



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

*Scott*  
*Chair*  
*Howard*  
*6/16*

**RECEIVED**

4APT-ARB

JUN 8 1999

JUN 14 1999

DIVISION OF AIR  
RESOURCES MANAGEMENT

Howard L. Rhodes, Director  
Division of Air Resources Management  
Florida Department of Environmental Protection  
Mail Station 5500  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

SUBJ: Proposed Title V Permit for FPC - DeBary Facility

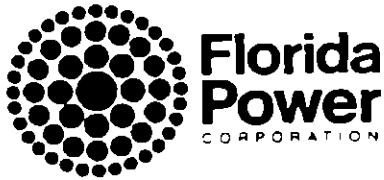
Dear Mr. Rhodes:

The purpose of this letter is to acknowledge the receipt of the State of Florida's proposed changes to the Florida Power Corporation - DeBary Facility proposed title V permit which was the subject of a U.S. Environmental Protection Agency (EPA) title V objection on February 26, 1999. EPA Region 4 has completed its review of the proposed changes to the permit and believes that the State has adequately addressed each of the issues enumerated in the objection. Therefore, EPA considers the objection to be resolved. Once the state's proposed changes are incorporated into the permit, the State may proceed with permit issuance.

We commend the efforts of your staff for facilitating the resolution of the permit issues. If you have any questions about this letter, please contact Ms. Carla E. Pierce, Chief, Operating Source Section at (404) 562-9099.

Sincerely,

Winston A. Smith  
Director  
Air, Pesticides & Toxics  
Management Division



RECEIVED  
APR 23 1999  
BUREAU OF  
AIR REGULATION

April 20, 1999

Mr. Scott Sheplak, P.E.  
Department of Environmental Protection  
Division of Air Resources Management  
2600 Blair Stone Road, MS 5505  
Tallahassee, FL 32399-2400

Dear Mr. Sheplak:

Re: EPA Objection to the Proposed Title V Permit  
Florida Power Corporation – DeBary Facility  
Permit No. 1270028-001-AV

This letter is written in response to the letter from the U.S. Environmental Protection Agency (EPA), dated February 26, 1999, objecting to the issuance of the proposed Title V permit for Florida Power Corporation's (FPC) DeBary Facility. The primary issue in EPA's objection letter was the perceived lack of periodic monitoring for the combustion turbine (CT) peaking units.

As an initial matter, FPC does not agree with EPA's claim that the issuance of their objection letter was within the official 45 day time frame allowed for EPA's review in section 70.8(c). The Proposed Title V operating permit for FPC's DeBary facility was posted on DEP's web site on January 4, 1999. Forty-five days from that date is February 18th, not February 26<sup>th</sup>. FPC understands that the agreement between the DEP and EPA is that the receipt date of a proposed permit is considered to be the date when EPA receives electronic notification of the permit's availability on DEP's web site. FPC has documentation from the DEP indicating an electronic transmittal to the EPA on January 4, 1999. According to the agreed upon procedure, if the DEP does not receive an error message from this transmission, the assumption is that EPA has been notified. FPC would like to know why the agreed upon procedure failed to work adequately in this case.

Further, FPC does not agree that this proposed Title V permit fails to fully meet the requirements of 40 CFR § 70.6(a)(3)(i). Current testing requirements are in compliance with the requirements of Chapter 62-297 F.A.C. Also, Rule 62-297 310(7)(b), F.A.C. allows for additional compliance testing if the Department has good cause to believe that a standard is being violated. Nonetheless, FPC would like to resolve EPA's objections and is submitting a timely response in an effort to meet the May 26, 1999 deadline. The objections are addressed below in the order in which they were presented in EPA's February 26, 1999 letter.

#### I. EPA Objection Issues

1) The proposed Title V permit for the DeBary facility currently imposes opacity limits (20 percent on P1-P6 and 10 percent on P7-P10) and an annual visible emissions (VE) testing requirement on each of the ten CTs (referred to as P1 through P10). The proposed permit further clarifies that this annual testing is only required after the unit operates on fuel oil for 400 hours or more per year (Conditions A.14 and B.36). Attached to this letter are the results of the VE compliance tests for these emission units since 1993 (Attachment 1), as well as the corresponding hours of operation. These data show that the maximum opacity measured on any of these ten CTs since 1993 was five percent (5%), which is either 25 or 50 percent of the applicable standards. Further, out of 43 separate VE compliance tests on these units, the results of 33 of these tests (78 percent) were zero percent opacity. Regarding hours of operation, units P1-P6 had not exceeded 400 hours in a year (going all the way back to 1993) until the summer of 1998. All electric generating units, not only within FPC's system, but state-wide, operated at record levels during the summer of 1998. The hours of operation for P7-P10 have historically been higher, however, these units are newer and more efficient. Further, FPC has converted two of these units to natural gas (P7 and P9) and has a construction permit that allows for the conversion of P8 and P10 to gas. After the conversions of P7 and P9 to gas in 1997, it can be seen that the hours of operation on oil have decreased dramatically. FPC expects the same trend following conversions to P8 (scheduled for completion by May 1999) and P10.

There are several relevant criteria in EPA's guidance for determining whether periodic monitoring meets the requirements of 40 CFR 70.6. One of these criteria is "the likelihood of violating the applicable requirement" (i.e., the less likely it is that the permit will be violated, the less periodic monitoring is needed). FPC's historical data indicates that it is very unlikely that the DeBary CTs would ever violate their opacity standard. In fact, this is true of all of FPC's CTs, not only at DeBary, but system-wide. Other relevant criteria include: whether add-on controls are necessary for the unit to meet the emission limit, the variability of emissions from the unit over time; and the kind of monitoring found on similar emission units. In this case, there are no add-on controls and, therefore, no possibility of control malfunction that would have a resultant affect on opacity. In addition, past test results show that there has been little variability in opacity over time. Finally, regarding the kind of monitoring found on similar emission units, please find attached a periodic monitoring "decision tree" for opacity that was obtained from the State of Tennessee (Attachment 2). The decision tree has two criteria that

should be noted: 1) if the combustion source is fired by natural gas or no. 2 fuel oil, no opacity readings are required and 2) if the highest 6-minute average is less than or equal to 50 percent of the applicable standard, a VE is only conducted prior to permit expiration.

Accordingly, FPC requests that the following "permitting note" be inserted following Conditions A.14 and B.36., to satisfy EPA's objection.

Permitting Note: The owner or operator shall conduct testing for visible emissions while firing fuel oil for each combustion turbine upon that turbine's exceeding 400 hours of operation on fuel oil in any given federal fiscal year (October 1 through September 30). Regardless of the number of hours of operation on fuel oil, at least one compliance test shall be conducted on all ten combustion turbines every five years, coinciding with the term of the operation permit for these turbines.

Similarly, FPC suggests that the following language be added to the Statement of Basis:

The Department has determined that the appropriate VE testing frequency for the ten combustion turbines is a VE test upon exceeding 400 hours of operation on fuel oil in any given federal fiscal year (October 1 through September 30). This frequency is justified by the low historical operational use of fuel oil for these units and the previous VE tests which documented compliance while firing fuel oil. Moreover, no Method 9 tests since 1993 on these ten units have resulted in an opacity measurement greater than 5% and, out of 43 separate VE compliance tests on these units, the results of 33 of these tests (78 percent) were zero percent opacity. Regarding hours of operation, units P1-P6 had not exceeded 400 hours on oil in a year (going all the way back to 1993) until the summer of 1998. All electric generating units, not only within FPC's system, but state-wide, operated at record levels during the summer of 1998. The hours of operation for P7-P10 have historically been higher, however, these units are newer and more efficient. Further, FPC has converted two of these units to natural gas (P7 and P9) and has a construction permit that allows for the conversion of P8 and P10 to gas. After the conversions of P7 and P9 to gas in 1997, it can be seen that the hours of operation on oil have decreased dramatically. FPC expects the same trend following conversions to P8 (scheduled for completion by May 1999) and P10.

2). Section III, subsection B contains limits for the newer CTs (i.e., P7-P10) for SO<sub>2</sub>, PM/PM<sub>10</sub>, CO and VOCs. The current proposed Title V permit requires testing once every year for these pollutants. EPA has commented that this testing frequency does not appear to constitute adequate periodic monitoring to ensure compliance with the limits for these pollutants.

It should be noted that the limits and associated requirements for these pollutants were established by the pre-construction review process, not the Title V process. All requirements established for these pollutants in the PSD permit were approved by EPA Region IV in 1993

and are federally enforceable; further, the permit is in compliance with the requirements of Chapter 62-297, F.A.C.. In particular, the SO<sub>2</sub> standard is adequately addressed by the EPA-approved customized fuel monitoring schedule. Therefore, because the testing frequency established under the PSD process was recently approved by EPA as protective of the National Ambient Air Quality Standards (NAAQS), periodic monitoring should not be of further concern. Further, Chapter 62-297 310(7)(b) allows the Department to require additional compliance testing if the Department has good cause to believe that FPC's limit is being violated.

3). Section III, subsection B, condition B 19 establishes that a one-hour opacity test with values no greater than 10 percent may serve as the annual particulate test. EPA commented that in order for this to be approved as periodic monitoring for PM, the permit or the statement of basis must contain a technical demonstration of the correlation between these two parameters.

Again, FPC believes that the associated requirements for these pollutants were properly established by the PSD pre-construction review process, which is designed to assure the maintenance of the NAAQS. EPA Region IV subsequently approved this permit and all terms and conditions are now federally enforceable; therefore, periodic monitoring should not be of further concern.

4). Section III, subsection B, condition B.8. In response to EPA's objection, FPC again reviewed 40 CFR 60.333, the standard for sulfur dioxide. EPA should note that a reading of this standard requires that a source comply with either 60.333(a) or 60.333(b). Condition B.9 of the proposed permit requires compliance with 60.333(b).

5). Section III, subsection B, condition B.25. In response to EPA's objection, FPC will agree to the addition of 40 CFR 60.11(g) to the permit as an applicable requirement. This language, clarifying the use of credible evidence, was recently adopted by the State of Florida for the very purpose cited in EPA's objection. No further changes are necessary.

## II. General Comments

1). Section III, subsection B, condition B.4. This condition originates from the BACT determination and should be cited along with the date of the determination, which is October 16, 1991.

2). Section III, subsection B, condition B 7. FPC agrees that this condition should reference the requirements of 40 CFR 60.332.

FPC understands that these issues need to be resolved prior to May 26, 1999 (90 days after the date of EPA's objection letter). Accordingly, FPC will contact DEP within the next week to discuss FPC's requested resolution.

Mr. Sheplak  
April 20, 1999  
Page 5

In the meantime, if you have any questions or comments regarding this information, please contact me at (727) 826-4258.

Sincerely,



Scott H. Osbourn  
Senior Environmental Engineer

Attachments

cc: Clair Fancy, DEP  
Gracy Danois, EPA Region IV  
Robert Manning, HGS&S  
Ken Kosky, Golder Associates

# ATTACHMENT 1

VE Test Results and Hours of Operation

**Florida Power Corporation  
Debary Peakers  
% Opacity**

Dates Tested	Pk - 1	Pk - 2	Pk - 3	Pk - 4	Pk - 5	Pk - 6	Pk - 7	Pk - 8	Pk - 9	Pk - 10
Jan-99	0	4.58	0	3.75	0	0				
Jun-98							0	0	0	0
Jan-98	0	0	5	0	5	0				
Jun-97							0	0	0	0
Dec-95							0	0	0	0
Sep-95							5	N/A	3.8	3.3
Mar-95							4.17	0	5	5
Mar-94							0	0	0	0
Jul-93							N/A	N/A	N/A	0
May-93							0	N/A	N/A	N/A
Jan-93	0	0	0	0	0	0				



**Florida Power Corporation  
Debary Peakers  
Operating Hours**

		Pk - 1	Pk - 2	Pk - 3	Pk - 4	Pk - 5	Pk - 6	Pk - 7	Pk - 8	Pk - 9	Pk - 10
1998	Gas	0	0	0	0	0	0	2299	0	2161	0
	Oil	479	603	537	632	577	646	264	1114	257	1145
	Total	<b>479</b>	<b>603</b>	<b>537</b>	<b>632</b>	<b>577</b>	<b>646</b>	<b>2563</b>	<b>1114</b>	<b>2418</b>	<b>1145</b>
1997	Gas	0	0	0	0	0	0	1617	0	1496	0
	Oil	259	333	241	355	282	354	200	870	226	822
	Total	259	333	241	355	282	354	<b>1817</b>	<b>870</b>	<b>1722</b>	<b>822</b>
1996	Gas	0	0	0	0	0	0	0	0	0	0
	Oil	281	236	261	224	263	243	663	711	753	630
	Total	281	236	261	224	263	243	<b>663</b>	<b>711</b>	<b>753</b>	<b>630</b>
1995	Gas	0	0	0	0	0	0	0	0	0	0
	Oil	151	113	132	108	141	102	438	371	439	379
	Total	151	113	132	108	141	102	<b>438</b>	<b>371</b>	<b>439</b>	<b>379</b>
1994	Gas	0	0	0	0	0	0	0	0	0	0
	Oil	177	116	144	106	120	110	499	492	426	382
	Total	177	116	144	106	120	110	<b>499</b>	<b>492</b>	<b>426</b>	<b>382</b>
1993	Gas	0	0	0	0	0	0	0	0	0	0
	Oil	177	116	144	106	120	110	499	492	426	382
	Total	177	116	144	106	120	110	<b>499</b>	<b>492</b>	<b>426</b>	<b>382</b>

## ATTACHMENT 2

Visible Emissions Decision Tree

STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

## FAX TRANSMITTAL MEMO

TO: Robert ManningFAX NUMBER: 850-224-8551FROM: Greg Forte  
TN APCFAX NUMBER: 615-532-0614SUBJECT: Opacity MatrixDATE: Jan. 6, 1999NUMBER OF PAGES INCLUDING THIS ONE: 2IF YOU DO NOT RECEIVE THIS ENTIRE DOCUMENT OR HAVE ANY QUESTIONS,  
CALL:G. ForteTELEPHONE NO. 615-532-0548

MESSAGE:

You may be able to find an electronic  
version at the TN web site.

**Decision Tree PM 101  
Sources Utilizing EPA Method 9**

**Notes:**

PM = Periodic Monitoring  
required by 1200-3-9-.02(11)(e)(1)(ii)

This Decision Tree outlines the criteria by which major sources can meet the periodic monitoring and testing requirements of Title V for demonstrating compliance with the visible emissions standards in paragraph 1200-3-9-.01. It is not intended to determine compliance requirements for EPA's Compliance Assurance Monitoring (CAM) Rule (formerly referred to as Enhanced Monitoring - Proposed 40 CFR 64).

Examine each emission source using this Decision Tree to determine PM required.

Use of continuous emission monitoring systems eliminates the need to do any additional periodic monitoring.

Visible Emission Evaluations (VEEs) are to be conducted utilizing EPA Method 9. The observer must be properly certified to conduct valid evaluations.

**Typical Pollutants**

Particulates, VOC, CO, SO<sub>2</sub>, NO<sub>x</sub>, HCl, HF, HBr, Ammonia, and Methane

Initial observation to be repeated within 90 days of startup of a modified source if a new construction permit is issued for modification of the source.

A VEE conducted by TDAPC personnel after the Title V permit is issued will also constitute an initial reading.

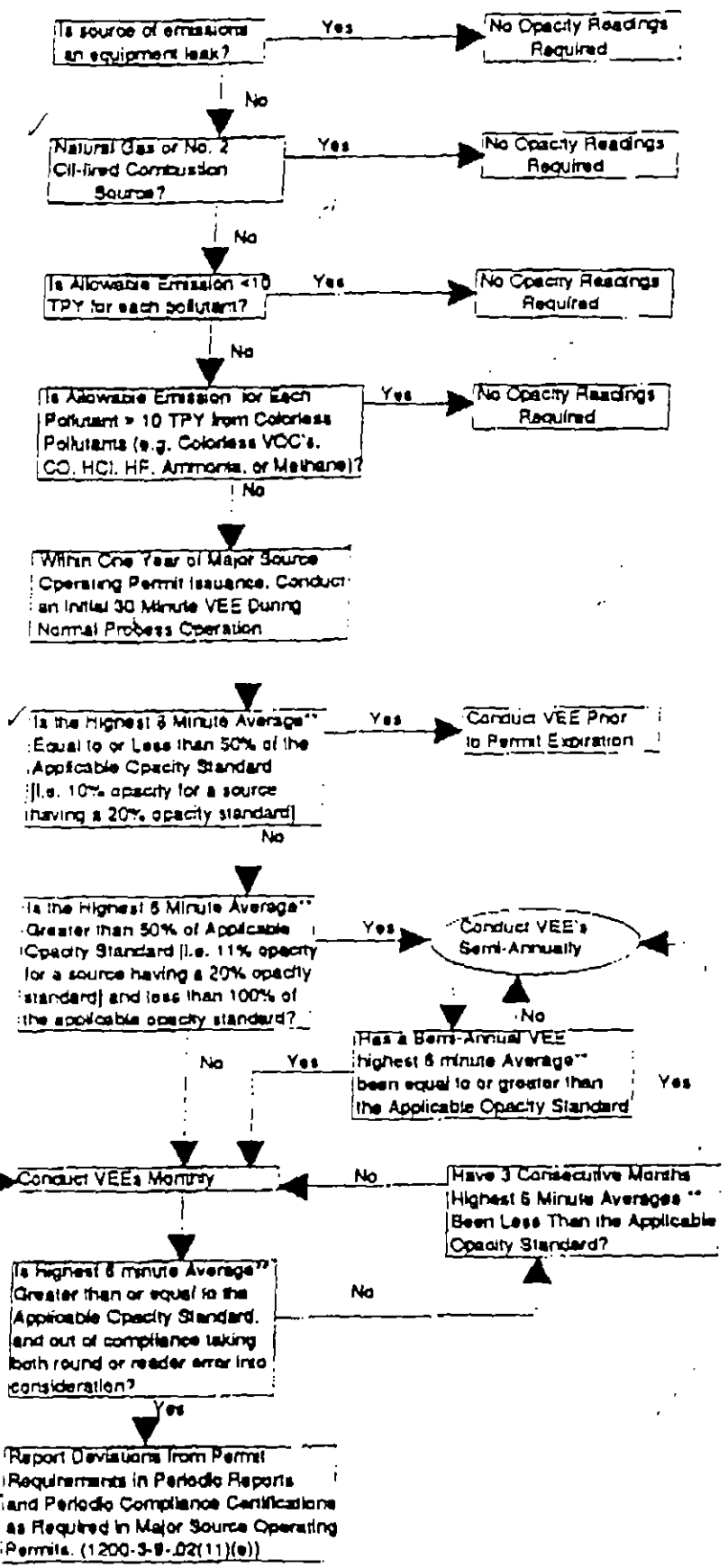
**Reader Error**

EPA Method 9, Non-NSPS or NESHAPs stipulated opacity standards:  
The TDAPC guidance is to declare non-compliance when the highest six-minute average\*\* exceeds the standard plus 8.8% opacity (e.g. 26.8% for a 20% standard).

EPA Method 9, NSPS or NESHAPs Stipulated Opacity Standards:  
EPA guidance is to allow only engineering round. No allowance for reader error is given.

\*Not Applicable to Asbestos Manufacturing Subject to 40 CFR 61.142

\*\*Or second highest six minute average. If the source has an exemption period stipulated in either the Regulations or in the permit.





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APR 21 1999

BUREAU OF  
AIR REGULATION

April 20, 1999

Mr. Scott Sheplak, P.E.  
Department of Environmental Protection  
Division of Air Resources Management  
2600 Blair Stone Road, MS 5505  
Tallahassee, FL 32399-2400

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2). Section III, subsection B, condition B.7. FPC agrees that this condition should reference the requirements of 40 CFR 60.332.

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Sincerely,



Scott H. Osbourn  
Senior Environmental Engineer

Attachments

cc: Clair Fancy, DEP  
Gracy Danois, EPA Region IV  
Robert Manning, HGS&S  
Ken Kosky, Golder Associates

4/22/99 cc: Scott Sheplak

# **ATTACHMENT 1**

VE Test Results and Hours of Operation

**Florida Power Corporation  
Debary Peakers  
% Opacity**

Dates Tested	Pk - 1	Pk - 2	Pk - 3	Pk - 4	Pk - 5	Pk - 6	Pk - 7	Pk - 8	Pk - 9	Pk -10
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Jun-98							0	0	0	0
Jan-98	0	0	5	0	5	0				
Jun-97							0	0	0	0
Dec-95							0	0	0	0
Sep-95							5	N/A	3.8	3.3
Mar-95							4.17	0	5	5
Mar-94							0	0	0	0
Jul-93							N/A	N/A	N/A	0
May-93							0	N/A	N/A	N/A
Jan-93	0	0	0	0	0	0				

**Florida Power Corporation  
Debary Peakers  
Operating Hours**

		Pk - 1	Pk - 2	Pk - 3	Pk - 4	Pk - 5	Pk - 6	Pk - 7	Pk - 8	Pk - 9	Pk - 10
1998	Gas	0	0	0	0	0	0	2299	0	2161	0
	Oil	479	603	537	632	577	646	264	1114	257	1145
	<b>Total</b>	<b>479</b>	<b>603</b>	<b>537</b>	<b>632</b>	<b>577</b>	<b>646</b>	<b>2563</b>	<b>1114</b>	<b>2418</b>	<b>1145</b>
1997	Gas	0	0	0	0	0	0	1617	0	1496	0
	Oil	259	333	241	355	282	354	200	870	226	822
	<b>Total</b>	<b>259</b>	<b>333</b>	<b>241</b>	<b>355</b>	<b>282</b>	<b>354</b>	<b>1817</b>	<b>870</b>	<b>1722</b>	<b>822</b>
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	Oil	281	236	261	224	263	243	663	711	753	630
	<b>Total</b>	<b>281</b>	<b>236</b>	<b>261</b>	<b>224</b>	<b>263</b>	<b>243</b>	<b>663</b>	<b>711</b>	<b>753</b>	<b>630</b>
1995	Gas	0	0	0	0	0	0	0	0	0	0
	Oil	151	113	132	108	141	102	438	371	439	379
	<b>Total</b>	<b>151</b>	<b>113</b>	<b>132</b>	<b>108</b>	<b>141</b>	<b>102</b>	<b>438</b>	<b>371</b>	<b>439</b>	<b>379</b>
1994	Gas	0	0	0	0	0	0	0	0	0	0
	Oil	177	116	144	106	120	110	499	492	426	382
	<b>Total</b>	<b>177</b>	<b>116</b>	<b>144</b>	<b>106</b>	<b>120</b>	<b>110</b>	<b>499</b>	<b>492</b>	<b>426</b>	<b>382</b>
1993	Gas	0	0	0	0	0	0	0	0	0	0
	Oil	177	116	144	106	120	110	499	492	426	382
	<b>Total</b>	<b>177</b>	<b>116</b>	<b>144</b>	<b>106</b>	<b>120</b>	<b>110</b>	<b>499</b>	<b>492</b>	<b>426</b>	<b>382</b>

# **ATTACHMENT 2**

Visible Emissions Decision Tree

STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION



FAX TRANSMITTAL MEMO

TO: Robert Manning

FAX NUMBER: 850-224-8551

FROM: Greg Forte  
TN APC

FAX NUMBER: 615-532-0614

SUBJECT: Opacity Matrix

DATE: Jan. 6, 1999

NUMBER OF PAGES INCLUDING THIS ONE: 2

IF YOU DO NOT RECEIVE THIS ENTIRE DOCUMENT OR HAVE ANY QUESTIONS,  
CALL:

G. Forte

TELEPHONE NO. 615-532-0548

MESSAGE:

You may be able to find an electronic  
version at the TN web site.

**Decision Tree PM for Opacity for Sources Utilizing EPA Method 9**

**Notes:**

PM = Periodic Monitoring required by 1200-3-9-.02(11)(e)(1)(II)

This Decision Tree outlines the criteria by which major sources can meet the periodic monitoring and testing requirements of Title V for demonstrating compliance with the visible emissions standards in paragraph 1200-3-5-.01. It is not intended to determine compliance requirements for EPA's Compliance Assurance Monitoring (CAM) Rule (formerly referred to as Enhanced Monitoring - Proposed 40 CFR 64).

Examine each emission source using this Decision Tree to determine PM required.

Use of continuous emission monitoring systems eliminates the need to do any additional periodic monitoring.

Visible Emission Evaluations (VEEs) are to be conducted utilizing EPA Method 9. The observer must be properly certified to conduct valid evaluations.

**Typical Pollutants**

Particulates, VOC, CO, SO<sub>2</sub>, NO<sub>x</sub>, HCl, HF, HBr, Ammonia, and Methane

Initial observation to be repeated within 90 days of startup of a modified source if a new construction permit is issued for modification of the source.

A VEE conducted by TDAPC personnel after the Title V permit is issued will also constitute an initial reading.

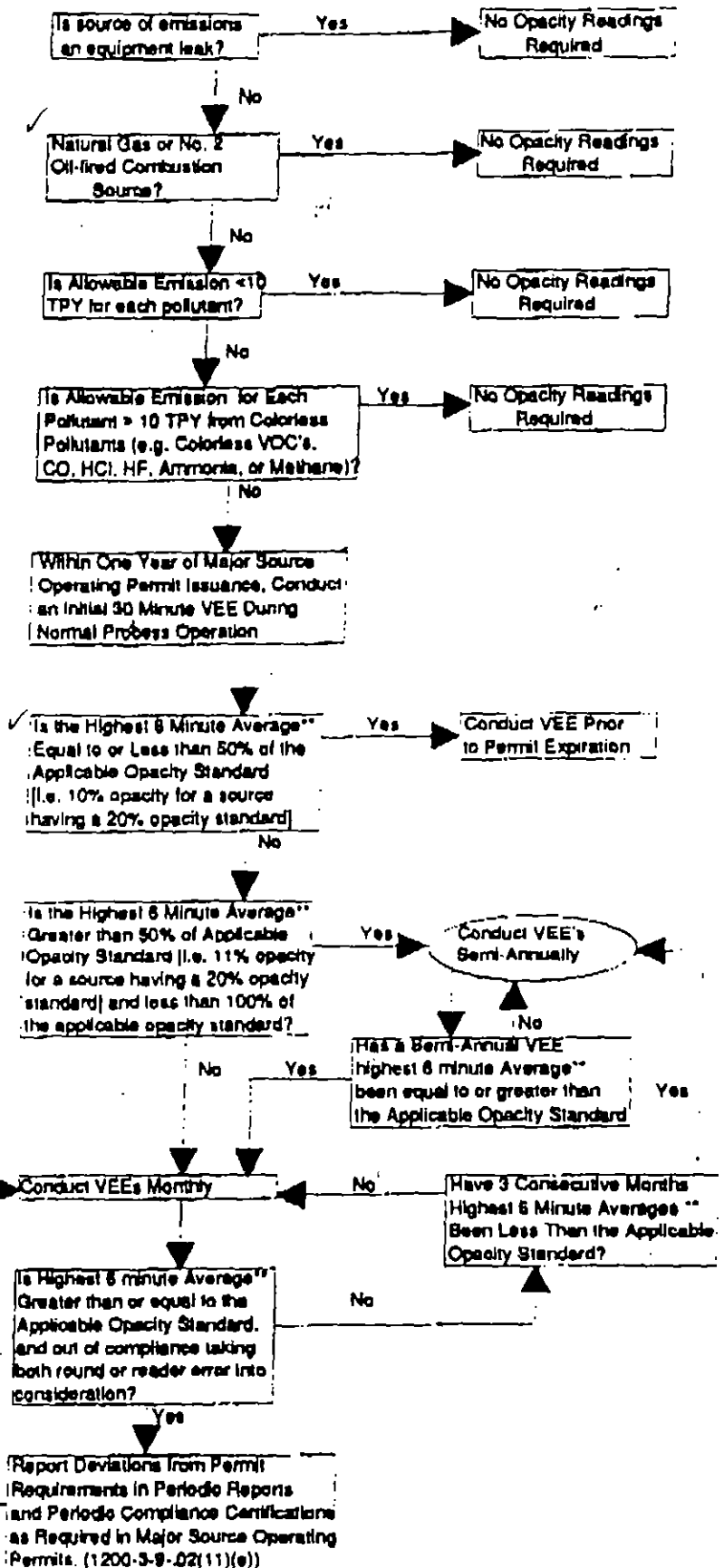
**Reader Error**

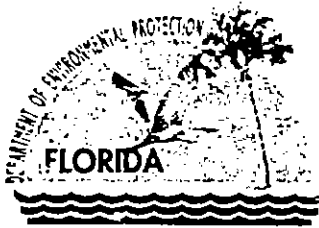
EPA Method 9, Non-NSPS or NESHAPs stipulated opacity standards: The TDAPC guidance is to declare non-compliance when the highest six-minute average\*\* exceeds the standard plus 6.8% opacity (e.g. 26.8% for a 20% standard).

EPA Method 9, NSPS or NESHAPs Stipulated Opacity Standards: EPA guidance is to allow only engineering round. No allowance for reader error is given.

\*Not Applicable to Asbestos Manufacturing Subject to 40 CFR 61.142

\*\*Or second highest six minute average. If the source has an exemption period stipulated in either the Regulations or in the permit.





Jeb Eush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

March 5, 1999

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. W. Jeffrey Pardue  
Director, Environmental Services Department  
Florida Power Corporation  
3201 34th Street South  
St. Petersburg, Florida 33711

Re: EPA Objection to PROPOSED Title V Permit No. 1270028-001-AV  
Plant Name: DeBary Facility

Dear Mr. Pardue:

On February 26, the department received a timely written objection from the United States Environmental Protection Agency to the referenced proposed permit. A copy of EPA's objection is attached.

In accordance with Section 403.0872(8), Florida Statutes (F.S.), the department must not issue a final permit until the objection is resolved or withdrawn. Pursuant to Section 403.0872(8), F.S., the applicant may file a written reply to the objection within 45 days after the date on which the department serves the applicant with a copy of the objection. The written reply must include any supporting materials that the applicant desires to include in the record relevant to the issues raised by the objection. The written reply must be considered by the department in issuing a final permit to resolve the objection of EPA. Please submit any written comments you wish to have considered concerning the objection to Mr. Scott M. Sheplak, P.E., at the above letterhead address.

Pursuant to 40 CFR 70.8(c)(4) the department will have to resolve the objection by issuing a permit that satisfies EPA within 90 days of the objection, or EPA will assume authority for the permit.

If you should have any questions, please contact Mr. Scott M. Sheplak, P.E., at 850/921-9532.

Sincerely,

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

CHF/sms/k

Enclosure

cc: Pat Comer, OGC w/enclosure  
Douglas Neeley, USEPA w/o enclosure  
Carla Pierce, USEPA w/o enclosure



February 26, 1999

4APT-ARB

Howard L. Rhodes, Director  
Air Resources Management Division  
Florida Department of Environmental Protection  
Mail Station 5500  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

SUBJ: EPA's Review of Proposed Title V Permit  
Florida Power Corporation  
DeBary Facility  
Permit No. 1270028-001-AV

Dear Mr. Rhodes:

The purpose of this letter is to provide comments to the Florida Department of Environmental Protection (DEP) on the proposed title V operating permit for Florida Power Corporation, DeBary Facility, which was posted on DEP's web site on January 4, 1999. Based on the Environmental Protection Agency's (EPA's) review of the proposed permit and the supporting information for this facility, EPA formally objects, under the authority of Section 505(b) of the Clean Air Act (the Act) and 40 C.F.R. § 70.8(c) (see also Florida Regulation 62-213.450), to the issuance of the title V permit for this facility. The bases of EPA's objection are as follows: 1) the permit does not fully meet the periodic monitoring requirements of 40 C.F.R. § 70.6(a)(3)(I), 2) the permit does not contain 40 C.F.R. §60.333(a) as an applicable requirement, and 3) the permit contains language that limits the type of information that can be used to evaluate the compliance status of the facility.

Section 70.8(c) requires EPA to object to the issuance of a proposed permit in writing within 45 days of receipt of the proposed permit (and all necessary supporting information) if EPA determines that the permit is not in compliance with the applicable requirements under the Act or 40 C.F.R. Part 70. EPA and DEP are in agreement that the receipt date of a proposed permit is considered to be the date when EPA receives electronic notification of the permit's availability on DEP's web site. Although the permit was posted on DEP's web site on January 4, 1999, EPA was not officially notified of the availability of the proposed permit. On February 11, 1999, EPA staff notified the State of this discrepancy and EPA agreed to issue comments expeditiously without requiring the State to re-post the proposed title V permit. Therefore, EPA considers issuance of this objection letter to be within the official 45 day time frame allowed in section 70.8(c) for EPA's review. Section 70.8(c)(4) and Section 505(c) of the Act further provide that if the State fails to revise and resubmit a proposed permit within 90 days to satisfy the objection, the authority to issue or deny the permit passes to EPA and EPA will act accordingly. Because the objection issues must be fully addressed within the 90 days, we

suggest that the revised permit be submitted in advance in order that any outstanding issues may be addressed prior to the expiration of the 90-day period.

Pursuant to 40 C.F.R. § 70.8(c), this letter and its enclosure contain a detailed explanation of the objection issues and the changes necessary to make the permit consistent with the requirements of 40 C.F.R. Part 70. The enclosure also contains general comments applicable to the permit.

If you have any questions or wish to discuss this further, please contact Ms. Carla E. Pierce, Chief, Operating Source Section at (404) 562-9099. Should your staff need additional information they may contact Ms. Gracy R. Danois, Florida Title V Contact, at (404) 562-9119, or Ms. Lynda Crum, Associate Regional Counsel, at (404) 562-9524.

Sincerely,

/s/

Winston A. Smith  
Director  
Air, Pesticides & Toxics  
Management Division

Enclosure

cc: Mr. W. Jeffrey Pardue, Director  
Environmental Services Dept.  
Florida Power Corporation

**Enclosure**

**U.S. EPA Region 4 Objection  
Proposed Part 70 Operating Permit  
Florida Power Corporation  
DeBary Station  
Permit no. 1270028-001-AV**

**I. EPA Objection Issues**

1. Periodic Monitoring: The permit does not require sufficient periodic monitoring to ensure compliance with the applicable opacity standard. The permit for FPC-DeBary only requires an annual one hour Method 9 visible emissions reading. In most cases, this does not constitute adequate periodic monitoring to ensure continuous compliance with the opacity standard. The permit must require that the source conduct visible emissions observations on a daily basis when

burning fuel oil, or a technical demonstration must be included in the statement of basis explaining why the State has chosen not to require any additional visible emissions testing. The demonstration needs to identify the rationale for basing the compliance certification on data from a short-term test performed once a year.

2. Periodic Monitoring: The permit does not require sufficient periodic monitoring to ensure compliance with the applicable SO<sub>2</sub>, PM/PM<sub>10</sub>, CO, and VOC, limits in Section III, subsection B. The FPC- DeBary permit only requires testing once every year for these pollutants. This monitoring scheme does not appear to constitute adequate periodic monitoring to ensure compliance with the limits contained in the permit. In order for infrequent testing to be approved as the periodic monitoring method for this facility, the State must provide a technical demonstration that no additional monitoring is warranted to ensure compliance with the limits listed above. The demonstration needs to identify the rationale for basing the compliance certification on data from a short-term test performed once a year. If it is determined that additional monitoring is necessary to ensure compliance with the permit conditions, more frequent testing requirements must be included in the permit.
3. Periodic Monitoring: Section III, subsection B, condition B.19 establishes that a one hour opacity test with values no greater than 10%, may serve as the annual particulate test. In order for this to be approved as periodic monitoring for PM, the permit or the statement of basis must contain a technical demonstration of the correlation between these two parameters and the methodology that the source will follow to assess compliance with the particulate matter standard in this permit.
4. Missing Applicable Requirement: Section III, subsection B, condition B.8, does not appear to ensure compliance with 40 CFR § 60.333(a). The permit must include the requirements contained in 40 CFR § 60.333(a), or the statement of basis must include an explanation of why this portion of the regulations do not apply to this facility.
5. Credible Evidence: Section III, subsection B, condition B.25, appear to limit the type of information that may be used to evaluate the compliance status of this facility. The source should be aware that any credible evidence may be used to ensure compliance and for enforcement associated with the title V permit. Although the intent of this provision is to specify the applicable test methods to be used, it could be misconstrued to be the exclusive means of determining compliance with the applicable emission limits. As EPA has previously explained, the reference test methods are to be used as test methods of reference against which other data will be measured. Thus, the reference test methods will be used as the standard for determining credibility and precision of other emissions data and measurements, but not as the sole means of determining compliance. In an effort to clarify that such permit conditions are not meant to

limit the use of any credible evidence, the statement of basis must include the following language:

*"This permit contains provisions which require specific test methods or procedures be used as a demonstration of compliance with permit limits, but are not intended as the only means of demonstrating or certifying compliance with permit limits. No provision in this permit precludes the use of any credible evidence for compliance and enforcement purposes."*

## II. General Comments

1. Section III, subsection B, condition B.4: Please add the appropriate regulatory citation to this condition. If the condition stems from the BACT determination, the date of the determination should also be cited.
2. Section III, subsection B, condition B.7: If this condition also assures compliance with 40 CFR § 60.332, the appropriate citation needs to be added to the condition.

Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

**Mr. W. Jeffrey Pardue, C.E.P.  
Dir. of Environ. Services  
Florida Power Corporation  
3201 34 Street South  
Saint Petersburg, FL 33711**

5. Received By: (Print Name)

6. Signature: (Addressee or Agent)

**X** *W. Jeffrey Pardue*

4a. Article Number  
**P 174 053 146**

4b. Service Type

Registered  Certified  
 Express Mail  Insured  
 Return Receipt for Merchandise  COD

7. Date of Delivery  
**MAR 10 1999**

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

Thank you for using Return Receipt Service.

PS Form 3811, December 1994 Domestic Return Receipt

P 174 053 146

US Postal Service  
**Receipt for Certified Mail**  
 No Insurance Coverage Provided.  
 Do not use for International Mail (See reverse)

**Mr. W. Jeffrey Pardue, C.E.P.  
Dir. of Environ. Services  
Florida Power Corporation  
3201 34 Street South  
Saint Petersburg, FL 33711**

PS Form 3800, April 1995

Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	<b>3-8-99</b> <i>59k</i>



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

50011 \$1,  
c/air  
Howard  
3/2  
**RECEIVED**

4APT-ARB

FEB 26 1999

MAR 01 1999  
DIVISION OF AIR  
RESOURCES MANAGEMENT

Howard L. Rhodes, Director  
Air Resources Management Division  
Florida Department of Environmental Protection  
Mail Station 5500  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

SUBJ: EPA's Review of Proposed Title V Permit  
Florida Power Corporation  
DeBary Facility  
Permit No. 1270028-001-AV

Dear Mr. Rhodes:

The purpose of this letter is to provide comments to the Florida Department of Environmental Protection (DEP) on the proposed title V operating permit for Florida Power Corporation, DeBary Facility, which was posted on DEP's web site on January 4, 1999. Based on the Environmental Protection Agency's (EPA's) review of the proposed permit and the supporting information for this facility, EPA formally objects, under the authority of Section 505(b) of the Clean Air Act (the Act) and 40 C.F.R. § 70.8(c) (see also Florida Regulation 62-213.450), to the issuance of the title V permit for this facility. The bases of EPA's objection are as follows: 1) the permit does not fully meet the periodic monitoring requirements of 40 C.F.R. § 70.6(a)(3)(I), 2) the permit does not contain 40 C.F.R. §60.333(a) as an applicable requirement, and 3) the permit contains language that limits the type of information that can be used to evaluate the compliance status of the facility.

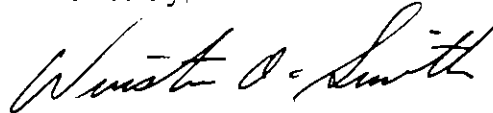
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accordingly. Because the objection issues must be fully addressed within the 90 days, we suggest that the revised permit be submitted in advance in order that any outstanding issues may be addressed prior to the expiration of the 90-day period.

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If you have any questions or wish to discuss this further, please contact Ms. Carla E. Pierce, Chief, Operating Source Section at (404) 562-9099. Should your staff need additional information they may contact Ms. Gracy R. Danois, Florida Title V Contact, at (404) 562-9119, or Ms. Lynda Crum, Associate Regional Counsel, at (404) 562-9524.

Sincerely,



Winston A. Smith  
Director  
Air, Pesticides & Toxics  
Management Division

Enclosure

cc: Mr. W. Jeffrey Pardue, Director  
Environmental Services Dept.  
Florida Power Corporation

## Enclosure

**U.S. EPA Region 4 Objection  
Proposed Part 70 Operating Permit  
Florida Power Corporation  
DeBary Station  
Permit no. 1270028-001-AV**

### **I. EPA Objection Issues**

1. **Periodic Monitoring:** The permit does not require sufficient periodic monitoring to ensure compliance with the applicable opacity standard. The permit for FPC-DeBary only requires an annual one hour Method 9 visible emissions reading. In most cases, this does not constitute adequate periodic monitoring to ensure continuous compliance with the opacity standard. The permit must require that the source conduct visible emissions observations on a daily basis when burning fuel oil, or a technical demonstration must be included in the statement of basis explaining why the State has chosen not to require any additional visible emissions testing. The demonstration needs to identify the rationale for basing the compliance certification on data from a short-term test performed once a year.
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## II. General Comments

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2. Section III, subsection B, condition B.7: If this condition also assures compliance with 40 CFR § 60.332, the appropriate citation needs to be added to the condition.

# INTEROFFICE MEMORANDUM

**Sensitivity:** COMPANY CONFIDENTIAL

**Date:** 04-Jan-1999 02:21pm  
**From:** Mary Fillingim TAL  
FILLINGIM\_M  
**Dept:** Air Resources Management  
**Tel No:** 850/488-0114

**To:** See Below  
**Subject:** New Posting #1270028

There is a new posting on Florida's website.

1270028001AV  
FPC-DEBARY PLANT

Proposed

The notification letter is encoded and attached. If you have any questions, feel free to contact me.

Thanks, \_Mary

## Distribution:

<b>To:</b>	adams yolanda	( adams.yolanda@epamail.epa.gov@in )
<b>To:</b>	pierce carla	( pierce.carla@epamail.epa.gov@in )
<b>To:</b>	Barbara Boutwell TAL	( BOUTWELL_B )
<b>To:</b>	Scott Sheplak TAL	( SHEPLAK_S )
<b>To:</b>	Terry Knowles TAL	( KNOWLES_T )
<b>To:</b>	danois gracy	( danois.gracy@epamail.epa.gov@in )
<b>To:</b>	Elizabeth Walker TAL	( WALKER_E )
<b>CC:</b>	Lennon Anderson TAL	( ANDERSON_L )

Barbara ← Leason → Scott

**RECEIVED**

THE STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION    BUREAU OF  
AIR REGULATION

DEC 15 1998

In the Matter of an  
Application for Permit by:

OGC CASE NO. \_\_\_\_\_

Florida Power Corporation,  
DeBary Plant

---

DRAFT Permit No.: 1270028-001-AV  
Volusia County, Florida

**NOTICE OF WITHDRAWAL OF PETITION FOR  
FORMAL ADMINISTRATIVE HEARING**

The Florida Power Corporation (FPC), by and through undersigned counsel, hereby withdraws its Petition for Formal Administrative Hearing, which was filed pursuant to Sections 120.569, 120.57 and 403.0872(5), Florida Statutes and Florida Administrative Code Rules 62-103.155 and 28-106.201. FPC filed this petition on November 4, 1997, in response to the Department of Environmental Protection's "Intent to Issue Title V Air Operation Permit" (Permit No. 1270028-001-AV) for the DeBary Plant located in Volusia County, Florida, to negotiate certain changes in the draft proposed Title V air operation permit with the Department of Environmental Protection (Department). As reflected in the preliminary Proposed Title V permit released on September 21, 1998 (attached), FPC and the Department have come to an agreement on the issues involving the above-referenced Draft Title V permit. Therefore, FPC hereby withdraws its Petition for Formal Administrative Proceeding, conditioned upon the Department's issuance of the Proposed Title V permit in accordance with the attached agreement.

Respectfully submitted this 14 day of December, 1998.

HOPPING GREEN SAMS & SMITH, P.A.

By: Robert A. Manning  
Robert A. Manning, Fla. Bar No. 0035173  
123 South Calhoun Street  
Post Office Box 6526  
Tallahassee, FL 32314  
(850) 222-7500

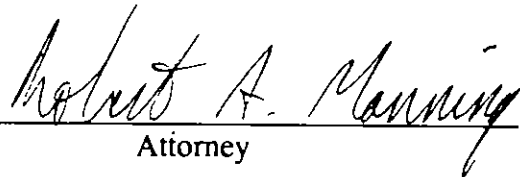
Attorneys for Florida Power Corporation

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following by  
U.S. Mail on this 14 day of December, 1998:

Clair H. Fancy, P.E., Chief  
Bureau of Air Regulation  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2600

Jeffrey Brown, Esq.  
Office of General Counsel  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2600

  
\_\_\_\_\_  
Attorney

September 21, 1998

Mr. W. Jeffery Pardue, C.E.P.  
Director of Environmental Services Department  
Florida Power Corporation  
3201 34th Street South  
St. Petersburg, FL 33711

Re: PROPOSED Title V Permit No.: 1270028-001-AV  
DeBary Facility

Dear Mr. Pardue:

One copy of the "PROPOSED PERMIT DETERMINATION" for the DeBary Facility located at 788 West Highbanks Road, DeBary, Volusia County, is enclosed. This letter is only a courtesy to inform you that the DRAFT permit has become a PROPOSED permit. Also, included are changes to Title V permits issued prior to 12/02/97.

An electronic version of this determination has been posted on the Division of Air Resources Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is <http://www2.dep.state.fl.us/air>.

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the PROPOSED permit is made by the USEPA within 45 days, the PROPOSED permit will become a FINAL permit no later than 55 days after the date on which the PROPOSED permit was mailed (posted) to USEPA. If USEPA has an objection to the PROPOSED permit, the FINAL permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you should have any questions, please contact Lennon Anderson at 850/921-9588.

Sincerely,

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

CHF/a

Enclosures

copy furnished to:  
Kennard Kosky, P.E., GA  
Scott H. Osbourn, FPC  
Len Kozlov, CD  
Ms. Gracy Danois, USEPA, Region 4 (INTERNET E-mail Memorandum)  
Ms. Carla E. Pierce, USEPA, Region 4 (INTERNET E-mail Memorandum)

## **PROPOSED PERMIT DETERMINATION**

PROPOSED Permit No.: 1270028-001-AV

Page 1 of 1

### **I. Public Notice.**

An "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" to Florida Power Corporation for the DeBary Facility located at 788 West Highbanks Road, DeBary, Volusia County was clerked on July 25, 1997. The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was published in the DeLand/West Volusia Beacon on August 20, 1997. The DRAFT Title V Air Operation Permit was available for public inspection at the Central District in Orlando and the permitting authority's office in Tallahassee. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was received on September 10, 1997.

### **II. Public Comments.**

Comments were received and the DRAFT Title V Operation Permit was changed. The comments were not considered significant enough to reissue the DRAFT Title V Permit and require another Public Notice. Comments were received from one respondent during the 30 (thirty) day public comment period.

A. Letter from Mr. Scott Osbourn dated August 20, 1997, and received on August 20, 1997.

#### **B. Document on file with the permitting authority:**

-Letter received August 20, 1997, from Mr. Scott Osbourn.

### **III. Conclusion.**

The permitting authority hereby issues the PROPOSED Permit No.: 1270028-001-AV, with any changes noted above.

## STATEMENT OF BASIS

Florida Power Corporation  
DeBary Facility  
**Facility ID No.:** 1270028  
Volusia County

Initial Title V Air Operation Permit  
**PROPOSED Permit No.:** 1270028-001-AV

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. 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.

This facility consists of six peaking combustion turbines which are fired with new No. 6 or new No. 2 fuel oil and four combustion turbines which are fired with new No. 2 fuel oil and/or natural gas.

The latter four combustion turbines (P7, P8, P9, P10) are each 92.9 megawatt simple cycle units manufactured by General Electric (Model PG7111EA). The units are fired with natural gas and/or new No. 2 fuel oil containing an average of 0.3 percent (%) sulfur. Annual hours of operation are limited to an equivalent of 3,390 or less based on a sliding scale related to the fuel sulfur content. Control measures and equipment consists of firing relatively clean fuel, good combustion practices, and water injection. These emissions units began commercial operation on November 1, 1992.

Each of the six peaking combustion turbines is a General Electric, Model MS 7000. The output is rated at 51,900 kW. New No. 2 or new No. 6 fuel oil is allowed to be fired, with the sulfur content not to exceed 0.5% and 0.7 % by weight, respectively. Commercial operation began on February 6, 1976; March 20, 1976; December 31, 1975; April 14, 1976; December 22, 1975; and April 30, 1975, respectively for PCT Units 1 through 6.

Also included in this permit are miscellaneous insignificant emissions units and/or activities.

Based on the initial Title V permit application received June 14, 1996, this facility is a major source of hazardous air pollutants (HAPs).

The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emissions limits and to aid in determining future rule applicability. A note below the permitted capacity condition clarifies this. Regular record keeping is not required for heat input.



Instead, the owner or operator is expected to determine heat input whenever emission testing is required, to demonstrate at what percentage of the rated capacity that the unit was tested. Rule 62-297.310(5),

F.A.C., included in the permit, requires measurement of process variables for emission tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate average hourly heat input during the test.

Florida Power Corporation  
DeBary Facility  
**Facility ID No.:** 1270028  
Volusia County

Initial Title V Air Operation Permit  
**PROPOSED Permit No.:** 1270028-001-AV

Permitting Authority:

State of Florida  
Department of Environmental Protection  
Division of Air Resources Management  
Bureau of Air Regulation  
Title V Section

Mail Station #5505  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Telephone: 850/488-1344  
Fax: 850/922-6979

September 16, 1998

Compliance Authority

Central District Office  
3319 Maguire Boulevard, Suite 232  
Orlando, FL 32803-3767  
Telephone: 407/894-7555  
Fax: 407/897-2966

Initial Title V Air Operation Permit  
PROPOSED Permit No.: 1270028-001-AV

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**Permittee:**  
Florida Power Corporation  
3201 34th Street South  
St. Petersburg, FL 33711

**PROPOSED Permit No.:** 1270028-001-AV  
**Facility ID No.:** 1270028  
**SIC Nos.:** 49  
**Project:** Initial Title V Air Operation Permit

This permit is for the operation of the DeBary Facility. This facility is located at 788 West Highbanks Road, DeBary, Volusia; UTM Coordinates: Zone 17, 467.5 km East and 3197.2 km North; Latitude: 28° 54' 17" North and Longitude: 81° 19' 55" West.

**STATEMENT OF BASIS:** This Title V air operation permit 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.

**Referenced attachments made a part of this permit:**

Appendix I-1, List of Insignificant Emissions Units and/or Activities  
APPENDIX TV-1, TITLE V CONDITIONS (version dated 12/02/97)  
APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/07/96)  
TABLE 297.310-1, CALIBRATION SCHEDULE (version dated 10/07/96)  
FIGURE 1 - SUMMARY REPORT-GASEOUS AND OPACITY EXCESS EMISSION  
AND MONITORING SYSTEM PERFORMANCE REPORT (version dated 7/96)  
Phase II Acid Rain Application/Compliance Plan received 12/22/95  
ORDER EXTENDING PERMIT EXPIRATION DATE dated xx/xx/xx

**Effective Date:** January 1, 1999  
**Renewal Application Due Date:** July 5, 2003  
**Expiration Date:** December 31, 2003

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Howard L. Rhodes, Director  
Division of Air Resources  
Management

HLR/sms/a

**Section I. Facility Information.**

**Subsection A. Facility Description.**

This facility consists of six peaking combustion turbines which are fired with new No. 6 or new No. 2 fuel oil and four combustion turbines which are fired with new No. 2 fuel oil and/or natural gas.

The latter four combustion turbines (P7, P8, P9, P10) are each 92.9 megawatt simple cycle units manufactured by General Electric (Model PG7111EA). The units are fired with natural gas and/or new No. 2 fuel oil containing an average of 0.3 percent (%) sulfur. Annual hours of operation are limited to an equivalent of 3,390 or less based on a sliding scale related to the fuel sulfur content. Control measures and equipment consists of firing relatively clean fuel, good combustion practices, and water injection.

Also, included in this permit are miscellaneous insignificant emissions units and/or activities.

Based on the initial Title V permit application received June 14, 1996, this facility is a major source of hazardous air pollutants (HAPs).

**Subsection B. Summary of Emissions Unit ID Nos. and Brief Descriptions.**

**E.U.**

<b><u>ID No.</u></b>	<b><u>Brief Description</u></b>
-003	Peaking Combustion Turbine Unit No. 1
-005	Peaking Combustion Turbine Unit No. 2
-007	Peaking Combustion Turbine Unit No. 3
-009	Peaking Combustion Turbine Unit No. 4
-011	Peaking Combustion Turbine Unit No. 5
-013	Peaking Combustion Turbine Unit No. 6
-015	Combustion Turbine Unit No. 7
-016	Combustion Turbine Unit No. 8
-017	Combustion Turbine Unit No. 9
-018	Combustion Turbine Unit No. 10

*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

These documents are on file with the permitting authority:

Initial Title V Permit Application received June 14, 1996.

Additional Information Request dated March 5, 1997

Additional Information Response received June 3, 1997

## Section II. Facility-wide Conditions.

### The following conditions apply facility-wide:

1. APPENDIX TV-1, TITLE V CONDITIONS, is a part of this permit.  
{Permitting note: APPENDIX TV-1, 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. **Not federally enforceable.** 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). If required by 40 CFR 68, the permittee shall submit to the implementing agency:
  - a. a risk management plan (RMP) when, and if, such requirement becomes applicable;
  - b. certification forms and/or RMPs according to the promulgated rule schedule.[40 CFR 68]
5. 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.]
6. **Not federally enforceable.** 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.]

**7. Not federally enforceable. Unconfined emissions of Particulate Matter.** No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any emissions unit whatsoever, including, but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrially related activities such as loading, unloading, storing or handling, without taking reasonable precautions to prevent such emission.

Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

- a. Paving and maintenance of roads, parking areas and yards.
- b. Landscaping or planting of vegetation.
- c. Limiting access to plant property by unnecessary vehicles.

[Rule 62-296.320(4)(c)1. & 3., F.A.C.; and, proposed by applicant in the initial Title V permit application received June 14, 1996.]

**8.** 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.]

**9. Statement of Compliance.** The annual statement of compliance pursuant to Rule 62-213.440(3), F.A.C., shall be submitted within 60 (sixty) days after the end of the calendar year. {See condition 52., APPENDIX TV-1, TITLE V CONDITIONS}  
[Rule 62-214.420(11), F.A.C.]

**10.** The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Central District Office:

Central District Office  
3319 Maguire Boulevard, Suite 232  
Orlando, FL 32803-3767  
Telephone: 407/894-7555  
Fax: 407/897-2966

**11.** 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 & EPCRA Enforcement Branch, Air Compliance Section  
61 Forsyth Street  
Atlanta, Georgia 30303  
Telephone: 404/562-9099  
Fax: 404/562-9095



### Section III. Emissions Unit and Conditions.

Subsection A. This section addresses the following emissions unit.

#### E.U.

<u>ID No.</u>	<u>Brief Description</u>
-003	Peaking Combustion Turbine Unit No. 1
-005	Peaking Combustion Turbine Unit No. 2
-007	Peaking Combustion Turbine Unit No. 3
-009	Peaking Combustion Turbine Unit No. 4
-011	Peaking Combustion Turbine Unit No. 5
-013	Peaking Combustion Turbine Unit No. 6

Each of the six peaking combustion turbines (PCT) is a General Electric, Model MS 7000. The output is rated at 51,900 kW. New No. 2 or new No. 6 fuel oil is allowed to be fired, with the sulfur content not to exceed 0.5% and 0.7 % by weight, respectively.

Commercial operation began on February 6, 1976; March 20, 1976; December 31, 1975; April 14, 1976; December 22, 1975, and April 30, 1975, respectively for PCT Units 1 through 6.

The following specific conditions apply to the emissions unit listed above:

#### Essential Potential to Emit (PTE) Parameters

**A.1. Permitted Capacity.** The operation rate for each PCT shall not exceed:

- 588 MMBtu/hr (LHV) at 95 °F using new No. 6 fuel oil or
- 673 MMBtu/hr (LHV) at 95 °F using new No. 2 fuel oil.

{Permitting note: The heat input and fuel consumption can vary with ambient temperature in accordance with the design curves. The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 - 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability.}

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

**A.2. Methods of Operation - Fuels.**

- Startup: The only fuels allowed to be burned are new No. 2 or new No. 6 fuel oil
- Normal: The only fuels allowed to be burned are new No. 2 or new No. 6 fuel oil  
New No. 2 fuel oil shall not be cofired with new No. 6 fuel oil.

[Rule 62-213.410, F.A.C.]

**A.3. Hours of Operation.** Each PCT is allowed to operate continuously, i.e., 8,760 hours/year.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

### **Emission Limitations and Standards**

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit. }

**A.4. Sulfur Dioxide.** The maximum sulfur content of the new No. 2 fuel oil shall not exceed 0.5 percent by weight.

[AO64-207447 and proposed by applicant in the initial Title V permit application received June 14, 1996]

**A.5. Sulfur Dioxide.** The maximum sulfur content of the new No. 6 fuel oil shall not exceed 0.7 percent by weight.

[AC64-2116, AC64-2117, AC64-2118, AC64-2119, AC64-2120, AC64-2121, AO64-207447 and proposed by applicant in the initial Title V permit application received June 14, 1996]

**A.6. Visible emissions.** Visible emissions from each PCT unit shall not be equal to or greater than 20 percent opacity.

[Rule 62-296.320(4)(b)1., F.A.C. and AO64-207447]

### **Monitoring of Operations**

**A.7.** The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis provided by the vendor upon each fuel delivery. See **Specific Condition A.9.**

[Rule 62-213.440, F.A.C.]

### **A.8. Determination of Process Variables.**

(a) **Required Equipment.** The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) **Accuracy of Equipment.** Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight 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.]

### Test Methods and Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit. }

**A.9.** The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-94, ASTM D4294-90(95), or both ASTM D4057-88 and ASTM D129-95 or the latest edition of the above ASTM methods.

[Rules 62-213.440 and 62-297.440, F.A.C.]

**A.10.** The test method for visible emissions shall be EPA Method 9, adopted and incorporated by reference in Rule 62-204.800, F.A.C., and referenced in Chapter 62-297, F.A.C.

[Rules 62-204.800, 62-296.320(4)(b)4.a. and 62-297.401, F.A.C.]

**A.11.** PCT Units No. 1 through 6 shall be tested in accordance with EPA Method 9 within 10 days after being placed back in operation using new No. 6 fuel oil.

[AO64-207447]

**A.12.** PCT Units No. 1 through 6 shall be tested for visible emissions annually on or within 60 days prior to March 1.

[AO64-207447]

**A.13. Opacity Compliance Tests.** When EPA Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

a. For batch, cyclical processes, or other operations which are normally completed within less than the minimum observation period and do not recur within that time, the period of observation shall be equal to the duration of the batch cycle or operation completion time.

b. The observation period for special opacity tests that are conducted to provide data to establish a surrogate standard pursuant to Rule 62-297.310(5)(k), F.A.C., Waiver of Compliance Test Requirements, shall be established as necessary to properly establish the relationship between a proposed surrogate standard and an existing mass emission limiting standard.

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

[Rule 62-297.310(4)(a)2., F.A.C.]

**A.14. (a) General Compliance Testing.**

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

a. Did not operate; or

b. In the case of a fuel burning emissions unit, burned liquid and/or solid fuel for a total of no more than 400 hours.

4. During each federal fiscal year (October 1 -- September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

a. Visible emissions;

8. Any combustion turbine that does not operate for more than 400 hours per year shall conduct a visible emissions compliance test once per each five-year period, coinciding with the term of its air operation permit.

[Rule 62-297.310(7), F.A.C.]

**A.15. These emissions units are also subject to conditions contained in **Subsection C. Common Conditions.****

**Subsection B. This section addresses the following emissions units.**

**E.U.**

<b><u>ID No.</u></b>	<b><u>Brief Description</u></b>
-015	Combustion Turbine Unit No. 7
-016	Combustion Turbine Unit No. 8
-017	Combustion Turbine Unit No. 9
-018	Combustion Turbine Unit No. 10

Each simple cycle combustion turbine (CT) is a General Electric PG7111EA model with a nameplate rating of 92.9 MW at ISO conditions. Each CT is allowed to burn new No. 2 fuel oil and/or natural gas. NO<sub>x</sub> emissions are controlled by water-injection. These emissions units began commercial operation on November 1, 1992.

{Permitting notes: Each CT is regulated under Acid Rain, Phase II; NSPS - 40 CFR 60, Subpart GG, Standards of Performance for Stationary Gas Turbines, adopted and incorporated by reference in Rule 62-204.800(7), F.A.C.; NSPS 40 CFR 60 Subpart A; Rule 212.400(5), F.A.C., Prevention of Significant Deterioration (PSD); Rule 62-212.400(6), F.A.C., Best Available Control Technology (BACT) Determination, dated October 16, 1991 }

**The following specific conditions apply to the emissions units listed above:**

**Essential Potential to Emit (PTE) Parameters**

**B.1. Permitted Capacity.** The operation rate for each CT shall not exceed:

- a. 1,144 MMBtu/hr/unit (LHV) at 20 °F using new No. 2 oil or
- b. 1,159 MMBtu/hr/unit (LHV) at 20 °F using natural gas.

{Permitting note: The heat input and fuel consumption can vary with ambient temperature in accordance with the design curves. The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 - 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability. }

[Rules 62-4.160(2), 62-210.200(PTE), F.A.C. and AC64-191015(B)]

**B.2. Methods of Operation - Fuels.**

- a. Startup: The only fuels allowed to be burned are natural gas and/or new No. 2 fuel.
- b. Normal: The only fuels allowed to be burned are natural gas and/or new No. 2 fuel.

[Rule 62-213.410, F.A.C. and AC64-191015(B)]

**B.3.** The maximum fuel consumption for the 4 CTs at 59 °F shall not exceed:

- a. 106,133,333 gal/yr, 12-month rolling average.
- b. 14,212 (million cubic feet)/yr, 12-month rolling average.

[AC64-191015(B); proposed by applicant in the initial Title V permit application amendment received August 29, 1997]

**B.4.** The capacity factor shall be limited to 33% based on a weighted 12-month rolling average sulfur content of 0.30 %. However, if the weighted rolling average sulfur content of the fuel oil is less than 0.30%, the capacity factor may be adjusted using the following table:

<u>Percent Average Sulfur Content</u>	<u>% Capacity Factor</u>	<u>Cumulative Hours/Year for any four CT</u>
0.30 - 0.295	33	11,564 (based on an average of 2891 hr/CT/yr)
0.29 - 0.285	34.4	12,056 (based on an average of 3014 hr/CT/yr)
0.28 - 0.275	35.8	12,544 (based on an average of 3136 hr/CT/yr)
0.27 - 0.265	37.2	13,036 (based on an average of 3259 hr/CT/yr)
0.26 - or less	38.7	13,560 (based on an average of 3390 hr/CT/yr)

[AC64-191015]

**B.5. Hours of Operation.** The cumulative hours of operation for any CT combination shall not exceed 13,560 hours/year, 12-month rolling average, at 38.7% capacity factor.

**See specific Condition B.4.**

[Rules 62-210.200(PTE) and 62-4.160(2), F.A.C.]

#### **Emission Limitations and Standards**

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit. }

**B.6.** All emission limits in **Specific Conditions B.7.** through **B.14.** are based on operation at 59 °F and 15% O<sub>2</sub>.

[AC64-191015]

**B.7. Nitrogen Oxides.** NO<sub>x</sub> emissions shall not exceed:

- a. 42 ppmvd @ 15% O<sub>2</sub> (182 lb/hr/unit and 1,234 TPY, 12-month rolling average, for all 4 CTs), new No. 2 fuel oil.
- b. 25 ppmvd @ 15% O<sub>2</sub> (107 lb/hr/unit and 726 TPY, 12-month rolling average, for all 4 CTs), natural gas.

[AC64-191015 and BACT Determination dated October 16, 1991]

**B.8. Sulfur Dioxide.** The new No. 2 fuel oil's sulfur content by weight shall not exceed 0.30 percent average, based upon a weighted 12 month rolling average, and 0.5 percent maximum (555 lb/hr/unit and 1,925 TPY, 12-month rolling average, for all 4 CTs).  
[AC64-191015 and BACT Determination dated October 16, 1991]

**B.9. Sulfur Dioxide.** The sulfur content of the natural gas shall not exceed 0.8 percent by weight.  
[40 CFR 60.333(b)]

**B.10. Particulate Matter.** PM/PM<sub>10</sub> emissions shall not exceed 0.015 lb/MMBtu (15.0 lb/hr/unit and 102 TPY, 12-month rolling average, for all 4 CTs).  
[AC64-191015 and BACT Determination dated October 16, 1991]

**B.11. Volatile Organic Compound.** VOC emissions shall not exceed 5 lb/hr/unit and 34 TPY, 12-month rolling average, for all 4 CTs.  
[AC64-191015 and BACT Determination dated October 16, 1991]

**B.12. Carbon Monoxide.** CO emissions shall not exceed 54 lb/hr/unit and 365 TPY, 12-month rolling average, for all 4 CTs.  
[AC64-191015 and BACT Determination dated October 16, 1991]

**B.13. Sulfuric Acid Mist.** The sulfur content by weight shall not exceed 0.30 percent, based upon a weighted 12-month rolling average, and 0.5 percent maximum (69 lb/hr/unit and 469 TPY, 12-month rolling average, for all 4 CTs).  
[AC64-191015 and BACT Determination dated October 16, 1991]

**B.14. Visible Emissions.** Visible emissions shall not exceed 20 percent opacity except at full load, in which case visible emissions shall not exceed 10 percent opacity.  
[AC64-191015]

### **Test Methods and Procedures**

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit. }

**B.15.** As required by this permit, compliance tests shall be conducted on an annual basis for parameters in **Specific Conditions B.16.** through **B.23.** on or within 60 days prior to July 15.  
[AO64-233544]

**B.16. Nitrogen Oxides.** The test method for NO<sub>x</sub> emissions shall be EPA Method 20. [AC64-191015]

**B.17. Sulfur Dioxide.** The owner or operator shall determine compliance with the sulfur content standard in **Specific Conditions B.8. and B.9.** as follows: Fuel analysis as specified in ASTM D 2880-94, or the latest edition, shall be used to determine the sulfur content of liquid fuels and ASTM D 1072-80, D 3031-81, D 4084-82, D 3246-81, or the latest edition, 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. [AC64-191015 and 40 CFR 60.335(d)]

**B.18. Particulate Matter.** The test method for PM/PM<sub>10</sub> shall be EPA Method 5 or Method 17. [AC64-191015]

**B.19.** A one hour opacity test for each CT with opacity values no greater than 10%, may serve as the annual particulate test. If however, opacity values are over 10% and less than 20%, then a Method 5 or Method 17 particulate test must be conducted on one CT to prove compliance with the particulate standard. The CT chosen for the Method 5 or Method 17 test, must be the one that exceeded the 10% opacity limit by the greatest amount. [AO64-233544]

**B.20. Volatile Organic Compounds.** The test method for VOC shall be EPA Method 25A. Testing is not required if compliance with CO limit is shown. [AC64-191015]

**B.21. Carbon Monoxide.** The test method for CO shall be EPA Method 10. [AC64-191015]

**B.22. Visible Emissions.** The test method for visible emissions shall be EPA Method 9. [AC64-191015]

**B.23. Sulfuric Acid Mist.** The test method for sulfuric acid mist shall be EPA Method 8 or fuel analysis as specified in ASTM D 2880-94 or the latest edition. [AC64-191015 and 40 CFR 60.335(d)]



**B.24.** 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)]

**B.25.** Compliance with standards in 40 CFR 60, other than opacity, shall be determined only by performance tests established by 40 CFR 60.8, unless otherwise specified in the applicable standard.

[40 CFR 60.11(a)]

**B.26.** 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 operation and maintenance procedures, and inspection of the source.

[40 CFR 60.11(d)]

**B.27. Circumvention.** 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]

**B.28.** To compute the nitrogen oxides emissions, the owner or operator shall use analytical methods and procedures that are accurate to within 5 percent and are approved by the Administrator to determine the nitrogen content of the fuel being fired.

[40 CFR 60.335(a)]

**B.29.** 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

40 CFR 60 or other methods and procedures as specified in this permit, except as provided for in 40 CFR 60.8(b). Acceptable alternative methods and procedures are given in paragraph 40 CFR 60.335(f).  
[40 CFR 60.335(b)]

**B.30.** To meet the requirements of 40 CFR 60.334(b), the owner or operator shall use the methods specified in 40 CFR 60.335(a) and 40 CFR 60.335(d) of 40 CFR 60.335 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.  
[40 CFR 60.335(e)]

**B.31. Required Number of Test Runs.** For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five day period allowed for the test, the Secretary or his or her designee may accept the results of the two complete runs as proof of compliance, provided that the arithmetic mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.  
[Rule 62-297.310(1), F.A.C.]

**B.32. Calculation of Emission Rate.** The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule.  
[Rule 62-297.310(3), F.A.C.]

**B.33. 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. When EPA Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

a. For batch, cyclical processes, or other operations which are normally completed within less than the minimum observation period and do not recur within that time, the period of observation shall be equal to the duration of the batch cycle or operation completion time.

b. The observation period for special opacity tests that are conducted to provide data to establish a surrogate standard pursuant to Rule 62-297.310(5)(k), F.A.C., Waiver of Compliance Test Requirements, shall be established as necessary to properly establish the relationship between a proposed surrogate standard and an existing mass emission limiting standard.

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

(b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.

(c) Required Flow Rate Range. For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.

(d) Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, attached.

(e) Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube.

[Rule 62-297.310(4), F.A.C.]

#### B.34. Determination of Process Variables.

(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight 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.]

**B.35.** The permittee shall comply with the requirements contained in APPENDIX SS-1, Stack Sampling Facilities, attached to this permit.  
[Rule 62-297.310(6), F.A.C.]

**B.36. Frequency of Compliance Tests.** The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

a. Did not operate; or

b. In the case of a fuel burning emissions unit, burned liquid and/or solid fuel for a total of no more than 400 hours.

4. During each federal fiscal year (October 1 -- September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

a. Visible emissions;

b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and

10. An annual compliance test conducted for visible emissions shall not be required for units exempted from permitting at Rule 62-210.300(3)(a), F.A.C., or units permitted under the General Permit provisions at Rule 62-210.300(4), F.A.C.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may

require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C. and SIP approved]

### Monitoring of Operations

**B.37.** The owner or operator of any stationary gas turbine subject to the provisions of 40 CFR 60, Subpart GG 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.

(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 40 CFR 60.334(b).

[40 CFR 60.334(b)(1) and (2)]

**B.38.** The permittee shall monitor sulfur content and nitrogen content of the new No. 2 fuel oil and sulfur content of natural gas. These values may be provided by the vendor and the sulfur content, for compliance purposes, shall be based on a weighted 12 month rolling average from fuel delivery receipts. The frequency of determinations of these values shall be as follows:

#### A. New No. 2 Fuel Oil

The values, sulfur and nitrogen content, shall be determined on each occasion that fuel is transferred to the storage tanks from any other source. The sulfur content of the fuel oil shall be based on a weighted 12 month rolling average and shall not exceed 0.3%. The

maximum weighted sulfur content of the fuel oil shall not exceed 0.5% at any time. Records of these values shall be kept by the facility for a five year period for regulatory agency inspection purposes.

B. Natural Gas

Pursuant to 40 CFR 60.344(b)(2), a custom fuel monitoring schedule for the determination of these values shall be followed for the natural gas fired at this facility and shall be as follows:

Custom Fuel Monitoring Schedule for Natural Gas

1. Monitoring of fuel nitrogen content shall not be required when firing natural gas.
2. Sulfur Monitoring:
  - a. Analysis for fuel sulfur content of the natural gas shall be conducted using one of the approved ASTM reference methods for the measurement of sulfur in gaseous fuels, or an approved alternative method. The reference methods are ASTM D1072-80; ASTM D3031-81; ASTM D3246-81; and ASTM D4084-82, or the latest edition of the above ASTM methods as referenced in 40 CFR 60.335(d).
  - b. This custom fuel monitoring schedule became effective on October 25, 1997. Sulfur monitoring shall be conducted twice monthly for six months. If this monitoring shows little variability in the fuel sulfur content, and indicates consistent compliance with 40 CFR 60.333 and the conditions of this permit, then sulfur monitoring shall be conducted once per quarter for six quarters. If monitoring data is provided by the applicant which demonstrates consistent compliance with the requirements herein the applicant may begin monitoring as per the requirements of 2.c.
  - c. If after the monitoring required in item 2.b. above, or herein, the sulfur content of the fuel shows little variability and, calculated as sulfur dioxide, represents consistent compliance with the sulfur dioxide emission limits specified under 40 CFR 60.333 and the conditions of this permit, sample analysis shall be conducted twice per annum. This monitoring shall be conducted during the first and third quarter of each calendar year.
  - d. Should any sulfur analysis as required in items 2.b. or 2.c. above indicate noncompliance with 40 CFR 60.333 and the conditions of this permit, the owner or operator shall notify the Department of such excess emissions and the

custom schedule shall be re-examined by the Environmental Protection Agency. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.

3. If there is a change in fuel supply, the owner or operator must notify the Department of such change for re-examination of this custom schedule. A substantial change in fuel quality shall be considered as a change in fuel supply. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.

4. Records of samples analysis and fuel supply pertinent to this custom schedule shall be retained for a period of five years, and be available for inspection by personnel of federal, state, and local air pollution control agencies.

[Rule 62-4.070(3), F.A.C., AC64-191015(B) and EPA's October 25, 1997 approval letter]

#### **Continuous Monitoring Requirements**

**B.39.** The 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)]

**B.40.** The owner or operator of any stationary gas turbine subject to the provisions of 40 CFR 60, Subpart GG and using water injection to control NO<sub>x</sub> emissions shall install and operate a continuous monitoring system to monitor and record the fuel consumption and the ratio of water to fuel being fired in the turbine. This system shall be accurate to within  $\pm 5.0$  percent and shall be approved by the Administrator.

[40 CFR 60.334(a)]

#### **Recordkeeping and Reporting Requirements**

**B.41.** For the purpose of reports required under 40 CFR 60.7(c), periods of excess emissions that shall be reported are defined as follows:

a. *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 the permitted nitrogen oxide standard by the initial performance test required in 40 CFR 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 initial performance test. 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).

[Rule 62-204.800, F.A.C.; 40 CFR 60.334(c)(1)]

**B.42.** The permittee 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)]

**B.43.** 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.

[40 CFR 60.7(d)(1) and (2)]

**B.44.** (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)]

**B.45.** The permittee shall maintain a file of all measurements, including continuous monitoring systems, 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; all other information required by this part recorded in a permanent form suitable for inspection. The file shall be retained for at least two years following the date of such measurements, maintenance, reports, and records.

[40 CFR 60.7(f)]

**B.46.** This emissions unit is also subject to conditions contained in **Subsection C. Common Conditions.**

**Subsection C. Common Conditions.**

**E.U.**

<b><u>ID No.</u></b>	<b><u>Brief Description</u></b>
-003	Peaking Combustion Turbine Unit No. 1
-005	Peaking Combustion Turbine Unit No. 2
-007	Peaking Combustion Turbine Unit No. 3
-009	Peaking Combustion Turbine Unit No. 4
-011	Peaking Combustion Turbine Unit No. 5
-013	Peaking Combustion Turbine Unit No. 6
-015	Combustion Turbine Unit No. 7
-016	Combustion Turbine Unit No. 8
-017	Combustion Turbine Unit No. 9
-018	Combustion Turbine Unit No. 10

**The following specific conditions apply to the emissions units listed above:**

**Excess Emissions**

**C.1.** Excess emissions resulting from startup, shutdown, or 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.]

**C.2.** 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.]

**Test Methods and Procedures**

**C.3.** Testing of emissions shall be conducted with the source operating at permitted capacity. Permitted capacity is defined as 95 - 100 percent of the manufacturer's rated heat input achievable for the average ambient (or conditioned) air temperature during the test. If it is impracticable to test at capacity, then sources may be tested at less than capacity. In such cases, the entire heat input vs. inlet temperature curve will be adjusted by the increment equal to the difference between the design heat input value and 105 percent of the value reached during the test. Data, curves, and calculations necessary to demonstrate the heat input rate correction at both design and test conditions shall be submitted to the Department with the compliance test report. [Rule 62-297.310(2), F.A.C. and AC64-191015(B)]

**Recordkeeping and Reporting Requirements**

**C.4.** In case of excess emissions resulting from malfunctions, Florida Power Corporation shall notify the Department's Central District Office in accordance with 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.]

**C.5.** The owner or operator shall notify the Central District Office of the Department, in writing, at least 15 days prior to the date on which each test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.  
[Rule 62-297.310(7)(a)9., F.A.C.]

**C.6. Test Reports.**

(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.

(b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.

(c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

1. The type, location, and designation of the emissions unit tested.
2. The facility at which the emissions unit is located.
3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are

authorized in this chapter, indicate which option was used.

10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rule 62-297.310(8), F.A.C.]

**C.7. Recordkeeping for periodic monitoring.** The owner or operator is required to maintain monthly logs of all 12-month rolling averages.

[Rule 62-213.440, F.A.C.]

**Section IV. This section is the Acid Rain Part.**

**Operated by:** Florida Power Corporation  
**ORIS code:** 6046

**Subsection A. This subsection addresses Acid Rain, Phase II.**

The emissions units listed below are regulated under Acid Rain, Phase II.

<u>E.U. ID No.</u>	<u>Brief Description</u>
-015	Combustion Turbine Unit No. 7
-016	Combustion Turbine Unit No. 8
-017	Combustion Turbine Unit No. 9
-018	Combustion Turbine Unit No. 10

**A.1.** The Phase II permit application(s) submitted for this facility, as approved by the Department, is a part of this permit. The owners and operators of these Phase II acid rain unit(s) must comply with the standard requirements and special provisions set forth in the application(s) listed below:

- a. DEP Form No. 62-210.900(1)(a), dated 07/01/95;  
 [Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

**A.2.** Sulfur dioxide (SO<sub>2</sub>) allowance allocations requirements for each Acid Rain unit is as follows:

<u>E.U. ID No.</u>	<u>EPA ID</u>	<u>Year</u>	<u>2000</u>	<u>2001</u>	<u>2002</u>	<u>2003</u>
-015	01	SO <sub>2</sub> allowances, under Table 2 or 3 of 40 CFR Part 73	699*	699*	699*	699*
-016	02	SO <sub>2</sub> allowances, under Table 2 or 3 of 40 CFR Part 73	699*	699*	699*	699*
-017	03	SO <sub>2</sub> allowances, under Table 2 or 3 of 40 CFR Part 73	699*	699*	699*	699*
-018	04	SO <sub>2</sub> allowances, under Table 2 or 3 of 40 CFR Part 73	699*	699*	699*	699*

\*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 or 3 of 40 CFR 73.

**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 requirement of the Act.

1. 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 62-213.400(3), F.A.C.:

2. No limit shall be placed on the number of allowances held by the source under the Federal Acid Rain Program.

3. 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, Fast-Track Revisions of Acid Rain Parts.

[Rule 62-213.413, F.A.C.]

**A.5. Comments, notes, and justifications:** None

## ELECTRONIC TRANSMISSION

Date: November 18, 1998

To: Scott Sheplak, FDEP - Tallahassee

From: Gracy R. Danois, EPA Region 4

Subject: Initial Comments on Proposed Title V Permit  
Florida Power Corporation - DeBary Facility  
Permit no. 1270028-001-AV

Below are initial comments from EPA Region 4 on the above referenced source. Our comments are divided into two categories: 1) Significant Comments and 2) General Comments. Significant comments are defined as those comments that would trigger an objection under 40 CFR Part 70. Given that EPA has several significant comments on this proposed permit, we would like to attempt resolution of all issues in order to avoid a formal objection on this permit. If resolution of our significant comments is not achieved, EPA Region 4 will issue an objection to the proposed permit pursuant to 40 CFR 70.8(c) on or before day-45 of the review period. For purposes of this permit review, day-45 is defined as December 2, 1998.

Another option available to you is withdrawal of the proposed permit from EPA review. If you choose to utilize this option, you must submit to EPA a written request that the permit be withdrawn including a statement that a proposed permit will be resubmitted for EPA review at a later date. Your written request to withdraw the proposed permit must be submitted to our office by no later than December 2, 1998.

1) Significant Comments

a. Periodic Monitoring: The permit does not require sufficient periodic monitoring to ensure compliance with the applicable opacity standard. The permit for FPC-DeBary only requires an annual one hour Method 9 visible emissions reading. In most cases, this does not constitute adequate periodic monitoring to ensure continuous compliance with the opacity standard. We recommend that the source be required to conduct visible emissions observations on a daily basis when burning fuel oil, or that a technical demonstration is included in the statement of basis explaining why the State has chosen not to require any additional visible emissions testing.

b. Periodic Monitoring: The permit does not require sufficient periodic monitoring to ensure compliance with the applicable SO<sub>2</sub>, PM/PM<sub>10</sub>, CO, and VOC, limits in Section III, subsection B. The FPC- DeBary permit only requires testing once every year for these pollutants. This monitoring scheme does not appear to constitute adequate periodic monitoring to ensure compliance with the limits contained in the permit. In order for infrequent testing to be approved as the periodic monitoring method for this facility, the State needs to provide a technical demonstration that no additional monitoring is warranted to ensure compliance with the limits listed above. The demonstration should identify the rationale for basing the compliance certification on data from a short-term test performed once a year. If it is determined that additional monitoring is necessary to ensure compliance with the permit conditions, more frequent testing requirements need to be included in the permit.



c. Periodic Monitoring: Section III, subsection B, condition B.19 establishes that a one hour opacity test with values no greater than 10%, may serve as the annual particulate test. In order for this to be approved as periodic monitoring for PM, the permit or the statement of basis needs to contain a technical demonstration of the correlation between these two parameters and the methodology that the source will follow to assess compliance with the particulate matter standard in this permit.

d. Missing Applicable Requirement: Section III, subsection B, condition B.8, does not appear to ensure compliance with 40 CFR § 60.333(a). The permit needs to include the requirements contained in 40 CFR § 60.333(a), or the statement of basis needs to include an explanation of why this portion of the regulations do not apply to this facility.

e. Credible Evidence: Section III, subsection B, condition B.25, appear to limit the type of information that may be used to evaluate the compliance status of this facility. The source should be aware that any credible evidence may be used to ensure compliance and for enforcement associated with the title V permit. Although the intent of this provision is to specify the applicable test methods to be used, it could be misconstrued to be the exclusive means of determining compliance with the applicable emission limits. As EPA has previously explained, the reference test methods are to be used as test methods of reference against which other data will be measured. Thus, the reference test methods will be used as the standard for determining credibility and precision of other emissions data and measurements, but not as the sole means of determining compliance. In an effort to clarify that such permit conditions are not meant to limit the use of any credible evidence, we have recently suggested that States consider including the following in their statement of basis:

"This permit contains provisions which require specific test methods or procedures be used as a demonstration of compliance with permit limits, but are not intended as the only means of demonstrating or certifying compliance with permit limits. No provision in this permit precludes the use of any credible evidence for compliance and enforcement purposes."

## 2) General Comments

a. Section III, subsection B, condition B.4: Please add the appropriate regulatory citation to this condition. If the condition stems from the BACT determination, the date of the determination should also be cited.

b. Section III, subsection B, condition B.7: If this condition also assures compliance with 40 CFR § 60.332, the appropriate citation needs to be added to the condition.

*Pelony*



**RECEIVED**

OCT 15 1998

**BUREAU OF  
AIR REGULATION**

October 12, 1998

Mr. Scott Sheplak, P.E.  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
2600 Blair Stone Rd.  
Tallahassee, Florida 32399-2400

Dear Mr. Sheplak:

Re: Status of Title V Permits

As you know, a meeting was held on August 28, 1998 between the Department and Mr. Scott Osbourn of my staff. The purpose of the meeting was to resolve several pending Title V issues in order to advance these permits to the "proposed" stage as expeditiously as possible. Based upon the meeting, the following is a brief summary of FPC's understanding and position regarding the status of several of FPC's Title V permits.

1. **Bartow facility** (DRAFT Title V Permit No. 1030011-002-AV)

FPC received the Intent to Issue Title V Air Operation Permit and draft Title V permit for the Bartow facility on October 6, 1997. Following several extensions of time and discussions with the Department, FPC filed a Petition for Administrative Hearing on April 30, 1998 (Petition). The primary issue involved in this Petition is whether FPC is required to retain an electrostatic precipitator (ESP) associated with Unit 1, although there are numerous other less contentious permit issues that also require resolution.

As detailed in FPC's November 11, 1997 comment letter and FPC's Petition filed April 30, 1998, FPC maintains that there is no factual or legal basis to require FPC to retain and operate the electrostatic precipitator (ESP) associated with Bartow Unit 1. However, in an effort to move the Title V permitting process forward, FPC is willing to accept a permit that requires that the ESP be retained and used. In exchange for accepting such a requirement, FPC requests the inclusion of additional permit language to clarify this unique situation. Specifically, the ESP utilized at the Bartow facility was not designed to be operated during fuel oil firing (i.e., the ESP was designed based on the use of a coal/oil mixture (COM) fuel). The ESP is also reaching the end of its anticipated design life. Therefore, significant capital investment will be required to continue its operation. Also, because this unit is oil-fired, the ESP is not needed to assure compliance with the applicable particulate matter limits. FPC requests that the statement of basis for the Bartow Title V

## DeBary Operating Hours

Author: Wilson B. Hicks Jr. at east/o=FLORIDA POWER/c=US/a=MCI/p=FLPROG  
Date: 8/31/98 12:08 PM  
Priority: Normal  
Receipt Requested  
TO: Scott H. Osbourn at goc,openmail  
Subject: DEBARY P7-P10 1997 AND 1998 OPERATING HOURS

----- Message Contents -----

SCOTT:

PER YOUR REQUEST, HERE ARE THE HOURS:

YEAR	1997	1998
P-7	1817	1453
P-8	870	673
P-9	1722	1393
P-10	822	676

IF YOU NEED ANY ADDITIONAL INFORMATION, PLEASE, LET ME KNOW.

WILSON

## Heat Input Correspondence



bcc: J. M. Kennedy  
J. L. Tillman

File: Title V Periodic Monitoring  
K:\user\sosbourn\1998\heatnpu.doc  
927-616000-AIR

August 27, 1998

Mr. Clair Fancy, P.E.  
Chief, Bureau of Air Regulation  
Florida Department of Environmental Protection  
2600 Blair Stone Rd.  
Tallahassee, Florida 32399-2400

Dear Mr. Fancy:

Re: Periodic Monitoring in Title V Permits: Heat Input Limits

As you know, a meeting was held between the EPA, the Department and utility representatives at the Florida Electric Power Coordinating Group (FPC) offices on July 14, 1998. The purpose of the meeting was to discuss the periodic monitoring requirements of 40 CFR 70.6(a)(3)(i) as applied to Title V permits. The meeting presented an opportunity for all parties to represent their views, and it was clear that there remains considerable disagreement as to the proper application of the periodic monitoring guidance.

In addition to the July 14, 1998 meeting, FPC has also reviewed DEP's March 10, 1998 letter to EPA (Re: Proposed Changes to FPL Proposed Title V Permits to Satisfy EPA Objections). FPC has still not formalized its position on periodic monitoring, including all of the issues raised in the March 10, 1998 letter. However, the resolution outlined in the March 10th letter regarding heat input limitations appears to be reasonable and one that FPC is willing to accept. This resolution required adding a note to the "permitted capacity" condition for each Title V permit, and an explanation that regular record keeping is not required for heat input. Specifically, the Department stated that they would add the following language to the statement of basis:

The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emissions limits and to aid in determining future rule applicability. A note below the permitted capacity condition clarifies this. Regular record keeping is not required for heat input. Instead, the owner or operator is expected to determine heat input whenever emission testing is required, to demonstrate at what percentage of the rated capacity that the unit was tested. Rule 62-297.310(5), F.A.C., included in the permit, requires measurement of process variables for emissions tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop

measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate average hourly heat input during the test.

Also, the Department added the following language to each permit condition titled Permitted Capacity:

{Permitting note: The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability.}

Accordingly, FPC requests that this language regarding heat input be added to all of FPC's Title V permits currently being processed by the Department. FPC intends to notify the Department as soon as possible after formalizing its position on the remainder of periodic monitoring issues. If you should have any questions concerning the above, please do not hesitate to contact me at (727) 826-4258.

Sincerely,



Scott H. Osbourn  
Senior Environmental Engineer

cc: Robert Manning, HGS&S

# INTEROFFICE MEMORANDUM

**Sensitivity:** COMPANY CONFIDENTIAL

**Date:** 21-Oct-1998 04:44pm  
**From:** Mary Fillingim TAL  
FILLINGIM\_M  
**Dept:** Air Resources Management  
**Tel No:** 850/488-0114

**To:** See Below  
**Subject:** Updated Proposed Permit Posting #1270028

There is a Proposed Permit posted on Florida's website.

1270028001AV  
FPC-DEBARY PLANT

Proposed

If you have any questions, please feel free to contact me.

Thanks, \_Mary

## Distribution:

<b>To:</b> adams yolanda	( adams.yolanda@epamail.epa.gov@in )
<b>To:</b> pierce carla	( pierce.carla@epamail.epa.gov@in )
<b>To:</b> Barbara Boutwell TAL	( BOUTWELL_B )
<b>To:</b> Scott Sheplak TAL	( SHEPLAK_S )
<b>To:</b> Terry Knowles TAL	( KNOWLES_T )
<b>To:</b> danois gracy	( danois.gracy@epamail.epa.gov@in )
<b>To:</b> Elizabeth Walker TAL	( WALKER_E )
<b>CC:</b> Lennon Anderson TAL	( ANDERSON_L )



# INTEROFFICE MEMORANDUM

**Sensitivity:** COMPANY CONFIDENTIAL

**Date:** 09-Oct-1998 07:50am  
**From:** Mary Fillingim TAL  
FILLINGIM\_M  
**Dept:** Air Resources Management  
**Tel No:** 850/488-0114

**To:** See Below  
**Subject:** New Posting #1270028

There is a new posting on Florida's website.

1270028001AV  
FPC-DEBARY PLANT

Proposed

The notification letter is encoded and attached. If you have any questions, please feel free to contact me.

Thanks,  
Mary

## Distribution:

<b>To:</b>	adams yolanda	( adams.yolanda@epamail.epa.gov@in )
<b>To:</b>	pierce carla	( pierce.carla@epamail.epa.gov@in )
<b>To:</b>	Barbara Boutwell TAL	( BOUTWELL_B )
<b>To:</b>	Scott Sheplak TAL	( SHEPLAK_S )
<b>To:</b>	Terry Knowles TAL	( KNOWLES_T )
<b>To:</b>	danois gracy	( danois.gracy@epamail.epa.gov@in )
<b>To:</b>	Elizabeth Walker TAL	( WALKER_E )
<b>CC:</b>	Lennon Anderson TAL	( ANDERSON_L )

## STATEMENT OF BASIS

Florida Power Corporation  
DeBary Facility  
**Facility ID No.:** 1270028  
Volusia County

Initial Title V Air Operation Permit  
**PROPOSED Permit No.:** 1270028-001-AV

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. 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.

This facility consists of six peaking combustion turbines which are fired with new No. 6 or new No. 2 fuel oil and four combustion turbines which are fired with new No. 2 fuel oil and/or natural gas.

The latter four combustion turbines (P7, P8, P9, P10) are each 92.9 megawatt simple cycle units manufactured by General Electric (Model PG7111EA). The units are fired with natural gas and/or new No. 2 fuel oil containing an average of 0.3 percent (%) sulfur. Annual hours of operation are limited to an equivalent of 3,390 or less based on a sliding scale related to the fuel sulfur content. Control measures and equipment consists of firing relatively clean fuel, good combustion practices, and water injection. These emissions units began commercial operation on November 1, 1992.

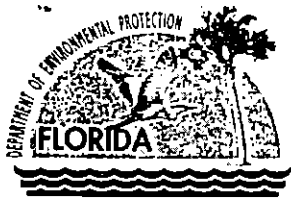
Each of the six peaking combustion turbines is a General Electric, Model MS 7000. The output is rated at 51,900 kW. New No. 2 or new No. 6 fuel oil is allowed to be fired, with the sulfur content not to exceed 0.5% and 0.7 % by weight, respectively. Commercial operation began on February 6, 1976; March 20, 1976; December 31, 1975; April 14, 1976; December 22, 1975; and April 30, 1975, respectively for PCT Units 1 through 6.

Also included in this permit are miscellaneous insignificant emissions units and/or activities.

Based on the initial Title V permit application received June 14, 1996, this facility is a major source of hazardous air pollutants (HAPs).

The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100

percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emissions limits and to aid in determining future rule applicability. A note below the permitted capacity condition clarifies this. Regular record keeping is not required for heat input. Instead, the owner or operator is expected to determine heat input whenever emission testing is required, to demonstrate at what percentage of the rated capacity that the unit was tested. Rule 62-297.310(5), F.A.C., included in the permit, requires measurement of process variables for emission tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate average hourly heat input during the test.



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

October 2, 1998

Mr. W. Jeffery Pardue, C.E.P.  
Director of Environmental Services Department  
Florida Power Corporation  
3201 34th Street South  
St. Petersburg, FL 33711

Re: PROPOSED Title V Permit No.: 1270028-001-AV  
DeBary Facility

Dear Mr. Pardue:

One copy of the "PROPOSED PERMIT DETERMINATION" for the DeBary Facility located at 788 West Highbanks Road, DeBary, Volusia County, is enclosed. This letter is only a courtesy to inform you that the DRAFT permit has become a PROPOSED permit. Also, included are changes to Title V permits issued prior to 12/02/97.

An electronic version of this determination has been posted on the Division of Air Resources Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is <http://www2.dep.state.fl.us/air>.

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the PROPOSED permit is made by the USEPA within 45 days, the PROPOSED permit will become a FINAL permit no later than 55 days after the date on which the PROPOSED permit was mailed (posted) to USEPA. If USEPA has an objection to the PROPOSED permit, the FINAL permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you should have any questions, please contact Lennon Anderson at 850/921-9588.

Sincerely,

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

CHF/a

Enclosures

copy furnished to:

Kennard Kosky, P.E., GA

Scott H. Osbourn, FPC

Len Kozlov, CD

Ms. Gracy Danois, USEPA, Region 4 (INTERNET E-mail Memorandum)

Ms. Carla E. Pierce, USEPA, Region 4 (INTERNET E-mail Memorandum)

10/14/98 cc = Lennon Anderson  
Reading File

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

## **PROPOSED PERMIT DETERMINATION**

PROPOSED Permit No.: 1270028-001-AV

Page 1 of 1

### **I. Public Notice.**

An "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" to Florida Power Corporation for the DeBary Facility located at 788 West Highbanks Road, DeBary, Volusia County was clerked on July 25, 1997. The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was published in the DeLand/West Volusia Beacon on August 20, 1997. The DRAFT Title V Air Operation Permit was available for public inspection at the Central District in Orlando and the permitting authority's office in Tallahassee. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" was received on September 10, 1997.

### **II. Public Comments.**

Comments were received and the DRAFT Title V Operation Permit was changed. The comments were not considered significant enough to reissue the DRAFT Title V Permit and require another Public Notice. Comments were received from one respondent during the 30 (thirty) day public comment period.

A. Letter from Mr. Scott Osbourn dated August 20, 1997, and received on August 20, 1997.

#### **B. Document on file with the permitting authority:**

-Letter received August 20, 1997, from Mr. Scott Osbourn.

### **III. Conclusion.**

The permitting authority hereby issues the PROPOSED Permit No.: 1270028-001-AV, with any changes noted above.

## CHANGES TO TITLE V PERMITS ISSUED PRIOR TO 8/8/97

Due to recent comments from Region 4, U.S. EPA, the Department agreed to make the following changes:

1. Citings of Rule 62-297.310(7)(a)10., F.A.C., will be deleted since no emissions units are exempt from permitting at a Title V source and the condition is only a statement referring the reader back to Rule 62-210.300(3)(a), F.A.C., which states the same.
2. In the citations to Rule 297.310(7)(b), F.A.C., the word "shall" was changed to "may" because of what has been approved in the SIP. The citing will also contain the qualifier "SIP approved".
3. The addresses and appropriate particulars were added for the compliance office and the U.S. EPA, Region 4 office in Section II. Facility-wide Conditions.
4. In Appendix TV-1:
  - a. Condition No. 11 has been flagged as "Not federally enforceable."
  - b. Condition No. 55 was deleted due to duplicity with condition No. 17; and, the subsequent conditions have been renumbered.
  - c. Condition No. 54 has been flagged as "Not federally enforceable."
  - d. Condition No. 56 (now No. 55) has been edited and the citing has a flag of "(Chapter 62-281, F.A.C., is not federally enforceable)".
  - e. Condition No. 57 (now No. 56) has been flagged as "Not federally enforceable until SIP approved."
5. In Section II. Facility-wide conditions., a condition was created to define the effective date of the permit as day one for any reporting, monitoring, or recording requirements that are time-based.
6. Acid Rain Part: the following new conditions have been added to the part:
  - a. *(new)* **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 requirement of the Act.
    1. 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 62-213.400(3), F.A.C.
    2. No limit shall be placed on the number of allowances held by the source under the Federal Acid Rain Program.
    3. Allowances shall be accounted for under the Federal Acid Rain Program.  
[Rule 62-213.440(1)(c), F.A.C.]
  - b. *(new)* **A.4. Statement of Compliance.** The annual statement of compliance pursuant to Rule 62-213.440(3), F.A.C., shall be submitted within 60 (sixty) days after the end of the calendar year.  
{See condition No. 51., Appendix TV-1, Title V Conditions.}  
[Rule 62-214.420(11), F.A.C.]

In addition to the above, the following changes have been made for clarity:

1. In Section II. Facility-wide Conditions., the EPA compliance test method (**Method 9**) is stated as the method of compliance and the appropriate rule citing was added [Rule 62-296.320(4)(b)1. & 4., F.A.C.].
2. Due to the above changes made to Appendix TV-1, the version will carry the date of "08/11/97".

In conclusion, the changes that have been made are insignificant in nature and do not impose additional noticing requirements.

## **CHANGES TO TITLE V PERMITS ISSUED PRIOR TO 12/02/97**

Title V permitting formats were updated due to recent rule changes and after considering comments received from the electric utilities. This permit reflects these changes. A brief summary of the changes is below.

- 1.** Recent rule changes changed "exempt activities" to "insignificant activities." Rules 62-213.430(6), F.A.C. and 62-210, F.A.C., reflecting this change went into effect November 13, 1997.
  - a.** The department inserted a condition in Appendix TV-1 clarifying that a Title V source can add an "insignificant activity" at its facility in accordance with the criteria under Rule 62-213.430(6), F.A.C., and include it in the Title V permit's list of "insignificant activities" at the next renewal, in accordance with Rule 62-213.430(6), F.A.C. See condition number 40.
  - b.** Appendix E-1 has been changed to Appendix I-1, and the language of this appendix was revised to refer to insignificant emissions units where appropriate.
  - c.** Appendix U-1 has been revised to refer to insignificant emissions units instead of exempt emissions units.
  
- 2.** Several changes were made to Appendix TV-1 to reflect the rule changes discussed above, and to properly identify conditions that are not federally enforceable.
  - a.** The following additional rules have been marked as "not federally enforceable":
    - 62-4.030, F.A.C., General Prohibition, (see condition number 1.)
    - 62-4.220, F.A.C., Operation Permit for New Sources, (see condition number 14.)
    - 62-210.300(5), F.A.C., Notification of Startup, (see condition number 19.)
  - b.** Appendix TV-1, now carries a version date of "12/02/97".

In conclusion, the changes that have been made are insignificant in nature and do not impose additional noticing requirements.

Florida Power Corporation  
DeBary Facility  
**Facility ID No.:** 1270028  
Volusia County

Initial Title V Air Operation Permit  
**PROPOSED Permit No.:** 1270028-001-AV

Permitting Authority:  
State of Florida  
Department of Environmental Protection  
Division of Air Resources Management  
Bureau of Air Regulation  
Title V Section

Mail Station #5505  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Telephone: 850/488-1344  
Fax: 850/922-6979

October 7, 1998

Compliance Authority  
Central District Office  
3319 Maguire Boulevard, Suite 232  
Orlando, FL 32803-3767  
Telephone: 407/894-7555  
Fax: 407/897-2966



Initial Title V Air Operation Permit  
**PROPOSED Permit No.: 1270028-001-AV**

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# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

**Permittee:**

Florida Power Corporation  
3201 34th Street South  
St. Petersburg, FL 33711

**PROPOSED Permit No.:** 1270028-001-AV

**Facility ID No.:** 1270028

**SIC Nos.:** 49

**Project:** Initial Title V Air Operation Permit

This permit is for the operation of the DeBary Facility. This facility is located at 788 West Highbanks Road, DeBary, Volusia; UTM Coordinates: Zone 17, 467.5 km East and 3197.2 km North; Latitude: 28° 54' 17" North and Longitude: 81° 19' 55" West.

**STATEMENT OF BASIS:** This Title V air operation permit 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.

**Referenced attachments made a part of this permit:**

Appendix I-1, List of Insignificant Emissions Units and/or Activities

APPENDIX TV-1, TITLE V CONDITIONS (version dated 12/02/97)

APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/07/96)

TABLE 297.310-1, CALIBRATION SCHEDULE (version dated 10/07/96)

FIGURE 1 - SUMMARY REPORT-GASEOUS AND OPACITY EXCESS EMISSION  
AND MONITORING SYSTEM PERFORMANCE REPORT (version dated 7/96)

Phase II Acid Rain Application/Compliance Plan received 12/22/95

ORDER EXTENDING PERMIT EXPIRATION DATE dated xx/xx/xx

**Effective Date:** January 1, 1999

**Renewal Application Due Date:** July 5, 2003

**Expiration Date:** December 31, 2003

---

Howard L. Rhodes, Director  
Division of Air Resources  
Management

HLR/sms/a

**Section I. Facility Information.**

**Subsection A. Facility Description.**

This facility consists of six peaking combustion turbines which are fired with new No. 6 or new No. 2 fuel oil and four combustion turbines which are fired with new No. 2 fuel oil and/or natural gas.

The latter four combustion turbines (P7, P8, P9, P10) are each 92.9 megawatt simple cycle units manufactured by General Electric (Model PG7111EA). The units are fired with natural gas and/or new No. 2 fuel oil containing an average of 0.3 percent (%) sulfur. Annual hours of operation are limited to an equivalent of 3,390 or less based on a sliding scale related to the fuel sulfur content. Control measures and equipment consists of firing relatively clean fuel, good combustion practices, and water injection.

Also, included in this permit are miscellaneous insignificant emissions units and/or activities.

Based on the initial Title V permit application received June 14, 1996, this facility is a major source of hazardous air pollutants (HAPs).

**Subsection B. Summary of Emissions Unit ID Nos. and Brief Descriptions.**

**E.U.**

<b><u>ID No.</u></b>	<b><u>Brief Description</u></b>
-003	Peaking Combustion Turbine Unit No. 1
-005	Peaking Combustion Turbine Unit No. 2
-007	Peaking Combustion Turbine Unit No. 3
-009	Peaking Combustion Turbine Unit No. 4
-011	Peaking Combustion Turbine Unit No. 5
-013	Peaking Combustion Turbine Unit No. 6
-015	Combustion Turbine Unit No. 7
-016	Combustion Turbine Unit No. 8
-017	Combustion Turbine Unit No. 9
-018	Combustion Turbine Unit No. 10

*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

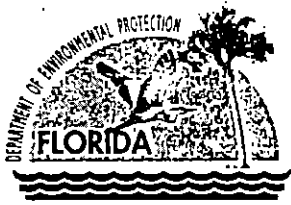
Appendix H-1, Permit History/ID Number Changes

These documents are on file with the permitting authority:

Initial Title V Permit Application received June 14, 1996.

Additional Information Request dated March 5, 1997

Additional Information Response received June 3, 1997



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

**Permittee:**  
Florida Power Corporation  
3201 34th Street South  
St. Petersburg, FL 33711

**PROPOSED Permit No.:** 1270028-001-AV  
**Facility ID No.:** 1270028  
**SIC Nos.:** 49  
**Project:** Initial Title V Air Operation Permit

This permit is for the operation of the DeBary Facility. This facility is located at 788 West Highbanks Road, DeBary, Volusia; UTM Coordinates: Zone 17, 467.5 km East and 3197.2 km North; Latitude: 28° 54' 17" North and Longitude: 81° 19' 55" West.

**STATEMENT OF BASIS:** This Title V air operation permit 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.

**Referenced attachments made a part of this permit:**

Appendix I-1, List of Insignificant Emissions Units and/or Activities  
APPENDIX TV-1, TITLE V CONDITIONS (version dated 12/02/97)  
APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/07/96)  
TABLE 297.310-1, CALIBRATION SCHEDULE (version dated 10/07/96)  
FIGURE 1 - SUMMARY REPORT-GASEOUS AND OPACITY EXCESS EMISSION  
AND MONITORING SYSTEM PERFORMANCE REPORT (version dated 7/96)  
Phase II Acid Rain Application/Compliance Plan received 12/22/95  
ORDER EXTENDING PERMIT EXPIRATION DATE dated 10/06/98

**Effective Date:** January 1, 1999  
**Renewal Application Due Date:** July 5, 2003  
**Expiration Date:** December 31, 2003

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Howard L. Rhodes, Director  
Division of Air Resources  
Management

HLR/sms/a

## Section II. Facility-wide Conditions.

### The following conditions apply facility-wide:

1. APPENDIX TV-1, TITLE V CONDITIONS, is a part of this permit.  
{Permitting note: APPENDIX TV-1, 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. **Not federally enforceable.** 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). If required by 40 CFR 68, the permittee shall submit to the implementing agency:
  - a. a risk management plan (RMP) when, and if, such requirement becomes applicable;
  - b. certification forms and/or RMPs according to the promulgated rule schedule.[40 CFR 68]
5. 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.]
6. **Not federally enforceable.** 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.]

**7. Not federally enforceable. Unconfined emissions of Particulate Matter.** No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any emissions unit whatsoever, including, but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrially related activities such as loading, unloading, storing or handling, without taking reasonable precautions to prevent such emission.

Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

- a. Paving and maintenance of roads, parking areas and yards.
- b. Landscaping or planting of vegetation.
- c. Limiting access to plant property by unnecessary vehicles.

[Rule 62-296.320(4)(c)1. & 3., F.A.C.; and, proposed by applicant in the initial Title V permit application received June 14, 1996.]

**8.** 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.]

**9. Statement of Compliance.** The annual statement of compliance pursuant to Rule 62-213.440(3), F.A.C., shall be submitted within 60 (sixty) days after the end of the calendar year. {See condition 52., APPENDIX TV-1, TITLE V CONDITIONS}  
[Rule 62-214.420(11), F.A.C.]

**10.** The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Central District Office:

Central District Office  
3319 Maguire Boulevard, Suite 232  
Orlando, FL 32803-3767  
Telephone: 407/894-7555  
Fax: 407/897-2966

**11.** 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 & EPCRA Enforcement Branch, Air Compliance Section  
61 Forsyth Street  
Atlanta, Georgia 30303  
Telephone: 404/562-9099  
Fax: 404/562-9095

**Section III. Emissions Unit and Conditions.**

**Subsection A. This section addresses the following emissions unit.**

**E.U.**

<b><u>ID No.</u></b>	<b><u>Brief Description</u></b>
-003	Peaking Combustion Turbine Unit No. 1
-005	Peaking Combustion Turbine Unit No. 2
-007	Peaking Combustion Turbine Unit No. 3
-009	Peaking Combustion Turbine Unit No. 4
-011	Peaking Combustion Turbine Unit No. 5
-013	Peaking Combustion Turbine Unit No. 6

Each of the six peaking combustion turbines (PCT) is a General Electric, Model MS 7000. The output is rated at 51,900 kW. New No. 2 or new No. 6 fuel oil is allowed to be fired, with the sulfur content not to exceed 0.5% and 0.7 % by weight, respectively. Commercial operation began on February 6, 1976; March 20, 1976; December 31, 1975; April 14, 1976; December 22, 1975; and April 30, 1975, respectively for PCT Units 1 through 6.

**The following specific conditions apply to the emissions units listed above:**

**Essential Potential to Emit (PTE) Parameters**

**A.1. Permitted Capacity.** The operation rate for each PCT shall not exceed:

- a. 640 MMBtu/hr (LHV) at 59 °F using new No. 6 fuel oil or
- b. 745 MMBtu/hr (LHV) at 59 °F using new No. 2 fuel oil.

{Permitting note: The heat input and fuel consumption can vary with ambient temperature in accordance with the design curves. The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 - 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability.}

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

**A.2. Methods of Operation - Fuels.**

- a. Startup: The only fuels allowed to be burned are new No. 2 or new No. 6 fuel oil
  - b. Normal: The only fuels allowed to be burned are new No. 2 or new No. 6 fuel oil
- New No. 2 fuel oil shall not be cofired with new No. 6 fuel oil.

[Rule 62-213.410, F.A.C.]



**A.3. Hours of Operation.** Each PCT is allowed to operate continuously, i.e., 8,760 hours/year.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

**Emission Limitations and Standards**

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

**A.4. Sulfur Dioxide.** The maximum sulfur content of the new No. 2 fuel oil shall not exceed 0.5 percent by weight.

[AO64-207447 and proposed by applicant in the initial Title V permit application received June 14, 1996]

**A.5. Sulfur Dioxide.** The maximum sulfur content of the new No. 6 fuel oil shall not exceed 0.7 percent by weight.

[AC64-2116, AC64-2117, AC64-2118, AC64-2119, AC64-2120, AC64-2121, AO64-207447 and proposed by applicant in the initial Title V permit application received June 14, 1996]

**A.6. Visible emissions.** Visible emissions from each PCT unit shall not be equal to or greater than 20 percent opacity.

[Rule 62-296.320(4)(b)1., F.A.C. and AO64-207447]

**Monitoring of Operations**

**A.7.** The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis provided by the vendor upon each fuel delivery. See **Specific Condition**

**A.9.**

[Rule 62-213.440, F.A.C.]

**A.8. Determination of Process Variables.**

(a) **Required Equipment.** The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) **Accuracy of Equipment.** Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight 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.]

### **Test Methods and Procedures**

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit. }

**A.9.** The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using either ASTM D2622-94, ASTM D4294-90(95), or both ASTM D4057-88 and ASTM D129-95 or the latest edition of the above ASTM methods.

[Rules 62-213.440 and 62-297.440, F.A.C.]

**A.10.** The test method for visible emissions shall be EPA Method 9, adopted and incorporated by reference in Rule 62-204.800, F.A.C., and referenced in Chapter 62-297, F.A.C.

[Rules 62-204.800, 62-296.320(4)(b)4.a. and 62-297.401, F.A.C.]

**A.11.** PCT Units No. 1 through 6 shall be tested in accordance with EPA Method 9 within 10 days after being placed back in operation using new No. 6 fuel oil.

[AO64-207447]

**A.12.** PCT Units No. 1 through 6 shall be tested for visible emissions annually on or within 60 days prior to April 1.

[Rule 62-297.310(7), F.A.C.]

**A.13. Opacity Compliance Tests.** When EPA Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

a. For batch, cyclical processes, or other operations which are normally completed within less than the minimum observation period and do not recur within that time, the period of observation shall be equal to the duration of the batch cycle or operation completion time.

b. The observation period for special opacity tests that are conducted to provide data to establish a surrogate standard pursuant to Rule 62-297.310(5)(k), F.A.C., Waiver of Compliance Test Requirements, shall be established as necessary to properly establish the relationship between a proposed surrogate standard and an existing mass emission limiting standard.

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

[Rule 62-297.310(4)(a)2., F.A.C.]

**A.14. (a) General Compliance Testing.**

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

a. Did not operate; or

b. In the case of a fuel burning emissions unit, burned liquid and/or solid fuel for a total of no more than 400 hours.

4. During each federal fiscal year (October 1 -- September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

a. Visible emissions;

8. Any combustion turbine that does not operate for more than 400 hours per year shall conduct a visible emissions compliance test once per each five-year period, coinciding with the term of its air operation permit.

[Rule 62-297.310(7), F.A.C.]

**A.15. These emissions units are also subject to conditions contained in **Subsection C. Common Conditions.****

**Subsection B. This section addresses the following emissions units.**

**E.U.**

<b><u>ID No.</u></b>	<b><u>Brief Description</u></b>
-015	Combustion Turbine Unit No. 7
-016	Combustion Turbine Unit No. 8
-017	Combustion Turbine Unit No. 9
-018	Combustion Turbine Unit No. 10

Each simple cycle combustion turbine (CT) is a General Electric PG7111EA model with a nameplate rating of 92.9 MW at ISO conditions. Each CT is allowed to burn new No. 2 fuel oil and/or natural gas. NOx emissions are controlled by water-injection. These emissions units began commercial operation on November 1, 1992

{Permitting notes: Each CT is regulated under Acid Rain, Phase II; NSPS - 40 CFR 60, Subpart GG, Standards of Performance for Stationary Gas Turbines, adopted and incorporated by reference in Rule 62-204.800(7), F.A.C.; NSPS 40 CFR 60 Subpart A; Rule 212.400(5), F.A.C., Prevention of Significant Deterioration (PSD); Rule 62-212.400(6), F.A.C., Best Available Control Technology (BACT) Determination, dated October 16, 1991 }

**The following specific conditions apply to the emissions units listed above:**

**Essential Potential to Emit (PTE) Parameters**

**B.1. Permitted Capacity.** The operation rate for each CT shall not exceed:

- a. 1,144 MMBtu/hr/unit (LHV) at 20 °F using new No. 2 oil or
- b. 1,159 MMBtu/hr/unit (LHV) at 20 °F using natural gas.

{Permitting note. The heat input and fuel consumption can vary with ambient temperature in accordance with the design curves. The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 - 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability. }

[Rules 62-4.160(2), 62-210.200(PTE), F.A.C. and AC64-191015(B)]

**B.2. Methods of Operation - Fuels.**

- a. Startup: The only fuels allowed to be burned are natural gas and/or new No. 2 fuel.
- b. Normal: The only fuels allowed to be burned are natural gas and/or new No. 2 fuel.

[Rule 62-213.410, F.A.C. and AC64-191015(B)]

**B.3.** The maximum fuel consumption for the 4 CTs at 59 °F shall not exceed:

- a. 106,133,333 gal/yr, 12-month rolling average.
  - b. 14,212 (million cubic feet)/yr, 12-month rolling average.
- [AC64-191015(B); proposed by applicant in the initial Title V permit application amendment received August 29, 1997]

**B.4.** The capacity factor shall be limited to 33% based on a weighted 12-month rolling average sulfur content of 0.30 %. However, if the weighted rolling average sulfur content of the fuel oil is less than 0.30%, the capacity factor may be adjusted using the following table:

<u>Percent Average Sulfur Content</u>	<u>% Capacity Factor</u>	<u>Cumulative Hours/Year for any four CT</u>
0.30 - 0.295	33	11,564 (based on an average of 2891 hr/CT/yr)
0.29 - 0.285	34.4	12,056 (based on an average of 3014 hr/CT/yr)
0.28 - 0.275	35.8	12,544 (based on an average of 3136 hr/CT/yr)
0.27 - 0.265	37.2	13,036 (based on an average of 3259 hr/CT/yr)
0.26 - or less	38.7	13,560 (based on an average of 3390 hr/CT/yr)

[AC64-191015]

**B.5. Hours of Operation.** The cumulative hours of operation for any CT combination shall not exceed 13,560 hours/year, 12-month rolling average, at 38.7% capacity factor. **See specific Condition B.4.**  
[Rules 62-210.200(PTE) and 62-4.160(2), F.A.C.]

**Emission Limitations and Standards**

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

**B.6.** All emission limits in **Specific Conditions B.7. through B.14.** are based on operation at 59 °F and 15% O<sub>2</sub>.  
[AC64-191015]

**B.7. Nitrogen Oxides.** NO<sub>x</sub> emissions shall not exceed:

- a. 42 ppmvd @ 15% O<sub>2</sub> (182 lb/hr/unit and 1,234 TPY, 12-month rolling average, for all 4 CTs), new No. 2 fuel oil.
- b. 25 ppmvd @ 15% O<sub>2</sub> (107 lb/hr/unit and 726 TPY, 12-month rolling average, for all 4 CTs), natural gas.

[AC64-191015 and BACT Determination dated October 16, 1991]

**B.8. Sulfur Dioxide.** The new No. 2 fuel oil's sulfur content by weight shall not exceed 0.30 percent average, based upon a weighted 12 month rolling average, and 0.5 percent maximum (555 lb/hr/unit and 1,925 TPY, 12-month rolling average, for all 4 CTs).  
[AC64-191015 and BACT Determination dated October 16, 1991]

**B.9. Sulfur Dioxide.** The sulfur content of the natural gas shall not exceed 0.8 percent by weight.  
[40 CFR 60.333(b)]

**B.10. Particulate Matter.** PM/PM<sub>10</sub> emissions shall not exceed 0.015 lb/MMBtu (15.0 lb/hr/unit and 102 TPY, 12-month rolling average, for all 4 CTs).  
[AC64-191015 and BACT Determination dated October 16, 1991]

**B.11. Volatile Organic Compound.** VOC emissions shall not exceed 5 lb/hr/unit and 34 TPY, 12-month rolling average, for all 4 CTs.  
[AC64-191015 and BACT Determination dated October 16, 1991]

**B.12. Carbon Monoxide.** CO emissions shall not exceed 54 lb/hr/unit and 365 TPY, 12-month rolling average, for all 4 CTs.  
[AC64-191015 and BACT Determination dated October 16, 1991]

**B.13. Sulfuric Acid Mist.** The sulfur content by weight shall not exceed 0.30 percent, based upon a weighted 12-month rolling average, and 0.5 percent maximum (69 lb/hr/unit and 469 TPY, 12-month rolling average, for all 4 CTs).  
[AC64-191015 and BACT Determination dated October 16, 1991]

**B.14. Visible Emissions.** Visible emissions shall not exceed 20 percent opacity except at full load, in which case visible emissions shall not exceed 10 percent opacity.  
[AC64-191015]

### **Test Methods and Procedures**

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

**B.15.** As required by this permit, compliance tests shall be conducted on an annual basis for parameters in **Specific Conditions B.16.** through **B.23.** on or within 60 days prior to April 1.  
[Rule 62-297.310(7), F.A.C.]

**B.16. Nitrogen Oxides.** The test method for NO<sub>x</sub> emissions shall be EPA Method 20. [AC64-191015]

**B.17. Sulfur Dioxide.** The owner or operator shall determine compliance with the sulfur content standard in **Specific Conditions B.8. and B.9.** as follows: Fuel analysis as specified in ASTM D 2880-94, or the latest edition, shall be used to determine the sulfur content of liquid fuels and ASTM D 1072-80, D 3031-81, D 4084-82, D 3246-81, or the latest edition, 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. [AC64-191015 and 40 CFR 60.335(d)]

**B.18. Particulate Matter.** The test method for PM/PM<sub>10</sub> shall be EPA Method 5 or Method 17. [AC64-191015]

**B.19.** A one hour opacity test for each CT with opacity values no greater than 10%, may serve as the annual particulate test. If however, opacity values are over 10% and less than 20%, then a Method 5 or Method 17 particulate test must be conducted on one CT to prove compliance with the particulate standard. The CT chosen for the Method 5 or Method 17 test, must be the one that exceeded the 10% opacity limit by the greatest amount. [AO64-233544]

**B.20. Volatile Organic Compounds.** The test method for VOC shall be EPA Method 25A. Testing is not required if compliance with CO limit is shown. [AC64-191015]

**B.21. Carbon Monoxide.** The test method for CO shall be EPA Method 10. [AC64-191015]

**B.22. Visible Emissions.** The test method for visible emissions shall be EPA Method 9. [AC64-191015]

**B.23. Sulfuric Acid Mist.** The test method for sulfuric acid mist shall be EPA Method 8 or fuel analysis as specified in ASTM D 2880-94 or the latest edition. [AC64-191015 and 40 CFR 60.335(d)]

**B.24.** 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)]

**B.25.** Compliance with standards in 40 CFR 60, other than opacity, shall be determined only by performance tests established by 40 CFR 60.8, unless otherwise specified in the applicable standard.

[40 CFR 60.11(a)]

**B.26.** 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 operation and maintenance procedures, and inspection of the source.

[40 CFR 60.11(d)]

**B.27. Circumvention.** 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]

**B.28.** To compute the nitrogen oxides emissions, the owner or operator shall use analytical methods and procedures that are accurate to within 5 percent and are approved by the Administrator to determine the nitrogen content of the fuel being fired.

[40 CFR 60.335(a)]

**B.29.** 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



40 CFR 60 or other methods and procedures as specified in this permit, except as provided for in 40 CFR 60.8(b). Acceptable alternative methods and procedures are given in paragraph 40 CFR 60.335(f).  
[40 CFR 60.335(b)]

**B.30.** To meet the requirements of 40 CFR 60.334(b), the owner or operator shall use the methods specified in 40 CFR 60.335(a) and 40 CFR 60.335(d) of 40 CFR 60.335 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.  
[40 CFR 60.335(e)]

**B.31. Required Number of Test Runs.** For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five day period allowed for the test, the Secretary or his or her designee may accept the results of the two complete runs as proof of compliance, provided that the arithmetic mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.  
[Rule 62-297.310(1), F.A.C.]

**B.32. Calculation of Emission Rate.** The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule.  
[Rule 62-297.310(3), F.A.C.]

**B.33. 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.** When EPA Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

a. For batch, cyclical processes, or other operations which are normally completed within less than the minimum observation period and do not recur within that time, the period of observation shall be equal to the duration of the batch cycle or operation completion time.

b. The observation period for special opacity tests that are conducted to provide data to establish a surrogate standard pursuant to Rule 62-297.310(5)(k), F.A.C., Waiver of Compliance Test Requirements, shall be established as necessary to properly establish the relationship between a proposed surrogate standard and an existing mass emission limiting standard.

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

(b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.

(c) Required Flow Rate Range. For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.

(d) Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, attached.

(e) Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube.

[Rule 62-297.310(4), F.A.C.]

**B.34. Determination of Process Variables.**

(a) **Required Equipment.** The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) **Accuracy of Equipment.** Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight 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.]

**B.35.** The permittee shall comply with the requirements contained in APPENDIX SS-1, Stack Sampling Facilities, attached to this permit.  
[Rule 62-297.310(6), F.A.C.]

**B.36. Frequency of Compliance Tests.** The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

a. Did not operate; or

b. In the case of a fuel burning emissions unit, burned liquid and/or solid fuel for a total of no more than 400 hours.

4. During each federal fiscal year (October 1 -- September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

a. Visible emissions;

b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and

10. An annual compliance test conducted for visible emissions shall not be required for units exempted from permitting at Rule 62-210.300(3)(a), F.A.C., or units permitted under the General Permit provisions at Rule 62-210.300(4), F.A.C.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may

require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.  
[Rule 62-297.310(7), F.A.C. and SIP approved]

### **Monitoring of Operations**

**B.37.** The owner or operator of any stationary gas turbine subject to the provisions of 40 CFR 60, Subpart GG 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.

(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 40 CFR 60.334(b).

[40 CFR 60.334(b)(1) and (2)]

**B.38.** The permittee shall monitor sulfur content and nitrogen content of the new No. 2 fuel oil and sulfur content of natural gas. These values may be provided by the vendor and the sulfur content, for compliance purposes, shall be based on a weighted 12 month rolling average from fuel delivery receipts. The frequency of determinations of these values shall be as follows:

#### **A. New No. 2 Fuel Oil**

The values, sulfur and nitrogen content, shall be determined on each occasion that fuel is transferred to the storage tanks from any other source. The sulfur content of the fuel oil shall be based on a weighted 12 month rolling average and shall not exceed 0.3%. The

maximum weighted sulfur content of the fuel oil shall not exceed 0.5% at any time. Records of these values shall be kept by the facility for a five year period for regulatory agency inspection purposes.

**B. Natural Gas**

Pursuant to 40 CFR 60.344(b)(2), a custom fuel monitoring schedule for the determination of these values shall be followed for the natural gas fired at this facility and shall be as follows:

Custom Fuel Monitoring Schedule for Natural Gas

1. Monitoring of fuel nitrogen content shall not be required when firing natural gas.
2. Sulfur Monitoring:
  - a. Analysis for fuel sulfur content of the natural gas shall be conducted using one of the approved ASTM reference methods for the measurement of sulfur in gaseous fuels, or an approved alternative method. The reference methods are ASTM D1072-80; ASTM D3031-81; ASTM D3246-81; and ASTM D4084-82, or the latest edition of the above ASTM methods as referenced in 40 CFR 60.335(d).
  - b. This custom fuel monitoring schedule became effective on October 25, 1997. Sulfur monitoring shall be conducted twice monthly for six months. If this monitoring shows little variability in the fuel sulfur content, and indicates consistent compliance with 40 CFR 60.333 and the conditions of this permit, then sulfur monitoring shall be conducted once per quarter for six quarters. If monitoring data is provided by the applicant which demonstrates consistent compliance with the requirements herein the applicant may begin monitoring as per the requirements of 2.c.
  - c. If after the monitoring required in item 2.b. above, or herein, the sulfur content of the fuel shows little variability and, calculated as sulfur dioxide, represents consistent compliance with the sulfur dioxide emission limits specified under 40 CFR 60.333 and the conditions of this permit, sample analysis shall be conducted twice per annum. This monitoring shall be conducted during the first and third quarter of each calendar year.
  - d. Should any sulfur analysis as required in items 2.b. or 2.c. above indicate noncompliance with 40 CFR 60.333 and the conditions of this permit, the owner or operator shall notify the Department of such excess emissions and the

custom schedule shall be re-examined by the Environmental Protection Agency. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.

3. If there is a change in fuel supply, the owner or operator must notify the Department of such change for re-examination of this custom schedule. A substantial change in fuel quality shall be considered as a change in fuel supply. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.

4. Records of samples analysis and fuel supply pertinent to this custom schedule shall be retained for a period of five years, and be available for inspection by personnel of federal, state, and local air pollution control agencies.

[Rule 62-4.070(3), F.A.C., AC64-191015(B) and EPA's October 25, 1997 approval letter]

### **Continuous Monitoring Requirements**

**B.39.** The 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)]

**B.40.** The owner or operator of any stationary gas turbine subject to the provisions of 40 CFR 60, Subpart GG and using water injection to control NO<sub>x</sub> emissions shall install and operate a continuous monitoring system to monitor and record the fuel consumption and the ratio of water to fuel being fired in the turbine. This system shall be accurate to within ±5.0 percent and shall be approved by the Administrator.

[40 CFR 60.334(a)]

#### **Recordkeeping and Reporting Requirements**

**B.41.** For the purpose of reports required under 40 CFR 60.7(c), periods of excess emissions that shall be reported are defined as follows:

a. *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 the permitted nitrogen oxide standard by the initial performance test required in 40 CFR 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 initial performance test. 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).

[Rule 62-204.800, F.A.C.; 40 CFR 60.334(c)(1)]

**B.42.** The permittee 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)]

**B.43.** 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.  
[40 CFR 60.7(d)(1) and (2)]

**B.44.** (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)]

**B.45.** The permittee shall maintain a file of all measurements, including continuous monitoring systems, 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; all other information required by this part recorded in a permanent form suitable for inspection. The file shall be retained for at least two years following the date of such measurements, maintenance, reports, and records.

[40 CFR 60.7(f)]

**B.46.** This emissions unit is also subject to conditions contained in **Subsection C. Common Conditions.**

**Subsection C. Common Conditions.**

**E.U.**

<b><u>ID No.</u></b>	<b><u>Brief Description</u></b>
-003	Peaking Combustion Turbine Unit No. 1
-005	Peaking Combustion Turbine Unit No. 2
-007	Peaking Combustion Turbine Unit No. 3
-009	Peaking Combustion Turbine Unit No. 4
-011	Peaking Combustion Turbine Unit No. 5
-013	Peaking Combustion Turbine Unit No. 6
-015	Combustion Turbine Unit No. 7
-016	Combustion Turbine Unit No. 8
-017	Combustion Turbine Unit No. 9
-018	Combustion Turbine Unit No. 10

**The following specific conditions apply to the emissions units listed above:**

**Excess Emissions**

**C.1.** Excess emissions resulting from startup, shutdown, or 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.]

**C.2.** 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.]

**Test Methods and Procedures**

**C.3.** Testing of emissions shall be conducted with the source operating at permitted capacity. Permitted capacity is defined as 95 - 100 percent of the manufacturer's rated heat input achievable for the average ambient (or conditioned) air temperature during the test. If it is impracticable to test at capacity, then sources may be tested at less than capacity. In such cases, the entire heat input vs. inlet temperature curve will be adjusted by the increment equal to the difference between the design heat input value and 105 percent of the value reached during the test. Data, curves, and calculations necessary to demonstrate the heat input rate correction at both design and test conditions shall be submitted to the Department with the compliance test report [Rule 62-297.310(2), F.A.C. and AC64-191015(B)]

**Recordkeeping and Reporting Requirements**

**C.4.** In case of excess emissions resulting from malfunctions, Florida Power Corporation shall notify the Department's Central District Office in accordance with 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.]

**C.5.** The owner or operator shall notify the Central District Office of the Department, in writing, at least 15 days prior to the date on which each test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.  
[Rule 62-297.310(7)(a)9., F.A.C.]

**C.6. Test Reports.**

(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.

(b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.

(c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

1. The type, location, and designation of the emissions unit tested.
2. The facility at which the emissions unit is located.
3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are

authorized in this chapter, indicate which option was used.

10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rule 62-297.310(8), F.A.C.]

**C.7. Recordkeeping for periodic monitoring.** The owner or operator is required to maintain monthly logs of all 12-month rolling averages.

[Rule 62-213.440, F.A.C.]

**Section IV. This section is the Acid Rain Part.**

**Operated by:** Florida Power Corporation  
**ORIS code:** 6046

**Subsection A. This subsection addresses Acid Rain, Phase II.**  
 The emissions units listed below are regulated under Acid Rain, Phase II.

<u>E.U. ID No.</u>	<u>Brief Description</u>
-015	Combustion Turbine Unit No. 7
-016	Combustion Turbine Unit No. 8
-017	Combustion Turbine Unit No. 9
-018	Combustion Turbine Unit No. 10

A.1. The Phase II permit application(s) submitted for this facility, as approved by the Department, is a part of this permit. The owners and operators of these Phase II acid rain unit(s) must comply with the standard requirements and special provisions set forth in the application(s) listed below:

- a. DEP Form No. 62-210.900(1)(a), dated 07/01/95;  
 [Chapter 62-213, F.A.C. and Rule 62-214.320, F.A.C.]

A.2. Sulfur dioxide (SO<sub>2</sub>) allowance allocations requirements for each Acid Rain unit is as follows:

<u>E.U. ID No.</u>	<u>EPA ID</u>	<u>Year</u>	<u>2000</u>	<u>2001</u>	<u>2002</u>	<u>2003</u>
-015	01	SO2 allowances, under Table 2 or 3 of 40 CFR Part 73	699*	699*	699*	699*
-016	02	SO2 allowances, under Table 2 or 3 of 40 CFR Part 73	699*	699*	699*	699*
-017	03	SO2 allowances, under Table 2 or 3 of 40 CFR Part 73	699*	699*	699*	699*
-018	04	SO2 allowances, under Table 2 or 3 of 40 CFR Part 73	699*	699*	699*	699*

\*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 or 3 of 40 CFR 73.

**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 requirement of the Act.

1. 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 62-213.400(3), F.A.C.
2. No limit shall be placed on the number of allowances held by the source under the Federal Acid Rain Program.
3. 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, Fast-Track Revisions of Acid Rain Parts.  
[Rule 62-213.413, F.A.C.]

**A.5. Comments, notes, and justifications:** None

## Appendix I-1, List of Insignificant Emissions Units and/or Activities.

Florida Power Corporation  
DeBary Facility

**PROPOSED Permit No.:** 1270028-001-AV  
**Facility ID No.:** 1270028

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The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, are exempt from the permitting requirements of Chapters 62-210 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 Rule 62-210.300(3)(a), 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 Rule 62-210.300(3)(a), 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. Comfort heating < 1 MMBtu/hr
2. Sand blaster
3. Non-industrial vacuum cleaning
4. Refrigeration equipment
5. Degreasing units using heavier-than-air vapors exclusively, except any such unit using or emitting any substance classified as a hazardous air pollutant.
6. Sanders < 5 sq.ft.
7. Lab equipment used for chemical or physical analyses
8. Brazing, soldering or welding equipment
9. Emergency generators
10. General purpose engines
11. Fire and safety equipment
12. Surface coating
13. Space heating equipment (non-boilers)
14. Petroleum lubrication systems
15. Vehicle refueling operations and associated fuel storage
16. One 13,309,800 (nominal) gallon storage tank for new No. 2 fuel oil
17. One 2,185,218 (nominal) gallon storage tank for new No 2 fuel oil
18. One 180 (nominal) gallon storage tank for diesel equipment
19. One 300 (nominal) gallon storage tank for unleaded gasoline
20. Ten 546 (nominal) gallon storage tanks for waste oil

21. One 2700 (nominal) gallon surge tank for lube oil
22. One 500 (nominal) gallon storage tank for diesel
23. One 500 (nominal) gallon storage surge tank
24. One overboard tank
25. Truck unloading
26. Non-halogenated solvent storage and cleaning operations, provided the solvents contain none of the hazardous air pollutants listed at Rule 62-210.200, F.A.C.
27. Diesel Generator (Detroit Diesel Allison-PTA-1SD-50)
28. Diesel/Caterpillar 3500/2500 hp/ 1879 kw



**Table 1-1, Summary of Air Pollutant Standards and Terms**

Florida Power Corporation  
DeBary Facility

**PROPOSED Permit No.:** 1270028-001-AV  
**Facility ID No.:** 1270028

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

**E.U. ID No. Brief Description**

-001 Peaking Combustion Turbine (PCT) Units 1, 2, 3, 4, 5 and 6

Pollutant Name	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See permit condition(s)
			Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
SO2	No. 2 fuel oil	8760	0.5% sulfur by weight						III.A.4
SO2	No. 6 fuel oil	8760	0.7% sulfur by weight						III.A.5
VE	No. 2 or No. 6 fuel oil	8760	20% opacity						III.A.6
<p>Notes: * The "Equivalent Emissions" listed are for informational purposes only.</p>									

electronic file name: 12700281.xls

**Table 1-1, Summary of Air Pollutant Standards and Terms**

Florida Power Corporation  
DeBary Facility

**PROPOSED Permit No.:** 1270028-001-AV  
**Facility ID No.:** 1270028

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

**E.U. ID No. Brief Description**

-002 Combustion Turbine (CT) Units 7, 8, 9 and 10

Pollutant Name	Fuel(s)	Hours/Year**	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See permit condition(s)
			Standard(s)	lbs./hour	TPY (4 CTs)	lbs./hour	TPY		
NOx	No. 2 fuel oil gas	3390 (equivalent)	42 ppmvd @ 15% O2	182/unit	1,234				III.B.7.
		3390 (equivalent)	25 ppmvd @ 15% O2	107/unit	726				
SO2	No. 2 fuel oil gas	3390 (equivalent)	0.3% avg. sulfur by weight	555/unit	1,925				III.B.8. III.B.9.
		3390 (equivalent)	0.8% sulfur by weight						
VE	No. 2 fuel oil and gas	3390 (equivalent)	20% opacity below full load and 10% opacity at full load						III.B.14.
PM/PM10	No. 2 fuel oil and gas	3390 (equivalent)	0.015 lb/MMBtu	15.0/unit	102				III.B.10.
VOC	No. 2 fuel oil and gas	3390 (equivalent)		5.0/unit	34				III.B.11.
CO	No. 2 fuel oil and gas	3390 (equivalent)		54/unit	365				III.B.12.
H2SO4 Mist	No. 2 fuel oil and gas	3390 (equivalent)	0.3% sulfur by weight	69/unit	469				III.B.13.

**Notes:**

\* The "Equivalent Emissions" listed are for informational purposes only

\*\* At 38.7 capacity factor, each turbine may operate up to an equivalent of 3,390 hours and 13,560 hours for any combination.

electronic file name: 12700281.xls

**Table 2-1, Summary of Compliance Requirements**

Florida Power Corporation  
DeBary Facility

**PROPOSED Permit No.:** 1270028-001-AV  
**Facility ID No.:** 1270028

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

**E.U. ID No.**    **Brief Description**  
-001            Peaking Combustion Turbine (PCT) Units 1, 2, 3, 4, 5 and 6

Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	See permit condition(s)	
						CMS**	
SO2	No. 2 or No. 6 fuel oil	Fuel oil analysis	Each Delivery				III.A.7.
VE	No. 2 or No. 6 fuel oil	EPA Method 9	Annually	1-Apr			III.A.10., 11 and 12

Notes:  
\* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.  
\*\*CMS [=] continuous monitoring system

electronic file name: 12700282.xls

**Table 2-1, Summary of Compliance Requirements**

Florida Power Corporation  
DeBary Facility

**PROPOSED Permit No.:** 1270028-001-AV  
**Facility ID No.:** 1270028

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

**E.U. ID No.**    **Brief Description**  
-002            Combustion Turbine (CT) Units 7, 8, 9 and 10

Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	Compliance	
						CMS**	See permit condition(s)
NOx	No. 2 fuel and gas	EPA Method 20	annually	1-Apr	1 hour		III.B.16.
SO2	No. 2 fuel and gas	EPA Method 6 or tests methods in ASTM D 2880-94	see custom fuel monitoring plan				III.B.17, 37 and 38
PM/PM10	No. 2 fuel and gas	EPA Method 5	annually	1-Apr	1 hour		III.B.18 and 19.
VOC	No. 2 fuel and gas	EPA Method 25A	annually	1-Apr	1 hour		III.B.20.
CO	No. 2 fuel and gas	EPA Method 10	annually	1-Apr	1 hour		III.B.21.
VE	No. 2 fuel and gas	EPA Method 9	annually	1-Apr	1 hour		III B.22.
H2SO4	No. 2 fuel and gas	EPA Method 8 or tests methods in ASTM D 2880-94	annually	1-Apr	1 hour		III.B.23.
Water/fuel fuel consumption						yes yes	III.B.40. III.B.40.

**Notes:**

\* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.

\*\*CMS [=] continuous monitoring system

electronic file name: 12700282.xls

## Appendix H-1, Permit History/ID Number Changes

Florida Power Corporation  
Debary

Facility ID No.: 1270028-001-AV

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### Permit History (for tracking purposes):

E.U.

<u>ID No</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date</u>	<u>Revised Date(s)</u>
-001	Boiler #1	AO64-201681	11/25/91	10/25/96	removed*	
-002	Boiler #2	AO64-201681	11/25/91	10/25/96	removed*	
-003	Gas Turbine #1 (Stack A)	AO64-207447	8/6/92	7/30/97	12/31/98	
-004	Gas Turbine #1 (Stack B)	AO64-207447	8/6/92	7/30/97	12/31/98	
-005	Gas Turbine #2 (Stack A)	AO64-207447	8/6/92	7/30/97	12/31/98	
-006	Gas Turbine #2 (Stack B)	AO64-207447	8/6/92	7/30/97	12/31/98	
-007	Gas Turbine #3 (Stack A)	AO64-207447	8/6/92	7/30/97	12/31/98	
-008	Gas Turbine #3 (Stack B)	AO64-207447	8/6/92	7/30/97	12/31/98	
-009	Gas Turbine #4 (Stack A)	AO64-207447	8/6/92	7/30/97	12/31/98	
-010	Gas Turbine #4 (Stack B)	AO64-207447	8/6/92	7/30/97	12/31/98	
-011	Gas Turbine #5 (Stack A)	AO64-207447	8/6/92	7/30/97	12/31/98	
-012	Gas Turbine #5 (Stack B)	AO64-207447	8/6/92	7/30/97	12/31/98	
-013	Gas Turbine #6 (Stack A)	AO64-207447	8/6/92	7/30/97	12/31/98	
-014	Gas Turbine #6 (Stack B)	AO64-207447	8/6/92	7/30/97	12/31/98	
-015	Simple Cycle Combustion Turbine	AO64-233544	10/26/93	10/19/98	12/31/98	
-016	Simple Cycle Combustion Turbine	AO64-233544	10/26/93	10/19/98	12/31/98	
-017	Simple Cycle Combustion Turbine	AO64-233544	10/26/93	10/19/98	12/31/98	
-018	Simple Cycle Combustion Turbine	AC64-191015	10/18/91	6/30/93	11/1/96	9/21/94
-019	Simple Cycle Combustion Turbine	AC64-191015	10/18/91	6/30/93	11/1/96	8/30/93 8/11/93 7/30/93 7/7/93

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### (if applicable) ID Number Changes (for tracking purposes):

From: Facility ID No.: 30ORL640028

To: Facility ID No.: 1270028

\*Boilers #1 and #2 were removed in 1997

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# Phase II Permit Application

For more information, see instructions and refer to 40 CFR 72.30 and 72.31 and Chapter 62-214, F.A.C.

This submission is:  New  Revised

**STEP 1**  
Identify the source by plant name, State, and ORIS code from NADE

FPC DeBary Facility, FL, 6046
-------------------------------

**STEP 2**  
Enter the boiler ID# from NADB for each affected unit, and indicate whether a repowering plan is being submitted for the unit by entering "yes" or "no" at column c. For new units, enter the requested information in columns d and e

Compliance Plan				
a	b		d	e
Boiler ID#	Unit Will Hold Allowances in Accordance with 40 CFR 72.9(c)(1)		New Units Commence Operation Date	New Units Monitor Certification Deadline
	Yes	No		
7	Yes	No	11/92	1/1/96 for NOx
8	Yes	No	11/92	1/1/96 for NOx
9	Yes	No	11/92	1/1/96 for NOx
10	Yes	No	11/92	1/1/96 for NOx
	Yes			
7,8,9,10	Yes	No	See Above	1/1/95 for SO2
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			

**STEP 3**  
Check the box if the response in column c of Step 2 is "Yes" for any unit

For each unit that will be repowered, the Repowering Extension Plan form is included and the Repowering Technology Petition form has been submitted or will be submitted by June 1, 1997.

Plant Name (from Step 1)  
*FPC DeBary Facility*

**Standard Requirements**

Permit 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, 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 permitting authority determines is necessary in order to review an Acid Rain part application and issue or deny an Acid Rain permit;
- (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 permitting authority; 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.

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)) 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)(i) 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 permit application, the Acid Rain permit, or the written exemption under 40 CFR 72.7 and 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 Administrator or permitting authority:
  - (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;
  - (iii) Copies of all reports, compliance certifications and other submissions and all records made or required under the Acid Rain Program; and,

**STEP 4**  
 Read the standard requirements and certification, enter the name of the designated representative, and sign and date

Plant Name (from Step 1)  
FPC DeBary Facility

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.

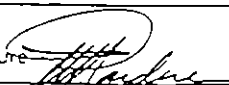
- (1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain part application, an Acid Rain part, or a written exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject 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 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, 75, 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 a written 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.

Certification

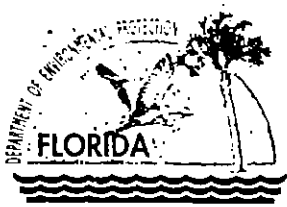
I am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and 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 <i>W. Jeffrey Pardue, C.E.P., Director, Environmental Services Dept.</i>	
Signature 	Date <i>12/14/95</i>



STEP 5 (optional)  
Enter the source AIRS  
and FINDS identification  
numbers, if known

AIRS
FINDS



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

## STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Mr. W. Jeffery Pardue, C.E.P.  
Director of Environmental Services Department  
Florida Power Corporation  
3201 34th Street South  
St. Petersburg, FL 33711

### ORDER EXTENDING PERMIT EXPIRATION DATE DeBary Facility, Facility ID No.: 1270028

Section 403.0872(2)(b), Florida Statutes (F.S.), specifies that any facility which submits to the Department of Environmental Protection (Department) a timely and complete application for a Title V permit "is entitled to operate in compliance with its existing air permit pending the conclusion of proceedings associated with its application."

Section 403.0872(6), F.S., provides that a proposed Title V permit which is not objected to by the United States Environmental Protection Agency (EPA) "must become final no later than fifty-five (55) days after the date on which the proposed permit was mailed" to the EPA.

Pursuant to the Federal Acid Rain Program as defined in Rule 62-210.200, Florida Administrative Code (F.A.C.), all Acid Rain permitting must become effective on January 1 of a given year.

This facility which will be permitted pursuant to Section 403.0872, F.S., (Title V permit) will be required to have a permit effective date subsequent to the final processing date of the facility's Title V permit.

To prevent misunderstanding and to assure that the above identified facility continues to comply with existing permit terms and conditions until its Title V permit becomes effective, it is necessary to extend the expiration date(s) of its existing valid permit(s) until the effective date of its Title V permit. Therefore, under the authority granted to the Department by section 403.061(8), F.S., **IT IS ORDERED:**

1. The expiration date(s) of the existing valid permit(s) under which the above identified facility is currently operating is (are) hereby extended until the effective date of its permit issued pursuant to section 403.0872, F.S., (Title V permit);

2. The facility shall comply with all terms and conditions of its existing valid permit(s) until the effective date of its Title V permit;

3. The facility will continue to comply with the requirements of Chapter 62-214, F.A.C., and the Federal Acid Rain Program, as defined in Rule 62-210.200, F.A.C., pending final issuance of its Title V permit.

PETITION FOR ADMINISTRATIVE REVIEW

The Department will take the action described in this Order unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 days of receipt of this Order. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the public notice or within 14 days of receipt of this Order, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the permitting authority's action is based must contain the following information:

- (a) The name and address of each agency affected and each agency's file or identification number, if known;
- (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
- (c) A statement of how and when each petitioner received notice of the agency action or proposed action;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief;
- (f) A demand for relief.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this Order. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation will not be available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this Order.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
- (c) Each rule or portion of a rule from which a variance or waiver is requested;
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
- (e) The type of action requested;
- (f) The specific facts that would justify a variance or waiver for the petitioner;
- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

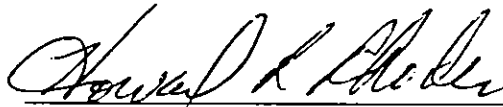
This Order constitutes final agency action unless a petition is filed in accordance with the above paragraphs.

RIGHT TO APPEAL

Any party to this Order has the right to seek judicial review of the Order 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 Office of General Counsel, 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 30 days from the date the Notice of Agency Action is filed with the Clerk of the Department.

DONE AND ORDERED this 6<sup>th</sup> day of Oct., 1998 in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION



HOWARD L. RHODES, Director  
Division of Air Resources Management  
Twin Towers Office Building  
Mail Station 5500  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400  
850/488-0114

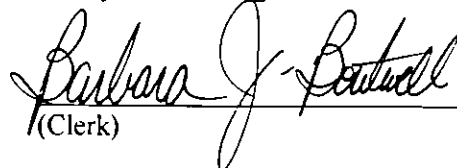
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this order and all copies were sent by certified mail (\*) before the close of business on 10/14/98 to the persons listed:

\*W. Jeffrey Pardue, C.E.P., FPC  
Len Kozlov, CD

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.

 10/14/98  
(Clerk) (Date)

Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1.  Addressee's Address
- 2.  Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:  
 Mr. W. Jeffery Pardue, C.E.P.  
 Director of Environmental  
 Services Department  
 3201 34th Street South  
 St. Petersburg, Florida 33711

4a. Article Number  
 P 265 301 740

4b. Service Type  
 Registered  Certified  
 Express Mail  Insured  
 Return Receipt for Merchandise  COD

7. Date of Delivery

5. Received By: (Print Name)  
*Kathy DeLong*

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

6. Signature: (Addressee or Agent)  
 X *Kathy DeLong for WJP*

PS Form 3811, December 1994

10259F 97-8-0179

Domestic Return Receipt

Thank you for using Return Receipt Service.

P 265 301 740

US Postal Service

**Receipt for Certified Mail**

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to Mr. W. Jeffery Pardue, C.E.P.	
Street & Number 3201 34th Street South	
Post Office, State, & ZIP Code St. Petersburg, FL 33711	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
<b>TOTAL Postage &amp; Fees</b>	<b>\$</b>
Postmark or Date 10/14/98 FPC - Debary ID#1270028	

PS Form 3800, April 1995