



RECEIVED

APR 30 2013

DIVISION OF AIR  
RESOURCE MANAGEMENT

April 29, 2013

Mr. Jeff Koerner  
Florida Department of Environmental Protection  
Division of Air Resource Management  
2600 Blair Stone Road  
Tallahassee, FL 32399

**Via FedEx**  
**Airbill No. 7996 3941 9684**

Mr. Al Linero  
Florida Department of Environmental Protection  
Division of Air Resource Management  
2600 Blair Stone Road  
Tallahassee, FL 32399

**Via FedEx**  
**Airbill No. 7996 3950 2199**

Ms. Leigh Ann Pell  
Florida Department of Environmental Protection  
Division of Air Resource Management  
2600 Blair Stone Road  
Tallahassee, FL 32399

**Via FedEx**  
**Airbill No. 7996 3950 2199**

**Re: Tampa Electric Company  
Polk Power Station  
Permit No. 1050233 – 028 – AV  
Comments to Revised Draft Permit 1050233 – 034 – AC**

Dear Mr. Koerner, Mr. Linero, and Ms. Pell,

On March 28, 2013, Tampa Electric Company (TEC) received email correspondence from the Florida Department of Environmental Protection (FDEP) announcing its intent to issue draft permit no. 1050233 – 034 – AC. The draft permit allows for the construction of a 4 – on – 1 combined cycle unit utilizing the current combustion turbines, EU – 009, EU – 010, EU 0 – 13, and EU – 014. After construction, these existing units will be able to operate in both simple and combined cycle mode.

Upon subsequent review of the draft air permits, Tampa Electric Company (TEC) identified some minor changes permit conditions that should be included in the final permit and administrative errors that should be revised before issuing the final permit. On April, 3 2013, TEC had a teleconference with the FDEP to discuss these issues. The main issues discussed included the request of 4 hours for warm startup of the steam turbine and the request to have separate emission unit (E.U.) IDs for the separate modes of operation, just as in Progress Energy’s Bartow plant. In addition to these items, TEC requests the department review other changes that would assist in clarity of the air construction permit. TEC has enclosed a red – line document of revised draft permit with the changes requested, the additions are seen in red and the deletions are seen as a red strikethrough.

TAMPA ELECTRIC COMPANY  
P. O. BOX 111 TAMPA, FL 33601-0111

(813) 228-4111

AN EQUAL OPPORTUNITY COMPANY  
TAMPAELECTRIC.COM

CUSTOMER SERVICE:  
HILLSBOROUGH COUNTY (813) 223-0800  
POLK COUNTY (863) 299-0800  
ALL OTHER COUNTIES 1 (888) 223-0800

On April 10, 2013, TEC published the Notice of Intent to Issue the Revised Draft Air Construction Permit in the legal section of the Lakeland Ledger. The proof of publication has been submitted to FDEP and the Environmental Protection Agency (EPA) Region 4. As a supplement to the comments provided in the red-line mark – up of the draft permit, TEC submits the following comments to the above referenced permit.

1. TEC requests additional hours for a warm startup of the steam turbine electric generator (STEG) in Condition 15 on Page 11 of the draft permit as follows:

*STEG Hot/Warm Startup:* For ~~hot~~/warm startup of the STEG, excluded emissions from any CTG/HRSG system used for startup of the STEG shall not exceed four (4) two (2) hours in any 24-hour period. A ~~hot~~/warm startup of the STEG is defined as startup of the 4-on-1 combined cycle system STEG following a shutdown ~~of the STEG~~ lasting less than 48 hours but longer than 8 hours.

*STEG Hot Startup:* For a hot startup of the STEG, excluded emissions from any CTG/HRSG used for startup of the STEG shall not exceed two (2) hours in any 24 – hour period. A hot startup of the STEG is defined as startup of the STEG following a shutdown of less than 8 hours.

TEC is requesting the change in language because it will be very difficult to start the STEG in a warm start scenario in only two hours. Attachment 1 shows the profile of the Alstom steam turbine start up. This startup scenario shows that at least 120 minutes will be required to complete a steam turbine for a warm start and this does not include time for the combustion turbine generator/heat recovery steam generator (CTG/HRSG) startup. In total, this process will take well over two hours to complete. Without this four hour provision all of TEC's startup scenarios will not be covered under this revised draft permit.

TEC needs the Condition 15 language to be consistent with the vendor documentation from Alstom, the steam turbine manufacturer, which shows that more than 2 hours is needed for a warm startup. TEC cannot take the chance that we would not be able to dispatch as needed due to this permit condition. Additionally, TEC would not like to be in a position where we are in not in compliance because of the need to provide electricity to our customers. TEC requests that FDEP look at all the available information and reasoning provided when making their determination on this permit condition.

We also would like to clarify that the excluded emissions are from any CTG/HRSG that is used in the startup of the STEG. TEC believes that this will provide the necessary language to avoid confusion between which excess emission exclusion should be utilized during startup.

2. TEC is requesting that the two stacks on each CTG be allocated their own EU ID. This would result in eight EU IDs. This would allow for easier RATA reporting for each stack. Per 40 CFR 75 requirements a RATA is required on each continuous emission monitoring system (CEMS) that has more than 168 hours for four quarters (does not have to be sequential quarters). This change will avoid submitting two separate RATAs for the same emission unit ID. In addition, the annual operating reports will be representative of the mode of operation the CTG operates. Please see the red – line of the permit below.

3. In prior phone conversations with FDEP, TEC noted that the CO stack test limits shown in Condition 9 for the combined cycle stacks do not include the additional CO emissions that may occur due to the use of the duct burners. TEC requests the following change on the table note of Condition 9 Emission Standards.

f. An initial and an annual CO stack test shall be conducted on each CTG while firing natural gas and operating in combined cycle mode. An initial CO stack test shall be conducted on each CTG while firing fuel oil and operating in combined cycle mode.

Stack tests while firing duct burners are not required. Stack tests while operating in simple cycle mode are not required.

This will make this condition consistent with the table note g for the VOC emission standards.

4. TEC requests that Condition 8d be made consistent with the other method of operation conditions included in this permit.

d. *Fuel Oil Usage – CTGs 2A, 2B, 2C and 2D:* CTGs 2A, 2B, 2C and 2D shall use ULSD fuel oil for no more than 750 avg. hours/CY/CTG of which no more than 375avg. hours/CY/CTG may be in simple cycle mode. The CTGs shall fire ULSD fuel oil no more than 48 hours per day.

5. TEC requests that on page 6 of 19 Section 2 conditions 10 be deleted. This condition is a repetition of what is seen in Section 3.A. Condition 1.
6. In this revised draft permit, the previously applicable permit requirements (i.e., the current permit requirements for simple cycle operation) remain in effect only through December 31 of the year that Polk 2 Combined Cycle begins operation. Depending on when Polk 2 Combined Cycle commences operation, this would allow the previously permit requirements to be utilized for a period ranging from 364 days (if Polk 2 Combined Cycle commences operation on January 1<sup>st</sup>) to one day (if Polk 2 Combined Cycle commences operation on December 30<sup>th</sup>). A short transition period would not allow TEC to provide load if any operational issues or other issues arise with the initial startup of Polk 2 Combined Cycle. TEC requests to be allowed to utilize past permits for up to one year after Polk 2 Combined Cycle began operation or when the revised Title V draft permit is received. Per the revised draft permit, an application for a revised Title V permit is required by 90 days prior to the AC permit expiration but not later than 180 days after commencing operation.
7. TEC requests the last bullet of condition 15 be changed to be clear that each CTG/HRSG system is allowed 2 hours in any 24 hour period for a documented malfunction. See changed language below and in the enclosed revised draft permit.

*Documented Malfunction:* For any the CTG/HRSG system, excess emissions of NO<sub>x</sub> resulting from documented malfunctions shall not exceed two hours in any 24-hour period. A “documented malfunction” means a malfunction that is documented within one working day of detection by contacting the Compliance Authority by telephone, facsimile transmittal, or electronic mail

In addition Condition 17 should be changed in the same manner.

8. Condition 18 should not have the language “and correct as described in Specific Condition 6” as there is no mass emission limits associated with these units.
9. Condition 26e should reference Condition 14, 15, and 16. Condition 16 must also be included as this condition allows for data exclusions during tuning events.
10. Regarding the Section 3 Condition 24 test method, TEC would prefer the flexibility to also EPA Method 320 instead of Method 18 to measure methane and ethane. Method 18 is not the preferred method for this procedure as the bags are susceptible to leaks and contamination. Additionally, the analyses are very expensive. The contract laboratory charges \$325 per sample bag. An analysis amounts to \$1,625 minimum per test, since typically 5 bags are shipped, not counting shipping and cost of the materials. Method 320 is a sampling method we are proficient at performing, is a real-time instrumental measurement system method, and is also being used to satisfy other parameters in the permit requirements.
11. In Condition 15, bullet 1, TEC requests the removal of the language that refers to how a cold startup of the STEG occurs. Due to the large nature of the STEG, we may need more than one CTG to provide additional steam to bring the STEG online. For this reason, TEC would like the flexibility to use an additional CTG, if necessary.
12. In Section 3D, the testing requirements should be deleted as there is no performance testing required for the purchase of new emergency generators as they come certified from the manufacturer.
13. Finally, TEC has identified some administrative errors that should be corrected before a final permit is received. Please see the red line version of the permit attached for the various requested administrative changes.

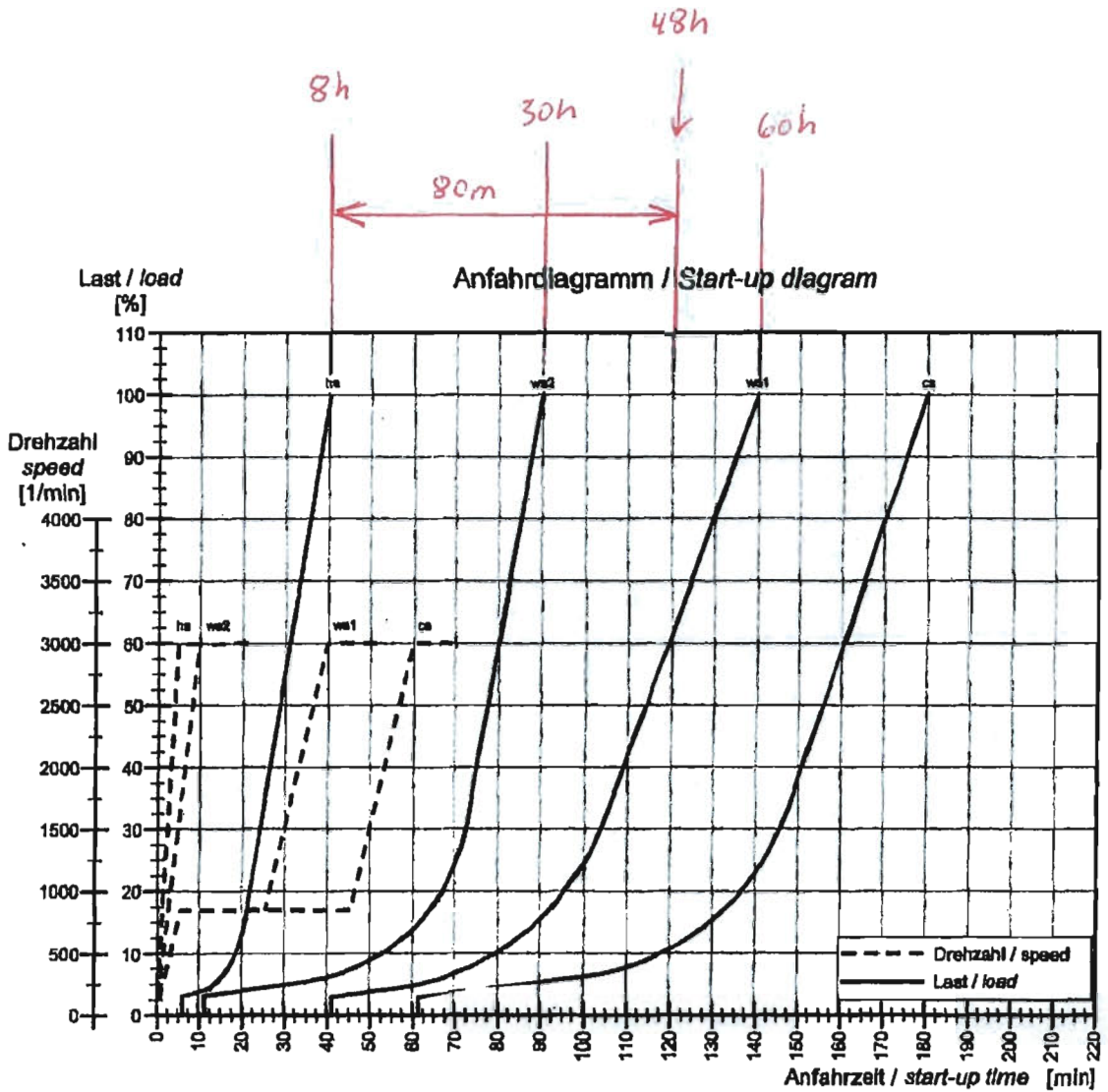
All the requested changes discussed below are included in the enclosed red – line of the Polk 2 Combined Cycle Revised Draft Permit (1050233 – 034 – AC). TEC hopes that these changes are taken into consideration, as we feel that with these changes the final permit would be as clear and correct as possible.

Thank you,



Lyndsey Baldyga  
Engineer – Air Programs  
Environmental Health and Safety  
Tampa Electric Company

**ATTACHMENT 1**



- ca = Kaltstart bei  $T_{Rotor} = 30^{\circ}\text{C}$  / cold start at  $T_{Rotor} = 30^{\circ}\text{C}$  (>120h shutdown)
- wa1 = Warmstart 1 bei  $T_{Rotor} = 130^{\circ}\text{C}$  / warm start 1 at  $T_{Rotor} = 130^{\circ}\text{C}$  (60h shutdown)
- wa2 = Warmstart 2 bei  $T_{Rotor} = 250^{\circ}\text{C}$  / warm start 2 at  $T_{Rotor} = 250^{\circ}\text{C}$  (30h shutdown)
- ha = Heissstart bei  $T_{Rotor} = 440^{\circ}\text{C}$  / hot start at  $T_{Rotor} = 440^{\circ}\text{C}$  (8h shutdown)

Nennleistung / rated output:  
 Drehzahl / speed:  
 Frischdampf Temperatur / live steam temperature:  
 Zwischendampf Temperatur / reheat steam temperature:

**TYPICAL**  
 For information Only

|                   |                         |                                     |                                     |
|-------------------|-------------------------|-------------------------------------|-------------------------------------|
| Replaces          |                         | ALSTOM Document Code                |                                     |
| Responsible dept. | Created by<br>D. Olsson | Checked by                          | Approved by<br>Format<br>A4         |
| Originator<br>    |                         | Document Type<br>typical            | Document Status                     |
|                   |                         | Title, Subtitle<br>Start-up Diagram | Identification number<br>1AHV423640 |
| Rev.              | Date<br>2013-02-11      | Lang.<br>83                         | Sheet<br>1/2                        |

## **ATTACHMENT 2**



**FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION**

BOB MARTINEZ CENTER  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400  
BOB MARTINEZ  
CENTER  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400

RICK SCOTT  
GOVERNOR

HERSCHEL T. VINYARD JR.  
SECRETARY

Formatted: Font: (Default) Times New Roman, 10 pt, Small caps

**PERMITTEE**

Tampa Electric Company (TEC)  
Post Office Box 111  
Tampa, Florida 33601-0111

*Authorized Representative:*

Paul Carpinone, Director  
Environmental Health and Safety

TEC Polk Power Station  
Project No. 1050233-034-AC  
Permit No. PSD-FL-421

SIC Code: 4911  
Expires: January 1, 2018  
Polk 2 Combined Cycle

**PROJECT**

This permit authorizes the construction of the Polk 2 Combined Cycle at the existing Polk Power Station. The Polk 2 Combined Cycle will be a "4-on-1" combined cycle unit with an electrical generating capacity of approximately 1,160 megawatts (MW). The project will utilize four existing 165 MW combustion turbine-electrical generators and will add four new heat recovery steam generators equipped with natural gas-fired duct burners, a single 500 MW steam turbine-electrical generator, a mechanical draft cooling tower, transmission upgrades and ancillary equipment. The existing Polk Power Station is located Polk County at 9895 State Road 37 South in Mulberry, Florida.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

**STATEMENT OF BASIS**

This air pollution construction 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.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. as well as those for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing 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 must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida  
(Electronic Signature)

DRAFT

Jeffery F. Koerner, Program Administrator  
Office of Permitting and Compliance  
Division of Air Resource Management  
[www.dep.state.fl.us](http://www.dep.state.fl.us)





**FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION**

BOB MARTINEZ CENTER  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400  
BOB MARTINEZ  
CENTER  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400

RICK SCOTT  
GOVERNOR

HERSCHEL T. VINYARD JR.  
SECRETARY

**Formatted:** Font: (Default) Times New Roman, 10 pt, Small caps

**PERMIT**

---

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit with Appendices) was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on the date indicated below to the following persons.

Paul L. Carpinone, TEC: [plcarpinone@tecoenergy.com](mailto:plcarpinone@tecoenergy.com)  
Karen A. Sheffield, TEC: [kasheffield@tecoenergy.com](mailto:kasheffield@tecoenergy.com)  
Tom Davis, P.E., ECT: [tdavis@ectinc.com](mailto:tdavis@ectinc.com)  
Kelley Boatwright, DEP SWD: [kelley.m.boatwright@dep.state.fl.us](mailto:kelley.m.boatwright@dep.state.fl.us)  
Cindy Mulkey, DEP Siting Office: [cindy.mulkey@dep.state.fl.us](mailto:cindy.mulkey@dep.state.fl.us)  
Heather Ceron, EPA Region 4: [ceron.heather@epa.gov](mailto:ceron.heather@epa.gov)  
Katy Forney, EPA Region 4: [forney.kathleen@epamail.epa.gov](mailto:forney.kathleen@epamail.epa.gov)  
Catherine Collins, U.S. FWS: [catherine\\_collins@fws.gov](mailto:catherine_collins@fws.gov)  
Lynn Scarce, DEP OPC: [lynn.scarce@dep.state.fl.us](mailto:lynn.scarce@dep.state.fl.us)

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.  
*(Electronic Signature)*

DRAFT

**SECTION 1. GENERAL INFORMATION**

**FACILITY DESCRIPTION**

The Polk Power Station consists of: a nominal 250 MW (net) solid fuel-based integrated gasification and combined cycle (Unit 1) including a sulfuric acid plant and an auxiliary boiler; four natural gas-fueled nominal 165 MW simple cycle combustion turbine-electrical generators (CTGs) designated as Units 2, 3, 4 and 5; and ancillary equipment. Units 2 and 3 are equipped with backup fuel oil-firing capability.

**PROJECT DESCRIPTION**

The project involves the conversion of Units 2 through 5 from simple cycle operation to a single “4-on-1” combined cycle operation that will be known as the Polk 2 Combined Cycle. The conversion will be accomplished by adding: a duct-fired heat recovery steam generator (HRSG) and combined cycle exhaust stack to each CTG; a single nominal 500 MW steam turbine-electrical generator; a mechanical draft cooling tower; and ancillary equipment.

The Polk 2 Combined Cycle will be a “4-on-1” combined cycle unit with an electrical generating capacity of approximately 1,160 MW. The project will utilize the Units 2 through 5 CTGs and will add four new heat recovery steam generators equipped with natural gas-fired duct burners, a single 500 MW steam turbine-electrical generator, a mechanical draft cooling tower, transmission upgrades and ancillary equipment. Ultralow sulfur distillate fuel oil will be used as back-up fuel.

Units 2, 3, 4 and 5 will be redesignated Units 2A, 2B, 2C and 2D and as new Emissions Unit (EU) Nos. 020, 021, 022, and 023 in the facility EU list.

| Facility ID No. 1050233 |   |
|-------------------------|---|
| EU No.                  | Emission Unit Description   |
| 001                     | 260 MW Combined Cycle Gas Turbine No. 1   |
| 003                     | 120 Million Btu per Hour Auxiliary Boiler   |
| 004                     | Sulfuric Acid Plant   |
| 005                     | Solid Fuel Handling System  |
| 006                     | Solid Fuel Gasification System  |
| 007                     | Emergency Generators  |
| 008                     | Heating Units and General Purpose Internal Combustion Engines                                       |
| 009                     | Nominal 165 MW Simple Cycle Turbine No. 2 <i>(to be operated as Unit 2A, EU No. 020 in future)</i>  |
| 010                     | Nominal 165 MW Simple Cycle Turbine No. 3 <i>(to be operated as Unit 2B, EU No. 021 in future)</i>  |
| 013                     | Nominal 165 MW Simple Cycle Turbine No. 4 <i>(to be operated as Unit 2B, EU No. 022 in future)</i>  |
| 014                     | Nominal 165 MW Simple Cycle Turbine No. 5 <i>(to be operated as Unit 2D, EU No. 023 in future)</i>  |
| 015                     | High-Temperature Syngas Cleanup System and Carbon Capture System (pre-commercial scale)             |
| 018                     | 500 KW Emergency Generator Diesel Engine  |
| 019                     | Mechanical Draft Cooling Tower – consisting of six cells with six individual exhaust fans           |
| 020                     | Unit 2A Nominal 165 MW Combustion Turbine and Duct-fired Heat Recovery Steam Generator <sup>1</sup> |
| 021                     | Unit 2B Nominal 165 MW Combustion Turbine and Duct-fired Heat Recovery Steam Generator <sup>1</sup> |
| 022                     | Unit 2C Nominal 165 MW Combustion Turbine and Duct-fired Heat Recovery Steam Generator <sup>1</sup> |
| 023                     | Unit 2D Nominal 165 MW Combustion Turbine and Duct-fired Heat Recovery Steam Generator <sup>1</sup> |

1. Steam produced in the Duct-fired HRSG will drive a separate 500 MW Steam Turbine-Electric Generator.

## SECTION 1. GENERAL INFORMATION

---

### FACILITY REGULATORY CLASSIFICATION

- The facility is **not** a major source of hazardous air pollutants (HAP).
- The facility operates units subject to the acid rain provisions of the Clean Air Act.
- The facility is subject to the Clean Air Interstate Rule (CAIR) in accordance with the Final Department Rules issued pursuant to CAIR as implemented by the Department in Rule 62-296.470, F.A.C.
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400, F.A.C. for the PSD of Air Quality.
- The proposed project triggers a PSD review and a requirement to conduct a Best Available Control Technology (BACT) pursuant to Department Rule 62-212.400, F.A.C.
- The proposed project includes units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations Part 60 (40 CFR 60).
- The proposed project includes units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.
- The project is subject to certification under the Florida Power Plant Siting Act, 403.501-518, F.S. and Chapter 62-17, F.A.C.

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. **Permitting Authority:** The permitting authority for this project is the Office of Permitting and Compliance in the Division of Air Resource Management of the Department of Environmental Protection (Department). The Office of Permitting and Compliance mailing address is 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. All documents related to applications for permits to operate an emissions unit shall be submitted to the Division of Air Resource Management of the Department of Environmental Protection (Department). Copies shall be sent to each agency identified under Compliance Authority.
2. **Compliance Authority:** All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Air Resource Section of the Department Southwest District Office at: 13051 North Telecom Parkway, Temple Terrace, Florida 33637. The telephone number is 813/632-7600 and the fax number is 813/632-7665.
3. **Appendices:** The following Appendices are attached as a part of this permit and must be complied with: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); Appendix D (Common Testing Requirements); Appendix Subpart A (NSPS Subpart A and NESHAP Subpart A); Appendix IIII (NSPS Subpart IIII); Appendix KKKK (NSPS Subpart KKKK); Appendix XS (Semiannual NSPS Excess Emission Report); Appendix ZZZZ (NESHAP Subpart ZZZZ).
4. **Applicable Regulations, Forms and Application Procedures:** Unless otherwise specified in this permit, the construction and operation of the subject emissions units 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 Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
5. **New or Additional Conditions:** 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.]
6. **Modifications:** The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. **Source Obligation**
  - (a) Authorization to construct shall expire if construction is not commenced within 18 months after receipt of the permit, if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. This provision does not apply to the time period between construction of the approved phases of a phased construction project except that each phase must commence construction within 18 months of the commencement date established by the Department in the permit.
  - (b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

---

**SECTION 2. ADMINISTRATIVE REQUIREMENTS**

---

(c) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

[Rule 62-212.400(12), F.A.C.]

8. Application for Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V air operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]
9. Construction and Expiration: The permit expiration date includes sufficient time to complete construction, perform required testing, submit test reports, and submit an application for a Title V operation permit to the Department. For good cause, the permittee may request that this air construction permit be extended. Such a request shall be submitted to the Department Office of Permitting and Compliance at least sixty (60) days prior to the expiration of this permit. [Rules 62-4.070(4), 62-4.080, and 62-210.300(1), F.A.C.]
10. Previous Permits: ~~The four combustion turbine electrical generators designated as Units 2, 3, 4 and 5 (Emissions Units 009, 010, 013 and 014) were constructed pursuant to permits PSD-FL-263 and PSD-FL-363. They may be operated in the manner described in those permits, modifications to those permits and the applicable facility Title V Operation Permit through December 31 of the calendar year during which the Polk 2 Combined Cycle commences operation. On and after January 1 of the following calendar year, the four combustion turbines redesignated as Emissions Units 20, 21, 22 and 23 may only be operated as allowed by this permit and by the Title V Permit described in Condition 8 above.~~

**SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS**

**A. POLK 2 COMBINED CYCLE (EU 020, 021, 022, and 023)**

This section of the permit addresses the following emission units.

| EU No.  | Emission Unit Description   |
|---|---|
| 009   | <u>Nominal 165 MW Simple Cycle Combustion Turbine No. 2</u>   |
| 010   | <u>Nominal 165 MW Simple Cycle Combustion Turbine No. 3</u>   |
| 013   | <u>Nominal 165 MW Simple Cycle Combustion Turbine No. 4</u>   |
| 014   | <u>Nominal 165 MW Simple Cycle Combustion Turbine No. 5</u>   |
| 020   | Unit 2A Nominal 165 MW Combustion Turbine and Duct-fired Heat Recovery Steam Generator <sup>1</sup> |
| 021   | Unit 2B Nominal 165 MW Combustion Turbine and Duct-fired Heat Recovery Steam Generator <sup>1</sup> |
| 022   | Unit 2C Nominal 165 MW Combustion Turbine and Duct-fired Heat Recovery Steam Generator <sup>1</sup> |
| 023   | Unit 2D Nominal 165 MW Combustion Turbine and Duct-fired Heat Recovery Steam Generator <sup>1</sup> |
| 1. Steam produced in the Duct-fired HRSG will drive a separate 500 MW Steam Turbine-Electric Generator.   |   |
| <p><b>Fuels:</b> Each combustion turbine (CTG) fires natural gas as the primary fuel and ultralow sulfur distillate (ULSD) fuel oil as a restricted alternate fuel. The heat recovery steam generators (HRSGs) duct burner fires only natural gas.</p> <p><b>Heat Input Ratings:</b> The maximum heat input rating of each CTG is 1,951 MMBtu/hour when firing natural gas and 2,110 MMBtu/hour when firing fuel oil based on a compressor inlet air temperature of 59 degrees Fahrenheit (°F), 60 percent (%) relative humidity, 14.7 pounds per square inch (psi) pressure, the higher heating value (HHV) of each fuel and 100% load. The design heat input of each duct burner located within each heat recovery steam generator (HRSG) is 264 MMBtu/hour.</p> <p><b>Controls:</b> Inherently clean fuels, lean premix combustion technology such as Dry Low-NO<sub>x</sub> (DLN) for gas firing, wet injection for ULSD fuel oil firing and selective catalytic reduction (SCR).</p> <p><b>Stack Parameters:</b> Each new HRSG has a stack height of approximately 148 feet with an exit diameter of 19 feet. Existing CTGs <del>22A, 32B, 42C, and 52D</del> have simple cycle stacks that are 114 feet high with an exit diameter of 18 feet.</p> <p><b>Continuous Monitors:</b> Each HRSG stack and each CTG stack is equipped with a continuous emissions monitoring system (CEMS) to measure and record nitrogen oxides (NO<sub>x</sub>) as well as flue gas oxygen (O<sub>2</sub>) or carbon dioxide (CO<sub>2</sub>) content.</p> |   |

**APPLICABLE PERMITS, STANDARDS AND REGULATIONS**

1. **Previously Applicable Permits:** The four CTGs previously designated as Units 2, 3, 4, and 5 (Emissions Units 009, 010, 013 and 014) were constructed pursuant to permits PSD-FL-263 and PSD-FL-363. They may be operated in the manner described in those permits, modifications to those permits and the applicable facility Title V Operation Permit up to one year after through December 31 of the calendar year during which the Polk 2 Combined Cycle commences operation or by the date of the revised Title V permit. On and after January 1 of the following calendar year after the Polk 2 Combined Cycle has been operating one year or the revised Title V permit is received, the four CTGs redesignated as Emissions Units 20, 21, 22, and 23 may only be operated as allowed by this permit and by the subsequent Title V Operation Permit described in **Section 2, Condition 8.**  
[Permits PSD-FL-263, PSD-FL-363, and 1050233-028-AV and revisions to those permits]
2. **NSPS Requirements:** The four CTGs shall comply with the applicable NSPS in 40 CFR 60, including: Subpart A (General Provisions) and Subpart KKKK (Standards of Performance for Stationary Gas Turbines).

**SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS**

**A. POLK 2 COMBINED CYCLE (EU 020, 021, 022, and 023)**

See Appendix Subpart A and Appendix KKKK.

[Rule 62-204.800(7)(b), F.A.C.; 40 CFR 60 Subpart A; 40 CFR 60 Subpart KKKK]

**EQUIPMENT**

3. Combustion Turbine Generators (CTGs): The permittee is authorized to modify, tune, operate, and maintain four CTGs each with a nominal generating capacity of 165 MW. Each CTG shall include an automated control system and have dual-fuel capability. Ancillary equipment for each CTG includes an inlet air filtration system, inlet air-cooling system and existing simple cycle (bypass) stack.  
[Application No. 1050233-034-AC]



### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

#### A. POLK 2 COMBINED CYCLE (EU 020, 021, 022, and 023)

4. **Heat Recovery Steam Generators (HRSGs):** The permittee is authorized to install, operate and maintain four HRSGs, associated duct burners and separate combined cycle exhaust stacks. Each HRSG shall be designed to recover exhaust heat energy from one of the four CTGs and deliver steam to the steam turbine-electrical generator (STEG). [Application No. 1050233-034-AC]
5. **Emission Controls**
  - a. **Dry Low NO<sub>x</sub> (DLN) Combustion:** The permittee shall employ lean premix (also called DLN) technology and an automated control system to control NO<sub>x</sub> emissions from each CTG when firing natural gas. The DLN combustors and automated control system shall be tuned to meet the CO and NO<sub>x</sub> limits specified in this subsection in combination with the SCR system when operating in combined cycle mode. When operating in simple cycle mode, the DLN combustors and automated control system shall be tuned to meet the CO and NO<sub>x</sub> limits specified in this subsection without use of the SCR system.
  - b. **Wet Injection:** The permittee shall continue to operate, and maintain a wet injection system (water or steam) to reduce NO<sub>x</sub> emissions from each CTG when firing ULSD fuel oil. The wet injection systems shall be tuned to meet the CO and NO<sub>x</sub> limits specified in this subsection when operating in combined cycle mode in combination with the SCR system. When operating in simple cycle mode, the wet injection system shall be tuned to meet the CO and NO<sub>x</sub> limits specified in this subsection without use of the SCR system.
  - c. **Selective Catalytic Reduction (SCR) Systems:** The permittee shall install, operate, and maintain a SCR system within each HRSG to control NO<sub>x</sub> emissions from each CTG in combined cycle mode when firing natural gas or ULSD. The SCR system consists of an ammonia injection grid, catalyst, ammonia storage, monitoring and control system; electrical, piping and other ancillary equipment.
  - d. **Ammonia Storage:** In accordance with 40 CFR 60.130, the storage of ammonia shall comply with all applicable requirements of the Chemical Accident Prevention Provisions in 40 CFR 68. [Application No. 1050233-034-AC; Rule 62-212.400(PSD/BACT), F.A.C.]

#### PERFORMANCE RESTRICTIONS

6. **Permitted Capacity - Gas Turbines:** The maximum heat input rate to each gas turbine is 1,951 MMBtu/hour when firing natural gas and 2,110 MMBtu/hour when firing distillate fuel oil (based on a compressor inlet air temperature of 59° F, the higher heating value (HHV) of each fuel, and 100% load). Heat input rates will vary depending upon gas turbine characteristics, ambient conditions, alternate methods of operation, and evaporative cooling. The permittee shall provide manufacturer performance curves (or equations) that correct combustion turbine design heat input rating and operation for site conditions to the Permitting and Compliance Authorities within 45 days of completing the initial compliance testing. Operating data may be adjusted for the appropriate site conditions in accordance with the performance curves and/or equations on file with the Department. [Rule 62-210.200(Potential to Emit - PTE), F.A.C.]
7. **Authorized Fuels:** The CTGs shall fire natural gas as the primary fuel, which shall contain no more than 2.0 grains of sulfur per 100 standard cubic feet (gr S/100 SCF) of natural gas. As a restricted alternate fuel, the CTGs may fire ULSD fuel oil containing no more than 0.0015% sulfur by weight. The duct burners shall only fire natural gas, which shall contain no more than 2.0 gr S/100 SCF. [Application No. 1050233-034-AC; Rule 62-210.200(PTE), F.A.C.]
8. **Methods of Operation:** The CTGs and duct burners shall operate only under the following methods and hours of operation of operation:
  - a. **Combined Cycle Operation:** Each CTG may operate continuously (8,760 hours per year) when using natural gas to produce direct, shaft-driven electrical power and steam-generated electrical power from the steam turbine-electrical generator as a four-on-one combined cycle unit subject to the restrictions of this permit. In accordance with the specifications of the SCR and HRSG manufacturers, the SCR system shall

**SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS**

**A. POLK 2 COMBINED CYCLE (EU 020, 021, 022, and 023)**

be on line and functioning properly during combined cycle operation or when the HRSG is producing steam. Steam from the HRSGs may occasionally be dumped directly to the condenser.

- b. *Duct Burner Operation:* The combined group of four natural gas-fired duct burners shall operate for no more than an average of 4,000 hours per calendar year per duct burner.
- c. *Simple Cycle Operation:* Beginning the first full calendar year (CY-1) after demonstrating initial compliance in combined cycle mode, the group of four CTGs shall operate in simple cycle mode for no more than an average of 900 hours per calendar year per CTG (avg. hours/CY/CTG) except that:
  - During CY-1, a one-time special allocation of 3,480 avg. hours/CTG shall be available for use by the permittee to provide for events when the steam turbine-electric generator is unavailable, including but not limited to planned outages, forced outages and derates;
  - If the one-time special allocation of 3,480 avg. hours/CTG is not fully used in CY-1, the balance may be carried over into CY-2;
  - If the annual allocation of 900 avg. hours/CTG is not fully used in CY-1, the remainder may be added to the year-end balance of the special allocation carried over from CY-1 and up to 3,480 avg. hours/CTG may be carried over into CY-2; and
  - If the annual allocation of 900 avg. hours/CTG is not fully used in CY-23, CY-34, CY-45, CY-56, etc., the remainder may be added to the year-end balance of the special allocation carried over from the previous year and up to 3,480 avg. hours/CTG may be carried over into subsequent CY-34, CY-45, CY-56, CY-67, etc., respectively.
- d. *Fuel Oil Usage – ~~CTGs 2A, 2B, 2C and 2D~~ CTGs 2A, 2B, 2C and 2D* shall use ULSD fuel oil for no more than 750 avg. hours/CY/CTG of which no more than 375 avg. hours/CY/CTG may be in simple cycle mode. The CTGs shall fire ULSD fuel oil no more than 48 hours per day combined.

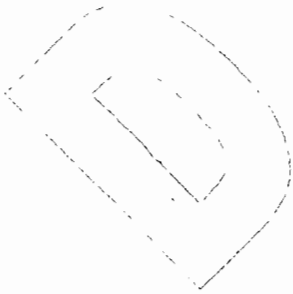
[Rules 62-210.200(PTE) and 62-212.400(BACT), F.A.C.]

**EMISSIONS STANDARDS**

- 9. Emissions Standards: Emissions from each CTG or CTG/duct burner set, as applicable, shall not exceed the following emission standards.

| Pollutant                              | Methods of Operation <sup>a</sup>         | Emission Standard <sup>b</sup>  | Compliance Method                       | BASIS <sup>c</sup> |
|--|---|---|---|--------------------|
| NO <sub>x</sub>                        | Simple Cycle/Gas                          | 15 ppmvd @15% O <sub>2</sub>  | 4-hour rolling, CEMS                    | KKKK               |
|  | Simple Cycle/Fuel Oil                     | 9 ppmvd @15% O <sub>2</sub>   | 24-hour block, CEMS                     | Previous BACT      |
|  | Combined Cycle/Gas                        | 42 ppmvd @15% O <sub>2</sub>  | 4-hour rolling, CEMS                    | KKKK               |
|  | Combined Cycle/Fuel Oil                   | 2.0 ppmvd @15% O <sub>2</sub> <sup>d</sup>  | 24-hour block, CEMS                     | BACT               |
|  | Simple Cycle, Low Load <sup>e</sup>       | 8.0 ppmvd @15% O <sub>2</sub> <sup>d</sup>  | 4-hour rolling, CEMS                    | KKKK               |
|  | Combined Cycle, Low load <sup>e</sup>     | 96 ppmvd @15% O <sub>2</sub>  | 30-day rolling, CEMS                    |                    |
| CO                                     | Simple or Combined, Gas <sup>f</sup>      | 4.1 ppmvd @15% O <sub>2</sub>   | Initial, Annual Stack Test <sup>f</sup> | BACT               |
|  | Simple or Combined, Fuel Oil <sup>f</sup> | 8.0 ppmvd @15% O <sub>2</sub>   |   |                    |
| VOC                                    | Simple or Combined <sup>g</sup>           | 1.4 ppmvd @15% O <sub>2</sub>   | Initial Stack Test <sup>g</sup>         | BACT               |
| SO <sub>2</sub> , SAM                  | Simple or Combined, Gas or Oil            | 2 gr S/100 SCF of gas, 0.0015% S fuel oil <sup>h</sup>  |   | BACT               |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | Simple or Combined Gas or Fuel Oil        | 2 gr S/100 SCF of gas, 0.0015% S fuel oil <sup>h</sup>  |   | BACT <sup>i</sup>  |
|  |   | Visible emissions shall not exceed 10% opacity for each 6-minute block average, as measured by EPA Method 9 <sup>j</sup>  |   |                    |
|  |   | Ammonia emissions shall not exceed 5 ppmvd @15% O <sub>2</sub> as measured by initial and annual stack tests <sup>j</sup> |   |                    |

**SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS**  
**A. POLK 2 COMBINED CYCLE (EU 020, 021, 022, and 023)**



### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

#### A. POLK 2 COMBINED CYCLE (EU 020, 021, 022, and 023)

- a. Simple = simple cycle and emissions measured in the bypass exhaust stack; Combined = combined cycle with or without use of duct burner and emissions measured in the HRSG exhaust stack.
- b. ppmvd @15% O<sub>2</sub> means parts per million by volume, dry and corrected to 15% oxygen.
- c. Basis for the emission standard is either NSPS Subpart KKKK or Department BACT determinations.
- d. The BACT emission standards for NO<sub>x</sub> while operating in combined cycle are more stringent than the corresponding Subpart KKKK emissions standards of 15 and 42 ppmvd @15% O<sub>2</sub> on a 30-day rolling average for natural gas and fuel oil, respectively.
- e. Subpart KKKK NO<sub>x</sub> limit applicable to turbines operating at less than 75% of peak.
- f. An initial and an annual CO stack test shall be conducted on each CTG while firing natural gas and operating in combined cycle mode. An initial CO stack test shall be conducted on each CTG while firing fuel oil and operating in combined cycle mode. Separate tests with duct burners are not required. Separate tests while operating in simple cycle are not required.
- g. An initial VOC stack test shall be conducted on each CTG while firing natural gas and operating in combined cycle mode. Separate tests with duct burners are not required. Separate tests while operating in simple cycle are not required.
- h. The applicant requested the stated sulfur fuel limits. These BACT values are more stringent and insure compliance with the corresponding Subpart KKKK SO<sub>2</sub> emission standard.
- i. The listed work practices and limits on surrogates and precursors limit potential PM/PM<sub>10</sub>/PM<sub>2.5</sub> (filterable and condensable).

[Application No. 1050233-034-AC; Rule 62-212.400(BACT), F.A.C.; 40 CFR 60 Subpart KKKK]

#### EXCESS EMISSIONS

*{Permitting Note: The following conditions apply only to the SIP-based emissions standards specified in Specific Condition No. 9 of this subsection. Rule 62-210.700, F.A.C. (Excess Emissions) cannot vary or supersede any federal provision of the NSPS, or Acid Rain programs.}*

10. Operating Procedures: BACT determinations established by this permit rely on "good operating practices" to reduce emissions. Therefore, all operators and supervisors shall be properly trained to operate and ensure maintenance of the CTGs, duct burners, HRSGs, and pollution control systems in accordance with the guidelines and procedures established by each manufacturer. The training shall include good operating practices as well as methods described below for minimizing excess emissions.

[Rules 62-4.070(3), 62-210.700 and 62-212.400(BACT), F.A.C.]

#### 11 Definitions:

- a. *Startup* is defined as the commencement of operation of any emissions unit which has shut down or ceased operation for a period of time sufficient to cause temperature, pressure, chemical or pollution control device imbalances, which result in excess emissions.
- b. *Shutdown* is the cessation of the operation of an emissions unit for any purpose.
- c. *Malfunction* is defined as any unavoidable mechanical and/or electrical failure of air pollution control equipment or process equipment or of a process resulting in operation in an abnormal or unusual manner.

[Rule 62-210.200(Definitions), F.A.C.]

12. Alternate Visible Emissions Standard: Visible emissions due to startups, shutdowns, fuel switches, and malfunctions shall not exceed 10% opacity except for up to ten, 6-minute averaging periods during a calendar day, which shall not exceed 20% opacity. [Application No. 1050233-034-AC; Rule 62-4.070(3), F.A.C.]

13. Excess Emissions Prohibited: 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. All such preventable emissions shall be included in any compliance determinations based on CEMS data. [Rule 62-210.700(4), F.A.C.]

14. Excess Emissions Allowed - Best Operational Practices: Excess emissions resulting from startup, shutdown or malfunction of the Polk 2 Combined Cycle are allowed providing the permittee employs Best Operational Practices to minimize emissions. The permittee shall include Best Operational Practices for Startup, Shutdown and Malfunction within the "4 on 1" Polk 2 Combined Cycle operating manual. The measures can include but are not limited to use of stack dampers to minimize heat loss during short-term shutdowns, additional piping, valves, practices, training or software to minimize the excess emissions.

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

#### A. POLK 2 COMBINED CYCLE (EU 020, 021, 022, and 023)

[Rules 62-4.070, 62-210.700(1) and 62-212.400(PSD/BACT), F.A.C.]

15. **Excess Emissions Allowed - Duration:** Excess emissions resulting from startup, shutdown or malfunction of the Polk 2 Combined Cycle are allowed providing the duration of excess emissions is minimized. Pursuant to Rules 62-210.700(1) and 62-210.700(5), F.A.C., the Department specifically authorizes the following durations of excess NO<sub>x</sub> emissions applicable to the CTG/HRSG systems. For each CTG/HRSG system, excess emissions of NO<sub>x</sub> resulting from startup, shutdown, or malfunction shall be excluded from CEMS data in any 24-hour period ("any 24-hour period" means a calendar day, midnight to midnight) for the following conditions (these conditions are considered separate events and each event may occur independently within any 24-hour period):
- **Steam Turbine-Electric Generator (STEG) Cold Startup:** For cold startup of the STEG, excluded emissions from any CTG/HRSG system used for the startup of the STEG shall not exceed eight (8) hours in any 24-hour period. A cold startup of the STEG is defined as startup of the ~~4-on-1 combined cycle system~~ STEG following a shutdown of the STEG lasting at least 48 hours.  
*{During a cold startup of the STEG, each CTG/HRSG system is sequentially brought on line at low load to gradually increase the temperature of the STG and prevent thermal metal fatigue. Shutdowns and documented malfunctions are separately regulated in accordance with the requirements of this condition.}*
  - **STEG Hot/Warm Startup:** For hot/warm startup of the STEG, excluded emissions from any CTG/HRSG used for the startup of the STEG shall not exceed ~~four~~ two (2) hours in any 24-hour period. A hot/warm startup of the STEG is defined as startup of the ~~4-on-1 combined cycle system~~ STEG following a shutdown of the STEG lasting less than 48 hours but longer than 8 hours.
  - **STEG Hot Startup:** For a hot startup of the STEG, excluded emissions from any CTG/HRSG used for startup of the STEG shall not exceed two (2) hours in any 24 – hour period. A hot startup of the STEG is defined as startup of the STEG following a shutdown of less than 8 hours.
  - **CTG/HRSG Cold Startup:** For cold startup of a CTG/HRSG system, excluded emissions shall not exceed four (4) hours in any 24-hour period. "Cold startup of a CTG/HRSG system" is defined as a startup after the pressure in the high-pressure (HP) steam drum falls below 450 pounds per square inch, gauge (psig) for at least a one-hour period.
  - **CTG/HRSG System Warm Startup:** For warm startup of a CTG/HRSG system, excluded emissions shall not exceed two (2) hours in any 24-hour period. "Warm startup of a CTG/HRSG system" is defined as a startup when the pressure in the HP steam drum is equal to or greater than 450 psig.
  - **CTG/HRSG System Shutdown:** For shutdown of the CTG/HRSG operation, excluded emissions from any CTG/HRSG system shall not exceed two hours in any 24-hour period.
  - **Fuel Switching:** For fuel switching, excluded emissions shall not exceed two (2) hours in any 24-hour period for each fuel switch and no more than four hours in any 24-hour period for any CTG /HRSG system.
  - **Documented Malfunction:** For any the CTG /HRSG system, excess emissions of NO<sub>x</sub> resulting from documented malfunctions shall not exceed two hours in any 24-hour period. A "documented malfunction" means a malfunction that is documented within one working day of detection by contacting the Compliance Authority by telephone, facsimile transmittal, or electronic mail.
16. **Combustor Tuning:** CEMS data collected during initial or other major combustor tuning sessions and during Full Speed No Load (FSNL) trip tests shall be excluded from the CEMS compliance demonstration provided the tuning session is performed in accordance with the manufacturer specifications. A "major tuning session" would occur after completion of initial construction, a combustor change-out, a major repair or maintenance 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 of at least one working (business) day that

**SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS**

**A. POLK 2 COMBINED CYCLE (EU 020, 021, 022, and 023)**

details the activity and proposed tuning schedule. The notice may be by telephone, facsimile transmittal, or electronic mail. [Design; Rule 62-4.070(3), F.A.C.]



### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

#### A. POLK 2 COMBINED CYCLE (EU 020, 021, 022, and 023)

17. Ammonia Injection: Ammonia injection shall begin as soon as operation of ~~any~~the CTG/HRSG system achieves the operating parameters specified by the manufacturer. As authorized by Rule 62-210.700(5), F.A.C., ~~condition 15~~the above condition allows excess emissions only for specifically defined periods of startup, shutdown, fuel switching, and documented malfunction of the CTG/HRSG system including the pollution control equipment. [Design; Rules 62-212.400(BACT) and 62-210.700, F.A.C.]

#### TESTING REQUIREMENTS

18. Operating Rate During Testing: Initial and annual stack tests shall be conducted at 90% or greater of the CTG design heat input ratings provided in emissions unit description above ~~and corrected as described in Specific Condition 6 of this subsection~~. If it is impracticable to test at 90% or greater of the design heat rate for the applicable conditions, the combustion turbine may be tested at less than 90%. In such case, the measured mass emission rates shall be corrected by dividing the result by the percent of the design heat rating at which the test was conducted and multiplying by 100%. [Rule 62-297.310, F.A.C.; 40 CFR 60.8]
19. Initial Combined Cycle Compliance Demonstrations: Initial CO, VOC, ammonia and visible emissions compliance stack tests while firing natural gas shall ~~be conducted or commence (based on averaging period)~~ within 60 days after achieving the maximum production rate, but not later than 180 days after the initial startup. Initial CO testing while firing fuel oil shall ~~be conducted or commence (based on averaging period)~~ within 60 days of any fuel oil firing in a CTG. [Rules 62-4.070, 62-297.310(7)(a), F.A.C.; 40 CFR 60.8]
20. Annual Compliance Testing: Annual compliance tests for CO, ammonia slip and visible emissions shall be conducted during each federal fiscal year (October 1<sup>st</sup> to September 30<sup>th</sup>) while firing natural gas in combined cycle mode. CO, ammonia slip and visible emissions tests shall be performed while firing fuel oil on each combustion turbine that is fired with fuel oil for more than 400 hours in combined cycle mode during the federal fiscal year.  
*{Permitting Note: After initial compliance with the VOC standards is demonstrated, annual compliance tests for VOC emissions are not required. Compliance with the CO emission standards shall thereafter be deemed to demonstrate compliance with the VOC emission standards. The Department retains the authority to require VOC testing for the reasons given in Appendix C, Condition 10, Special Compliance Tests.}*  
[Rules 62-4.070(3) and 62-297.310(7)(a)4, F.A.C.]
21. Continuous Compliance: The permittee shall demonstrate continuous compliance with the 24-hour NO<sub>x</sub> BACT emissions standards based on data collected by the certified CEMS. Within 45 days of conducting any Relative Accuracy Test Audit (RATA) on a CEMS, the permittee shall submit a report to the Compliance Authority summarizing results of the RATA. [Rule 62-4.070(3), F.A.C.; 40 CFR 60 Subpart KKKK]
22. Compliance for SAM, SO<sub>2</sub> and PM/PM<sub>10</sub>/PM<sub>2.5</sub>: In stack compliance testing is not required for SAM, SO<sub>2</sub> and PM/PM<sub>10</sub>/PM<sub>2.5</sub>. Compliance with the limits and control requirements for SAM, SO<sub>2</sub> and PM/PM<sub>10</sub>/PM<sub>2.5</sub> is based on the recordkeeping required in **Specific Condition 30**. Additional compliance assurance is provided by visible emissions and CO testing and NO<sub>x</sub> continuous monitoring.  
[Rule 62-212.400 (BACT), F.A.C.]
23. Test Requirements: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(7)(a)9, F.A.C.]

**SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS**  
**A. POLK 2 COMBINED CYCLE (EU 020, 021, 022, and 023)**

24. Test Methods: Required initial and annual compliance stack tests shall be performed in accordance with the following reference methods.

| Method  | Description of Method <sup>a</sup>   |
|---|--|
| 9   | Visual Determination of the Opacity of Emissions from Stationary Sources   |
| 10  | Determination of CO Emissions from Stationary Sources  |
| 18 <sup>b</sup>   | Measurement of Gaseous Organic Compound Emissions by Gas Chromatography  |
| 25A <sup>b</sup>  | Determination of Total Gaseous Organic Concentration using Flame Ionization Analyzer   |
| CTM-027<br>or<br>320  | Procedure for Collection and Analysis of Ammonia in Stationary Source<br>{Notes: This is an EPA conditional test method. The minimum detection limit shall be 1 ppm.}<br>Measurement of Vapor Phase Organic and Inorganic Emissions by Extractive Fourier Transform Infrared (FTIR) Spectroscopy |
| <p>a. No other methods may be used for compliance testing unless prior written approval is received from the Department Office of Permitting and Compliance in accordance with an alternate sampling procedure pursuant to 62-297.620, F.A.C.</p> <p>b. EPA Method 25A is used to determine Total Gaseous Organic Concentration; a conservative estimator for VOC. EPA Method 18 or Method 320 may be used to determine and deduct emissions of methane and ethane from the emissions measured using Method 25A when determining VOC emissions.</p> |  |

[Rule 62-204.800 F.A.C., Rule 62-297.100 F.A.C., 40 CFR 60 Appendix A]

**MONITORING REQUIREMENTS**

25. Continuous Emissions Monitoring Systems (CEMS): The permittee shall install, calibrate, maintain, and operate CEMS to measure and record the emissions of NO<sub>x</sub> from each HRSG stack and each CTG stack in a manner sufficient to demonstrate continuous compliance with the CEMS emission standards of this subsection. During simple cycle operation, a CEMS on the simple cycle stacks shall be used to show compliance with the NO<sub>x</sub> standard given in the subsection. Each monitoring system shall be installed, calibrated, and properly functioning prior to the initial performance tests. Within one working day of discovering emissions in excess of a NO<sub>x</sub> standard (and subject to the specified averaging period), the permittee shall notify the Compliance Authority.

- a. *NO<sub>x</sub> Monitors*: Each NO<sub>x</sub> monitor shall be certified, operated, and maintained in accordance with the requirements of 40 CFR 75. Record keeping and reporting shall be conducted pursuant to 40 CFR 75. The RATA tests required for the NO<sub>x</sub> monitor shall be performed using EPA Method 7E in Appendix A of 40 CFR 60.
- b. *Diluent Monitors*: The O<sub>2</sub> or carbon dioxide (CO<sub>2</sub>) content of the flue gas shall be monitored at the location where NO<sub>x</sub> are monitored to correct the measured emissions rates to 15% oxygen. If a CO<sub>2</sub> monitor is installed, the O<sub>2</sub> content of the flue gas shall be calculated using F-factors that are appropriate for the fuel fired. Each monitor shall comply with the performance and quality assurance requirements of 40 CFR 75.

26. CEMS Data Requirements:

- a. *Data Collection*: Emissions shall be monitored and recorded at all times including startup, operation, shutdown, and malfunction except for continuous monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments. The CEMS shall be designed and operated to sample, analyze, and record data evenly spaced over an hour. If the CEMS 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



### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

#### A. POLK 2 COMBINED CYCLE (EU 020, 021, 022, and 023)

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 CEMS shall be expressed as ppmvd corrected to 15% O<sub>2</sub>. The CEMS shall be used to demonstrate compliance with the CEMS emission standards for NO<sub>x</sub> as specified in this permit. For purposes of determining compliance with the CEMS emissions standards of this permit, missing (or excluded) data shall not be substituted.

- b. *Valid Hour*: Hourly average values shall begin at the top of each hour. Each hourly average 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). If less than two such data points are available, the hourly average value is not valid. An hour in which any oil is fired is attributed towards compliance with the permit standards for oil firing. The permittee shall use all valid measurements or data points collected during an hour to calculate the hourly average values.
- c. *24-hour Block Averages*: A 24-hour block shall begin at midnight of each operating day and shall be calculated from 24 consecutive valid hourly average concentration values. If a unit operates less than 24 hours during the block, or there are less than 24 valid hourly averages available, the 24-hour block average shall be the average of all available valid hourly average concentration values for the 24-hour block.

*{Permitting Note: For purposes of determining compliance with the 24-hour CEMS standards, the missing data substitution methodology of 40 CFR Part 75, Subpart D, shall not be utilized. Instead, the 24-hour block average shall be determined using the remaining hourly data in the 24-hour block and periods of missing CEMS data are to be reported as monitor downtime in the excess emissions and monitoring performance reports. For example, the "24-hr block average" may consist of only 6 valid operating hours for the day.}*

- d. *4-hour Rolling Averages*: A 4-hour rolling average is the arithmetic average of the average emission concentration measured by the CEMS for a given hour and the three unit operating hour average concentrations immediately preceding that unit operating hour.
- e. *Data Exclusion*: Each CEMS shall monitor and record emissions during all operations including episodes of startup, shutdown, malfunction, fuel switches and combustor tuning. Some of the CEMS emissions data recorded during these episodes may be excluded from the corresponding CEMS compliance demonstration subject to the provisions of **Specific Condition Nos. 14, ~~and 15,~~ and 16** of this section. All periods of data excluded shall be consecutive for each such episode and only data obtained during the described episodes (startup, shutdown, malfunction, fuel switches, combustor tuning) may be used for the appropriate exclusion periods. The permittee shall minimize the duration of data excluded for such episodes to the extent practicable. Data recorded during such episodes shall not be excluded if the 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 such episodes. 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.
- f. *Availability*: Monitor availability for the CEMS shall be 95% or greater in any calendar quarter. The quarterly excess emissions report shall be used to demonstrate monitor availability. In the event 95% availability is not achieved, the permittee shall provide the Department with a report identifying the problems in achieving 95% availability and a plan of corrective actions that will be taken to achieve 95% availability. The permittee shall implement the reported corrective actions within the next calendar quarter. Failure to take corrective actions or continued failure to achieve the minimum monitor availability shall be violations of this permit, except as otherwise authorized by the Department Compliance Authority.

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

#### A. POLK 2 COMBINED CYCLE (EU 020, 021, 022, and 023)

[Rule 62-297.520, F.A.C.; 40 CFR 60.7(a)(5); 40 CFR 60.13; 40 CFR Part 51 Appendix P; 40 CFR 60 Appendix B - Performance Specifications; 40 CFR 60 Appendix F - Quality Assurance Procedures; Rule 62-4.070(3), F.A.C.]

27. **Ammonia Monitoring Requirements:** In accordance with the manufacturer specifications, the permittee shall install, calibrate, operate and maintain an ammonia flow meter to measure and record the ammonia injection rate to the SCR system prior to the initial compliance tests. The permittee shall document and periodically update the general range of ammonia flow rates required to meet permitted emissions levels over the range of load conditions allowed by this permit by comparing NO<sub>x</sub> emissions recorded by the CEM system with ammonia flow rates recorded using the ammonia flow meter. During NO<sub>x</sub> monitor downtimes or malfunctions, the permittee shall operate at the ammonia flow rate and, as applicable for fuel oil firing, the water-to-fuel ratio, that is consistent with the documented flow rate for the combustion turbine load condition. [Rules 62-4.070(3) and 62-212.400(BACT), F.A.C.]

#### RECORDS AND REPORTS

28. **Monitoring of Capacity:** The permittee shall monitor and record the operating rate of each CTG and HRSG duct burner system on a daily average basis, considering the number of hours of operation during each day (including the times of startup, shutdown, malfunction and fuel switching). Such monitoring shall be made using a monitoring component of the CEMS required above, or by monitoring daily rates of consumption and heat content of each allowable fuel in accordance with the provisions of 40 CFR 75 Appendix D. [Rule 62-4.070(3) and 62-212.400(BACT), F.A.C.]
29. **Monthly Operations Summary:** By the fifth calendar day of each month, the permittee shall record the following for each fuel in a written or electronic log for each CTG for the previous month of operation: fuel consumption, hours of operation, and the updated 12-month rolling totals for each. Information recorded and stored as an electronic file shall be available for inspection and printing within at least three days of a request by the Department. The fuel consumption shall be monitored in accordance with the provisions of 40 CFR 75 Appendix D. [Rules 62-4.070(3), F.A.C.]
30. **Fuel Sulfur Records:** The permittee shall demonstrate compliance with the fuel sulfur limits specified in this permit by maintaining the following records of the sulfur contents.
- Natural Gas:** Compliance with the fuel sulfur limit for natural gas shall be demonstrated by keeping reports obtained from the vendor indicating the average sulfur content of the natural gas being supplied from the pipeline for each month of operation. Methods for determining the sulfur content of the natural gas shall be ASTM methods D4084-82, D4468-85, D5504-01, D6228-98 and D6667-01, D3246-81 or more recent versions.
  - ULSD Fuel Oil:** Compliance with the distillate fuel oil sulfur limit shall be demonstrated by taking a sample, analyzing the sample for fuel sulfur, and reporting the results to the Compliance Authority upon initial startup. Sampling the fuel oil sulfur content shall be conducted in accordance with ASTM D4057-88, Standard Practice for Manual Sampling of Petroleum and Petroleum Products, and one of the following test methods for sulfur in petroleum products: ASTM methods D5453-00, D129-91, D1552-90, D2622-94, or D4294-90. More recent versions of these methods may be used. For each subsequent fuel delivery, the permittee shall maintain a permanent file of the certified fuel sulfur analysis from the fuel vendor. At the request of a Compliance Authority, the permittee shall perform additional sampling and analysis for the fuel sulfur content.

The above methods shall be used to determine the fuel sulfur content in conjunction with the provisions of 40 CFR 75 Appendix D. [Rule 62-4.070(3), F.A.C.; Rule 62-4.160(15), F.A.C.]

**SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS**

**A. POLK 2 COMBINED CYCLE (EU 020, 021, 022, and 023)**

31. Emissions Performance Test Reports: A report indicating the results of any required emissions performance test shall be submitted to the Compliance Authority no later than 45 days after completion of the last test run. 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)(c), F.A.C. and in Appendix C of this permit. [Rule 62-297.310(8), F.A.C.]

32. Excess Emissions Reporting:

a. *Malfunction Notification*: If emissions in excess of a standard (subject to the specified averaging period) occur due to malfunction, the permittee shall notify the Compliance Authority 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.

b. *SIP Quarterly Permit Limits Excess Emissions Report*: Within 30 days following the end of each calendar-quarter, the permittee shall submit a report to the Compliance Authority summarizing periods of NO<sub>x</sub> emissions in excess of the SIP permit emission standards, and the amount of authorized data excluded following the format in Appendix XS attached to this permit. Periods of startup, shutdown, malfunction, fuel switching and tuning shall be monitored and recorded at all times. In addition, the report shall summarize the CEMS systems monitor availability for the previous quarter.

c. *NSPS Semi-Annual Excess Emissions Reports*: For purposes of reporting emissions in excess of NSPS Subpart KKKK, excess NO<sub>x</sub> emissions from the CTGs when operating in combined cycle mode are defined as: a specified averaging period over which either the NO<sub>x</sub> hourly average concentrations corrected to 15% O<sub>2</sub>, emissions are greater than 15 ppm at 15% O<sub>2</sub> on a 30-day rolling average while firing natural gas and greater than 42 ppm at 15% O<sub>2</sub> on a 30-day rolling average while firing ULSD fuel oil on a 30 unit operating days rolling average basis. Excess NO<sub>x</sub> emissions from the CTGs when operating in simple cycle mode are defined as NO<sub>x</sub> hourly average concentrations corrected to 15% O<sub>2</sub> that are greater than 15 ppmvd while firing natural gas and 42 ppmvd while firing ULSD fuel oil on a 4-hour rolling basis. Excess SO<sub>2</sub> emissions from the CTGs occur when; or the total sulfur content of the fuel being combusted in the CTG-affected facility exceeds the limit specified in 40 CFR 60.4330(a)(2). Within thirty (30) days following each calendar semi-annual period, the permittee shall submit a report on any periods of excess emissions that occurred during the previous semi-annual period to the Compliance Authority.

Formatted: Subscript

*{Note: If there are no periods of excess emissions as defined in NSPS Subpart KKKK, a statement to that effect may be submitted with the SIP Quarterly Report to suffice for the NSPS Semi-Annual Report.}*

[Rule 62-4.130, F.A.C.; Rule 62-204.800, F.A.C., Rule 62-210.700(6), F.A.C., 40 CFR 60.7, 40 CFR 60.4420]

33. Annual Operating Report: The permittee shall submit an annual report that summarizes the actual operating hours and emissions from this facility. The permittee shall also keep records sufficient to determine the annual throughput of ULSD fuel oil for the fuel oil storage tank for use in the Annual Operating Report. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year. [Rule 62-210.370(2), F.A.C.]

**SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS**

**D. EMERGENCY GENERATOR (EU 018)**

The specific conditions in this section apply to the following emissions unit:

| EU No. | Brief Description                                      |
|--------|--|
| 018    | 500 kW emergency generator (model year 2011 and later) |

**APPLICABLE STANDARDS AND REGULATIONS**

- NSPS, Subpart IIII Applicability:** The emergency generator is a Stationary Compression Ignition Internal Combustion Engine (Stationary ICE) and is subject to 40 CFR 60 Subpart IIII. The applicant shall comply with 40 CFR 60 Subpart IIII only to the extent that the regulations apply to the emission unit and its operations (e.g. non-road, emergency, displacement, capacity and model year selected). [40 CFR 60 Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines; Rule 62-204.800(8)(b)79., F.A.C.]
- NESHAP, Subpart ZZZZ Applicability:** The emergency generator is a Stationary Reciprocating Internal Combustion Engine located at a minor source of hazardous air pollutants emissions and are subject to 40 CFR 63 Subpart ZZZZ. Because the emergency generator is subject to regulation under 40 CFR 60 Subpart IIII, Subpart ZZZZ only requires that the emergency generator meet the requirements of 40 CFR 60 Subpart IIII. No further requirements of Subpart ZZZZ apply to the emergency generator. [40 CFR 63 Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, section 63.6590(c); Rule 62-204.800(11)(b)82., F.A.C.]

**EQUIPMENT SPECIFICATIONS**

- Equipment:** The permittee is authorized to install, operate, and maintain one fuel oil-fired emergency generator. [Application No. 1050233-034-AC]

**EMISSIONS AND PERFORMANCE REQUIREMENTS**

- Hours of Operation and Fuel Specifications:** Excluding emergencies, the hours of operation shall not exceed 100 hours/year. The generator shall burn distillate fuel oil with a sulfur content of 15 parts per million (ppm) or less. [Application No. 1050233-034-AC; Rule 62-210.200(PTE), F.A.C.]
- Emergency Generator Emission Limits:**

| Emergency Generator<br>(> 560 kW)  | CO<br>(g/kW-hr) <sup>1</sup> | PM<br>(g/kW-hr) | NMHC <sup>2</sup> +NO <sub>x</sub><br>(g/kW-hr) | Diesel Fuel <sup>3</sup><br>(sulfur) |
|--|------------------------------|-----------------|---|--------------------------------------|
| Model year 2011 and later  | 3.5                          | 0.20            | 6.4   | 15 ppm                               |
| 1. g/kW-hr means grams per kilowatt-hour.<br>2. NMHC means Non-Methane Hydrocarbons.<br>3. Nonroad diesel specification of 15 ppm is from 40 CFR part 80, subpart I – Motor Vehicle Diesel Fuel; Nonroad, Locomotive, and Marine Diesel Fuel; and ECA Marine Fuel. |                              |                 |   |                                      |

[Application No. 1050233-034-AC; NSPS Subpart IIII]

- Operation and Maintenance.** The owner or operator must operate and maintain the stationary compression ignition RICE according to the manufacturer written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer. In addition, owners and operators may only change those settings that are permitted by the manufacturer. The owner or operator must meet the requirements of 40 CFR parts 89, 94 and/or 1068, as they apply. [40 CFR 60.4211(a)]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

D. EMERGENCY GENERATOR (EU 018)

MONITORING OF OPERATIONS

7. Hour Meter. The owner or operator must install a non-resettable hour meter if one is not already installed. [40 CFR 60.4209(a)]

COMPLIANCE AND TESTING REQUIREMENTS

8. Compliance and Testing Requirements. ~~Manufacturer certification can be provided to the Department in lieu of actual stack testing in accordance to 40 CFR Part 89 or Part 94, as applicable, for the same model year and maximum engine power. The emergency engine shall be certified by the engine manufacturer to meet the applicable 40 CFR Part 60 Subpart IIII emission limits. No performance testing is required.~~

TESTING REQUIREMENTS

9. Performance Test. ~~Performance test must be conducted according to the in-use testing procedures in 40 CFR Part 1039, Subpart F.~~

~~NTE Standards. Exhaust emissions from stationary compression ignition RICE that are complying with the emission standards specified in **Specific Conditions 5** of this subsection must not exceed the (NTE) numerical requirements, rounded to the same number of decimal places as the applicable standard, determined from the following equation:  $NTE = (1.25) \times (\text{Standard})$ . [40 CFR 60.4212]~~

RECORDS AND REPORTS

- 10.9. Notification, Recordkeeping and Reporting Requirements: The permittee shall adhere to the compliance testing and certification requirements listed in 40 CFR 60.4211 and maintain records demonstrating fuel usage and quality. [Rule 62-212.400 (BACT), F.A.C. and 40 CFR 60.4211]

- 11.10. Required Records. Owner or operator must keep records of the operation of the engine in emergency and non-emergency and for maintenance that are recorded through the non-resettable hour meter. The owner or operator must record the time of operation of the engine and the reason the engine was in operation during that time. [40 CFR 60.4214]

- 12.11. Record Retention: The owner or operator must keep records in a suitable and readily available form for expeditious reviews. The owner or operator must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. [40 CFR 63.6660 and 40 CFR 63.10(b)(1)]

**SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS**

**E. COOLING TOWER (EU 019)**

This subsection of the permit addresses the following emissions unit.

| ID No. | Emissions Unit Description  |
|--------|---|
| 019    | Mechanical Draft Cooling Tower – consisting of six cells with six individual exhaust fans |

The mechanical cooling tower will use onsite reclaimed water from the facility water treatment plant as the primary source of cooling water and the existing onsite wells as the backup source of cooling water or a combination of reclaimed water and well water.

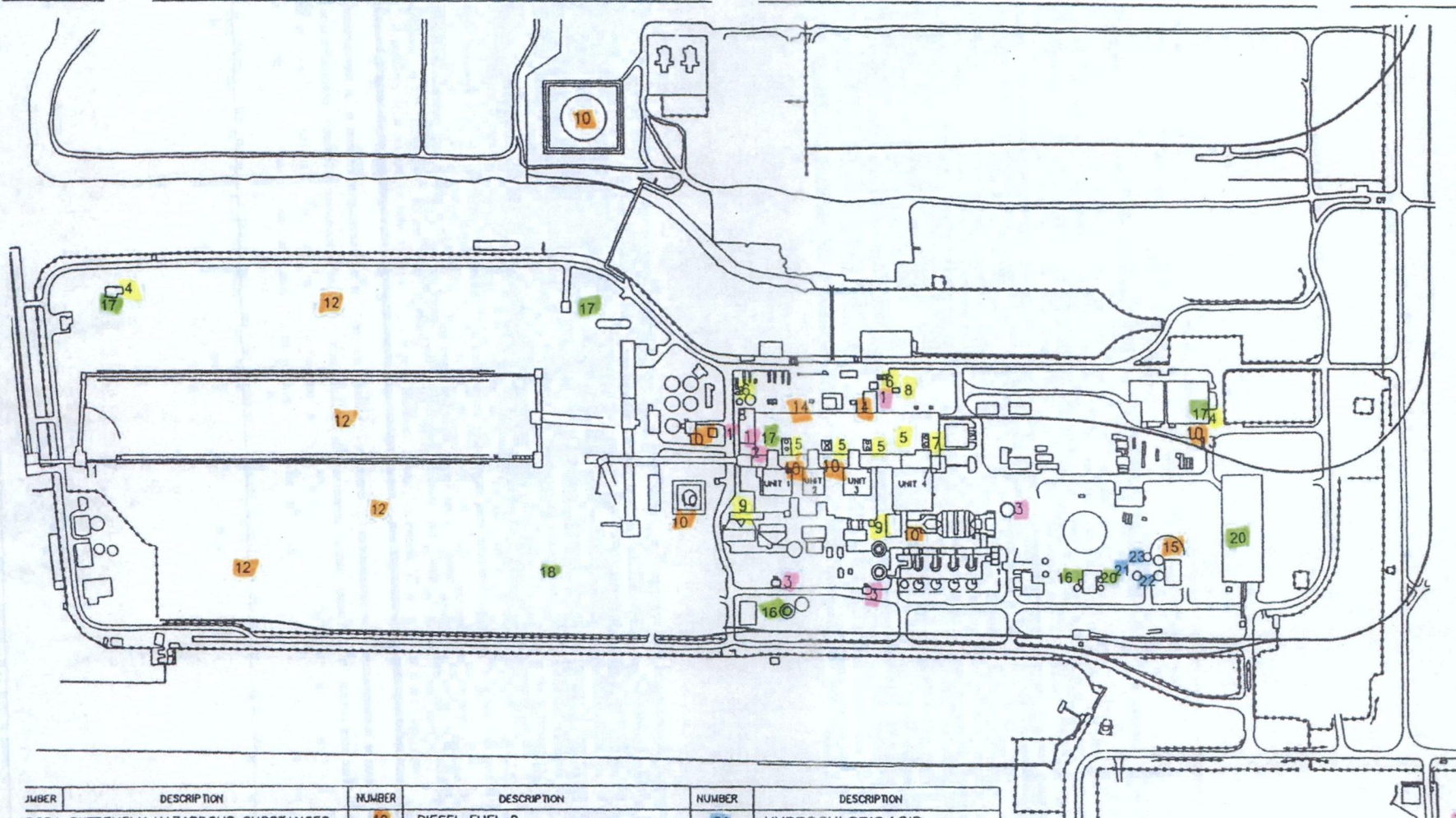
**EQUIPMENT**

1. **Cooling Tower:** The permittee is authorized to install one 6-cell wet evaporative mechanical draft cooling tower with the following nominal design characteristics: an air exhaust flow rate of 1,200,000 actual cubic feet per minute (acfm); a circulating water flow rate of 62,500 gallons per minute; drift eliminators; and a drift rate of no more than 0.0005 percent of the circulating water flow. [Application No. 1050233-034-AC; Design]

**EMISSIONS AND PERFORMANCE REQUIREMENTS**

2. **Drift Rate:** Within 60 days of commencing commercial operation, the permittee shall certify that the cooling tower was constructed to achieve the specified drift rate of no more than 0.0005 percent of the circulating water flow rate. [Rule 62-212.400(BACT), F.A.C.]

*{Permitting Note: This work practice standard is established as BACT for PM/PM<sub>10</sub>/PM<sub>2.5</sub> emissions from the cooling tower. Based on this design criteria, potential emissions are expected to be less than 0.4 tons of PM and PM<sub>10</sub> per year and less than 0.03 tons of PM<sub>2.5</sub> per year.}*



| NUMBER                  | DESCRIPTION                         | NUMBER | DESCRIPTION         | NUMBER         | DESCRIPTION             |
|-------------------------|-------------------------------------|--------|---------------------|----------------|-------------------------|
|                         | PCRA EXTREMELY HAZARDOUS SUBSTANCES | 10     | DIESEL FUEL 2       | 21             | HYDROCHLORIC ACID       |
| 1                       | SULFURIC ACID                       | 11     | DUSTBUSTER RDC8020B | 22             | FERRIC CHLORIDE         |
| 2                       | HYDRAZINE                           | 12     | COAL                | 23             | HYDRATED LIME           |
| 3                       | SULFUR TRIOXIDE (COAL ASH)          | 13     | GASOLINE            |                |                         |
| SHA HAZARDOUS CHEMICALS |                                     |        | 14                  | CARBON DIOXIDE |                         |
| 4                       | PROPANE - NR                        | 15     | FGD GYPSUM          |                |                         |
| 5                       | ELECTROHYDRAULIC FLUID - NR         | 16     | DIBASIC ACID        |                |                         |
| 6                       | TURBINE OIL                         | 17     | LUBE OIL            |                | NR = NOT REPORTABLE AMT |
| 7                       | SODIUM HYPOCHLORITE -NR             | 18     | BOILER SLAG         |                |                         |
| 8                       | SODIUM HYDROXIDE SOLUTION           | 19     | BOTTOM ASH          |                |                         |
| 9                       | SULFUR                              | 20     | CALCIUM CARBONATE   |                |                         |

SCALE: 1" = 200'

2002 EPCRA EXTREMELY HAZARDOUS SUBSTANCE AND OSHA HAZARDOUS CHEMICAL LOCATIONS  
BIG BEND STATION

STATION MANAGER: [Name] DATE: [Date]  
 SUPERVISOR: [Name] DATE: [Date]  
 OFFICE: [Name] DATE: [Date]