



Florida Municipal Power Agency

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Susan Schumann
Environmental Licensing and Permitting

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BUREAU OF AIR REGULATION

June 2, 2008

Trina Vielhauer, Chief
Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Florida Municipal Power Agency / Cane Island Power Park Unit 4
Air Permit No. PSD-FL-400 / Air Permit No. 0970043-014-AC

Dear Trina,

FMPA respectfully submits the following comments associated with proposed Air Permit No. PSD-FL-400.

In addition to the attached comments, FMPA notes that, while the permit correctly identifies the NSPS (New Source Performance Standard) limit under 40 CFR 60 Subpart KKKK for nitrogen oxides (NO_x) emissions as 15 ppm on a 30-day rolling average, it is important to include a notation in the permit confirming that continuous compliance is not required. We expect that excess emissions during periods of startup, shutdown, and malfunction will occur, resulting in emissions in excess of 15 ppm. These excess emissions, which are included as part of the 30-day rolling average, will be reported as required, although emission levels above 15 ppm as a result of emissions during periods of startup, shutdown, or malfunction should not be considered a violation of the standard.

When the U.S. Environmental Protection Agency promulgated this standard, the Federal Register preamble recognized that "even for well-operated units with efficient NO_x emission controls, excess emission 'spikes' during unit startup and shutdown are inevitable, and malfunctions of emission controls and process equipment occasionally occur. . . . While continuous compliance is not required, excess emissions during startup, shutdown, and malfunction must be reported. . . . It is clear that continuous compliance is not a requirement of the final rule during periods of startup, shutdown, and malfunction." 71 Federal Register 38482 (July 6, 2006).

We would like to meet with you at your earliest convenience to discuss resolution of these issues. In the meantime, please contact me via email or call me at (407) 355-7767 if any additional clarification is needed regarding the comments.

Thank you,

Susan R. Schumann
Florida Municipal Power Agency

**Cane Island Power Park #4 Draft PSD-FL-400
Explanation of proposed revisions submitted by FMPA**

Page number in draft permit	Corresponding Condition in draft permit	Explanation of Revision / Comment
1	n/a	Expiration of permit should be extended to August 31, 2012, to allow for flexibility in construction schedule.
2	n/a	Revise language to clarify inclusion of Unit #4 and auxiliary equipment.
4	8	Add language to identify "commencing operation" as "first fire" date
6	10	Revise language to reflect 2 grains of sulfur, rather than 2.0
7	12	Revise table to reflect operation without duct-burning; 24-hour block and 12-month rolling averages; and deletion of references to PM _{2.5}
7	12.a. & b.	Revision of language from "shall" to "may."
7	12.d.	Clarification of language to reflect compliance method
7	12.g.	Add sentence to the end to clarify KKKK requirements
10	23	Revise to reflect averaging methods.
12	26.g.	Revise language to reflect compliance with 40CFR Part 75
12	28.	Request deletion of this condition. It is unnecessary, since there are no limits on hours for CIPP#4
12	29.	Request deletion of this condition. It is unnecessary, since there are no limits on fuel usage for CIPP#4
13	32.b.	Revise language to reflect semi-annual report, as required by NSPS. There is no FDEP rule to require quarterly reports
13	33	Revise language to reference Rule, as opposed to specific submittal date.
14	4.	Revise language to reflect record maintenance period of five years.
14	5.	Acknowledge that model year 2009 (or later) NSPS certified engine demonstrates compliance with CO BACT.
14	6.	Add language to reflect testing requirements.
15	6.	Revise language to reflect correct measurement.
15	7.	Add language to reflect testing requirements.
16	1.	Revise language to provide less Cooling Tower detail.
BD-1	n/a	Revise table to reflect operation without duct-burning; 24-hour block and 12-month rolling averages; and deletion of references to PM _{2.5}
BD-1	a. and b.	Revision of language from "shall" to "may."
BD-1	d.	Clarification of language to reflect compliance method
BD-1	g.	Add sentence to the end to clarify KKKK requirements
KKKK-1	n/a	Revision of language to reflect applicability of 2007 language
TE-1	I.C.	Revise distance to NWA
TE-2	I.E.	Revise language to accurately reflect NSPS applicability
TE-2	I.E.	Revise language to accurately reflect CIPP HAP applicability
TE-2	II.A.	Delete language referring to stack in this section, since it is not "auxiliary equipment." Stack parameters are properly presented on Page TE-3.
TE-14	Table 9	Revise to accurately reflect CIPP Unit 4 and Treasure Coast Unit 1
TE-19	Table 15	Revise to accurately reflect TCEC limits
TE-21	IV.E.	Revise to accurately reflect cooling tower rate
TE-21	IV.E.	Revise language to reflect 2 grains of sulfur, rather than 2.0
TE-22	IV.G.	Revise table to reflect operation without duct-burning; 24-hour block and 12-month rolling averages; and deletion of references to PM _{2.5}
TE-22, 23	IV.G.a. and b.	Revision of language from "shall" to "may."
TE-23	d.	Clarification of language to reflect compliance method
TE-23	IV.G.g.	Add sentence to the end to clarify KKKK requirements
TE-24	IV.H	Acknowledge that model year 2009 (or later) NSPS certified engine demonstrates compliance with CO BACT.
TE-26	IV.I	Clarify language regarding operations
5,7,10,16; BD-1; TE-3,6,21,22,23	multiple	Request deletion of all references to PM _{2.5} , since the CIPP#4 application was submitted prior to May 8, the project is subject to guidance that PM ₁₀ is a surrogate for PM _{2.5} .