also requires a low oxygen content in the exhaust stream in order to be effective. Given that a top-down review leads one to an SCR in this application, SNCR does not merit further consideration.

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Emerging Technologies: SCONOX™ and XONON™

SCONOX™ is a catalytic technology that achieves NO_x control by oxidizing and then absorbing the pollutant onto a honeycomb structure coated with potassium carbonate. The pollutant is then released as harmless molecular nitrogen during a regeneration cycle that requires dilute hydrogen gas. The technology has been demonstrated on small units in California and has been purchased for a small source in Massachusetts.¹ California regulators and industry sources have permitted the La Paloma Plant near Bakersfield for the installation of one 250 MW block with SCONOX™.² The overall project includes several more 250 MW blocks with SCR for control.³ According to industry sources, the installation has proceeded with a standard SCR due to schedule constraints. Recently, PG&E Generating has been approved to install SCONOX™ on two F frame units at Otay Mesa, approximately 15 miles S.E. of San Diego, California. Additionally, USEPA has identified an "achieved in practice" BACT value of 2.0 ppmvd over a three-hour rolling average based upon the recent performance of a Vernon, California natural gas-fired 32 MW combined cycle turbine (without duct burners) equipped with the patented SCONOX™ system.

SCONOX Operation

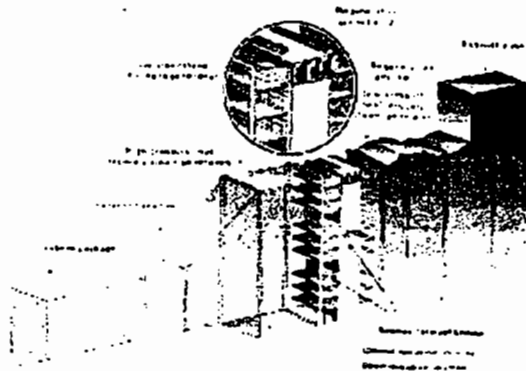


Figure D

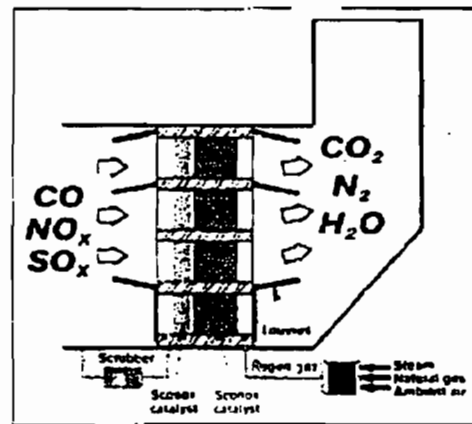


Figure E. Flow diagram showing conversion of various pollutants by SCONOX and Scrubber

Figure E

SCONOX™ technology (at 2.0 ppmvd) is considered to represent LAER in non-attainment areas where cost is not a factor in setting an emission limit. It competes with less-expensive SCR in those areas, but has the advantages that it does not cause ammonia emissions in exchange for NO_x reduction. Advantages of the SCONOX™ process include (in addition to the reduction of NO_x) the elimination of ammonia and the control of VOC and CO emissions. SCONOX™ has not been applied on any major sources in ozone attainment areas, apparently only due to cost considerations. The Department is interested in seeing this technology implemented in Florida and intends to continue to work with applicants seeking an opportunity to demonstrate ammonia-free emissions on a large unit. The Department estimates that the application of this control technology to the Stanton A Combined Cycle Unit results in cost-effectiveness of just less than \$10,000 per ton of NO_x removed. Although there are specific items within the applicant's original analysis (which estimates a cost effectiveness of \$10,200 per ton of NO_x and CO removed from each CT/HRSG) that the Department cannot support (e.g. lost power revenues, contingency factors above 3%, etc.) on balance the Department concurs with the conclusion that SCONOX is not likely cost-effective for this project.

Calytica Energy Systems, Inc. develops, manufactures and markets the XONON™ Combustion System. XONON™, which works by partially burning fuel in a low temperature pre-combustor and completing the

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combustion in a catalytic combustor. The overall result is low temperature partial combustion (and thus lower NO_x combustion) followed by flameless catalytic combustion to further attenuate NO_x formation. The technology has been demonstrated on combustors on the same order of size as SCONOX™ has. XONON™ avoids the emissions of ammonia and the need to generate hydrogen. It is also extremely attractive from a mechanical point of view.

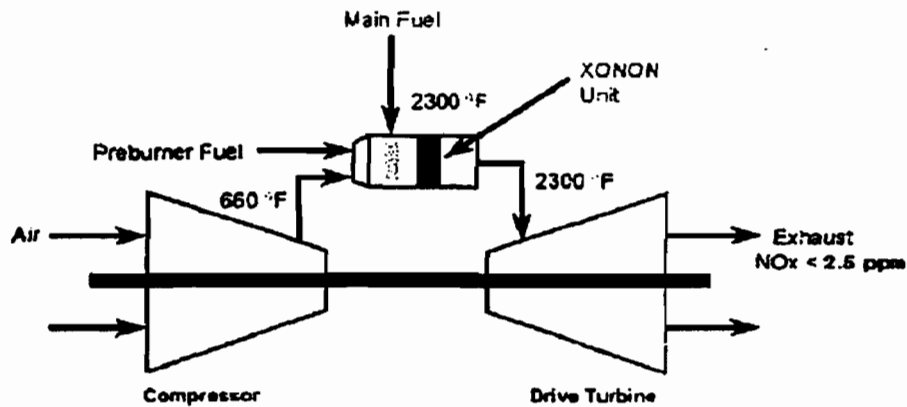


Figure F



**XONON-2 installed
with test instruments**

Figure G

On February 8, 2001, Catalytica Energy Systems, Inc. announced that its XONON™ Cool Combustion system had successfully completed an evaluation process by the U.S. Environmental Protection Agency (EPA), which verified the ultra-low emissions performance of a XONON™-equipped gas turbine operating at Silicon Valley Power. The performance results gathered through the EPA's Environmental Technology Verification (ETV) Program provide high-quality, third party confirmation of XONON™'s ability to deliver a near-zero emissions solution for gas turbine power production. The verification, which was conducted over a two-day period on a XONON™-equipped Kawasaki M1A-13A (1.4 MW) gas turbine operating at Silicon Valley Power, recorded nitrogen oxides (NO_x) emissions of less than 2.5 parts per million (ppm) and ultra-low emissions of carbon monoxide and unburned hydrocarbons.

The XONON™-equipped Kawasaki M1A-13A gas turbine has operated for over 7400 hours at Silicon Valley Power (SVP), a municipally owned utility, supplying near pollution-free power to the residents of the City of Santa Clara, California, with NO_x levels averaging under 2.5 ppm. Three XONON™-equipped Kawasaki M1A-13X turbines, a slightly modified commercial version of the M1A-13A, are expected to enter commercial service in late 2001 in Massachusetts at a healthcare facility of a U.S. Government agency.

In a definitive agreement signed on November 19, 1998, GE Power Systems and Catalytica agreed to the commercialization of the XONON™ system for new and existing GE gas turbines. The agreement provides for the collaborative adaptation of XONON™ combustion technology to GE gas turbines for commercial sale. In December 1999, GE accepted the first order for XONON™-equipped GE 7FA gas turbines as the preferred emission control system for Enron's proposed Pastoria Energy Facility. This appears to be an up-and-coming technology, the development of which will be watched closely by the Department for future applications. However, the technology cannot (at this time) be recommended for the attendant project.

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REVIEW OF PARTICULATE MATTER (PM/PM₁₀) AND SO₂ CONTROL TECHNOLOGIES:

Particulate matter is generated by various physical and chemical processes during combustion and will be affected by the design and operation of the NO_x controls. The particulate matter emitted from this unit will mainly be less than 10 microns in diameter (PM₁₀).

Natural gas is an inherently clean fuel and contains no ash. Natural gas and very low sulfur fuel oil (0.05%) will be the only fuels fired at the Stanton Combined Cycle Unit and they are efficiently combusted in gas turbines making any conceivable add-on control technique for PM/PM₁₀ or SO₂ either unnecessary or impractical.

A technology review indicated that the top control option for PM/PM₁₀ as well as SO₂ is a combination of good combustion practices, fuel quality, and filtration of inlet air.

The applicant has identified PM emissions over 20 TPY from the fresh-water mechanical cooling towers. Accordingly, drift eliminators shall be installed to reduce PM/PM₁₀. The drift eliminators shall be designed and maintained to reduce drift to 0.002 percent of the circulating water flow rate. No PM testing is required because the Department's Emission Monitoring Section has determined that there is no appropriate PM test method for these types of cooling towers.

REVIEW OF CARBON MONOXIDE (CO) CONTROL TECHNOLOGIES

CO is emitted from combustion turbines due to incomplete fuel combustion. Combustion design and catalytic oxidation are the control alternatives that are viable for the project. The most stringent control technology for CO emissions is the use of an oxidation catalyst (excluding the SCONOX™ process).

Among the most recently permitted projects with oxidation catalyst requirements are the 500 MW Wyandotte Energy project in Michigan, the El Dorado project in Nevada, Ironwood in Pennsylvania, Millenium in Massachusetts, and Calpine Sutter in California. The permitted CO values of these units are between 3 and 5 ppmvd. Catalytic oxidation was recently installed at a cogeneration plant at Reedy Creek (Walt Disney World), Florida to avoid PSD review, which would have been required due to increased operation at low load. Seminole Electric will install oxidation catalyst to meet the permitted CO limit at its planned 244 MW Westinghouse 501FD combined cycle unit in Hardee County, Florida.⁴

Most combustion turbines incorporate good combustion to minimize emissions of CO. These installations typically achieve emissions between 10 and 30 ppmvd at full load, even as they achieve relatively low NO_x emissions by SCR or dry low NO_x means. OUC/KUA/FMPA/SO propose to meet a limit of 14 ppmvd while firing fuel oil above 50% output. However, the applicant prefers to be permitted with higher values of 18.1 ppmvd and 27.9 ppmvd for the full output operating modes of duct burner firing, and duct burner firing with power augmentation, respectively. Duct burner firing is requested for the entire year and power augmentation is requested for up to 1000 hours per year.

The Department has reviewed actual data from similar facilities and has reasonable assurance that the General Electric PG7241FA units selected by the applicant will achieve values well below those proposed by the applicant (and guaranteed by GE), without requiring installation of an oxidation catalyst. However, should the applicant desire to obtain a sufficient operating margin above the BACT established limit identified below, the permit will authorize the installation of oxidation catalysts at an established limit of 5 ppmvd CO, providing that the applicant installs the catalyst within 24 months of commercial operation. Otherwise, the Department will require the use of a CEMS for compliance on a 24-hour block average, with two limits depending upon actual operation. The limits will be:

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- a) 14 ppmvd based upon a 24-hour block average for all periods of fuel oil firing; otherwise, the limit is
- b) 17 ppmvd for all operating modes, based upon a 24-hour block average, which is consistent with the recently issued determination made at Blue Heron Energy Center

REVIEW OF VOLATILE ORGANIC COMPOUND (VOC) CONTROL TECHNOLOGIES

Volatile organic compound (VOC) emissions, like CO emissions, are formed due to incomplete combustion of fuel. The high flame temperature is very efficient at destroying VOC. The applicant has proposed good combustion practices to control VOC. The limits proposed by the applicant for this project are 3.6 ppmvd for gas firing with duct burners, 2.7 ppmvd while firing oil and 6.3 ppmvd during operation with duct burners plus power augmentation. According to the applicant's submittals, VOC emissions less than 2 ppm will be achieved at 100% output and duct burners off.⁵

REVIEW OF HAZARDOUS AIR POLLUTANTS (HAPS) CONTROL TECHNOLOGIES

Based upon the application, this facility will not emit HAPS above the significance thresholds, which would require the application of MACT. The formaldehyde emission factors that have been proposed by the applicant are 8.42E-5 lb/MMBtu and 1.90E-4 lb/MMBtu for gas and oil respectively. These are appropriate emission factors based upon AP-42, since the factors originated from the largest frame (7) machine within the AP-42 database. These are shown as 7EA Machines and listed in the database as ID No's 18 and 19 respectively. Annual formaldehyde emissions will therefore be approximately 2 TPY with total HAP emissions less than 18 TPY. Accordingly, the application of a MACT Determination is not required.

DEPARTMENT BACT DETERMINATION

Following are the BACT limits determined for the Stanton A Combined Cycle project assuming full load. Values for NO_x and CO are corrected to 15% O₂. The emission limits (or their equivalents) as well as the applicable averaging times are itemized within the Specific Conditions of the permit.

POLLUTANT	CONTROL TECHNOLOGY	BACT
PM/PM ₁₀ , VE	Clean Fuels Good Combustion	10 Percent Opacity 5 ppmvd Ammonia Slip
SO ₂ / SAM	Clean Fuels	0.5 grains / 100 scf (gas) 0.05% Sulfur distillate oil for 1000 hrs / year
CO	Pipeline Natural Gas Good Combustion	17 ppmvd (all operating modes) gas – 24 hr. avg. 14 ppmvd (all operating modes) oil – 24 hr. avg. 5 ppmvd (CT & DB & PA) with ox. catalyst
VOC	Pipeline Natural Gas Good Combustion	3.6 ppmvd / 2.7 ppmvd (gas / oil) 6.3 ppmvd during DB plus PA 3 ppmvd (CT & DB & PA) with ox. catalyst
NO _x	DLN & SCR	3.5 ppmvd @ 15% O ₂ (gas) – 3 hr. avg. 10 ppmvd @ 15% O ₂ (oil) – 3 hr. avg.
PM - cooling tower	High efficiency drift eliminators	0.002% drift loss

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BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

RATIONALE FOR DEPARTMENT'S DETERMINATION

- The Lowest Achievable Emission Rate (LAER) for NO_x is approximately 2 ppmvd. It has been achieved at a small combustion turbine installation using SCONO_x.
- EPA Region IV advised that the Department (in a draft BACT) did not present "any unusual site-specific conditions associated with the KUA Cane Island 3 project to indicate that the use of SCR to achieve 3.5 ppmvd would create greater problems than experienced elsewhere at other similar facilities."⁶ The Fish & Wildlife Service had similar comments for Calpine Osprey Energy Center.⁸
- FDEP considers a 3-hour averaging time for NO_x compliance and a 5-ppmvd ammonia slip rate to be BACT, as can be seen in other recent BACT Determinations.
- Uncertainties (and statistical variances) in NO_x emissions related to instrumentation, methodology, calibration and sampling errors, exhaust flow, ammonia slip bias, corrections to 15% O₂ and ambient conditions, etc., are approximately equal to "ultra low NO_x" limits (2.5-3.5 ppmvd).⁷
- VOC emissions of < 2 ppm from the combustion turbine by Good Combustion proposed by the applicant are acceptable values determined as BACT. However, values less than 1 ppm have already been achieved on the DLN 2.6 combustors (GE 7FA) units after tuning.
- The CO emission rate will be verified continuously with CEMS. With the duct burner on, emissions will be less than 19 ppmvd, which is within the range of recent Department BACT determinations for combustion turbines alone. However, values as high as 28 ppmvd will not be authorized, as requested by the applicant. The CO limit will be 17 ppmvd on a weighted daily (24-hour block) average, which incorporates a reasonable allowance for all daily off-normal operations. In order to accommodate the applicant's concerns over the stringency of the limit, the installation of an oxidation catalyst will be authorized, provided that it is installed in a timely fashion.
- For reference, the CO limit for the FPL Fort Myers project is 12 ppmvd. Limits for the Santa Rosa Energy Center are 9 ppmvd with the duct burner off and 24 ppmvd with the duct burner on. The CO impact on ambient air quality is lower compared to other pollutants because the allowable concentrations of CO are much greater than for NO_x, SO₂, VOC (ozone) or PM₁₀.
- PM₁₀ emissions will be very low and difficult to measure. Therefore, the Department will set a Visible Emission standard of 10 percent opacity as BACT.

COMPLIANCE PROCEDURES

POLLUTANT	COMPLIANCE PROCEDURE
PM/Visible Emissions	Method 5 (initial test only) and Method 9 (annually)
Volatile Organic Compounds	Method 18, 25, or 25A (initial tests only)
Carbon Monoxide	CEMS plus annual method 10 during operation at capacity without use of duct burners and power augmentation
VOC and CO with Oxidation Catalyst	Annual Method 18, 25 or 25A and Method 10 with Duct Burners and Power Augmentation
NO _x 3-hr block average	NO _x CEMS, O ₂ or CO ₂ diluent monitor, and flow device as needed
NO _x (performance)	Annual Method 20 or 7E

APPENDIX BD
BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

BACT EXCESS EMISSIONS APPROVAL

Pursuant to the Rule 62-210.700 F.A.C., the Department through this BACT determination will allow excess emissions as follows: Valid hourly emission rates shall not include periods of startup, shutdown, or malfunction as defined in Rule 62-210.200 F.A.C., where emissions exceed the applicable standard. These excess emissions periods shall be reported as required within the Specific Conditions of the Permit. A valid hourly emission rate shall be calculated for each hour in which at least two pollutant concentrations are obtained at least 15 minutes apart. The following emission levels represent excess emission *estimates* during startup periods:

STARTUP TYPE	TIME	ESTIMATED EMISSION MAXIMUM LEVELS BY POLLUTANT FOR EACH CT (TOTAL lbm)				
		NO _x	SO ₂	PM ₁₀	VOC	CO
Natural Gas - Cold	4 hours	160	0	48	80	500
Natural Gas - Hot / Warm	2 hours	80	0	24	40	250

STARTUP TYPE	TIME	ESTIMATED EMISSION MAXIMUM LEVELS BY POLLUTANT FOR EACH CT (TOTAL lbm)				
		NO _x	SO ₂	PM ₁₀	VOC	CO
Distillate Oil - Cold	4 hours	360	400	70	80	500
Distillate Oil - Hot / Warm	2 hours	180	200	35	40	250

The following emissions (TPY) are shown for informational purposes only. They represent a *conservative* estimate of annualized startup emissions, which are largely controllable through best operating practices. Since each startup requires many hours of preceding shutdown time where emissions are zero, there will likely be *no annual net emission increase* from the previously estimated TPY:

STARTUP TYPE	NO. REQUIRED	NO _x	SO ₂	PM ₁₀	VOC	CO
Cold	48 (2 on oil)	4.1	0.4	1.2	1.9	12.0
Hot / Warm	240 (10 on oil)	10.1	1.0	0.7	4.8	30.0
Total	288 (12 on oil)	14.2	1.4	1.9	6.7	42.0

Excess emissions may occur under the following startup scenarios, subject to Rule 62-210.700, F.A.C. However, excess emissions resulting from startup, shutdown, or malfunction shall *only* be permitted provided that best operational practices are adhered to and the duration of excess emissions shall be minimized. Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited pursuant to Rule 62-210.700, F.A.C. These emissions shall be included in the 3-hr average for NO_x and the 24-hr average for CO.

Hot / Warm Start: Two hours following a HRSG shutdown less than 72 hours.

Cold Start: Four hours following a HRSG shutdown greater than or equal to 72 hours.

APPENDIX BD
BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

DETAILS OF THE ANALYSIS MAY BE OBTAINED BY CONTACTING:

Michael P. Halpin, P.E. Review Engineer *MPH*
Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Recommended By:

Approved By:

C.H. Fancy

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

Howard L. Rhodes

Howard L. Rhodes, Director
Division of Air Resources Management

9/25/01

Date:

9/25/01

Date:

APPENDIX BD
BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

REFERENCES

- ¹ News Release. Goaline Environmental. Genetics Institute Buys SCONOX Clean Air System. August 20, 1999.
- ² "Control Maker Strives to Sway Utility Skeptics." Air Daily. Volume 5, No. 199. October 14, 1998.
- ³ Telecom. Linero, A.A., FDEP, and Beckham, D., U.S. Generating. Circa November 1998.
- ⁴ Letter. Opalinski, M.P., SECI to Linero, A.A., FDEP. Turbines and Related Equipment at Hardee Unit 3. December 9, 1998.
- ⁵ Application for Air Permit, Attachment 2 Performance Data – GE Performance Data Natural Gas Firing Only.
- ⁶ Letter. Neeley, R. Douglas, EPA Region IV, to Fancy, C.H., FDEP. Draft PSD Permit – KUA Project. February 2, 1999.
- ⁷ Zachary, J, Joshi, S., and Kagolanu, R., Siemens. "Challenges Facing the Measurement and Monitoring of Very Low Emissions in Large Scale Gas Turbine Projects." Power-Gen Conference. Orlando, Florida. December 9-11, 1998.
- ⁸ Letter. Porter, Ellen to Linero, A.A., FDEP. Technical Review of Prevention of Significant Deterioration Permit Application For Osprey Energy Center. April 17, 2000.

ATTACHMENT SEC-EU17-I7
Identification of Applicable Requirements

Title V Core List

Effective: 03/01/02

[**Note:** The Title V Core List is meant to simplify the completion of the "List of Applicable Regulations" for DEP Form No. 62-210.900(1), Application for Air Permit - Long Form. The Title V Core List is a list of rules to which all Title V Sources are presumptively subject. The Title V Core List may be referenced in its entirety, or with specific exceptions. The Department may periodically update the Title V Core List.]

Federal: *(description)*

40 CFR 61, Subpart M: NESHAP for Asbestos.

40 CFR 82: Protection of Stratospheric Ozone.

40 CFR 82, Subpart B: Servicing of Motor Vehicle Air Conditioners (MVAC).

40 CFR 82, Subpart F: Recycling and Emissions Reduction.

State: *(description)*

CHAPTER 62-4, F.A.C.: PERMITS, effective 06-01-01

62-4.030, F.A.C.: General Prohibition.

62-4.040, F.A.C.: Exemptions.

62-4.050, F.A.C.: Procedure to Obtain Permits; Application.

62-4.060, F.A.C.: Consultation.

62-4.070, F.A.C.: Standards for Issuing or Denying Permits; Issuance; Denial.

62-4.080, F.A.C.: Modification of Permit Conditions.

62-4.090, F.A.C.: Renewals.

62-4.100, F.A.C.: Suspension and Revocation.

62-4.110, F.A.C.: Financial Responsibility.

62-4.120, F.A.C.: Transfer of Permits.

62-4.130, F.A.C.: Plant Operation - Problems.

62-4.150, F.A.C.: Review.

62-4.160, F.A.C.: Permit Conditions.

62-4.210, F.A.C.: Construction Permits.

62-4.220, F.A.C.: Operation Permit for New Sources.

CHAPTER 62-210, F.A.C.: STATIONARY SOURCES - GENERAL REQUIREMENTS, effective 06-21-01

62-210.300, F.A.C.: Permits Required.

62-210.300(1), F.A.C.: Air Construction Permits.

62-210.300(2), F.A.C.: Air Operation Permits.

62-210.300(3), F.A.C.: Exemptions.

62-210.300(5), F.A.C.: Notification of Startup.

62-210.300(6), F.A.C.: Emissions Unit Reclassification.

62-210.300(7), F.A.C.: Transfer of Air Permits.

Title V Core List

Effective: 03/01/02

62-210.350, F.A.C.: Public Notice and Comment.
62-210.350(1), F.A.C.: Public Notice of Proposed Agency Action.
62-210.350(2), F.A.C.: Additional Public Notice Requirements for Emissions Units Subject to Prevention of Significant Deterioration or Nonattainment-Area Preconstruction Review
62-210.350(3), F.A.C.: Additional Public Notice Requirements for Sources Subject to Operation Permits for Title V Sources.

62-210.360, F.A.C.: Administrative Permit Corrections.
62-210.370(3), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility.
62-210.400, F.A.C.: Emission Estimates.
62-210.650, F.A.C.: Circumvention.
62-210.700, F.A.C.: Excess Emissions.

62-210.900, F.A.C.: Forms and Instructions.
62-210.900(1), F.A.C.: Application for Air Permit - Title V Source, Form and Instructions.
62-210.900(5), F.A.C.: Annual Operating Report for Air Pollutant Emitting Facility, Form and Instructions.
62-210.900(7), F.A.C.: Application for Transfer of Air Permit – Title V and Non-Title V Source.

CHAPTER 62-212, F.A.C.: STATIONARY SOURCES - PRECONSTRUCTION REVIEW, effective 08-17-00

CHAPTER 62-213, F.A.C.: OPERATION PERMITS FOR MAJOR SOURCES OF AIR POLLUTION, effective 04-16-01

62-213.205, F.A.C.: Annual Emissions Fee.
62-213.400, F.A.C.: Permits and Permit Revisions Required.
62-213.410, F.A.C.: Changes Without Permit Revision.
62-213.412, F.A.C.: Immediate Implementation Pending Revision Process.
62-213.415, F.A.C.: Trading of Emissions Within a Source.
62-213.420, F.A.C.: Permit Applications.
62-213.430, F.A.C.: Permit Issuance, Renewal, and Revision.
62-213.440, F.A.C.: Permit Content.
62-213.450, F.A.C.: Permit Review by EPA and Affected States
62-213.460, F.A.C.: Permit Shield.

62-213.900, F.A.C.: Forms and Instructions.
62-213.900(1), F.A.C.: Major Air Pollution Source Annual Emissions Fee Form.
62-213.900(7), F.A.C.: Statement of Compliance Form.

Title V Core List

Effective: 03/01/02

CHAPTER 62-296, F.A.C.: STATIONARY SOURCES - EMISSION STANDARDS.

effective 03-02-99

62-296.320(4)(c), F.A.C.: Unconfined Emissions of Particulate Matter.

62-296.320(2), F.A.C.: Objectionable Odor Prohibited.

CHAPTER 62-297, F.A.C.: STATIONARY SOURCES - EMISSIONS MONITORING, effective 03-02-99

62-297.310, F.A.C.: General Test Requirements.

62-297.330, F.A.C.: Applicable Test Procedures.

62-297.340, F.A.C.: Frequency of Compliance Tests.

62-297.345, F.A.C.: Stack Sampling Facilities Provided by the Owner of an Emissions Unit.

62-297.350, F.A.C.: Determination of Process Variables.

62-297.570, F.A.C.: Test Report.

62-297.620, F.A.C.: Exceptions and Approval of Alternate Procedures and Requirements.

Miscellaneous:

CHAPTER 28-106, F.A.C.: Decisions Determining Substantial Interests

CHAPTER 62-110, F.A.C.: Exception to the Uniform Rules of Procedure, effective
07-01-98

CHAPTER 62-256, F.A.C.: Open Burning and Frost Protection Fires, effective 11-30-94

CHAPTER 62-257, F.A.C.: Asbestos Notification and Fee, effective 02-09-99

CHAPTER 62-281, F.A.C.: Motor Vehicle Air Conditioning Refrigerant Recovery and
Recycling, effective 09-10-96

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
40 CFR Part 60 – Standards for Performance for New Stationary Sources					
<i>Subpart A – General Provisions</i>					
60.7	Notification and record keeping	✓			
60.8	Performance tests	✓			
60.11	Compliance with standards and maintenance requirements	✓			
60.12	Circumvention	✓			
60.13	Monitoring requirements	✓			
60.19	General notifications and reporting requirements	✓			
<i>Subpart D – Standards of Performance for Fossil-Fuel Fired Steam Generators for Which Construction is Commenced After August 17, 1971</i>					
60.40	Applicability and designation of affected facility		-		
60.41	Definitions		-		
60.42	Standard for particulate matter		-		
60.43	Standard for sulfur dioxide (SO ₂)		-		
60.44	Standard for nitrogen oxides (NO _x)		-		
60.45	Emissions and fuel monitoring		-		
60.46	Test methods and procedures		-		
<i>Subpart Da – Standard of Performance for Electric Utility Steam Generating Units for Which Construction Commenced After September 18, 1978</i>					
60.40Da	Applicability and designation of affected facility	✓			
60.42Da(a)(1) and (b)	Standard for particulate matter	✓			
60.42Da(a)(2)(3), (c), and (d)	Standard for particulate matter		-		
60.43Da(b)(2)	Standard for sulfur dioxide	✓			
60.43Da(a), (b)(1), (c), (d), (e), (f), (g), (h), (i), (j), (k)	Standard for sulfur dioxide		-		
60.44Da(b), (c), (e), (f)	Standard for nitrogen oxides		-		
60.44Da (a), (d)	Standard for nitrogen oxides	✓			
60.45Da	Standard for mercury		-		

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
60.47Da	Commercial demonstration permit		-		
60.48Da (a), (b), (c), (e) – (k)	Compliance provisions	✓			
60.48Da (d), (l)-(p)	Compliance provisions		-		
60.48Da(q)	Compliance provisions for sources subject to 60.42Da(b)	✓			
60.49Da (a), (o), (u)(2), (w)	Emission Monitoring	✓			
60.49Da (b)-(n), (p)- (t), (u)(1), (v)	Emission Monitoring		-		
60.50Da (a), (b), (d), (e), and (f)	Compliance determination procedures and methods	✓			
60.50Da (c), (g), and (h)	Compliance determination procedures and methods		-		
60.51Da (a)	Reporting requirements	✓			
60.51Da (b)-(k)	Reporting requirements		-		
60.52Da	Recordkeeping requirements	✓			
<i>Subpart Db – Standards of Performance for Industrial – Commercial – Institutional Steam Generating Units</i>					
60.42Db	Standard for sulfur dioxide.		-		
60.43Db	Standard for particulate matter.		-		
60.44Db	Standard for nitrogen oxides.		-		
60.45Db	Compliance and performance test methods and procedures for sulfur dioxide.		-		
60.46Db	Compliance and performance test methods and procedures for particulate matter and nitrogen oxides.		-		
60.47Db	Emission monitoring for sulfur dioxide.		-		
60.48Db	Emission monitoring for particulate matter and nitrogen oxides.		-		
60.49Db	Reporting and recordkeeping.		-		
<i>Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units</i>					
60.42Dc	Standard for sulfur dioxide.		-		
60.43Dc	Standard for particulate matter.		-		
60.44Dc	Compliance and performance test methods and procedures for sulfur dioxide.		-		
60.45Dc	Compliance and performance test methods and procedures for particulate matter.		-		
60.46Dc	Emission monitoring for sulfur dioxide.		-		

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
60.47Dc	Emission monitoring for particulate matter.		-		
60.48Dc	Reporting and recordkeeping.		-		
<i>Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978</i>					
60.112	Standard for volatile organic compounds (VOC)		-		
60.113	Monitoring of operations.		-		
<i>Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984</i>					
60.115a	Monitoring of operations		-		
<i>Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification commenced After July 23, 1984</i>					
60.110b	Applicability and designation of affected facility	✓			
60.111b	Definitions	✓			
60.112b	Standard for volatile organic compounds	✓			
60.113b	Testing and procedures	✓			
60.114b	Alternative means of emission limitations	✓			
60.115b	Recordkeeping and reporting requirements	✓			
60.116b	Monitoring of operations	✓			
<i>Subpart Y – Standards of Performance for Coal Preparation Plants</i>					
60.252	Standard for particulate matter		-		
60.253	Monitoring of operations		-		
60.254	Test methods and procedures		-		
<i>Subpart GG – Standard of Performance for Stationary Gas Turbines</i>					
60.332(a)(1),(3), and (4), (b) and (f)	Standard for nitrogen oxides	✓			
60.332(a)(2); (c)-(e), (g)-(l)	Standard for nitrogen oxides		-		
60.333	Standard for sulfur dioxide	✓			
60.334(a), (b), (d) – (g)	Monitoring of operations		-	Daily monitoring of fuel sulfur and nitrogen content not required because custom	

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
				schedule requested and approved.	
60.334 (b), (c), (h), (i), and (j)	Monitoring of operations	✓			
60.335	Test methods and procedures	✓			
	40 CFR Part 60 – Standards of Performance for New Stationary Sources: Subparts B, C, Cb, Cc, Cc, Cd, Ce, D, Db, Dc, E, Ea, Eb, Ec, F, G, H, I, J, K, Ka, Kb, L, M, N, Na, O, P, Q, R, S, T, U, V, W, X, Y, Z, AA, AAa, BB, CC, DD, EE, HH, KK, LL, MM, NN, PP, QQ, RR, SS, TT, UU, VV, WW, XX, AAA, BBB, DDD, FFF, GG, HHHH, III, JJJ, KKK, LLL, NNN, OOO, PPP, QQQ, RRR, SSS, TTT, UUU, VVV, WWW, AAAA, BBBB, CCCC, DDDD, EEEE, FFFF, GGGG, HHHH, IIII, JJJJ, KKKK		-		
	<i>Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants</i>				
60.672	Standard for Particulate Matter		-		
60.674	Monitoring of Operations		-		
60.676	Reporting and Recordkeeping		-		
	<i>Subpart HHHH—Emission Guidelines and Compliance Times for Coal-Fired Electric Steam Generating Units</i>				
60.4106	Standard requirements		-		
60.4110	Authorization and Responsibilities of Hg designated representative		-		
60.4111	Alternate Hg designated representative		-		
60.4112	Changing Hg designated representative and alternate Hg designated representative; changes in owners and operators		-		
60.4113	Certificate of representation		-		
60.4114	Objections concerning Hg designated representative		-		
60.4120	General Hg budget trading program permit requirements		-		
60.4121	Submission of Hg budget permit applications		-		
60.4122	Information requirements for Hg budget permit applications		-		
60.4123	Hg budget permit contents and term		-		
60.4124	Hg budget permit revisions		-		
60.4142	Hg allowance allocations.		-		
60.4151	Establishment of accounts		-		
60.4152	Responsibilities of Hg authorized account representative		-		
60.4154	Compliance with Hg budget emissions limitation		-		
60.4160	Submission of Hg allowance transfers		-		

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
60.4170	General requirements		-		
60.4171	Initial certification and recertification procedures		-		
60.4172	Out of control periods		-		
60.4173	Notifications		-		
60.4174	Recordkeeping and reporting		-		
60.4175	Petitions		-		
60.4176	Additional requirements to provide heat input data		-		
<i>Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines</i>					
<i>Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines</i>					
60.4230	Am I subject to this subpart?		-		
60.4231	What emission standards must I meet if I am a manufacturer of stationary SI internal combustion engines?		-		
60.4232	How long must my engines meet the emission standards if I am a manufacturer of stationary SI internal combustion engines?		-		
60.4233	What emission standards must I meet if I am an owner or operator of a stationary SI internal combustion engine?		-		
60.4234	How long must I meet the emission standards if I am an owner or operator of a stationary SI internal combustion engine?		-		
60.4235	What fuel requirements must I meet if I am an owner or operator of a stationary SI gasoline fired internal combustion engine subject to this subpart?		-		
60.4236	What is the deadline for importing or installing stationary SI ICE produced in the previous model year?		-		
60.4237	What are the monitoring requirements if I am an owner or operator of an emergency stationary SI internal combustion engine?		-		
60.4238	What are my compliance requirements if I am a manufacturer of stationary SI internal combustion engines ≤19 KW (25 HP)?		-		
60.4239	What are my compliance requirements if I am a manufacturer of stationary SI internal combustion engines >19 KW (25 HP) that use gasoline?		-		
60.4240	What are my compliance requirements if I am a manufacturer of stationary SI internal combustion engines >19 KW (25 HP) that are rich burn engines that use LPG?		-		
60.4241	What are my compliance requirements if I am a manufacturer of stationary SI internal combustion engines participating in the voluntary certification program?		-		

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
60.4242	What other requirements must I meet if I am a manufacturer of stationary SI internal combustion engines?		-		
60.4243	What are my compliance requirements if I am an owner or operator of a stationary SI internal combustion engine?		-		
60.4244	What test methods and other procedures must I use if I am an owner or operator of a stationary SI internal combustion engine?		-		
60.4245	What are my notification, reporting, and recordkeeping requirements if I am an owner or operator of a stationary SI internal combustion engine?		-		
60.4246	What parts of the General Provisions apply to me?		-		
60.4247	What parts of the mobile source provisions apply to me if I am a manufacturer of stationary SI internal combustion engines?		-		
60.4248	What definitions apply to this subpart?		-		
<i>Subpart KKKK — Standards of Performance for Stationary Combustion Turbine</i>					
60.4300	What is the purpose of this subpart?		-		
60.4305	Does this subpart apply to my stationary combustion turbine?		-		
60.4310	What types of operations are exempt from these standards of performance?		-		
60.4315	What pollutants are regulated by this subpart?		-		
60.4320	What emission limits must I meet for nitrogen oxides (NOx)?		-		
60.4325	What emission limits must I meet for NOx if my turbine burns both natural gas and distillate oil (or some other combination of fuels)?		-		
60.4330	What emission limits must I meet for sulfur dioxide (SO ₂)?		-		
60.4333	What are my general requirements for complying with this subpart?		-		
60.4335	How do I demonstrate compliance or NOx if I use water or steam injection?		-		
60.4340	How do I demonstrate continuous compliance for NOx if I do not use water or steam injection?		-		
60.4345	What are the requirements for the continuous emission monitoring system equipment, if I choose to use this option?		-		
60.4350	How do I use data from the continuous emission monitoring equipment to identify excess emissions?		-		
60.4355	How do I establish and document a proper parameter monitoring plan?		-		
60.4360	How do I determine the total sulfur content of the turbine's combustion fuel?		-		

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
60.4365	How can I be exempted from monitoring the total sulfur content of the fuel?		-		
60.4370	How often must I determine the sulfur content of the fuel?		-		
60.4375	What reports must I submit?		-		
60.4380	How are excess emissions and monitor downtime defined for NOx		-		
60.4385	How are <i>excess</i> emissions and monitoring downtime defined for SO2?		-		
60.4390	What are my reporting requirements if I operate an emergency combustion turbine or a research and development turbine?		-		
60.4410	How do I establish a valid parameter range if I have chosen to continuously monitor parameters?		-		
60.4415	How do I conduct the initial and subsequent performance tests for sulfur?		-		
60.4420	What definitions apply to this subpart?		-		
Table to Subpart K K K K of Part 60	Nitrogen Oxide Emission Limits For New Stationary Combustion Turbines		.		
Part 61 – EPA Regulations on National Emission Standards for Hazardous Air Pollutants					
<i>Subpart A – General Provisions</i>					
61.05	Prohibited Activities	✓			Facility
61.09	Notification of Startup		-		Facility
61.10	Source Reporting and Request for Waiver of Compliance		-		Facility
61.11	Waiver of Compliance		-		Facility
61.12(b)	Compliance with Standards and Maintenance Requirements	✓			Facility
61.13	Emission Tests and Waiver of Emission Tests		-		Facility
61.14	Monitoring Requirements		-		Facility
61.19	Circumvention		-		Facility
<i>Subpart M – National Emission Standards for Asbestos</i>					
Appendix C to Part 61 – Quality Assurance Procedures					
		✓			Facility
Part 63 – EPA Regulations on National Emissions Standard for Hazardous Air Pollutants for Source Categories					
40 CFR Part 63 – National Emission Standards for Hazardous Air Pollutants for Source Categories			-	No NESHAP contains requirements which are applicable to the Smith Unit 3 CTGs.	
<i>Subpart A – General Provisions</i>					
63.4	Prohibited Activities and Circumvention		-		

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
63.6	Compliance with Standards and Maintenance Requirements		-		
63.7	Performance Testing Requirements		-		
63.8	Monitoring Requirements		-		
63.9	Notification Requirements		-		
63.10	Reporting and Recordkeeping Requirements		-		
63.11	Control Device Requirements		-		
<i>Subpart Q – National Emission Standards for Industrial Process Cooling Towers</i>					
63.402	Standard		-		
63.403	Compliance Dates		-		
63.404	Compliance Demonstrations		-		
63.405	Notification Requirements		-		
63.406	Recordkeeping and Reporting Requirements		-		
<i>Subpart T – National Standards for Halogenated Solvent Cleaning</i>					
63.462	Batch Cold Cleaning Machine Standards		-		
63.463	Batch Vapor and In-Line Cleaning Machine Standards		-		
63.464	Alternative Standards		-		
63.465	Test Methods		-		
63.466	Monitoring Procedures		-		
63.467	Recordkeeping Requirements		-		
63.468	Reporting Requirements		-		
63.471	Facility-wide Standards		-		
Part 64 – Compliance Assurance Monitoring					
64.2	Applicability	✓			
64.3	Monitoring design criteria	✓			
64.4	Submittal requirements	✓			
64.7	Operation of approved monitoring	✓			
64.8	Quality improvement plan (QIP) requirements	✓			
64.9	Reporting and recordkeeping requirements	✓			
64.10	Savings provisions	✓			
40 CFR Part 72 – Acid Rain Program Permits					
<i>Subpart A – Acid Rain Program Permits</i>					

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
72.1	Purpose and scope	✓			
72.2	Definitions	✓			
72.3	Measurements, Abbreviations, and Acronyms	✓			
72.6	Applicability	✓			
72.7	New Units Exemption		-		
72.8	Retired Units Exemption		-		
72.9 excluding (c)(3)(i), (ii), and (iii), and (d)	Standard Requirements	✓			
<i>Subpart B – Designated Representative</i>					
72.20	Authorization and Responsibilities of the Designated Representative	✓			
72.21	Submission	✓			
72.22	Alternate Designated Representative	✓			
72.23	Changing the Designated Representative; Alternate Designated Representative; Changes in the Owners and Operators	✓			
72.24	Certificate of Representation	✓			
72.26	Delegation by Designated Representative and Alternative Designated Representative	✓			
<i>Subpart C – Acid Rain Applications</i>					
72.30	Requirements to Apply	✓			
72.31	Information Requirements for Acid Rain Permit Applications	✓			
72.32	Permit Applications to Shield and Binding Effect of Permit Application	✓			
72.33	Identification of Dispatch System	✓			
<i>Subpart D – Acid Rain Compliance Plan and Compliance Options</i>					
72.40 (a)(1)	General (a) (1) applicable & separate law for (a)(2) – N/A	✓			
72.40 (a)(2)	General		-		
72.41	Phase I Substitution Plans		-		
72.42	Phase I Extension Plans		-		
72.43	Phase I Reduced Utilization Plans		-		
72.44	Phase II Repowering Extensions		-		
<i>Subpart E – Acid Rain Permit Contents</i>					
72.51	Permit Shield	✓			

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
<i>Subpart H – Permit Revisions</i>					
72.80	General	✓			
72.81	Permit Modifications	✓			
72.82 (a) and (c)	Fast-track Modifications	✓			
72.83	Administrative Permit Amendment	✓			
72.84	Automatic Permit Amendment	✓			
72.85	Permit Reopenings	✓			
<i>Subpart I – Compliance Certification</i>					
72.90	Annual Compliance Certification Report	✓			
72.91	Phase I Unit Adjusted Utilization		-		
72.92	Phase I Unit Allowance Surrender		-		
72.93	Units with Phase I Extension Plans		-		
72.94	Units with Repowering Extension Plans		-		
72.95	Allowance Deduction Formula	✓			
72.96	Administrator’s Action on Compliance Certifications		-		
Part 73 – Sulfur Dioxide Allowance System					
73.13	Procedures for Submittals	✓			
73.33	Authorized Account Representative	✓			
73.35	Compliance	✓			
Part 75 – Continuous Emissions Monitoring					
75.4	Compliance Dates	✓			
75.5	Prohibitions	✓			
75.10	General Operating Requirements	✓			
75.11 (d)(2)	Specific Provisions for Monitoring SO ₂ Emissions (SO ₂ and Flow Monitors)	✓			
75.12 (a), (b)	Specific Provisions for Monitoring NO _x Emissions (NO _x and Diluent Gas Monitors)	✓			
75.13 (b)	Specific Provisions for Monitoring CO ₂ Emissions	✓			
75.14 (c)	Specific Provisions for Monitoring Opacity	✓			
75.15	Specific Provisions for Monitoring SO ₂ Emissions Removal by Qualifying Phase I Technology		-		
75.16	Specific Provisions for Monitoring Emissions from Common, By-Pass, and Multiple		-		

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
	Stacks for SO ₂ Emissions and Heat Input Determinations				
75.17	Specific Provisions for Monitoring Emissions from Common, By-Pass, and Multiple Stacks for NO _x Emission Rate		-		
75.18	Specific Provisions for Monitoring Emissions from Common, By-Pass, and Multiple Stacks for Opacity		-		
75.19	Optional SO ₂ , NO _x , and CO ₂ Emissions Calculations for Low Mass Emissions (LME) Units	✓			
75.20 (b), (c)	Certification and Recertification Procedures	✓			
75.21	Quality Assurance and Quality Control Requirements	✓			
75.22	Reference Test Methods	✓			
75.23	Alternatives to Standards Incorporated by Reference	✓			
75.24	Out-of-Control Periods	✓			
75.30	General Provisions	✓			
75.31	Initial Missing Data Procedures	✓			
75.32	Determination of Monitor Data Availability for Standard Missing Data Procedures	✓			
75.33	Standard Missing Data Procedures	✓			
75.34	Units with Add-On Emission Controls	✓			
75.35	Missing Data Procedures for CO ₂	✓			
75.36	Missing Data Procedures for Heat Input	✓			
75.37	Missing Data Procedure for Moisture	✓			
75.38	Standard Missing Data Procedures for Hg CEMS		-		
75.39	Missing Data Procedures for Sorbent Trap Monitoring Systems		-		
75.40	General Demonstration Requirements	✓			
75.41	Precision Criteria	✓			
75.42	Reliability Criteria	✓			
75.43	Accessibility Criteria	✓			
75.44	Timeliness Criteria	✓			
75.45	Daily Quality Assurance Criteria	✓			
75.46	Missing Data Substitution Criteria	✓			
75.47	Criteria for a Class of Affected Units	✓			
75.48	Petition for an Alternative Monitoring System	✓			

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
75.53	Monitoring Plan	✓			
75.57	General Recordkeeping Provisions	✓			
75.58	General Recordkeeping Provisions for Specific Situations	✓			
75.59	Certification, Quality Assurance, and Quality Control Record Provisions	✓			
75.60	General Provisions	✓			
75.61	Notifications	✓			
75.62	Monitoring Plan Submittals	✓			
75.63	Initial Certification or Recertification Application	✓			
75.64	Quarterly Reports	✓			
75.65	Opacity Reports	✓			
75.66	Petitions to Administrator	✓			
75.67	Retired Units Petitions		-		
75.70	NO _x Mass Emissions Provisions	✓			
75.71	Specific Provisions for Monitoring NO _x and Heat Input for the Purpose of Calculating NO _x Mass Emissions	✓			
75.72	Determination of NO _x Mass Emissions	✓			
75.73	Recordkeeping and Reporting	✓			
75.74	Annual and Ozone Season Monitoring and Reporting Requirements	✓			
75.75	Annual and Ozone Season Calculation Procedures for Special Circumstances	✓			
75.80	General Provisions	✓			
75.81	Monitoring of Hg Mass Emissions and Heat Input at the Unit Level		-		
75.82	Monitoring of Hg Mass Emissions and Heat Input at the Common and Multiple Stacks		-		
75.83	Calculation of Hg Mass Emissions and Heat Input Rate		-		
75.84	Recordkeeping and Reporting	✓			
Appendix A to Part 75 – Specifications and Test Procedures		✓			
Appendix B to Part 75 – Quality Assurance and Quality Control Procedures		✓			
Appendix C to Part 75 – Missing Data Statistical Estimation Procedures		✓			
Appendix D to Part 75 – Optional SO ₂ Emissions Data Protocol for Gas-Fired Units and Oil-Fired Units		✓			
Appendix E to Part 75 – Optional NO _x Emissions Estimation Protocol for Gas-Fired Peaking Units and Oil-Fired Peaking Units			-		
Appendix F to Part 75 - Conversion Procedures		✓			

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
Appendix G to Part 75 - Determination of CO Emissions		✓			
Appendix H to Part 75 – Revised Traceability Protocol No. 1		✓			
Appendix I to Part 75 – Optional F-Factor/Fuel Flow Method			-		
Appendix J to Part 75 – Compliance Dates for Revised Recordkeeping Requirements and Missing Data Procedures		✓		Unit 3 N/A	
Appendix K to Part 75 – Quality Assurance and Operating Procedures for Sorbent Trap Monitoring Systems			-		
Part 76 – Acid Rain Nitrogen Oxides Emission Reduction Program					
76.5	NO _x Emission Limitations for Group 1 Boilers		-		
76.6	NO emission limitations for Group 2 boilers		-		
76.7	Revised NO _x emission limitations for Group 1, Phase II boilers		-		
76.8	Early Election for Group 1, Phase II Boilers		-		
76.9	Permit Applications and Compliance Plans		-		
76.10	Alternative Emission Limitations		-		
76.11	Emissions Averaging		-		
76.12	Phase I NO _x Compliance Extensions		-		
76.13	Compliance and Excess Emissions		-		
76.14	Monitoring, Recordkeeping, and Reporting		-		
76.15	Test Methods and Procedures		-		
Part 77 – Excess Emissions					
77.3	Offset Plans	✓		Possible future requirement	
77.5	Deduction of Allowances	✓		Possible future requirement	
77.6	Excess Emission Penalties for SO ₂ and NO _x	✓		Possible future requirement	
Part 82 - Protection of Stratospheric Ozone					
82.34	Prohibitions		-		
82.36	Approved refrigerant recycling equipment		-		
82.38	Approved independent standards testing organizations		-		
82.40	Technician training and certification		-		
82.42	Certification, recordkeeping and public notification requirements		-		

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
82.154	Prohibitions		-		
82.156	Required practice		-		
82.158	Standards for recycling and recovery equipment		-		
82.160	Approved equipment testing organizations		-		
82.161	Technician certification		-		
82.162	Certification by owners of recovery and recycling equipment		-		
82.164	Reclaimer certification		-		
82.166(k)(m)	Reporting and recordkeeping requirements for owners/operators		-	Facility has no units > 50 lbs.	
40 CFR 279.72	Used oil Regulations		-	Facility burns on-spec used oil	
Part 96 - Clean Air Interstate Rule					
<i>Subpart A</i>	<i>NOx Budget Trading Program General Provisions</i>		-		
<i>Subpart B</i>	<i>Authorized Account Representative for NOx Budget Sources</i>		-		
<i>Subpart C</i>	<i>Permits</i>		-		
<i>Subpart D</i>	<i>Compliance Certification</i>		-		
<i>Subpart E</i>	<i>NOx Allowance Allocations</i>		-		
<i>Subpart F</i>	<i>NOx Allowances Tracking System</i>		-		
<i>Subpart G</i>	<i>NOx Allowance Transfers</i>		-		
<i>Subpart H</i>	<i>Monitoring and Reporting</i>		-		
<i>Subpart I</i>	<i>Individual Unit Opt-ins</i>		-		
<i>Subpart J</i>	<i>Mobile and Area Sources (Reserved)</i>		-		
<i>Subpart AA - CAIR NOx Annual Trading Program General Provisions</i>					
96.101	Purpose	✓			
96.102	Definitions	✓			
96.103	Measurements, abbreviations, and acronyms	✓			
96.104	Applicability	✓			
96.105	Retired unit exemption	✓			
96.106	Standard requirements	✓		Possible future requirement	
96.107	Computation of time	✓			

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
96.108	Appeal procedures	✓		Possible future requirement	
<i>Subpart BB - CAIR Designated Representative for CAIR NOx Sources</i>					
96.110	Authorization and responsibilities of CAIR designated representative	✓			
96.111	Alternate CAIR designated representative	✓			
96.112	Changing CAIR designated representative and alternate CAIR designated representative; changes in owners and operators	✓			
96.113	Certificate of representation	✓			
96.114	Objections concerning CAIR designated representative	✓			
96.115	Delegation by CAIR designated representative and alternate CAIR designated representative	✓			
<i>Subpart CC - Permits</i>					
96.120	General CAIR NOx Annual Trading Program permit requirements	✓			
96.121	Submission of CAIR permit applications	✓			
96.122	Information requirements for CAIR permit applications	✓			
96.123	CAIR permit contents and terms	✓			
96.124	CAIR permit revisions	✓			
<i>Subpart EE -CAIR NOx Allowance Allocations</i>					
96.140	State trading budgets		-		
96.141	Timing requirements for CAIR NOx allowance allocations		-		
96.142	CAIR NOx allowance allocations		-		
96.143	Compliance supplement pool		-		
<i>Subpart FF- CAIR NOx Allowance Tracking System</i>					
96.151	Establishment of accounts	✓			
96.152	Responsibilities of CAIR authorized account representative	✓			
96.153	Recordation of CAIR NOx allowance allocations	✓			
96.154	Compliance with CAIR NOx emissions limitation	✓			
96.155	Banking	✓			
96.156	Account error		-		
96.157	Closing of general accounts	✓			
<i>Subpart GG - CAIR NOx Allowance Transfers</i>					

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
96.160	Submission of CAIR NOx allowance transfers	✓			
96.161	EPA recordation		-		
96.162	Notification		-		
<i>Subpart HH - Monitoring and Reporting</i>					
96.170	General requirements	✓			
96.171	Initial certification and recertification procedures	✓			
96.172	Out of control periods	✓			
96.173	Notifications	✓			
96.174	Recordkeeping and reporting	✓			
96.175	Petitions	✓			
<i>Subpart II - CAIR NOx Opt-In Units</i>					
<i>Subpart AAA - CAIR SO₂ Trading Program General Provisions</i>					
96.201	Purpose	✓			
96.202	Definitions	✓			
96.203	Measurements, abbreviations, and acronyms	✓			
96.204	Applicability	✓			
96.205	Retired unit exemption	✓		Possible future requirement	
96.206	Standard requirements	✓			
96.207	Computation of time	✓			
96.208	Appeal procedures	✓		Possible future requirement	
<i>Subpart BBB - CAIR Designated Representative for CAIR SO₂ Sources</i>					
96.210	Authorization and responsibilities of CAIR designated representative	✓			
96.211	Alternate CAIR designated representative	✓			
96.212	Changing CAIR designated representative and alternate CAIR designated representative: changes in owners and operators	✓			
96.213	Certificate of representation	✓			
96.214	Objections concerning CAIR designated representative	✓			
96.215	Delegation by CAIR designated representative and alternate CAIR designated representative	✓			

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
<i>Subpart CCC - Permits</i>					
96.220	General CAM SO ₂ Trading Program permit requirements	✓			
96.221	Submission of CAIR permit applications	✓			
96.222	Information requirements for CAIR permit applications	✓			
96.223	CAIR permit contents and term	✓			
96.224	CAIR permit revisions	✓			
<i>Subpart FFF - CAIR SO₂ Allowance Tracking System</i>					
96.251	Establishment of accounts	✓			
96.252	Responsibilities of CAIR authorized account representative	✓			
96.253	Recordation of CAIR SO ₂ allowances		-		
96.254	Compliance with CAIR SO ₂ emissions limitation	✓			
96.255	Banking	✓			
96.256	Account error		-		
96.257	Closing of general accounts	✓			
<i>Subpart GGG - CAIR SO₂ Allowance Transfers</i>					
96.260	Submission of CAIR allowance transfers	✓			
96.261	EPA recordation		-		
96.262	Notification		-		
<i>Subpart HHH - Monitoring and Reporting</i>					
96.270	General requirements	✓			
96.271	Initial certification and recertification procedures	✓			
96.272	Out of control periods	✓			
96.273	Notifications	✓			
96.274	Recordkeeping and reporting	✓			
96.275	Petitions	✓			
<i>Subpart III - CAIR SO₂ Opt-In Units</i>					
<i>Subpart AAAA-CAIR NO_x Ozone Season Trading Program General Provisions</i>					
96.301	Purpose	✓			
96.302	Definitions	✓			
96.303	Measurements, abbreviations, and acronyms	✓			
96.304	Applicability	✓			

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
96.305	Retired unit exemption	✓		Possible future requirement	
96.306	Standard requirements	✓			
96.307	Computation of time	✓			
96.308	Appeal proccdures	✓		Possible future requirement	
<i>Subpart BBBB - CAIR Designated Representative for CAIR NOx Ozone Season Sources</i>					
96.310	Authorization and responsibilities of CAIR designated representative	✓			
96.311	Alternate CAIR designated representative	✓			
96.312	Changing CAIR designated representative and alternate CAIR designated representative; changes in owners and operators	✓			
96.313	Certificate of representation	✓			
96.314	Objections concerning CAIR designated representative	✓			
96.315	Delegation by CAIR designated representative and alternate CAIR designated representative	✓			
<i>Subpart CCCC - Permits</i>					
96.320	General CAIR NOx Ozone Season Trading Program permit requirements	✓			
96.321	Submission of CAIR permit applications	✓			
96.322	Information requirements for CAIR permtit applications	✓			
96.323	CAIR permit contents and term	✓			
96.324	CAIR permit revisions	✓			
<i>Subpart EEEE - CAIR NOx Ozone Season Allowance Allocations</i>					
96.340	State trading budgets		-		
96.341	Timing requirements for CAIR NOx Ozone Season allowance allocations		-		
96.342	CAIR NOx Ozone Season allowance allocations		-		
<i>Subpart FFFF - CAIR NOx Ozone Season Allowance Tracking System</i>					
96.351	Establishment of accounts	✓			
96.352	Responsibilities of CAIR authorized account representative	✓			
96.353	Recordation of CAIR NOx Ozone Season allowance allocations		-		
96.354	Compliance with CAIR NOx emissions limitation	✓			
96.355	Banking	✓			

EPA Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) EPA Title	Applicable Requirement		Comments/ Discussion	Unit/Facility Potential Applicability
		Yes	No/ NA		
96.356	Account error		-		
96.357	Closing of general accounts	✓			
<i>Subpart GGGG - CAIR NOx Ozone Season Allowance Transfers</i>					
96.360	Submission of CAIR NOx Ozone Season allowance transfers	✓			
96.361	EPA recordation		-		
96.362	Notification		-		
<i>Subpart HHHH - Monitoring and Reporting</i>					
96.370	General requirements	✓			
96.371	Initial certification and recertification procedures	✓			
96.372	Out of control periods	✓			
96.373	Notifications	✓			
96.374	Recordkeeping and reporting	✓			
96.375	Petitions	✓			
<i>Subpart IIII - CAIR NOx Ozone Season Opt-in Units</i>					
			-		

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FDEP Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) FDEP Title	Applicable Requirement		Comments/ Discussion	Unit/ Facility Potential Applicability
		Yes	No/ NA		
Chapter 62-4 Permits					
62.4.030	General Prohibition	✓		State only	Facility
62.4.040 (1)	Exemptions	✓		State only	Facility
62-4.050	Procedures to Obtain Permits	✓		State only	Facility
62-4.052	Surveillance Fees		-		
62-4.055	Permit Processing		-		
62-4.060	Consultation		-		
62-4.070	Standards for Issuing or Denying Permits; Issuance; Denial		-		
62-4.080	Modification of Permit Conditions		-		
62-4.090	Renewals		-	State only	
62-4.100	Suspension and Revocation	✓		State only	Facility
62-4.110	Financial Responsibility	✓		May apply in the future	Facility
62-4.120	Transfer of Permits	✓		May apply in the future	Facility
62-4.130	Plant Operation – Problems	✓		State only	Facility
62-4.150	Review	✓			
62-4.160	Permit Conditions		-		
62-4.200	Scope of Part II		-		
62-4.210	Construction Permits	✓		May apply in the future	
62-4.220	Operation Permits for New Sources		-		
62-4.240-250	Water Permit Provisions		-		
Chapter 62-17 Electrical Power Plant Siting					
62-204.800	(8) Title 40, Code of Federal Regulations, Part 60, Standards of Performance for New Stationary Sources	✓		State only	
(8)(b) The following Standards of Performance for New Stationary Sources contained in 40 CFR 60, revised as of July 1, 2001, or later as specifically indicated					
	1. 40 CFR 60.40 Subpart D, Fossil-fuel-fired Steam Generators for which Construction is Commenced after August 17, 1971		-	State only	
	2. 40 CFR 60.40a Subpart Da, Electric Utility Steam Generators for which Construction is	✓		State only	

FDEP Rule	Stanton Units -025 and -026, two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) FDEP Title	Applicable Requirement		Comments/ Discussion	Unit/ Facility Potential Applicability
		Yes	No/ NA		
	Commenced after September 18, 1978				
	3. 40 CFR 60.40b Subpart Db, Industrial-Commercial-Institutional Steam Generating Units		-	State only	
	4. 40 CFR 60.40c Subpart Dc, Small Industrial-Commercial-Institutional Steam Generating Units		-	State only	
	14. 40 CFR 60.110 Subpart K, Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced after June 11, 1973, and prior to May 19, 1978		-	State only	
	15. 40 CFR 60.110a Subpart Ka, Storage Vessels for Petroleum Liquids for Which Construction, reconstruction, or Modification Commenced after May 18, 1978, and prior to July 23, 1984		-	State only	
	16. 40 CFR 60.110b Subpart Kb, Volatile Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984	✓		State only	
	31. 40 CFR 60.250 Subpart Y, Coal Preparation Plants		-	State only	
	39. 40 CFR 60.330 Subpart GG, Stationary Gas Turbines	✓		State only	
	66. 40 CFR 60.670 Subpart OOO, Non-Metallic Mineral Processing Plants		-	State only	
	78. 40 CFR 60.4201 Subpart IIII, Stationary Compression Ignition Internal Combustion Engines		-	State only	
	79. 40 CFR 60.4231 Subpart JJJJ, Stationary Spark Ignition Internal Combustion Engines		-	State only	
	80. 40 CFR 60 Subpart KKKK, Stationary Combustion Turbines		-	State only	
	(8)(c) The Standards of Performance for New Stationary Sources adopted by reference in this rule shall be controlling over other standards the air pollution rules of the Department except that any emissions limiting standard contained in or determined pursuant to the air pollution rules of the Department which is more stringent than one contained in a Standard of Performance, or which regulates emissions of pollutants or emissions units not regulated by an applicable Standard of Performance, shall apply.		-	State only	
	(8)(d) General Provisions Adopted	✓		State only	
	(8)(e) Appendices Adopted. The following appendices of 40 CFR Part 60, revised as of July 1, 1994, or later as specifically indicated, are adopted and incorporated by reference.				
	1. 40 CFR 60 Appendix A, Test Methods, are adopted by reference	✓		State only	
	2. 40 CFR 60 Appendix B, Performance Specifications	✓		State only	
	3. 40 CFR 60 Appendix C, Determination of Emission Rate Change	✓		State only	
	5. 40 CFR 60 Appendix F, Quality Assurance Procedures	✓		State only	
	(9) 40 CFR 60, Emission Guidelines and Compliance Times				

FDEP Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) FDEP Title	Applicable Requirement		Comments/ Discussion	Unit/ Facility Potential Applicability
		Yes	No/ NA		
	(9)(a) General Applicability and Definitions		-	State only	
	(9)(h) 40 CFR 60 Subpart HHHH, Coal-Fired Electric Steam Generating Units		-	State only	
	(10) 40 CFR Part 61, National Emission Standards for Hazardous Air Pollutants (NESHAPS)				
	(10)(b)8. 40 CFR Part 61 Subpart M, Asbestos	✓		State only	Facility
	(10)(d) General provisions Adopted. The general provisions of 40 CFR Part 61 Subpart A, revised July 1, 2001, are adopted and incorporated by reference except 40 CFR 61.04, 40 CFR 61.08, 40 CFR 61.11, and 40 CFR 61.18	✓		State only	Facility
	(11) 40 CFR Part 63 National Emissions Standards for Hazardous Air Pollutants (NESHAPS)				
	(11)(b) Standards Adopted				
	(11)(b)10. 40 CFR 63 Subpart Q, Chromium Emissions from Industrial Process Cooling Towers		-	State only	
	(11)(b)13. 40 CFR 63 Subpart T, Halogenated Solvent Cleaning		-	State only	
	(11)(d) General Subparts Adopted				
	1. 40 CFR 63 Subpart A, General Provisions		-	State only	
	2. 40 CFR 63 Subpart B, Equivalent Emissions Limitations by Permit (112(j))		-	State only	
	4. 40 CFR 63 Subpart D, Compliance Extensions for Early Reductions		-	State only	
	(12) Adoption of 40 CFR 64, Compliance Assurance Monitoring		-	State only	
	(13) Adoption of 40 CFR 65, Consolidated Federal Air Rule		-	State only	
	(14) Adoption of 40 CFR 68, Reserved		-	State only	
	(15) Adoption of 40 CFR 70, Federal Title V Rule	✓		State only	Facility
	(16) Adoption of 40 CFR 72, Federal Acid Rain Program	✓		State only	
	(17) Adoption of 40 CFR 73, SO ₂ Allowance System	✓		State only	
	(19) Adoption of 40 CFR 75, CEMS	✓		State only	
	(20) Adoption of 40 CFR 76, Acid Rain NO _x Requirement	✓		State only	
	(21) Adoption of 40 CFR 77, Acid Rain Excess Emissions	✓		State only	
	(22) Adoption of 40 CFR 78, Appeal Procedures for the Acid Rain Program	✓		State only	
	(24) Adoption of 40 CFR 82, Stratospheric Ozone	✓		State only	Facility
	(26) Adoption of 40 CFR 96, CAIR SO ₂ and NO _x Trading Program	✓		State only	
Chapter 62-210 Stationary Sources – General Requirements					
62-210.100	Purpose and Scope		-		
62-210.200	Definitions		-		

FDEP Rule	Stanton Units -025 and -026, two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) FDEP Title	Applicable Requirement		Comments/ Discussion	Unit/ Facility Potential Applicability
		Yes	No/ NA		
62-210.220	Small Business Assistance Program		-		
62-210.300	Permits Required				
	(1) Air Construction Permits	✓			Facility
	(2) Air Operation Permits, except (b)	✓			Facility
	(3)(a) categorized and Conditional Exemptions - #1-37	✓			Facility
	(3)(b) Generic and Temporary Exemptions	✓			Facility
	(4) Authorization by Air General Permits		-		
	(5) Notification of Startup. The owners of operator of any emissions unit or facility which has a valid air operation permit which has been shut down more than one year, shall notify the Department in writing of the intent to start up such emissions unit or facility, a minimum of 60 days prior to the intended startup date.		-		
	(a) The notification shall include information as to the startup date, anticipated emission rates or pollutants releases, 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		-		
	(6) Emissions Unit Reclassification	✓		May apply in the future	
	(7) Transfer of Air Permit	✓			
62-210.310	Air General Permits		-		
62-210.350	(1) Public Notice and Comment - Public Notice of Proposed Agency Action	✓			Facility
	(2) Additional Notice Requirements for Sources Subject to Prevention of Significant Deterioration or Nonattainment Area new Source Review	✓			Facility
	(3) Additional Public Notice Requirements for Sources Subject to Operation Permits for Title V Sources	✓			Facility
62-210.360	Administrative Permit Corrections	✓			
62-210.370	Emissions Computation and Reporting	✓			
62-210.550	Stack Height Policy	✓			
62-210.650	Circumvention	✓			
62-210.700	(1) Excess Emissions	✓			

FDEP Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) FDEP Title	Applicable Requirement		Comments/ Discussion	Unit/ Facility Potential Applicability
		Yes	No/ NA		
	(2) Excess Emissions		-		
	(3) Excess Emissions		-		
	(4) Excess Emissions	✓			
	(5) Excess Emissions	✓			
	(6) Excess Emissions	✓			
62-210.900	Forms and Instructions				
	(5) Annual Operating Reports	✓			Facility
62-210.920	Notification Forms of Air General Permits		-		
Chapter 62-213 Operation Permits for Major Sources of Air Pollution					
62.213.100	Purpose and Scope		-		
62-213.205	Annual Emissions Fee	✓			Facility
62-213.300	Title V Air General Permits		-		
62-213.400	Permits and Permit Revisions Required	✓			Facility
62-213.410	Changes Without Permit Revision	✓		May apply in the future	Facility
62-213.412	Immediate Implementation Pending Revision Process	✓		May apply in the future	Facility
62-213.413	Fast-Track Revisions of Acid Rain Parts	✓		May apply in the future	
62-213.415	Trading of Emissions Within a Source	✓		May apply in the future	Facility
62-213.420(1)(a)2. and (1)(b), (2), (3), and (4)	Permit Applications	✓			Facility
62-213.430	(1) Permit Issuance, Renewal, and Revision – Action on Application		-		Facility
	(2) Permit Denial		-		
	(3) Permit Renewal	✓			Facility
	(4) Permit Revision	✓			Facility
	(5) EPA Recommended Actions		-		
	(6) Insignificant Emission Units	✓			Facility
62-213.460	Permit Shield	✓			Facility

FDEP Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) FDEP Title	Applicable Requirement		Comments/ Discussion	Unit/ Facility Potential Applicability
		Yes	No/ NA		
62-213.900	(1), (7), and (8) Forms and Instructions	✓			Facility
Chapter 62-214 Requirements for Sources Subject to the Federal Acid Rain Program					
62-214.100	Purpose and Scope		-		
62-214.300	Applicability	✓			Facility
62-214.320	Applications	✓			
62-214.330	(1)(a) Acid Rain Compliance Plan and Compliance Options	✓			
62-214.340	Exemptions	✓			Facility
62-214.350	Certification	✓			
62-214.360	Department Action on Applications		-		
62-214.370	Revisions and Administrative Corrections	✓			
62-214.420	Acid Rain Part Content		-		
62-214.430	implementation and Termination of Compliance Options. Procedures for Activation and Termination of Compliance Options.	✓			
Chapter 62-242	Motor Vehicle Standards and Test Procedures		-		
Chapter 62-243	Tampering with Motor Vehicle Air Pollution Control Equipment		-		
Chapter 62-252 Gasoline Vapor Control					
62-252.300	Gasoline Dispensing Facilities – Stage I Vapor Recovery				
	(2) Prohibition		-	State Only	Facility
	(3) Control Technology Requirements		-	State Only	Facility
	(4) Compliance Schedule		-	State Only	Facility
62-252.400	Gasoline Dispensing Facilities – Stage II Vapor Recovery				
	(2) Prohibition		-	State Only	Facility
	(3) Control Technology Requirements		-	State Only	Facility
	(4) Compliance Schedules		-	State Only	Facility
	(5) Testing		-	State Only	Facility
	(6) Recordkeeping		-	State Only	Facility
	(7) System Maintenance		-	State Only	Facility
	(8) Training		-	State Only	Facility
62-252.500	Gasoline Tanker Trucks				
	(2) Prohibitions		-	State Only	Facility

FDEP Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) FDEP Title	Applicable Requirement		Comments/ Discussion	Unit/ Facility Potential Applicability
		Yes	No/ NA		
	(3) Leak testing		-	State Only	Facility
Chapter 62-256 Open Burning and Frost Protection Fires					
62-256.300	Prohibitions	✓		State Only	Facility
62-256.700	Open Burning Allowed	✓		State Only	Facility
Chapter 62-257 Asbestos Removal					
62-257.301	Notification Procedure and Fee	✓		State Only	Facility
62-257.400	Fee Schedule	✓		State Only	Facility
62-257.900	Form	✓		State Only	Facility
Chapter 62-281 Motor Vehicle Air Conditioning Refrigerant Recovery and Recycling					
62-281.100	Purpose, Scope, and Compliance Requirements		-	State Only	Facility
Chapter 62-296 Stationary Sources – Emission Standards					
62-296.320	General Pollutant Emission Limiting Standards				
	(1) Volatile organic compounds emissions or organic solvents emissions	✓			Facility
	(2) Objectionable Odor Prohibited	✓		State Only	Facility
	(3) Open Burning	✓		State Only	Facility
	(4)(a) Process Weight Table		-		
	(4)(b) General Visible Emissions Standard	✓			Facility
	(4)(c) Unconfined Emissions of Particulate Matter	✓			Facility
62-296.340	Best Available Retrofit Technology		-		
62-296.341	Regional Haze – Reasonable Progress		-		
62-296.405	Fossil Fuel Steam generators with More than 250 Million Btu per Hour Heat Input				
	(1) Existing Emissions Units				
	(a) Visible Emissions		-		
	(b) Particulate Matter – 0.1 pound per million Btu heat input, as measured by applicable compliance methods		-		
	(c) Sulfur Dioxide, as measured by applicable compliance methods		-		
	(d) Nitrogen Oxides (expressed as NO _x)		-		
	(e) Test methods and Procedures		-		
	(f) Continuous Emissions Monitoring Requirements		-		
	(g) Quarterly Reporting Requirements		-		

FDEP Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) FDEP Title	Applicable Requirement		Comments/ Discussion	Unit/ Facility Potential Applicability
		Yes	No/ NA		
	(2) New Emissions Units				
	(a) Visible Emissions – See Rule 62-204.800(7) and 40 CFR 60.42 and 60.42a	✓			
	(b) Particulate Matter – See Rule 62-204.800(7) and 40 CFR 60.42 and 60.42a	✓			
	(c) Sulfur Dioxide – See Rule 62-204.800(7) and 40 CFR 60.43 and 60.43a	✓			
	(d) Nitrogen Oxides – See Rule 62-204.800(7) and 40 CFR 60.44 and 60.44a	✓			
62-296.406	Fossil Fuel Steam Generators with Less than 250 million Btu per Hour Heat Input, New and Existing Emissions Units				
	(1) Visible Emissions		-		
	(2) Particulate Matter – Best available control technology in accordance with Rule 62-210.400(40)		-		
	(3) Sulfur Dioxide – Best available control technology in accordance with Rule 62-210.200(40)		-		
62-296.411	Sulfur Storage and Handling Facilities	✓			
62-296.470	Implementation of Federal Clean Air Interstate Rule	✓			
62-296.480	Implementation of Federal Clean Air Mercury Rule		-		
62-296.500	Reasonably Available Control Technology (RACT) – Volatile Organic Compounds (VOC) and Nitrogen Oxides (NO _x) Emitting Facilities				
	(1) Applicability		-		
	(2) Permit, Recordkeeping, and Compliance Reporting Requirements		-		
	(a) Permits – Special Considerations		-		
	(b) Recordkeeping		-		
	(c) Reporting		-		
	(3) Exceptions		-		
	(4) Consideration of Exempt Solvents		-		
	(5) Compliances may be demonstrated for surface coating and graphic arts facilities on a 24-hr weighted average basis for a single source point with a single emission limit		-		
	(6) Specific Emission Limitations		-		
62-296.508	Petroleum Liquid Storage				
	(1) Applicability		-		
	(2) Control Technology		-		
	(3) Test Methods		-		
62-296.511	Solvent Metal Cleaning				
	(1) Applicability		-		
	(2) Cold Cleaning Control Technology		-		

FDEP Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) FDEP Title	Applicable Requirement		Comments/ Discussion	Unit/ Facility Potential Applicability
		Yes	No/ NA		
	(3) Open Top Vapor Degreaser Control Technology		-		
	(4) Conveyorized Degreaser Control Technology		-		
	(5) Test Methods and Procedures		-	* 8-hr test requirement not in SIP	
62-296.516	Petroleum Liquid Storage Tanks with External Floating Roofs				
	(1) Applicability		-		
	(2) Control Technology		-		
	(3) Test Methods and Procedures		-		
62-296.570	Reasonably Available Control Technology (RACT) – Requirements for Major VOC – and NO _x Emitting Facilities				
	(1) Applicability		-		
	(2) Compliance Requirements		-		
	(3) Operation Permit Requirements		-		
	(4) RACT Emissions Limiting Standards		-		
	(a) Compliance Dates and Monitoring		-		
	(b) Emission Limiting Standards		-		
	(c) Exception for Startup, Shutdown, or Malfunction		-		
62-296.700	Reasonably Available Control Technology (RACT) Particulate Matter				
	(1) Applicability		-		
	(2) Exemptions		-		
	(3) Specific RACT Emission Limiting Standards for Stationary Emissions Units		-		
	(4) Maximum Allowable Emission Rates		-		
	(a) Emissions Unit Data		-		
	(b) Maximum Emission Rates		-		
	(5) Circumvention		-		
	(6) Operation and Maintenance Plan		-		
	(a) Air Pollution Control Devices and Collection Systems		-		
	(b) Control Equipment Data		-		
	(c) Processing or Materials Handling Systems		-		
	(d) Fossil Fuel Steam Generators		-		

FDEP Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) FDEP Title	Applicable Requirement		Comments/ Discussion	Unit/ Facility Potential Applicability
		Yes	No/ NA		
62-296.702	Fossil Fuel Steam Generators				
	(1) Applicability		-		
	(2) Emission Limitations		-		
	(a) Particulate Matter – 1.10 lb/mmBtu		-		
	(b) Visible Emissions – 20% opacity		-		
	(3) Test Methods and Procedures		-		
62-296.711	Materials Handling, Sizing, Screening, Crushing and Grinding Operations				
	(1) Applicability		-		
	(2) Emission Limitations		-		
	(3) Test Methods and Procedures		-		
Chapter 62-297 Stationary Sources – Emission Monitoring					
62-297.310	General Test Requirements				
	(1) Required Number of Test Runs	✓			
	(2) Operating Rate During testing	✓			
	(3) Calculation of Emission Rate	✓			
	(4) 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	✓			
	(b) Minimum Sample Volume	✓			
	(c) Required Flow Rate Range	✓			
	(d) Calibration	✓			
	(e) EPA Method 5	✓			
	(5) Determination of Process Variables	✓			
	(6) Required Stack Sampling Facilities				
	(a) Permanent Test Facilities	✓			
	(b) Temporary Test Facilities		-		
	(c) Sampling Ports	✓			

FDEP Rule	Stanton Units -025 and -026 , two 170 MW Gas Combined-Cycle Combustion Turbines with HRSGs, Unit -027 (Cooling Tower), and Unit -028 (Fuel Oil Storage Tank) FDEP Title	Applicable Requirement		Comments/ Discussion	Unit/ Facility Potential Applicability
		Yes	No/ NA		
	(d) Work Platform	✓			
	(e) Access	✓			
	(f) Electrical Power	✓			
	(g) Sampling Equipment Support	✓			
	(7) Frequency of Compliance Tests				
	(a) General Compliance testing	✓			
	1. Compliance test requirement prior to obtaining operating permit		-		
	2. Annual test requirement for excess PM emissions	✓			
	3. Annual test requirement prior to obtaining renewal permit	✓			
	4.a. Annual VE Test	✓			
	4.b. Annual test for lead, acrylonitride, and other regulated pollutants		-		
	4.c. Annual test for each NESHAP pollutant		-		
	5. No annual PM test required if burn no liquid and/or solid fuel for greater than 400 hrs/year		-		
	6. Exemption from semi-annual PM test for steam generators	✓			
	7. Exemption from quarterly PM test for units not utilizing liquid and/or solid fuel for more than 100 hrs.	✓			
	8. Five year VE test requirement for units that operate no more than 400 hrs/year	✓			
	9. Fifteen day advance notification requirement prior to test	✓			
	10. Compliance test exemption for exempt units and units utilizing a general permit		-		
	(b) Special Compliance Tests	✓		Applicable upon any complaint	
	(c) Waiver of Compliance Test Requirement	✓			
	(8) Test Reports	✓			
62-297.401	Compliance Test Methods	✓			
62-297.440	Supplementary Test Procedures	✓			
62-297.450	EPA VOC Capture Efficiency Test Procedures		-		
62-297.520	CEMS Performance Specifications	✓			
62-297.620	Exceptions and Approval of Alternate Procedures and Requirements	✓			

**ATTACHMENT SEC-EU17-18
Compliance Assurance Monitoring**

**STANTON COMBINED CYCLE UNIT A
COMPLIANCE ASSURANCE MONITORING PLAN**

**Combined Cycle Units 025 and 026
NO_x Emissions Controlled by SCR**

	INDICATOR NO. 1	INDICATOR NO. 2
I. Indicator	NO _x concentration	
Measurement Approach	NO _x concentrations are measured continuously using a NO _x /CO ₂ CEMS installed and operated in accordance with 40 CFR Part 75.	
II. Indicator Range	An excursion is defined as a NO _x concentration above 3.5 ppmv @ 15% O ₂ on a 3-hour block average basis when firing natural gas and above 10.0 ppmv @ 15% O ₂ on a 3-hour block average basis when firing distillate fuel oil.	
III. Performance Criteria	The NO _x /CO ₂ CEMS inlet gas sample is obtained from ports located in the HRSG stack for each unit. The location of these sample ports and the sample gas system is in accordance with 40 CFR Part 75 requirements.	
A. Data Representativeness		
B. Verification of Operational Status	NO _x /CO ₂ EMS have been certified per 40 CFR Part 75 requirements.	
C. Quality Assurance and Control Practices and Criteria	Per 40 CFR Part 75 requirements	
D.1. Monitoring Frequency	Continuous	
D.2. Data Collection Procedures	Computerized data acquisition and handling system (DAHS).	
D.3. Averaging Period	3-Hour block	

ATTACHMENT SEC-EU17-19
Alternative Methods of Operation

ALTERNATIVE METHODS OF OPERATION
Stanton Units 25 & 26

- 1. Combustion Turbine Unit operated under normal conditions between 50 – 100 % load utilizing natural gas as the primary fuel with no duct burners in service.**
- 2. Combustion Turbine Unit operated under normal conditions between 50 – 100% load utilizing No. 2 fuel oil as the primary fuel with no duct burners in service.**
- 3. Combustion Turbine Unit operated under normal conditions between 50 – 100 % load utilizing natural gas as the primary fuel with no duct burners in service with evaporative cooling.**
- 4. Combustion Turbine Unit operated under normal conditions between 50 – 100% load utilizing No. 2 fuel oil as the primary fuel with no duct burners in service with evaporative cooling.**
- 5. Combustion Turbine Unit operated under normal conditions between 50 – 100% load utilizing natural gas as the primary fuel with all duct burners in service using natural gas.**
- 6. Combustion Turbine Unit operated under normal conditions between 50 – 100% load utilizing No. 2 fuel oil as the primary fuel with all duct burners in service using natural gas.**
- 7. Combustion Turbine Unit operated under normal conditions between 50 – 100% load utilizing natural gas as the primary fuel with all duct burners in service using natural gas and evaporative cooling.**
- 8. Combustion Turbine Unit operated under normal conditions between 50 -100% load utilizing No. 2 fuel oil as the primary fuel with all duct burners in service using natural gas and evaporative cooling.**

9. Combustion Turbine Unit operated under normal conditions between 50 -100% load utilizing natural gas as the primary fuel with all duct burners in service using natural gas and evaporative cooling plus power augmentation.

10. Combustion Turbine Unit operated under normal conditions between 50 -100% load utilizing No. Fuel oil as the primary fuel with all duct burners in service using natural gas and evaporative cooling plus power augmentation.

Note: Startup and Shutdown operations are defined as any operation less than 50% load using natural gas or No. 2 fuel oil. Special alternative emission limitations are outlined in the PSD permit for these operations.

Table 1
Combustion Turbine Operating Scenarios

Natural Gas							
Case	Ambient Temperature (°F)	Load (%)	CTG-1	CTG-2	Evaporative Cooling	Power Augmentation	Duct Burner
1	19	100	X	X			
2	19	75	X	X			
3	19	50	X	X			
4	19	100	X	X			X
5	45	100	X	X			
6	45	75	X	X			
7	45	50	X	X			
8	45	100	X	X			X
9	60	100	X	X	X	X	X
10	70	100	X	X	X		
11	70	75	X	X			
12	70	50	X	X			
13	70	100	X	X	X		X
14	95	100	X	X	X		
15	95	75	X	X			
16	95	50	X	X			
17	95	100	X	X	X	X	X
18	95	100	X	X	X	X	X
19	95	100	X	X	X		X
Distillate Fuel Oil							
20	19	100	X	X			
21	19	75	X	X			
22	19	50	X	X			
23	45	100	X	X			
24	70	100	X	X	X		
25	95	100	X	X	X		

ATTACHMENT SEC-EU19-11
Other Information Required by Rule or Statute

TANKS 4.0.9d
Emissions Report - Detail Format
Tank Identification and Physical Characteristics

Identification

User Identification:	007
City:	Orlando
State:	Florida
Company:	OUC
Type of Tank:	Vertical Fixed Roof Tank
Description:	Fuel Oil Storage Tank

Tank Dimensions

Shell Height (ft):	40.00
Diameter (ft):	92.00
Liquid Height (ft):	37.60
Avg. Liquid Height (ft):	19.25
Volume (gallons):	1,860,000.00
Turnovers:	15.48
Net Throughput(gal/yr):	29,749,640.00
Is Tank Heated (y/n):	N

Paint Characteristics

Shell Color/Shade:	White/White
Shell Condition:	Good
Roof Color/Shade:	White/White
Roof Condition:	Good

Roof Characteristics

Type:	Dome
Height (ft):	0.00
Radius (ft) (Dome Roof):	82.23

Breather Vent Settings

Vacuum Settings (psig):	-0.03
Pressure Settings (psig):	0.03

Meteorological Data used in Emissions Calculations: Orlando, Florida (Avg Atmospheric Pressure = 14.75 psia)

TANKS 4.0.9d
Emissions Report - Detail Format
Liquid Contents of Storage Tank

007 - Vertical Fixed Roof Tank
Orlando, Florida

Mixture/Component	Month	Daily Liquid Surf. Temperature (deg F)			Liquid Bulk Temp (deg F)	Vapor Pressure (psia)			Vapor Mol. Weight.	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Vapor Pressure Calculations
		Avg.	Min.	Max.		Avg.	Min.	Max.					
Distillate fuel oil no. 2	All	74.32	68.84	79.80	72.34	0.0103	0.0087	0.0119	130.0000			168.00	Option 1: VP70 = .009 VP80 = .012

TANKS 4.0.9d
Emissions Report - Detail Format
Detail Calculations (AP-42)

007 - Vertical Fixed Roof Tank
Orlando, Florida

Annual Emission Calculations

Standing Losses (lb):	581,5748
Vapor Space Volume (cu ft):	186,162,5981
Vapor Density (lb/cu ft):	0.0002
Vapor Space Expansion Factor:	0.0372
Vented Vapor Saturation Factor:	0.9849
Tank Vapor Space Volume:	
Vapor Space Volume (cu ft):	186,162,5981
Tank Diameter (ft):	92,0000
Vapor Space Outage (ft):	28,0044
Tank Shell Height (ft):	40,0000
Average Liquid Height (ft):	19,2500
Roof Outage (ft):	7,2544
Roof Outage (Dome Roof)	
Roof Outage (ft):	7,2544
Dome Radius (ft):	82,2300
Shell Radius (ft):	46,0000
Vapor Density	
Vapor Density (lb/cu ft):	0.0002
Vapor Molecular Weight (lb/lb-mole):	130,0000
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	0.0103
Daily Avg. Liquid Surface Temp. (deg. F):	533,9945
Daily Average Ambient Temp. (deg. F):	72,3167
Ideal Gas Constant R (psia cuft / (lb-mol-deg R)):	10,731
Liquid Bulk Temperature (deg. F):	532,0067
Tank Paint Solar Absorptance (Shell):	0.1700
Tank Paint Solar Absorptance (Roof):	0.1700
Daily Total Solar Insulation Factor (Btu/sqft day):	1,486,6667
Vapor Space Expansion Factor	
Vapor Space Expansion Factor:	0.0372
Daily Vapor Temperature Range (deg. F):	21,9205
Daily Vapor Pressure Range (psia):	0.0032
Breather Vent Press. Setting Range (psia):	0.0600
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	0.0103
Vapor Pressure at Daily Minimum Liquid Surface Temperature (psia):	0.0087
Vapor Pressure at Daily Maximum Liquid Surface Temperature (psia):	0.0119
Daily Avg. Liquid Surface Temp. (deg F):	533,9945
Daily Min. Liquid Surface Temp. (deg F):	528,5143
Daily Max. Liquid Surface Temp. (deg F):	539,4746
Daily Ambient Temp. Range (deg. F):	20,6167
Vented Vapor Saturation Factor	
Vented Vapor Saturation Factor:	0.9849
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	0.0103
Vapor Space Outage (ft):	28,0044
Working Losses (lb):	
Vapor Molecular Weight (lb/lb-mole):	948,2017
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	130,0000
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	0.0103

Annual Net Throughput (gal/yr.):	29,749,640,000
Annual Turnovers:	15.4839
Turnover Factor:	1.0000
Maximum Liquid Volume (gal):	1,860,000,000
Maximum Liquid Height (ft):	37.6000
Tank Diameter (ft):	92.0000
Working Loss Product Factor:	1.0000

Total Losses (lb): 1,529,7765

TANKS 4.0.9d
Emissions Report - Detail Format
Individual Tank Emission Totals

Emissions Report for: Annual

007 - Vertical Fixed Roof Tank
Orlando, Florida

Components	Losses(lbs)		
	Working Loss	Breathing Loss	Total Emissions
Distillate fuel oil no. 2	948.20	581.57	1,529.78

