STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF PERMIT

In the Matter of an
Application for Permit Modification by:

Florida Power Corporation (FPC) -Intercession City Plant
Post Office Box 14042 – MAC BB1A
St. Petersburg, Florida 33733
_____/

DEP File No. 1270028-004-AC (PSD-FL-167 J)
De Bary Power Plant
Units 7-10 Inlet Fogger Project
Volusia County

Enclosed is the Final Permit Number 1270028-004-AC (PSD-FL-167 J) for a modification of FPC's existing air construction permit to install foggers at the compressor inlets of four 93-megawatt natural gas and No. 2 fuel oil-fired General Electric PG7111EA combustion turbine-electrical generators at the DeBary Power Plant in Volusia County

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

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

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT MODIFICATION (including the FINAL permit modification) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 3-31-00 to the person(s) listed:

W. Jeffrey Pardue, FPC*
Jennifer A. Stenger, P.E., FPC
Len Kozlov, DEP, CD
Gregg Worley, EPA
John Bunyak, NPS

Clerk Stamp

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

Kori Tobin 3-31-00
(Clerk) (Date)

FINAL DETERMINATION

Florida Power Corporation
De Bary Power Plant
Units 7-10 Inlet Fogger Project
Volusia County
DEP File No. 1270028-004-AC (PSD-FL-167 J)

An Intent to Issue an air construction permit was distributed on February 14, 2000. The project is the installation of evaporative cooling systems (foggers) at the compressor inlets of four existing 93 MW combustion turbine-electrical generators located at the FPC DeBary Plant. This facility is located on West Highbanks Road, Volusia County.

The Public Notice of Intent to Issue Air Construction Permit was published in The News-Journal on February 14, 2000. No comments were received as a result of the public notice.

A specific reporting requirement was added related to the number of hours that the foggers will be permitted to operate. The permit and DEP file numbers were reconciled to account for all of the previous revisions to the original project to construct the four combustion turbine-electrical generators. The permit number is revised from PSD-FL-167C to PSD-FL-167J.

The final action of the Department will be to issue the permit as noticed except for the changes noted above.

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
Mr. Jeffrey Pardue, CEP
FPC
P O Box 14042-MAC BBIA
St. Petersburg, Fl
33733

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* B. Date of Delivery
APR 03 2000

C. Signature
X ☐ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number *(Copy from service label)* Z 031 391 895

PS Form 3811, July 1999 Domestic Return Receipt 102595-99-M-1789

Z 031 391 895

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

Sent to Jeffrey Pardue	
Street & Number FPC	
Post Office, State, & ZIP Code St. Pete Fl	
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	
TOTAL Postage & Fees	$
Postmark or Date 3-31-00	

1270028-004-AC
PSO-Fl-167J

PS Form 3800, April 1995

Department of Environmental Protection

Jeb Bush
Governor

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

David B. Struhs
Secretary

PERMITTEE:

Florida Power Corporation
Post Office Box 14042 MAC BB1A
St. Petersburg, Florida 33733

Authorized Representative:

W. Jeffrey Pardue, CEP
Director, Environmental Services

DEP File No.	1270028-004-AC
Permit No.	PSD-FL-167 J
Project	Peaking Unit Nos. 7-10
SIC No.	4911
Expires:	December 31, 2000

PROJECT AND LOCATION:

Re-issued and modified permit for the construction of four simple cycle combustion turbine-electrical generators (Peaking Units Nos. 7-10). This action also provides for installation of inlet foggers on the four 92.9 megawatt simple cycle General Electric PG7111EA combustion turbine-electrical generators units (Peaking Units 7-10), identified in the Department's ARMS database as E.U.Nos. 015 - 018.

The units are located at the FPC DeBary City Plant, 788 West Highbanks Rd, Volusia County. The UTM coordinates are: Zone 17; 467.5 km E and 3197.2 km N.

STATEMENT OF BASIS:

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The above named permittee is authorized to modify the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

ATTACHED APPENDICES MADE A PART OF THIS PERMIT:

Appendix GC	Construction Permit General Conditions
Appendix SC	Specific Conditions (including Permit 1270028-002-AC (PSD-FL-167B)

Howard L. Rhodes, Director
Division of Air Resources
Management

APPENDIX SC

SPECIFIC CONDITIONS

1. This permit, PSD-FL-167J (DEP File 1270028-004-AC), supersedes permit PSD-FL-167B (DEP Files 1270028-002-AC and AC64-191015B) issued on May 6, 1997.
2. The provisions of air construction permit PSD-FL-167B (DEP Files 1270028-002 and AC64-191015B) issued May 6, 1997 are attached and incorporated into this air construction permit except for the changes that follow in Specific Condition 3-5 below.
3. Evaporative cooling systems (foggers) may be installed at the compressor inlet to each of the four simple cycle General Electric PG7111EA combustion turbine-electric generators.
4. The inlet evaporative cooling systems may operate up to 4900 hours per year in aggregate (average 1225 hours per unit per year).
5. The permittee shall record on a monthly basis in a written log the number of hours of operation for each evaporative cooling system and the total combined hours of operation for the previous 12 months for all four evaporative cooling systems. [Rule 62-4.160(15), F.A.C.]

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, Florida 33711

Permit No.	AC64-191015(B)
PSD No.	PSD-FL-167(B)
File No.	1270028-002-AC
Expires:	December 31, 1997
Facility	DeBary

Authorized Representative:
Mr. W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department

LOCATED AT:

UTM: Zone 17, 467.5 km East and 3197.2 km North

Directions: *West Highbanks Road, DeBary, Volusia County*

STATEMENT OF BASIS:

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and the Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297. The above named permittee is authorized to construct or modify the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department) and made a part hereof and specifically described as follows:

For four 92.9 MW simple cycle combustion turbines (CT's - P7, P8, P9, and P10) with maximum heat input of 1,144 (oil) and 1,159 (gas) MMBtu/hr/unit at 20°F to be located at the DeBary Facility in DeBary, Volusia County. The turbines are GE PG7111EA equipped with wet injection capability. The source shall be constructed in accordance with the permit application, plans, documents, amendments, and drawings, except as otherwise noted in the General and Specific Conditions.

Attached appendices made a part of this permit:

Appendix GC	Construction Permit General Conditions
Appendix SC	Specific Conditions

Howard L. Rhodes, Director
Division of Air Resources
Management

APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

G.2 This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

(a) Have access to and copy and records that must be kept under the conditions of the permit;
(b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and.
(c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

(a) A description of and cause of non-compliance; and
(b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extend it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.

G.13 This permit also constitutes:

(a) Determination of Best Available Control Technology *(X)*
(b) Determination of Prevention of Significant Deterioration *(X)*; and
(c) Compliance with New Source Performance Standards *(X)*.

G.14 The permittee shall comply with the following:

(a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

(b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

(c) Records of monitoring information shall include:

1. The date, exact place, and time of sampling or measurements;
2. The person responsible for performing the sampling or measurements;
3. The dates analyses were performed;
4. The person responsible for performing the analyses;
5. The analytical techniques or methods used; and
6. The results of such analyses.

G.15 When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

APPENDIX SC
SPECIFIC CONDITIONS

1. This permit supersedes permit AC64-191015 (PSD-FL-167), dated October 18, 1991, and its revisions dated:

   June 30, 1993 - Change Method 3 to Method 3A
   August 11, 1993 - Replace trace element limits with use of low sulfur oil
   August 30, 1993 - Correct PM basis and SAM limit
   September 21, 1994 - Incorporate heat input curves

   The provisions of the air construction permit AC64-191015 (PSD-FL-167), dated October 18, 1991 and the revisions to that permit, attached and listed above, are incorporated into this air construction permit except for the changes that follow in Specific Conditions 2. through 6, below.

2. Table 1 from Previous Specific Condition 1 is changed per the previous modifications listed above and the present modification to read as shown in revised Table 1, attached.

3. Previous Specific Condition 3 is changed as follows:

   FROM

   These sources are allowed to use only No. 2 fuel oil with a 0.30% average and 0.5% sulfur content maximum, by weight. The sulfur content is based upon a weighted 12 month rolling average of fuel oil analysis from delivery receipts.

   TO:

   These units are allowed to use No. 2 fuel oil with a 0.30% average and 0.5% maximum sulfur content, by weight, as well as natural gas. The sulfur content is based upon a weighted 12-month rolling average of fuel oil analysis from delivery receipts.

4. Previous Specific Condition 4 is changed as follows:

   FROM

   The permitted materials and utilization rates for the combined cycle gas turbines shall not exceed: (a) the maximum heat input of 1,144 MMBtu/hr/unit at 20° F. (b) maximum No. 2 fuel oil consumption shall not exceed 7,826 (at 59° F) gal/hr/unit or 159,200,000 gal/yr for 6 CT's. (c) SO2 emissions for the six combustion turbines not exceed 2,888 tons/year. (d) the maximum capacity factor shall be limited to 38.7%.

TO

The permitted materials and utilization rates for the combined cycle gas turbines shall not exceed: (a) the maximum heat input of 1,144 (oil) and 1,159 (gas) MMBtu/hr/unit at 20°F. (b) maximum No. 2 fuel oil consumption shall not exceed 106,133,333 gal/yr for 4 CT's. (c) SO2 emissions for the four combustion turbines not exceed 1925 tons/year. (d) the maximum capacity factor shall be limited to 38.7% (equivalent to 3,390 hours per year).

5. The first paragraph of Previous Specific Condition 8 is changed as follows:

FROM

Compliance with the NOx, SO_2, CO, PM, PM_{10} and VOC standards shall be determined (on each unit within 10% maximum heat rate input) within 180 days of initial operation and annually thereafter, by the following reference methods as described in 40CFR60, Appendix A (July, 1990 version) and adopted by reference in F.A.C. Rule 17-2.700.

TO

Testing of emissions of NOx, SO_2, CO, PM, PM_{10} and VOC shall be conducted with the source operating at capacity. 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.

6. Previous Specific Condition 14 is changed as follows:

FROM

Test results will be the average of 3 valid runs. The Central District office will be notified at least 15 days in writing in advance of the compliance test(s). The sources shall operate between 90% and 100% of permitted capacity during the compliance test(s) as adjusted for ambient temperature. Compliance test results shall be submitted to the Central District office no later than 45 days after completion.

TO

Test results will be the average of 3 valid runs. The Central District office shall be notified at least 15 days in writing in advance of the compliance test(s). Compliance test results shall be submitted to the Central District office no later than 45 days after completion.

TABLE 1 (Revised)
ALLOWABLE EMISSION LIMITS
Simple Cycle Combustion Turbine

Pollutant	Standard Oil Firing	Each Unit lb/hr [a]	Total 4 Units	Basis
NO_x	42 ppm at 15% oxygen dry basis	182	1,234[b]	BACT
NO_x	25 ppm at 15% oxygen dry basis (gas firing)	107	726[b]	FPC
SO_2	No. 2 fuel oil with 0.3% avg. and 0.5% max. sulfur	555	1,925[c]	BACT
PM/PM_{10}	0.015 lb/MMBtu	15	102[b]	BACT
VOC	-	5	34[b]	BACT
CO	-	54	365[b]	BACT
Sulfuric Acid Mist	No. 2 fuel oil with 0.3% avg. and 0.5% max,. sulfur	69	469[b]	BACT

[a] Emission rates based on 59°F and 15% O_2.

[b] Equivalent to 3390 hours per year at peak load and 38.7% capacity factor.

[c] Total TPY CAP for SO2 assumes 33% capacity factor and fuel sulfur content of 0.30%.

Memorandum

Florida Department of
Environmental Protection

TO: Howard L. Rhodes

THRU: Clair H. Fancy

FROM: Al Linero
Teresa Heron

DATE: March 24, 2000

SUBJECT: FPC DeBary Plant Inlet Fogger Project
DEP File No. 1270028-004-AC (PSD-FL-167 J)

Attached is the final permit for the inlet fogger project for this facility. The permit is to install foggers ahead of the compressor inlets of four simple cycle combustion turbines. The foggers will operate on hot days and days of relatively low humidity. The evaporative cooling effected by the foggers will allow the units to operate closer to their rated capacity. On a hot dry day, FPC may be able to get another 20 MW out of the facility.

Emissions will increase because the heat rate through the units will increase when the foggers are used and effectively cool the inlet air. FPC proposes to limit operation of the coolers to 1,225 hours per unit per year to insure PSD is not triggered by their use.

We recommend your signature and approval.

AAL/th

Attachments

Check Sheet

Company Name: FPC Intercession City - DeBary Power Pla
Permit Number: 1270028-004-AC
PSD Number: 167J (Modification)
Permit Engineer: Al or Teresa Heron

Application:

- [x] Initial Application
  - [ ] Incompleteness Letters
  - [ ] Responses
  - [ ] Waiver of Department Action
  - [ ] Department Response
  - [ ] Other

Cross References:

- [ ]
- [ ]
- [ ]

167 E ?
167 J ?
or

Intent:

- [x] Intent to Issue
- [x] Notice of Intent to Issue
- [x] Technical Evaluation
- [ ] BACT Determination
- [x] Unsigned Permit

Correspondence with:

- [ ] EPA
- [ ] Park Services
- [ ] Other

- [x] Proof of Publication
  - [ ] Petitions - (Related to extensions, hearings, etc.)
  - [ ] Waiver of Department Action
  - [ ] Other

Final Determination:

- [x] Final Determination
- [x] Signed Permit
- [ ] BACT Determination
- [ ] Other

Post Permit Correspondence:

- [ ] Extensions/Amendments/Modifications
- [ ] Other

PSD-FL-167 PERMITTING HISTORY

FPC-DeBary **Facility ID No.: 1270028**
DeBary Power Plant

PSD Permit History (for tracking purposes):

	Issue	PERMITTING ACTION DESCRIPTION
Permit No.	Date	
PSD-FL-167 AC64- 191015	10/18/91	To construct/install six 92.9 MW, oil fired simple cycle combustion turbines. Peaking units: 3390 hour/yr each. Fuel oil burning. Expiration date January 31, 1993.
PSD-FL-167A AC64- 191015A	11/23/92	Extension of permit expiration date to March 31, 1993
PSD-FL-167B AC64 191015B	4/8/93	Extension of permit expiration date to June 30, 1993
PSD-FL-167C AC64- 191015C	6/29/93	Extension of permit expiration date to July 30, 1993. Letter of approval revised on July 7, 1993.
PSD-FL-167D AC64- 191015D	6/30/93	Change Method 3 to 3A
PSD-FL-167E AC64- 191015E	8/3/93	Extension of permit expiration date to August 31, 1993
PSD-FL-167F AC64- 191015F	8/11/93	Replace trace element limits with use of low sulfur oil
PSD-FL-167G AC64- 191015G	8/30/93	Correct PM basis and SAM limit
PSD-FL-167H AC64- 191015H	9/21/94	Incorporate heat input curves
PSD-FL-167I 1270028-002AC	5/06/97	Modification to reissue the expired construction permit for six 92.9 MW, oil fired SC turbines: revise the number of units to the four already constructed; and allow installation of natural gas firing capabilities. Peaking units: 3390 hour/yr each. PSD Permit number reads PSD-FL-167B.
PSD-FL-167J 1270028-004AC	3/31/00	Permit modification for the installation of inlet foggers in each of the four SC turbines. See files for year 2000.

Detail | Events | Facility | perMitted EU | Help | eXit

Permitting Application

Permit #:	PATS:	Issue:	Expire:

Project #/Name	Owner/Company	Type/Sub	Receive
001/FPC-DEBARY PLANT	FLORIDA POWER CORPORATION	AV /00	14-JUN-1996
002/FPC'S DEBARY PLANT SITE	FLORIDA POWER CORPORATION	AC /1F	08-NOV-1996
003/FPC - DEBARY TITLE V REVI	**FLORIDA POWER CORPORATION**	**AV /02**	**27-DEC-1999**
004/FPC-INLET FOGGING-DEBARY	FLORIDA POWER CORPORATION	AC /1D	31-JAN-2000
/FLORIDA POWER/DEBARY BOIL	FLORIDA POWER CORPORATION	AO /09	14-OCT-1986
/FLORIDA POWER CORP/DEBARY	FLORIDA POWER CORPORATION	AO /07	12-JAN-1987
/FPC DEBARY/SIX PEAKING UN	FLORIDA POWER CORPORATION	AC /1A	31-DEC-1990
/FLORIDA POWER/DEBARY BOIL	FLORIDA POWER CORPORATION	AO /2B	30-AUG-1991
/FLORIDA POWER CORP/6 DEBA	FLORIDA POWER CORPORATION	AO /1B	23-JAN-1992
/FPC/DEBARY COMBUSTION TUR	FLORIDA POWER CORPORATION	AO /1A	25-JUN-1993
/		/	
/		/	
/		/	
/		/	

Press [NXTBLK] for summary information.
Count: *10 <Replace>

Appendix H-1, Permit History/ID Number Changes

Florida Power Corporation
Debary Facility

FINAL Permit No.: 1270028-001-AV

Permit History (for tracking purposes):

E.U. ID No	Description	Permit No.	Issue Date	Expiration Date	Extended Date[1, 2]	Revised Date(s)
-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 – -014	Gas Turbine #'s 1-6	AO64-207447	8/6/92	7/30/97		
-015	Simple Cycle Combustion Turbine	AO64-233544	10/26/93	10/19/98		
-016	Simple Cycle Combustion Turbine	AO64-233544	10/26/93	10/19/98		
-017	Simple Cycle Combustion Turbine	AO64-233544	10/26/93	10/19/98		
-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

ID Number Changes (for tracking purposes):

From: **Facility ID No.**: 30ORL640028
To: **Facility ID No.**: 1270028

Notes:
*Boilers #1 and #2 were removed in 1997
1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C.
2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C.
{Rule 62-213.420(1)(b)2., F.A.C., allows Title V Sources to operate under existing valid permits that were in effect at the time of application until the Title V permit becomes effective}

Florida Power
CORPORATION

March 13, 2000

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

Dear Mr. Linero:

Re: DeBary Inlet Fogging - Proof of Publication

I have enclosed the proof of publication of the Public Notice of Intent to Issue Air Construction Permit Modification for Florida Power Corporation's DeBary facility.

Please contact me at (727) 826-4334 if you have any questions.

Sincerely,

J. Michael Kennedy, Q.E.P.
Manager, Air Programs

ONE POWER PLAZA, 263 - 13th Avenue South, BB1A, St. Petersburg, FL 33701-5511 •
P.O. Box 14042, BB1A • St. Petersburg • Florida 33733-4042 • (727) 820-5151
A Florida Progress Company

The News-Journal

Published Daily and Sunday
Daytona Beach, Volusia County, Florida

State of Florida,
County of Volusia:

Before the undersigned authority personally appeared

.....Kristine Smith.....

who, on oath says that he is.....

.....Regional Advertising Manager.....

of The News-Journal, a daily and Sunday newspaper, published at Daytona Beach in Volusia County, Florida; that the attached copy of advertisement, being a .....

.....Public Notice of Intent.....

.....

in the matter of .....

.....State of Florida, Department of Environmental Protection

in the .....Court, was published

in said newspaper in the issues.....

.....February 24, 2000.....

Affiant further says that The News-Journal is a newspaper published at Daytona Beach, in said Volusia County, Florida, and that the said newspaper has heretofore been continuously published in said Volusia County, Florida, each day and Sunday and has been entered as second-class mail matter at the post office in Daytona Beach, in said Volusia County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Kristine Smith

Sworn to and subscribed before me

this .....24th.....day of ....2000.....

A.D. 20 00

BARBARA LANE
Notary Public, State of Florida
My Comm. Exp. Nov. 28, 2003
Comm. No. CC 890979

PROOF OF PUBLICATION

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PAID NOTICE

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION

STATE OF FLORIDA, DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No. 1270028-004-AC (PSD-FL-167 C)

Florida Power Corporation DeBary Plant, Units 7-10 Inlet Fogger Project, Volusia County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permi modification to Florida Power Corporation (FPC). The permit is to install foggers at the compressor inlets of four 93 megawatt natural gas and No. 2 fuel oil-fired General Electric PG7111EA combustion turbine-electrical generators at the DeBary Plant in Volusia County. A Best Available Control Technology (BACT) determination was not required pursuant to Rule 62-212.400, F.A.C. The applicant's name and address are Florida Power Corporation, Post Office Box 14042, MAC BBIA, St. Petersburg, Florida 33733.

These units normally achieve their maximum rated output on cold days because the greater compressor inlet density allows greater throughput in the rotor or expansion section of the combustion turbine. The maximum power output is lower on ho days because of the lower compressor inlet density. The foggers increase hot-day power output by approximately 4-6 MW through evaporative cooling of the compressor inlet air although maximum output over all temperatures will remain 93 MW or below. The foggers provide no benefit on very humid or cold days and will not be used under those conditions. The result is that maximum hourly air pollution emissions will not increase although actual annual emissions will increase within thei permitted limits because more fuel will be used on hot, relatively dry days.

Although the number of days during which the foggers can economically operate probably limits emissions increases to levels below significance for the purposes of PSD applicability, FPC proposes enforceable conditions to insure non applicability. FPC asserts and the Department accepts that the modification will not cause any meaningful change in the hours of operation of these simple cycle peaking units. They are already limited to 3390 hours of operation per unit. The maximum increase in annual emissions caused by project in tons per year is summarized below along with the PSD-significant levels.

Pollutants	Annual Emission Increase	PSD Significant Levels
PM/PM_{10}	2.2	25/15
SAM	2.5	7
SO_2	39.9	40
NO_x	28.1	40
VOC	0.5	40
CO	7.4	100

An air quality impact analysis was not required or conducted. No significant impacts are expected to occur as a result of this project. It will not cause or contribute to a violation of any ambient air quality standard or increment.

The Department will issue the FINAL permit modification with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of thirty (30 days from the date of publication of "Public Notice of Intent to Issue Air Construction Permit Modification." Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505 Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen (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 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department'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, i 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 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, including the specific facts th petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules o statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of th relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency proposed action.

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

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means th the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interest will be affected by any such final decision of the Department on the application have the right to petition to become a party t the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 am to 5:00 pm, Monda through Friday, except legal holidays, at:

Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Ste. 4, Tallahassee, FL 32301
Telephone: 850/488-0114; Fax: 850/922-6979

Department of Environmental Protection
Central District Office
3319 Maguire Boulevard, Ste. 232, Orlando, FL 32803-3767
Telephone: 407/894-7555; Fax: 407/897-5963

The complete project file includes the application, technical evaluation, Draft Permit Modification, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Source Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301 or call 850/488-0114, for additional information.

Department of
Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

February 14, 2000

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. W. Jeffrey Pardue, CEP
Director Environmental Services
Florida Power Corporation
Post Office Box 14042, MAC BB1A
St. Petersburg, Florida 33733

Re: DEP File No. 1270028-004-AC (PSD-FL-167 C)
DeBary City Plant Units 7-10
Inlet Foggers

Dear Mr. Pardue:

Enclosed is one copy of the Draft Permit and Technical Evaluation and Preliminary Determination, for the referenced project in Osceola County. The Department's Intent to Issue Air Construction Permit Modification and the "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION" are also included.

The Public Notice must be published one time only as soon as possible in a newspaper of general circulation in the area affected, pursuant to Chapter 50, Florida Statutes. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the Department's proposed action to A. A. Linero, P.E., Administrator, New Source Review Section at the above letterhead address. If you have any questions, please call Mr. Linero at 850/921-9523 or Teresa Heron at 850/921-9529.

Sincerely,

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

CHF/aal

Enclosures

In the Matter of an
Application for Permit by:

Mr. W. Jeffrey Pardue, CEP
Director Environmental Services
Florida Power Corporation
Post Office Box 14042, MAC BB1A
St. Petersburg, Florida 33733

DEP File No. 1270028-004-AC
Permit Modification No. PSD-FL-167(C)
Simple Cycle Peaking Units 7-10
Inlet Fogger Project
Volusia County

/

INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit modification (copy of DRAFT Permit Modification attached) for the proposed project, detailed in the application specified above and the attached Technical Evaluation and Preliminary Determination, for the reasons stated below.

The applicant, Florida Power Corporation (FPC), applied on January 31,2000 to the Department to add inlet foggers to four simple cycle combustion turbine-electrical generators (Units 7-10) at the DeBary City Plant in Volusia County.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-212. The above actions are not exempt from permitting procedures. The Department has determined that an air construction permit modification is required to conduct the work.

The Department intends to issue this air construction permit modification based on the belief that reasonable assurances have been provided to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1., F.A.C., you (the applicant) are required to publish at your own expense the enclosed "Public Notice of Intent to Issue Air Construction Permit Modification." The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114; Fax 850/ 922-6979). The Department suggests that you publish the notice within thirty days of receipt of this letter. You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in section 50.051, F.S. to the office of the Department issuing the permit or other authorization. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rules 62-110.106(9) & (11), F.A.C.

The Department will issue the final permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of thirty (30) days from the date of publication of "Public Notice of Intent to Issue Air Construction Permit Modification." Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station # 35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen 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 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department'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 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, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department'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

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 notice. 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 is not 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 notice of intent.

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 the 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.

Executed in Tallahassee, Florida.

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

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION (including the PUBLIC NOTICE, Technical Evaluation and Preliminary Determination, and the DRAFT Permit Modification) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 2-14-00 to the person(s) listed:

W. Jeffrey Pardue, FPC*
Jennifer A. Stenger P.E., FPC
Len Kozlov, DEP CD
Gregg Worley, EPA
John Bunyak, NPS

Clerk Stamp

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

(Clerk) 2-14-00 (Date)

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:
Jeffrey Pardue, CEP
FPC
PO Box 14042, MAC BBIA
St. Pete, Fl
33733

4a. Article Number
Z 031 391 862

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

7. Date of Delivery
PETERSBURG, FL 33
FEB 16 2000

5. Received By: *(Print Name)*

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

6. Signature: *(Addressee or Agent)*
X

PS Form **3811**, December 1994 102595-98-B-0229 Domestic Return Receipt

Is your RETURN ADDRESS completed on the reverse side?

Thank you for using Return Receipt Service.

Z 031 391 862

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

Sent to Jeffrey Pardue	
Street & Number FPC	
Post Office, State, & ZIP Code St Pete, Fl	
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	
TOTAL Postage & Fees	$
Postmark or Date 1270028-004-AE PSO-FL-167C 2-14-00	

PS Form **3800**, April 1995

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No. 1270028-004-AC (PSD-FL-167 C)

Florida Power Corporation DeBary Plant
Units 7-10 Inlet Fogger Project
Volusia County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit modification to Florida Power Corporation (FPC). The permit is to install foggers at the compressor inlets of four 93-megawatt natural gas and No. 2 fuel oil-fired General Electric PG7111EA combustion turbine-electrical generators at the DeBary Plant in Volusia County. A Best Available Control Technology (BACT) determination was not required pursuant to Rule 62-212.400, F.A.C. The applicant's name and address are Florida Power Corporation, Post Office Box 14042, MAC BB1A, St. Petersburg, Florida 33733.

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Bureau of Air Regulation
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The complete project file includes the application, technical evaluation, Draft Permit Modification, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Source Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

1. Applicant

Florida Power Corporation
P.O. Box 14042, MAC BB1A
St. Petersburg, Florida 33733

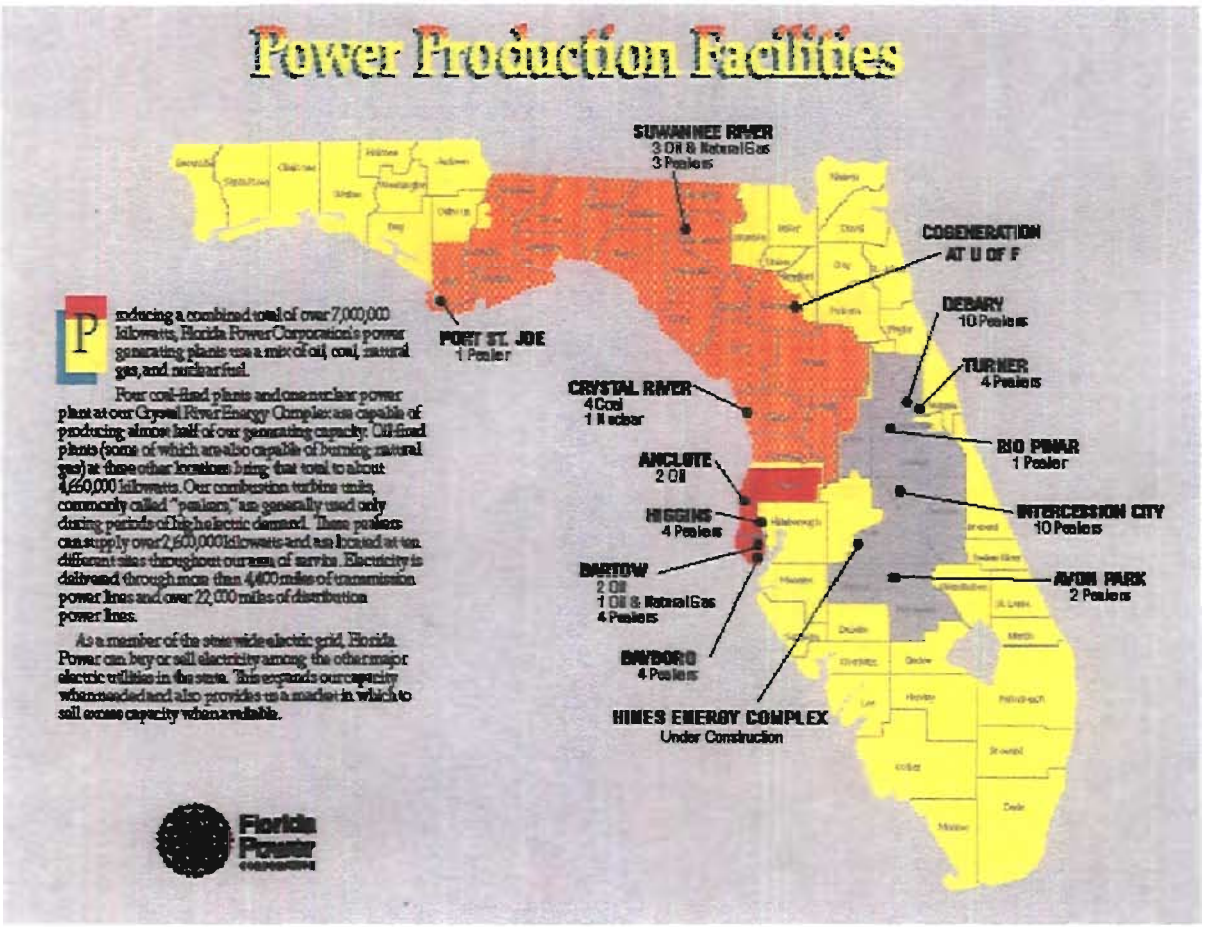
Authorized Representative: W. Jeffrey Pardue, CEP

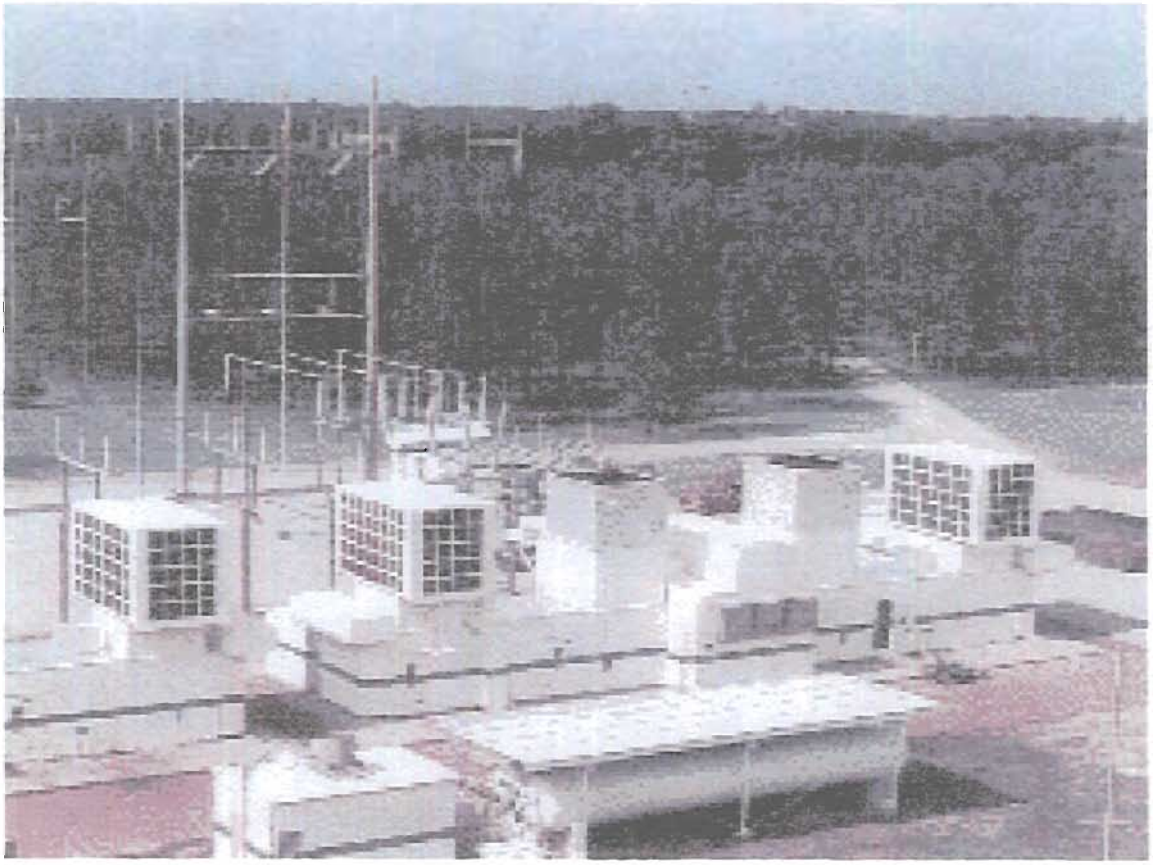
2. Source Name and Location

DeBary Plant
Units P7, P8, P9, P10
DeBary, Volusia County

UTM Coordinates: Zone 17, 467.5 km East and 3197.2 km North

The location of the DeBary Plant within the FPC system is shown below followed by a photograph of the site downloaded from the FPC website:





3. Source Description

The Florida Power Corporation (FPC) DeBary Plant consists of ten combustion turbine peaking units. Units Nos. P7, P8, P9, and P10 (designated in the ARMS database as E.U.: 015, 016, 017, and 018) are each 92.9 megawatt simple cycle General Electric PG7111EA combustion turbine-electrical generators. The units are fired with pipeline natural gas or No. 2 fuel oil containing 0.3 percent (%) or less sulfur. Annual hours of operation per unit are limited to 3,390 or less based on a sliding scale related to the fuel sulfur content. Control measures and equipment consist of firing clean fuels, good combustion practices, and wet injection.

4. Current Permit and Major Regulatory Program Status

Construction of Units P7-P10 was authorized by the Department's Prevention of Significant Deterioration (PSD) Permit No. PSD-FL-167 and Air Construction Permit AC 64-191015 issued in October 1993. A modification of this permit was issued in May 7, 1997 (PSD-FL-167 B and 1270028-002 AC). The four units along with six other units at the plant are operated under Title V Air Operation Permit No. 1270028-001-AV issued in June 1999.

The initial construction of Units P7-P10 was authorized pursuant to the Department's Preconstruction Review and Permitting requirements in Rules 62-210 and 62-212, F.A.C. The units were also reviewed in accordance with the New Source Performance Standard (NSPS) Subpart GG - Standards of Performance for Stationary Gas Turbines, adopted by reference in Rule 62-204.800, F.A.C.

5. Permit Modification Request

On January 31, 2000 the Department received a request from FPC for modification of its permits to install inlet foggers at the compressor inlets of Units P7-P10. These units normally achieve their maximum rated output on cold days because the greater compressor inlet air density allows greater throughput in the rotor or expansion section of the combustion turbine. The maximum power output is lower on hot days because of the lower compressor inlet density. The foggers increase hot-day power output by approximately 4-6 MW through evaporative cooling of the compressor inlet air although maximum output over all temperatures will remain 93 MW or below. The foggers provide little or no benefit on humid or cold days and will not be used under those conditions.

Inlet foggers are routinely included in new combustion turbine projects and have not affected the Department's decisions regarding Best Available Control Technology.

6. Emissions Increases Due to Modification/Method of Operation

Because the main components of the units, including the compressors, combustors, rotors, fuel system, etc., will not be modified, it is arguable that the inlet foggers are not physical modification of the units. However the foggers are physical pieces of equipment whose addition and use can increase emissions on hot or dry days. The use of the foggers can also be considered a change in method of operation of the inlet "air conditioning system" that is already used to filter incoming air.

FPC estimated the maximum emissions increases by using the heat-input increase associated with a 20 degree F decrease in compressor inlet temperature. Using the heat input curve, a 20-degree F temperature decrease results in an increase in heat input of 60 mmBtu per hour. This value is multiplied by the emission rate in lb/mmBtu to obtain hourly emissions increases. The results are summarized below together with annual emission increase estimates, based on 1, 225 hours of operation per fogger per year. The estimates are based on fuel oil firing and would be substantially less when firing natural gas.

TOTAL EMISSIONS INCREASES DUE TO USE OF INLET FOGGERS AT FOUR UNITS

Pollutant	Emission Rate lb/mmBtu	Emission Increase lb/hr	Annual Increase tons/yr	PSD Threshold tons/yr
NO_x	See Curve	11	28.1	40
PM/PM_{10}	0.015	0.9	2.2	25/15
CO	0.05	3	7.4	100
VOC	0.004	0.2	0.5	40
SO_2	0. 27	16.2	39.9	40
SAM	0.016	1	2.5	7

The emissions increases calculated are the direct result from the modification or change in method of operation. These assume that the ability to achieve greater power output when the foggers are used does not result in the increased usage of the peaking units. The rationale is discussed below.

7. Evaluation of PSD Applicability

As a major source, a modification or change in method of operation of Units P7-P10 resulting in **significant net emissions increases** is subject to PSD review. Significant net emissions increase is defined in Rule 62-212.400, F.A.C as follows:

> *Significant Net Emissions Increase – A significant net emissions increase of a pollutant regulated under the Act is a* ***net emissions increase*** *equal to or greater than the applicable significant emission rate listed in Table 212.400-2, Regulated Air Pollutants – Significant Emission Rates.*

The significant emission rates are included (see PSD Threshold) in the Table above. The meaning of a net emissions increase is given in Rule 62-212.400, F.A.C. as:

> *Net Emissions Increase - A modification to a facility results in a net emissions increase when, for a pollutant regulated under the Act, the sum of all of the contemporaneous creditable increases and decreases in the* ***actual emissions*** *of the facility, including the increase in emissions of the modification itself and any increases and decreases in quantifiable fugitive emissions, is greater than zero.*

The definition of actual emissions is given in Rule 62-210.200, F.A.C. (definitions) as follows:

> *Actual Emissions - The actual rate of emission of a pollutant from an emissions unit as determined in accordance with the following provisions:*
>
> *(a) In general, actual emissions as of a particular date shall equal the average rate, in tons per year, at which the emissions unit actually emitted the pollutant during a two year period which precedes the particular date and which is representative of the normal operation of the emissions unit. The Department may allow the use of a different time period upon a determination that it is more representative of the normal operation of the emissions unit. Actual emissions shall be calculated using the emissions unit's actual operating hours, production rates and types of materials processed, stored, or combusted during the selected time period.*
>
> *(b) The Department may presume that unit-specific allowable emissions for an emissions unit are equivalent to the actual emissions of the emissions unit provided that, for any regulated air pollutant, such unit-specific allowable emissions limits are federally enforceable.*
>
> *(c) For any emissions unit (other than an electric utility steam-generating unit specified in subparagraph (d) of this definition) which has not begun* ***normal operations*** *on a particular date, actual emissions shall equal the* ***potential emissions*** *of the emissions unit on that date.*

The term normal operations appears to be undefined and subject to some interpretation. Potential emissions are defined as follows:

> *Potential Emissions or Potential to Emit - The maximum capacity of an emission unit or facility to emit a pollutant under its physical and operational design. Any enforceable physical or operational limitation on the capacity of the emission unit or facility to emit a pollutant, including any air pollution control equipment and any restrictions on hours of operation or on the type or amount of material combusted, stored, or processed shall be treated as part of its design provided that, for any regulated air pollutant, such physical or operational limitation is federally enforceable.*

Actual hours of operation over the last 6 years are as follows:

	Annual Operating Hours 1994 - 1999					
Unit/Year	1994	1995	1996	1997	1998	1999
P-7	499	438	663	1817	2563	1980
P-8	492	371	711	870	1114	1746
P-9	426	439	763	1722	2418	1969
P-10	382	379	630	822	1145	1019

There has been a steady increase in annual hours of operation since these units were installed in 1993. During 1998 and 1999, these units were each utilized between 1019 and 2563 hours per year or more than half of the 3,390 permitted hours of operation per unit per year.

Although recent hours of operation are well below the permitted limits, they are actually fairly high compared with the typically low levels of operation characteristic of peaking units. Among the reasons for the relatively high levels are the prolonged shutdown of the baseloaded Crystal River Nuclear Unit 3 in 1997, the very hot summer of 1998, and the recognized low electrical power reserve margin in the State.

If these peaking units were being entirely replaced by larger units, it would be clear that they have not begun normal operations. In such a case, a comparison of future to past actual emissions would be based on a comparison of potential emissions to past actual emissions. Such a comparison would undoubtedly result in a determination that PSD is applicable unless the company took an extreme limitation in hours of operation.

If a like-kind replacement was being made, the same comparison would also result in a determination that PSD is applicable. That particular case was addressed for the purposes of comparison to the specific case addressed in the Puerto Rican Cement Decision. This is the watershed Federal Circuit Court of Appeals decision that upheld the past actual-to-potential emission comparison applicable to (at least) modernization projects. The comments of interest for the purposes of the present review are as follows:

> *"One can imagine circumstances that might test the reasonableness of EPA's regulation. An electricity company, for example, might wish to replace a peak load generator -- one that operates only a few days per year -- with a new peak load generator that the firm could, but almost certainly will not, operate every day. And, uncertainties about the precise shape of future electricity peak demand might make the firm hesitate to promise EPA it will never increase actual emissions (particularly since EPA insists, as a condition of accepting the promise and issuing the NAD, that the firm also promise not to apply for permission for an actual increase under the PSD review process). Whatever the arguments about the "irrationality" of EPA's interpretation in such circumstances, however, those circumstances are not present here. The Company is not interested in peak load capacity; it operated its old kilns at low levels in the past; its new, more efficient kiln might give it the economic ability to increase production; consequently, EPA could plausibly fear an increase in actual emissions were it to provide the NAD. Thus, this seems the very type of case for which the regulations quoted above were written. We can find nothing arbitrary or irrational about EPA applying those regulations to the Company's proposal."*

The FPC inlet fogger project is yet another step removed from a modernization project than the like-kind replacement example. The units will not be replaced at all. The modification and its effects can be isolated and directly estimated. The Department believes that the peaking units have begun normal operation. The addition of the inlet foggers will not change that fact or cause an increase in hours of operation. The modification itself (i.e. installation and operation of the foggers), however, has not yet begun normal operation and its future actual emissions based on potential to emit should be initially estimated assuming usage of the units at full capacity during the permitted 3,390 hours per unit per year.

The number of days during which the foggers can economically operate probably limits actual emissions increases to levels below significance for the purposes of PSD applicability. However, FPC proposes to limit operation of the foggers to an equivalent of 1225 hours per unit per year. This value is approximately equal to the recent historical hours of operation for the four peaking units. It is also a clear indication that compressor air inlet cooling will not cause the units to operate all of the permitted hours. Emissions will increase under these limitations (as previously tabulated) by levels less than the significant emissions rates. The Department concludes, therefore that PSD does not apply to this project.

8. Proposed Addition of New Conditions to Permit PSD-FL-167

The construction permit has expired for the DeBary Project to construct Units P7 through P10. The Department will re-issue the permit incorporating all other previously approved revisions and modifications to-date and will add a further condition authorizing installation and operation of the inlet foggers.

The new condition applicable to the inlet foggers proposed for Units P7 through P10 are shown in the draft re-issued and modified permit. It limits operation of the inlet foggers to 4900 hours per year, based on 1,225 hours per unit per year.

9. Conclusions

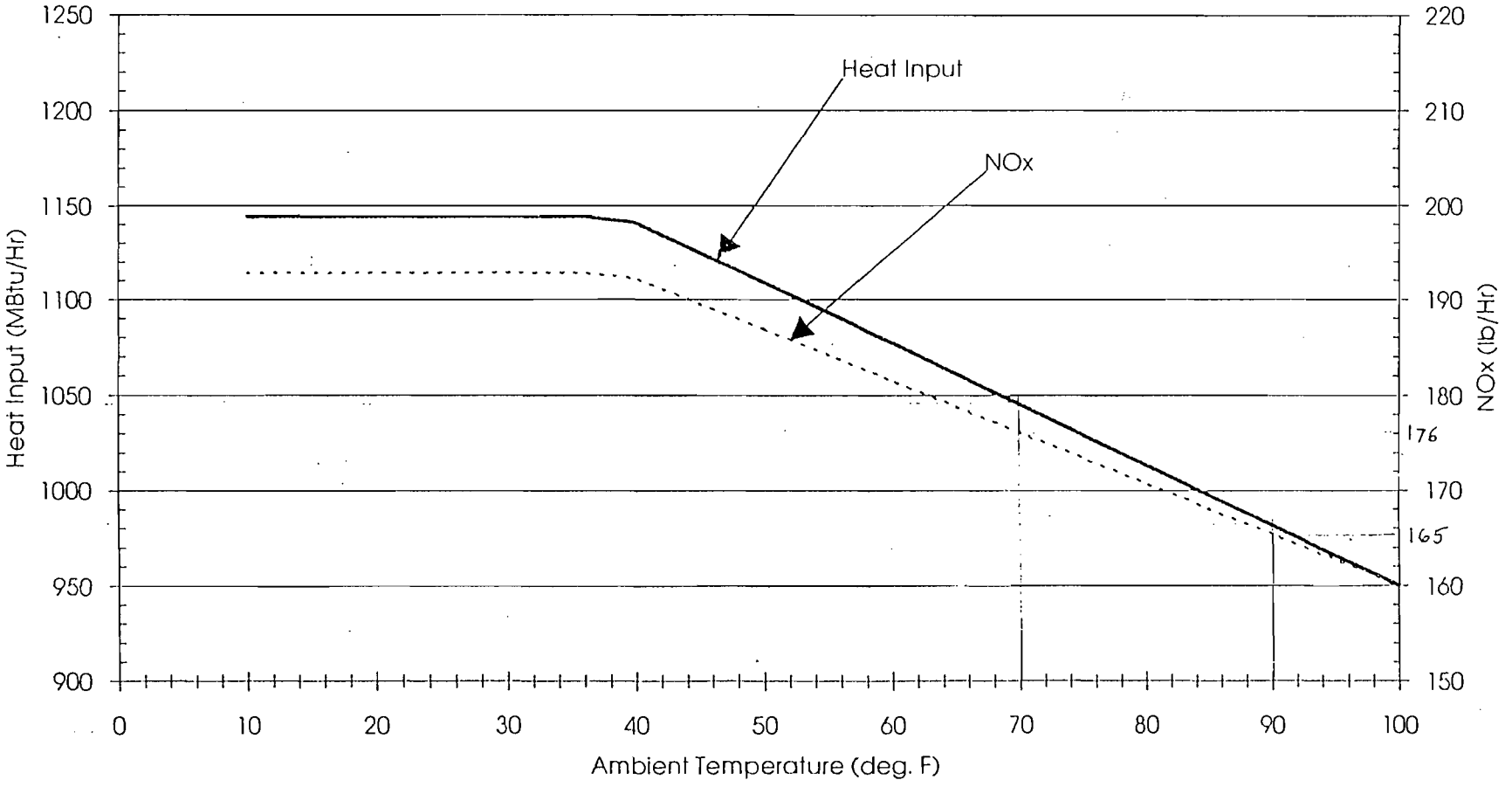
The changes authorized by this permit modification will not cause increases in hours of operation and will not result in significant net emissions increases. The project will not increase the maximum short-term emission rates as these are already achieved under natural conditions of low ambient temperatures without the use of the foggers.

The Department concludes that PSD is not applicable to this project. The changes will not cause a significant impact or cause or contribute to a violation of any ambient air quality standard or PSD increment.

The Department's conclusion does not set a precedent for projects implemented at any facilities other than simple cycle peaking units. It does not set precedents related to any physical changes within the compressors, combustors, rotors, or other key components at such units. The application and determination of the Department's rules does not constitute an interpretation of the EPA rules under 40CFR52.21, Prevention of Significant Deterioration or 40CFR60, New Source Performance Standards.

Florida Power Corporation

GE Frame 7EA Combustion Turbines



Note: Curves based on General Electric's (GE's) expected performance data.

6/10/94

PERMITTEE:

Florida Power Corporation
Post Office Box 14042 MAC BB1A
St. Petersburg, Florida 33733

Authorized Representative:

W. Jeffrey Pardue, CEP
Director, Environmental Services

DEP File No.	1270028-004-AC
Permit No.	PSD-FL-167 C
Project	Peaking Unit Nos. 7-10
SIC No.	4911
Expires:	December 31, 2000

PROJECT AND LOCATION:

Re-issued and modified permit for the construction of four simple cycle combustion turbine-electrical generators (Peaking Units Nos. 7-10). This action also provides for installation of inlet foggers on the four 92.9 megawatt simple cycle General Electric PG7111EA combustion turbine-electrical generators units (Peaking Units 7-10), identified in the Department's ARMS database as E.U.Nos. 015 - 018.

The units are located at the FPC DeBary City Plant, 788 West Highbanks Rd, Volusia County. The UTM coordinates are: Zone 17; 467.5 km E and 3197.2 km N.

STATEMENT OF BASIS:

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The above named permittee is authorized to modify the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

ATTACHED APPENDICES MADE A PART OF THIS PERMIT:

Appendix GC	Construction Permit General Conditions
Appendix SC	Specific Conditions (including Permit 1270028-002-AC and PSD-FL-167B)

Howard L. Rhodes, Director
Division of Air Resources Management

APPENDIX SC

SPECIFIC CONDITIONS

1. The original permit for six simple cycle combustion turbine-electrical generators, AC 64-191015 and PSD-FL-167, dated October 18,1991 was incorporated and modified into air construction permit 1270028-002-AC (PSD-FL-167 B) on May 6, 1997.

   The provisions of air construction permit, 1270028-002-AC (PSD-FL-167 B) to install four simple cycle combustion turbine-electrical generators, dated May 6, 1997 are attached and incorporated into the new air construction permit identified as 1270028-004-AC (PSD-FL-167 C).

   This new permit, 1270028-004-AC (PSD-FL-167 C), supersedes permit 1270028-002-AC (PSD-FL-167 B) to install four simple cycle combustion turbine-electrical generators

2. Inlet foggers may be installed at the compressor inlet to each of the four simple cycle General Electric PG7111EA combustion turbine-electric generators. The four foggers may operate up to 4900 hours per year in aggregate (average 1225 hours per unit per year).

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF FINAL PERMIT MODIFICATION

In the Matter of an
Application for Permit Modification

Mr. W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Dept.
Florida Power Corp.
3201 34th Street South
St. Petersburg, FL 33711

DEP File No. 1270028-002-AC
PSD-FL-167(B)
DeBary Power Plant
Volusia County

Enclosed is Permit Modification Number PSD-FL-167(B) to add natural gas firing capability to four existing oil-fired peaking units at the DeBary Power Plant. This permit modification is issued pursuant to Section 403, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

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

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT MODIFICATION (including the FINAL permit Modification) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 5-6-97 to the person(s) listed:

Mr. W. Jeffrey Pardue, FPC *
Mr. Ken Kosky, P.E.
Mr. Brian Beals, EPA
Mr. John Bunyak, NPS
Mr. Len Kosloy, CD

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Lynn Haber 5-6-97
(Clerk) (Date)

FINAL DETERMINATION

Florida Power Corporation

Permit No. PSD-FL-167(B), File No. 1270028-002-AC
DeBary Facility, Peaking Units P7, P8, P9, and P10

An Intent to Issue a permit modification for Florida Power Corporation (FPC), DeBary Facility, Peaking Units P7, P8, P9, and P10 was distributed on February 14, 1997. The facility is located on West Highbanks Road, Volusia County. The Public Notice of Intent to Issue was published in the Volusia County News-Journal on March 25, 1997. No comments were received in response to the public notice or from agencies reviewing the proposed action.

The final action of the Department will be to issue the permit as proposed.

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, Florida 33711

Permit No.	AC64-191015(B)
PSD No.	PSD-FL-167(B)
File No.	1270028-002-AC
Expires:	December 31, 1997
Facility	DeBary

Authorized Representative:
Mr. W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department

LOCATED AT:

UTM: Zone 17, 467.5 km East and 3197.2 km North

Directions: *West Highbanks Road, DeBary, Volusia County*

STATEMENT OF BASIS:

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and the Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297. The above named permittee is authorized to construct or modify the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department) and made a part hereof and specifically described as follows:

For four 92.9 MW simple cycle combustion turbines (CT's - P7, P8, P9, and P10) with maximum heat input of 1,144 (oil) and 1,159 (gas) MMBtu/hr/unit at 20°F to be located at the DeBary Facility in DeBary, Volusia County. The turbines are GE PG7111EA equipped with wet injection capability. The source shall be constructed in accordance with the permit application, plans, documents, amendments, and drawings, except as otherwise noted in the General and Specific Conditions.

Attached appendices made a part of this permit:

Appendix GC	Construction Permit General Conditions
Appendix SC	Specific Conditions

Howard L. Rhodes, Director
Division of Air Resources Management

APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

G.2 This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

(a) Have access to and copy and records that must be kept under the conditions of the permit;
(b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and.
(c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

(a) A description of and cause of non-compliance; and
(b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extend it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.

G.13 This permit also constitutes:

(a) Determination of Best Available Control Technology *(X)*
(b) Determination of Prevention of Significant Deterioration *(X)*; and
(c) Compliance with New Source Performance Standards *(X)*.

G.14 The permittee shall comply with the following:

(a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

(b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

(c) Records of monitoring information shall include:

1. The date, exact place, and time of sampling or measurements;
2. The person responsible for performing the sampling or measurements;
3. The dates analyses were performed;
4. The person responsible for performing the analyses;
5. The analytical techniques or methods used; and
6. The results of such analyses.

G.15 When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

APPENDIX SC
SPECIFIC CONDITIONS

1. This permit supersedes permit AC64-191015 (PSD-FL-167), dated October 18, 1991, and its revisions dated:

   June 30, 1993 - Change Method 3 to Method 3A
   August 11, 1993 - Replace trace element limits with use of low sulfur oil
   August 30, 1993 - Correct PM basis and SAM limit
   September 21, 1994 - Incorporate heat input curves

   The provisions of the air construction permit AC64-191015 (PSD-FL-167), dated October 18, 1991 and the revisions to that permit, attached and listed above, are incorporated into this air construction permit except for the changes that follow in Specific Conditions 2. through 6, below.

2. Table 1 from Previous Specific Condition 1 is changed per the previous modifications listed above and the present modification to read as shown in revised Table 1, attached.

3. Previous Specific Condition 3 is changed as follows:

   FROM

   These sources are allowed to use only No. 2 fuel oil with a 0.30% average and 0.5% sulfur content maximum, by weight. The sulfur content is based upon a weighted 12 month rolling average of fuel oil analysis from delivery receipts.

   TO:

   These units are allowed to use No. 2 fuel oil with a 0.30% average and 0.5% maximum sulfur content, by weight, as well as natural gas. The sulfur content is based upon a weighted 12-month rolling average of fuel oil analysis from delivery receipts.

4. Previous Specific Condition 4 is changed as follows:

   FROM

   The permitted materials and utilization rates for the combined cycle gas turbines shall not exceed: (a) the maximum heat input of 1,144 MMBtu/hr/unit at 20°F. (b) maximum No. 2 fuel oil consumption shall not exceed 7,826 (at 59° F) gal/hr/unit or 159,200,000 gal/yr for 6 CT's. (c) SO2 emissions for the six combustion turbines not exceed 2,888 tons/year. (d) the maximum capacity factor shall be limited to 38.7%.

TO

The permitted materials and utilization rates for the combined cycle gas turbines shall not exceed: (a) the maximum heat input of 1,144 (oil) and 1,159 (gas) MMBtu/hr/unit at 20° F. (b) maximum No. 2 fuel oil consumption shall not exceed 106,133,333 gal/yr for 4 CT's. (c) SO2 emissions for the four combustion turbines not exceed 1925 tons/year. (d) the maximum capacity factor shall be limited to 38.7% (equivalent to 3,390 hours per year).

5. The first paragraph of Previous Specific Condition 8 is changed as follows:

FROM

Compliance with the NOx, SO_2, CO, PM, PM_{10} and VOC standards shall be determined (on each unit within 10% maximum heat rate input) within 180 days of initial operation and annually thereafter, by the following reference methods as described in 40CFR60, Appendix A (July, 1990 version) and adopted by reference in F.A.C. Rule 17-2.700.

TO

Testing of emissions of NOx, SO_2, CO, PM, PM_{10} and VOC shall be conducted with the source operating at capacity. 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.

6. Previous Specific Condition 14 is changed as follows:

FROM

Test results will be the average of 3 valid runs. The Central District office will be notified at least 15 days in writing in advance of the compliance test(s). The sources shall operate between 90% and 100% of permitted capacity during the compliance test(s) as adjusted for ambient temperature. Compliance test results shall be submitted to the Central District office no later than 45 days after completion.

TO

Test results will be the average of 3 valid runs. The Central District office shall be notified at least 15 days in writing in advance of the compliance test(s). Compliance test results shall be submitted to the Central District office no later than 45 days after completion.

TABLE 1 (Revised)
ALLOWABLE EMISSION LIMITS
Simple Cycle Combustion Turbine

Pollutant	Standard Oil Firing	Each Unit lb/hr [a]	Total 4 Units	Basis
NO_x	42 ppm at 15% oxygen dry basis	182	1,234[b]	BACT
NO_x	25 ppm at 15% oxygen dry basis (gas firing)	107	726[b]	FPC
SO_2	No. 2 fuel oil with 0.3% avg. and 0.5% max. sulfur	555	1,925[c]	BACT
PM/PM_{10}	0.015 lb/MMBtu	15	102[b]	BACT
VOC	-	5	34[b]	BACT
CO	-	54	365[b]	BACT
Sulfuric Acid Mist	No. 2 fuel oil with 0.3% avg. and 0.5% max,. sulfur	69	469[b]	BACT

[a] Emission rates based on 59°F and 15% O_2.

[b] Equivalent to 3390 hours per year at peak load and 38.7% capacity factor.

[c] Total TPY CAP for SO2 assumes 33% capacity factor and fuel sulfur content of 0.30%.

Memorandum

Florida Department of
Environmental Protection

TO: C. H. Fancy

THRU: Al Linero

FROM: Teresa Heron

DATE: February 11, 2000

SUBJECT: FPC DeBary Plant Inlet Fogger Project
DEP File No. 1270028-004-AC

Attached is the draft public notice package including the Intent to Issue and the Technical Evaluation and Preliminary Determination for the inlet fogger project. The application is to install inlet foggers ahead of the compressor inlets of four simple cycle combustion turbines. The foggers will operate on hot days and days of relatively low humidity. The evaporative cooling effected by the foggers will allow the units to operate closer to their rated capacity.

Emissions will increase because the heat rate through the units will increase when the foggers are used and effectively cool the inlet air. FPC proposes to limit operation of the coolers to 1,225 hours per unit per year to insure PSD is not triggered by their use. The issue of making a future potential to past actual annual emission increase calculation is extensively addressed in the Technical Evaluation.

We recommend your signature and approval of the cover letter and Intent to Issue.

AAL/aal

Attachments

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

P.E. Certification Statement

Permittee:

DEP File No. 1270028-004-AC

Florida Power Corporation (FPC)
DeBary Generating Station
Volusia County

Project type:

Project to install inlet foggers ahead of the compressor inlets of four simple cycle combustion turbines. The foggers will operate on hot days and days of relatively low humidity. The evaporative cooling effected by the foggers will allow the units to operate closer to their rated capacity.

Emissions will increase because the heat rate through the units will increase when the foggers are used and effectively cool the inlet air. FPC proposes to limit operation of the coolers to 1,225 hours per unit per year to insure PSD is not triggered by their use. Project is not subject to PSD review.

I HEREBY CERTIFY *that the engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).*

2/11/00

A. A. Linero, P.E. Date
Registration Number: 26032

Bureau of Air Regulation
New Source Review Section
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Phone (850) 921-9523
Fax (850) 922-6979

A. A. LINERO
CERTIFICATE NO. 26032
STATE OF FLORIDA
REGISTERED ENGINEER
2/11

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

1. **Applicant**

Florida Power Corporation
~~3201 34th Street South~~ P.O. Box 14042
St. Petersburg, Florida 337~~01~~ 33

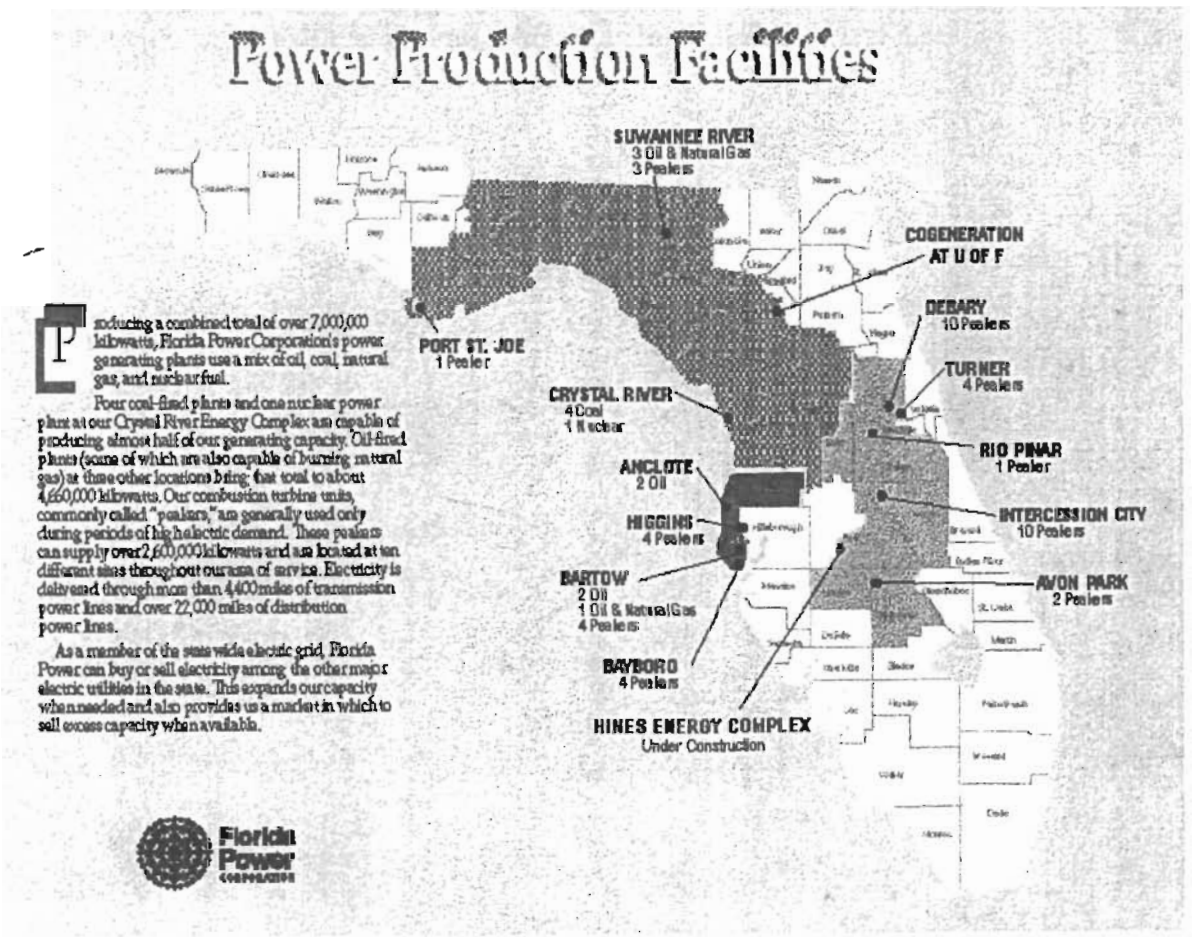
Authorized Representative: W. Jeffrey Pardue, CEP

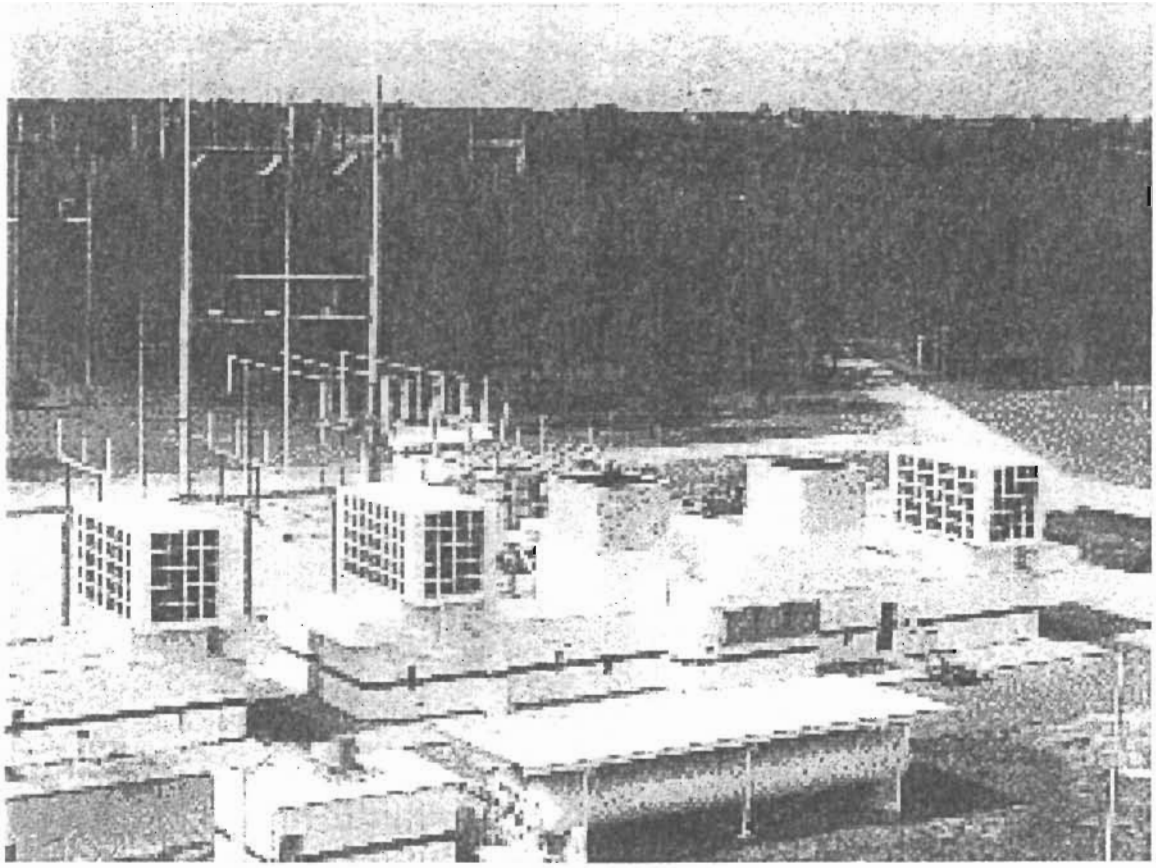
RECEIVED
JAN 31 2000
BUREAU OF AIR REGULATION

2. **Source Name and Location**

~~Intercession City~~ DeBary Plant
Units P7, P8, P9, P10
~~Intercession City~~ DeBary, ~~Osceola~~ Volusia County
UTM Coordinates: Zone 17, ~~446.3~~ 467.5 km East and ~~3126~~ 3197 km North

The location of the ~~Intercession City~~ DeBary Plant within the FPC system is shown below followed by a photograph of the site downloaded from the FPC website:





3. **Source Description**

The Florida Power Corporation (FPC) ~~Intercession City~~ DeBary Plant consists of ten combustion turbine peaking units. Units Nos. P7, P8, P9, and P10 (designated collectively as Emission Unit 002) are each 92.9 megawatt simple cycle General Electric PG7111EA combustion turbine-electrical generators. The units are fired with pipeline natural gas or No. 2 fuel oil containing 0.2 percent (%) or less sulfur. Annual hours of operation per unit are limited to 3,390 or less based on a sliding scale related to the fuel sulfur content. Control measures and equipment consist of firing clean fuels, good combustion practices, and wet injection.

4. **Current Permit and Major Regulatory Program Status**

Construction of Units P7-P10 was authorized by the Department's Prevention of Significant Deterioration (PSD) Permit No. PSD-FL-~~180~~ 167 and Air Construction Permit AC~~49-203114~~ 64-191015 issued in October 1993. ~~Two other larger units were also authorized but only one was constructed.~~ The four units along with six other units at the plant are operated under Title V Air Operation Permit No. ~~0970014~~ 1270028-001-AV issued in ~~January 1998.~~ June 1999.

The initial construction of Units P7-P10 ~~(and P11)~~ was authorized pursuant to the Department's Preconstruction Review and Permitting requirements in Rules 62-210 and 62-212, F.A.C. The units were also reviewed in accordance with the New Source Performance Standard (NSPS) Subpart GG - Standards of Performance for Stationary Gas Turbines, adopted by reference in Rule 62-204.800, F.A.C.

5. **Permit Modification Request**

On ~~February 24, 1998~~ January XX, 2000 the Department received a request from FPC for modification of its permits to install inlet foggers at the compressor inlets of Units P7-P10. These units normally achieve their maximum rated output on cold days because the greater compressor inlet air density allows greater throughput in the rotor or expansion section of the combustion turbine. The maximum power output is lower on hot days because of the lower compressor inlet density. The foggers increase hot-day power output by approximately 4-6 MW through evaporative cooling of the compressor inlet air although maximum output over all temperatures will remain 93 MW or below. The foggers provide little or no benefit on humid or cold days and will not be used under those conditions.

Inlet foggers are routinely included in new combustion turbine projects and have not affected the Department's decisions regarding Best Available Control Technology.

6. **Emissions Increases Due to Modification/Method of Operation**

Because the main components of the units, including the compressors, combustors, rotors, fuel system, etc., will not be modified, it is arguable that the inlet foggers are not physical modification of the units. However the foggers are physical pieces of equipment whose addition and use can increase emissions on hot or dry days. The use of the foggers can also be considered a change in method of operation of the inlet "air conditioning system" that is already used to filter incoming air.

FPC estimated the maximum emissions increases by using the heat-input increase associated with a 20 degree F decrease in compressor inlet temperature. Using the heat input curve, a 20-degree F temperature decrease results in an increase in heat input of 60 mmBtu per hour. This value is multiplied by the emission rate in lb/mmBtu to obtain hourly emissions increases. The results are summarized below together with annual emission increase estimates, based on ~~1,750~~ 1,225 hours of operation per fogger per year. The estimates are based on fuel oil firing and would be substantially less when firing natural gas.

TOTAL EMISSIONS INCREASES DUE TO USE OF INLET FOGGERS AT FOUR UNITS

Pollutant	Emission Rate lb/mmBtu	Emission Increase lb/hr	Annual Increase tons/yr	PSD Threshold tons/yr
NO_x	See Curve	11	~~39~~ 28.1	40
PM/PM_{10}	0.015	0.9	~~3~~ 2.2	25/15
CO	0.05	3	~~14~~ 2.4	100
VOC	0.004	0.2	~~1~~ 0.5	40
SO_2	0.~~19~~ 0.27	~~14~~ 16.2	~~40~~ 39.9	40
SAM	0.016	1	~~3~~ 2.5	7

The emissions increases calculated are the direct result from the modification or change in method of operation. These assume that the ability to achieve greater power output when the foggers are used does not result in the increased usage of the peaking units. The rationale is discussed below.

7. **Evaluation of PSD Applicability**

As a major source, a modification or change in method of operation of Units P7-P10 resulting in **significant net emissions increases** is subject to PSD review. Significant net emissions increase is defined in Rule 62-212.400, F.A.C as follows:

> *Significant Net Emissions Increase – A significant net emissions increase of a pollutant regulated under the Act is a* ***net emissions increase*** *equal to or greater than the applicable significant emission rate listed in Table 212.400-2, Regulated Air Pollutants – Significant Emission Rates.*

The significant emission rates are included (see PSD Threshold) in the Table above. The meaning of a net emissions increase is given in Rule 62-212.400, F.A.C. as:

> *Net Emissions Increase - A modification to a facility results in a net emissions increase when, for a pollutant regulated under the Act, the sum of all of the contemporaneous creditable increases and decreases in the* ***actual emissions*** *of the facility, including the increase in emissions of the modification itself and any increases and decreases in quantifiable fugitive emissions, is greater than zero.*

The definition of actual emissions is given in Rule 62-210.200, F.A.C. (definitions) as follows:

> *Actual Emissions - The actual rate of emission of a pollutant from an emissions unit as determined in accordance with the following provisions:*
>
> *(a) In general, actual emissions as of a particular date shall equal the average rate, in tons per year, at which the emissions unit actually emitted the pollutant during a two year period which precedes the particular date and which is representative of the normal operation of the emissions unit. The Department may allow the use of a different time period upon a determination that it is more representative of the normal operation of the emissions unit. Actual emissions shall be calculated using the emissions unit's actual operating hours, production rates and types of materials processed, stored, or combusted during the selected time period.*
>
> *(b) The Department may presume that unit-specific allowable emissions for an emissions unit are equivalent to the actual emissions of the emissions unit provided that, for any regulated air pollutant, such unit-specific allowable emissions limits are federally enforceable.*
>
> *(c) For any emissions unit (other than an electric utility steam-generating unit specified in subparagraph (d) of this definition) which has not begun* ***normal operations*** *on a particular date, actual emissions shall equal the* ***potential emissions*** *of the emissions unit on that date.*

The term normal operations appears to be undefined and subject to some interpretation. Potential emissions are defined as follows:

> *Potential Emissions or Potential to Emit - The maximum capacity of an emission unit or facility to emit a pollutant under its physical and operational design. Any enforceable physical or operational limitation on the capacity of the emission unit or facility to emit a pollutant, including any air pollution control equipment and any restrictions on hours of operation or on the type or amount of material combusted, stored, or processed shall be treated as part of its design provided that, for any regulated air pollutant, such physical or operational limitation is federally enforceable.*

Actual hours of operation ~~since the start of operations~~ over the last 3 years are as follows:

Annual Operating Hours 1993 - 1998

Unit/Year	1993	1994	1995	1997	1998	1999
P-7	193	873	649	~~1125~~ 1,817	~~1996~~ 2,563	~~1927~~ 1,980
P-8	222	724	562	~~1269~~ 870	~~1974~~ 1,114	~~1796~~ 1,746
P-9	68	697	715	~~1177~~ 1,722	~~2031~~ 2,418	~~1981~~ 1,969
P-10	155	579	512	~~1186~~ 822	~~1893~~ 1,145	~~2015~~ 1,019

There has been a steady increase in annual hours of operation since these units were installed in 1993. During 1998 and 1999, these units were each utilized between 1,~~796~~ 919 and ~~2051~~ 2,563 hours per year or more than half of the 3,390 permitted hours of operation per unit per year.

Although recent hours of operation are well below the permitted limits, they are actually fairly high compared with the typically low levels of operation characteristic of peaking units. Among the reasons for the relatively high levels are the prolonged shutdown of the baseloaded Crystal River Nuclear Unit 3 in 1997, the very hot summer of 1998, and the recognized low electrical power reserve margin in the State.

If these peaking units were being entirely replaced by larger units, it would be clear that they have not begun normal operations. In such a case, a comparison of future to past actual emissions would be based on a comparison of potential emissions to past actual emissions. Such a comparison would undoubtedly result in a determination that PSD is applicable unless the company took an extreme limitation in hours of operation.

If a like-kind replacement was being made, the same comparison would also result in a determination that PSD is applicable. That particular case was addressed for the purposes of comparison to the specific case addressed in the Puerto Rican Cement Decision. This is the watershed Federal Circuit Court of Appeals decision that upheld the past actual-to-potential emission comparison applicable to (at least) modernization projects. The comments of interest for the purposes of the present review are as follows:

> *"One can imagine circumstances that might test the reasonableness of EPA's regulation. An electricity company, for example, might wish to replace a peak load generator -- one that operates only a few days per year -- with a new peak load generator that the firm could, but almost certainly will not, operate every day. And, uncertainties about the precise shape of future electricity peak demand might make the firm hesitate to promise EPA it will never increase actual emissions (particularly since EPA insists, as a condition of accepting the promise and issuing the NAD, that the firm also promise not to apply for permission for an actual increase under the PSD review process). Whatever the arguments about the "irrationality" of EPA's interpretation in such circumstances, however, those circumstances are not present here. The Company is not interested in peak load capacity; it operated its old kilns at low levels in the past; its new, more efficient kiln might give it the economic ability to increase production; consequently, EPA could plausibly fear an increase in actual emissions were it to provide the NAD. Thus, this seems the very type of case for which the regulations quoted above were written. We can find nothing arbitrary or irrational about EPA applying those regulations to the Company's proposal."*

The FPC inlet fogger project is yet another step removed from a modernization project than the like-kind replacement example. The units will not be replaced at all. The modification and its effects can be isolated and directly estimated. The Department believes that the peaking units have begun normal operation. The addition of the inlet foggers will not change that fact or cause an increase in hours of operation. The modification itself (i.e. installation and operation of the foggers), however, has not yet begun normal operation and its future actual emissions based on potential to emit should be initially estimated assuming usage of the units at full capacity during the permitted 3,390 hours per unit per year.

The number of days during which the foggers can economically operate probably limits actual emissions increases to levels below significance for the purposes of PSD applicability. However, FPC proposes to limit operation of the foggers to ~~1,750~~ hours per unit per year. This value is approximately equal to the recent historical hours of operation for the four peaking units. It is also a clear indication that compressor air inlet cooling will not cause the units to operate all of the permitted hours. Emissions will increase under these limitations (as previously tabulated) by levels less than the significant emissions rates. The Department concludes, therefore that PSD does not apply to this project.

8. Proposed Addition of New Conditions to Permit PSD-FL-~~180~~

The construction permit has expired for the ~~Intercession City~~ Project to construct Units P7 through P10~~P11~~. The Department will re-issue the permit incorporating all other previously approved revisions and modifications to-date and will add a further condition authorizing installation and operation of the inlet foggers.

The new condition applicable to the inlet foggers proposed for Units P7 through P10 are shown in the draft re-issued and modified permit. It limits operation of the inlet foggers to ~~1,750~~ hours ~~per unit~~ per year.

9. Conclusions

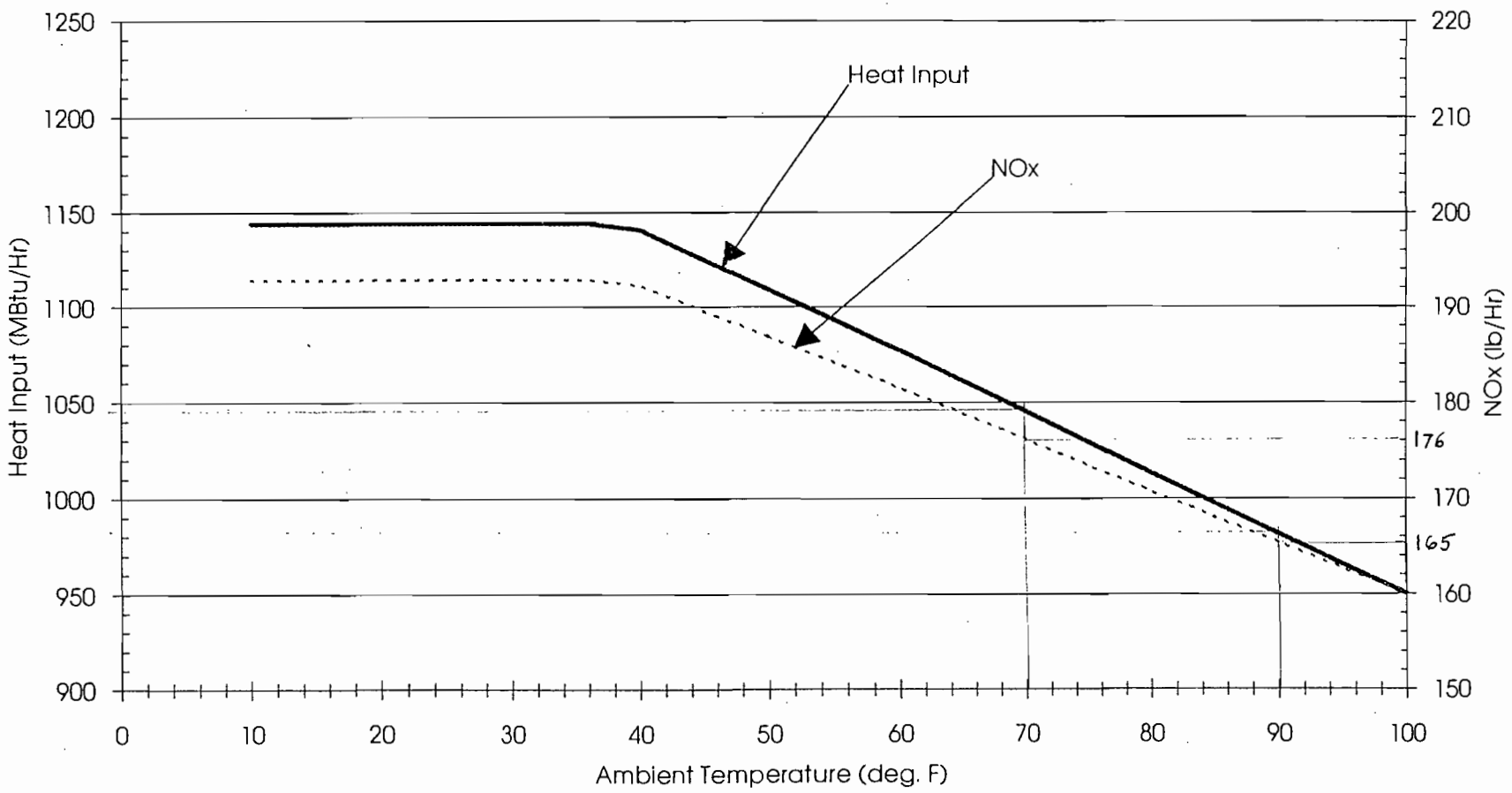
The changes authorized by this permit modification will not cause increases in hours of operation and will not result in significant net emissions increases. The project will not increase the maximum short-term emission rates as these are already achieved under natural conditions of low ambient temperatures without the use of the foggers.

The Department concludes that PSD is not applicable to this project. The changes will not cause a significant impact or cause or contribute to a violation of any ambient air quality standard or PSD increment.

The Department's conclusion does not set a precedent for projects implemented at any facilities other than simple cycle peaking units. It does not set precedents related to any physical changes within the compressors, combustors, rotors, or other key components at such units. The application and determination of the Department's rules does not constitute an interpretation of the EPA rules under 40CFR52.21, Prevention of Significant Deterioration or 40CFR60, New Source Performance Standards.

Florida Power Corporation

GE Frame 7EA Combustion Turbines



Note: Curves based on General Electric's (GE's) expected performance data.

6/10/94

Florida Power
CORPORATION

RECEIVED
JAN 31 2000
BUREAU OF AIR REGULATION

January 24, 2000

Mr. Al Linero, P.E.
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

1270028-004-AC

Dear Mr. Linero:

Re: Inlet Fogging Permit Application - FPC DeBary Facility

Enclosed are three originals of a construction permit application for installation of inlet fogging systems on Units 7 through 10 at Florida Power Corporation's (FPC) DeBary plant. As you know, as it did at the Intercession City plant in 1999, FPC wishes to installinlet fogging systems on these units in order to obtain additional electric output during summer peak demand periods.

FPC requests that the inlet fogging be permitted for use at the DeBary facility for a total of 5,100 hours/year. Permitting the use of inlet fogging will help FPC address a very real need for additional generating capacity during the summer of 2000 with a corresponding insignificant increase in emissions. Please contact Mike Kennedy at (727) 826-4334 if you have any questions.

Sincerely,

W. Jeffrey Pardue, C.E.P.
Director

cc: CD ✓

ONE POWER PLAZA, 263 - 13th Avenue South, BB1A, St. Petersburg, FL 33701-5511 •
P.O. Box 14042, BB1A • St. Petersburg • Florida 33733-4042 • (727) 820-5151
A Florida Progress Company

Department of Environmental Protection

DIVISION OF AIR RESOURCES MANAGEMENT

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Identification of Facility Addressed in This Application

1. Facility Owner/Company Name : Florida Power Corporation	
2. Site Name : DeBary Plant	
3. Facility Identification Number : 1270028	[ ] Unknown
4. Facility Location : DeBary Street Address or Other Locator : 788 West Highbanks Rd. City : DeBary County : Volusia	Zip Code : 32713
5. Relocatable Facility? [ ] Yes [X] No	6. Existing Permitted Facility? [X] Yes [ ] No

Rec'd January 31, 2000
Airs ID # 1270028-004-AC

4. Professional Engineer Statement :

I, the undersigned, hereby certify, except as particularly noted herein, that :*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollutant control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [ ] if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [X] if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [ ] if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Signature _____ Date 11/25/00

(seal)

I. Part 6 - 1

DEP Form No. 62-210.900(1) - Form
Effective : 3-21-96

* I am certifying the technical content of the permit application, but not the engineering design/construction of the inlet fogging system.

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type
002	Combustion Turbine (CT) Peaking Unit Nos. 7-10	

Purpose of Application and Category

Category I : All Air Operation Permit Applications Subject to Processing Under Chapter 62-213, F.A.C.

This Application for Air Permit is submitted to obtain :

[ ] Initial air operation permit under Chapter 62-213, F.A.C., for an existing facility which is classified as a Title V source.

[ ] Initial air operation permit under Chapter 62-213, F.A.C., for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number :

[ ] Air operation permit renewal under Chapter 62-213, F.A.C., for a Title V source.

Operation permit to be renewed :

[ ] Air operation permit revision for a Title V source to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number :

Operation permit to be revised :

[ ] Air operation permit revision or administrative correction for a Title V source to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application.

Operation permit to be revised/corrected :

[ ] Air operation permit revision for a Title V source for reasons other than construction or modification of an emissions unit.

Operation permit to be revised :

Reason for revision :

Category II : All Air Operation Permit Applications Subject to Processing Under Rule 2-210.300(2)(b), F.A.C.

This Application for Air Permit is submitted to obtain :

[ ] Initial air operation permit under Rule 62-210.300(2)(b), F.A.C., for an existing facility seeking classification as a synthetic non-Title V source.

Current operation/construction permit number(s) :

[ ] Renewal air operation permit under Fule 62-210.300(2)(b), F.A.C., for a synthetic non-Title V source.

Operation permit to be renewed :

[ ] Air operation permit revision for a synthetic non-Title V source.

Operation permit to be revised :

Reason for revision :

Category III : All Air Construction Permit Applications for All Facilities and Emissions Units

This Application for Air Permit is submitted to obtain :

[X] Air construction permit to construct or modify one or more emissions units within a facility (including any facility classified as a Title V source).

Current operation permit number(s), if any :
0970014-001-AV

[ ] Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.

Current operation permit number(s) :

[ ] Air construction permit for one or more existing, but unpermitted, emissions units.

Application Processing Fee

Check one :

[ ] Attached - Amount : $0.00 [X] Not Applicable.

Construction/Modification Information

1. Description of Proposed Project or Alterations : Project to add inlet fogging to each of Units 7 through 10. Fogging consists of atomized water to cool the inlet air to the turbine, producing additional electric generation output.	
2. Projected or Actual Date of Commencement of Construction :	15-Mar-2000
3. Projected Date of Completion of Construction :	01-May-2000

Professional Engineer Certification

1. Professional Engineer Name : Jennifer A. Stenger Registration Number : 0052125	
2. Professional Engineer Mailing Address : Organization/Firm : Florida Power Corporation Street Address : P.O. Box 14042, MAC BB1A City : St. Petersburg	State : FL Zip Code : 33733
3. Professional Engineer Telephone Numbers : Telephone : (727)826-4132	Fax : (727)826-4216

4. Professional Engineer Statement :

I, the undersigned, hereby certify, except as particularly noted herein, that :*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollutant control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [ ] if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [X] if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [ ] if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Jennifer A. Stange
Signature
(seal)

1/25/00
Date

* I am certifying the technical content of the permit application, but not the engineering design/construction of the inlet fogging system.

* Attach any exception to certification statement.

Application Contact

1. Name and Title of Application Contact :

Name : J. Michael Kennedy, Q.E.P.
Title : Manager, Air Programs

2. Application Contact Mailing Address :

Organization/Firm : Florida Power Corporation
Street Address : P.O. Box 14042, MAC BB1A
City : St. Petersburg
State : FL Zip Code : 33733

3. Application Contact Telephone Numbers :

Telephone : (727)826-4334 Fax : (727)826-4216

Application Comment

This application is for a permit to authorize the installation of inlet fogging on DeBary Units 7 through 10.

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility, Location, and Type 6

1. Facility UTM Coordinates :
   Zone : 17 East (km) : 467.50 North (km) : 3197.20

2. Facility Latitude/Longitude :
   Latitude (DD/MM/SS) : 28 54 17 Longitude (DD/MM/SS) : 81 19 55

3. Governmental Facility Code :	4. Facility Status Code :	5. Facility Major Group SIC Code :	6. Facility SIC(s) :
0	A	49	

7. Facility Comment :

Facility consists of 10 combustion turbine peaking units. Six CTs are fired with #2 distillate oil with a maximum sulfur content of 0.5%. Four CTs are fired with #2 distillate oil with a maximum sulfur content of 0.2% or natural gas. These 4 CTs are limited to average annual capacity factor of 33% based on weighted 12-month rolling average sulfur content of 0.3%, which may be increased up to 38.7% if average sulfur content is 0.26% or less.

Facility Contact

1. Name and Title of Facility Contact :
   W. B. Hicks
   Asset Manager

2. Facility Contact Mailing Address :
   Organization/Firm : Florida Power Corporation
   Street Address : 788 West Highbanks Rd.
   City : DeBary State : FL Zip Code : 32713

3. Facility Contact Telephone Numbers :
   Telephone : (407)668-5103 Fax : (407)646-8370

Facility Regulatory Classifications

1. Small Business Stationary Source?	N
2. Title V Source?	Y
3. Synthetic Non-Title V Source?	N
4. Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?	Y
5. Synthetic Minor Source of Pollutants Other than HAPs?	N
6. Major Source of Hazardous Air Pollutants (HAPs)?	N
7. Synthetic Minor Source of HAPs?	N
8. One or More Emissions Units Subject to NSPS?	Y
9. One or More Emission Units Subject to NESHAP?	N
10. Title V Source by EPA Designation?	N
11. Facility Regulatory Classifications Comment : Combustion Turbine Units 7 through 10, to which this application applies, are subject to NSPS for stationary gas turbines (40 CFR Part 60, Subpart GG).	

B. FACILITY REGULATIONS

Rule Applicability Analysis

Not Applicable

B. FACILITY REGULATIONS

List of Applicable Regulations

Refer to Attachment DB-FI-B

C. FACILITY POLLUTANTS

Facility Pollutant Information

1. Pollutant Emitted	2. Pollutant Classification
PM10	A
NOX	A
PM	A
CO	A
SO2	A
VOC	A
SAM	A

D. FACILITY POLLUTANT DETAIL INFORMATION

Facility Pollutant Information Pollutant 1

1. Pollutant Emitted :	PM10
2. Requested Emissions Cap :	(lbs/hour) (tons/year)
3. Basis for Emissions Cap Code :	
4. Facility Pollutant Comment :	

DEP Form No. 62-210.900(1) - Form
Effective : 3-21-96

D. FACILITY POLLUTANT DETAIL INFORMATION

Facility Pollutant Information Pollutant 2

1. Pollutant Emitted :	NOX
2. Requested Emissions Cap :	(lbs/hour) (tons/year)
3. Basis for Emissions Cap Code :	
4. Facility Pollutant Comment :	

D. FACILITY POLLUTANT DETAIL INFORMATION

Facility Pollutant Information Pollutant 3

1. Pollutant Emitted :	PM
2. Requested Emissions Cap :	(lbs/hour) (tons/year)
3. Basis for Emissions Cap Code :	
4. Facility Pollutant Comment :	

D. FACILITY POLLUTANT DETAIL INFORMATION

Facility Pollutant Information Pollutant 4

1. Pollutant Emitted :	CO
2. Requested Emissions Cap :	(lbs/hour) (tons/year)
3. Basis for Emissions Cap Code :	
4. Facility Pollutant Comment :	

D. FACILITY POLLUTANT DETAIL INFORMATION

Facility Pollutant Information Pollutant 5

1. Pollutant Emitted :	SO2
2. Requested Emissions Cap :	(lbs/hour) (tons/year)
3. Basis for Emissions Cap Code :	
4. Facility Pollutant Comment :	

D. FACILITY POLLUTANT DETAIL INFORMATION

Facility Pollutant Information Pollutant 6

1. Pollutant Emitted :	VOC
2. Requested Emissions Cap :	(lbs/hour) (tons/year)
3. Basis for Emissions Cap Code :	
4. Facility Pollutant Comment :	

D. FACILITY POLLUTANT DETAIL INFORMATION

Facility Pollutant Information Pollutant 7

1. Pollutant Emitted :	SAM
2. Requested Emissions Cap :	(lbs/hour) (tons/year)
3. Basis for Emissions Cap Code :	
4. Facility Pollutant Comment :	

D. FACILITY SUPPLEMENTAL INFORMATION

Supplemental Requirements for All Applications

1. Area Map Showing Facility Location :	DB-F1-E1
2. Facility Plot Plan :	DB-F1-E2
3. Process Flow Diagram(s) :	DB-F1-E3
4. Precautions to Prevent Emissions of Unconfined Particulate Matter :	NA
5. Fugitive Emissions Identification :	NA
6. Supplemental Information for Construction Permit Applicat	DB-F1-E4

Additional Supplemental Requirements for Category I Applications Only

7. List of Proposed Exempt
8. List of Equipment/Activities Regulated under
9. Alternative Methods of Operation :
10. Alternative Modes of Operation (Emissions
11. Identification of Additional Applicable
12. Compliance Assurance Monitoring
13. Risk Management Plan Verification :
14. Compliance Report and Plan :
15. Compliance Certification (Hard-copy Require

ATTACHMENT DB-FI-B

ATTACHMENT DB-FI-B
APPLICABLE REQUIREMENTS LISTING - POWER PLANTS

FACILITY: FPC DeBary Plant

FDEP Rules:

General Permits:

62-4.030	
62-4.040(1)(a)	- Exemptions from permitting
62-4.040(1)(b)	- Exemptions from permitting
62-4.100	
62-4.130	

Asbestos NESHAP:

62-204.800(8)(b)8.(State Only)	- Asbestos Removal
62-204.800(8)(d) (State Only)	- General Provisions (Asbetos)

Stationary Sources-General:

62-210.300(2)

Exemptions - Plant Specific:

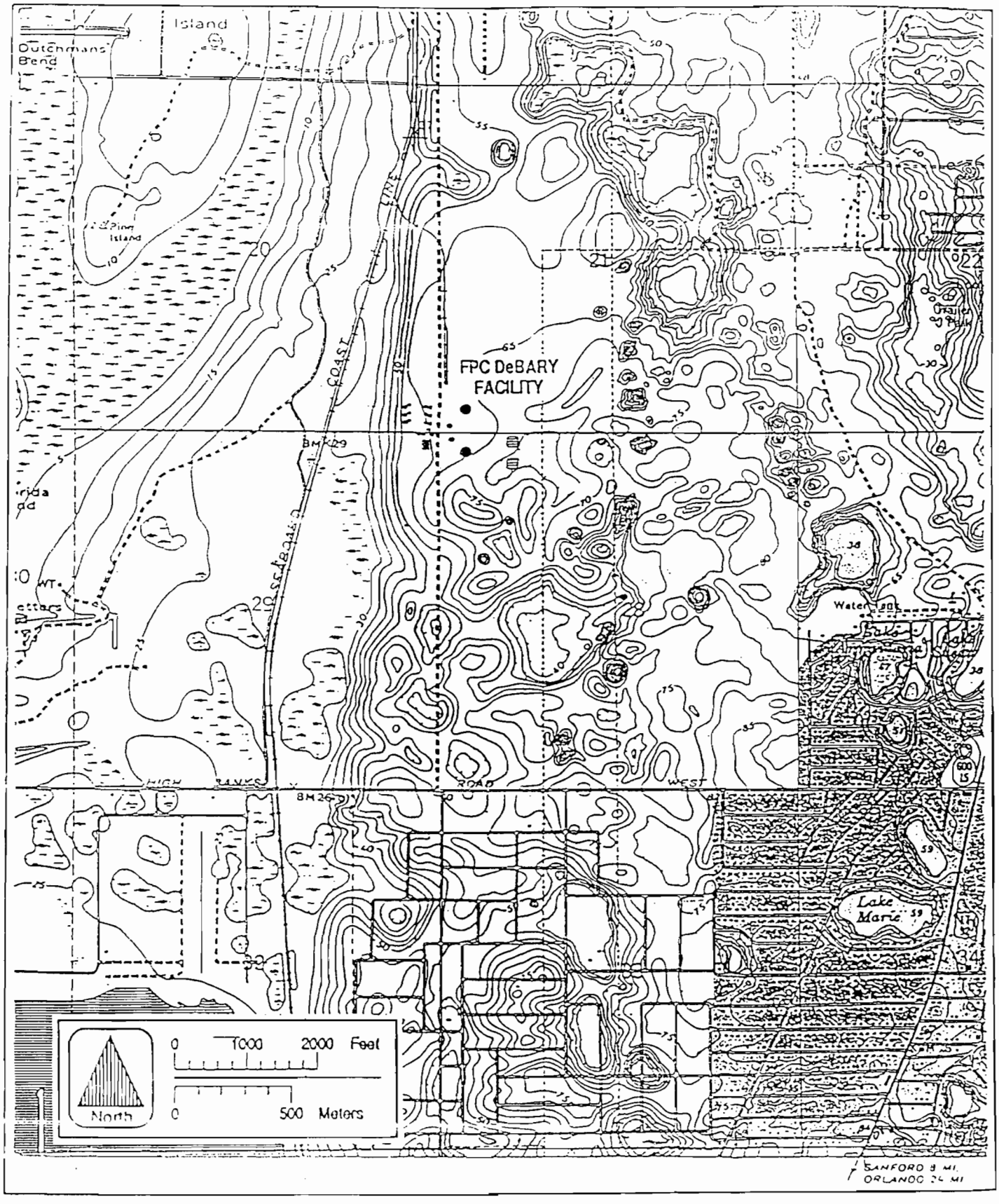
62-210.300(3)(a)4.	- comfort heating < 1 mmBtu/hr
62-210.300(3)(a)5.	- mobile sources
62-210.300(3)(a)7.	- non-industrial vacuum cleaning
62-210.300(3)(a)8.	- refrigeration equipment
62-210.300(3)(a)9.	- vacuum pumps for labs
62-210.300(3)(a)10.	- steam cleaning equipment
62-210.300(3)(a)11.	- sanders < 5 ft2
62-210.300(3)(a)12.	- space heating equip.; (non-boilers)
62-210.300(3)(a)14.	- bakery ovens
62-210.300(3)(a)15.	- lab equipment
62-210.300(3)(a)16.	- brazing, soldering or welding
62-210.300(3)(a)17.	- laundry dryers
62-210.300(3)(a)20.	- emergency generators < 32,000 gal/yr
62-210.300(3)(a)21.	- general purpose engines < 32,000 gal.yr
62-210.300(3)(a)22.	- fire and safety equipment
62-210.300(3)(a)23.	- surface coating >5% VOC; 6 gal/month
62-210.300(3)(a)24.	- surface coating <5% VOC
62-210.300(3)(b)	- Temporary Exemptions
62-210.370(3)	- AOR's
62-210.900(5)	- AOR Form

Title V Permits:	
62-213.205(1)(a)	- Fees
62-213.205(1)(b)	
62-213.205(1)(c)	
62-213.205(1)(e)	
62-213.205(1)(f)	
62-213.205(1)(g)	
62-213.205(1)(i)	
62-213.205(1)(j)	
62-213.400	- Permits/Revisions
62-213.410	- Changes without permit revisions
62-213.420.(1)(b)2.	- Permits-allows continued operation
62-213.420.(1)(b)3.	- Permits-additional information
62-213.460	- Permit Shield
62-213.900(1)	- Fee Form
Open Burning:	
62-256.300	- Prohibitions
62-256.700	- Open burning Allowed
Asbestos Removal:	
62-257.301	- Notification and Fee
62-257.400	- Fee Schedule
62-257.900	- Form
Stationary Sources-Emission Standards:	
62-296.320(2) (State Only)	- Odor
62-296.320(3)(b)(State Only)	- Emergency Open Burning
62-296.320(4)(b)	- General VE Standard
62-296.320(4)(c)	- Unconfined Emissions of Particulate Matter
Stationary Sources-Emission Monitoring	
62-297.310(7)(a)10.	- Exemption of annual VE for 210.300(3)(a) sources/Gen. Per.

Federal Regulations:	
Asbestos Removal:	
40 CFR 61.05	- Prohibited Activities
40 CFR 61.12(b)	- Compliance with work practice standard
40 CFR 61.14	- Monitoring Requirements (if reguired)
40 CFR 61.19	- Circumvention
40 CRF 61.145	- Demolition and Renovation
40 CFR 61.148	- Standard for Insulating Material

ATTACHMENT DB-FI-E1

AREA MAP

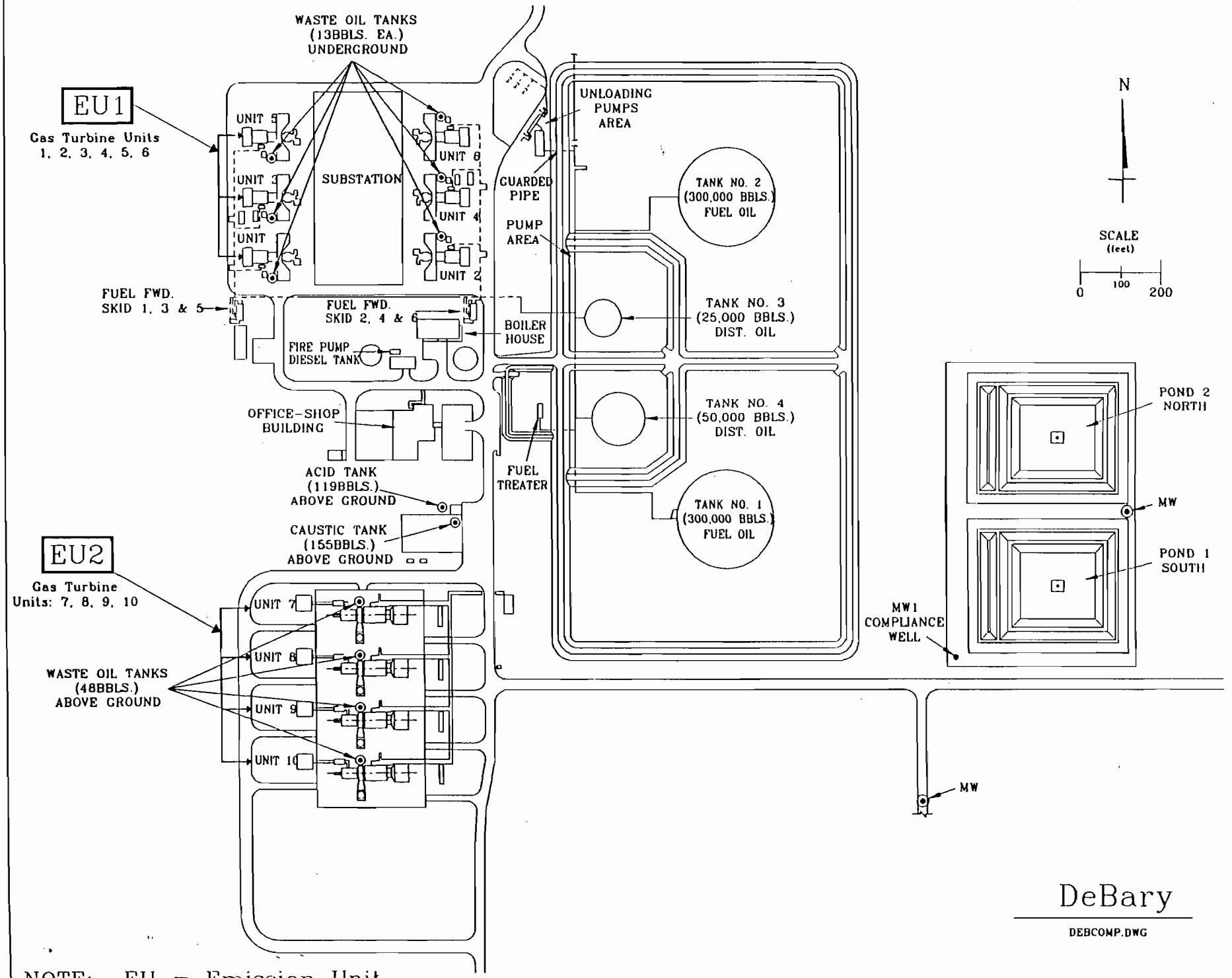


LOCATION OF THE FPC DeBARY FACILITY

KBN

ATTACHMENT DB-FI-E2

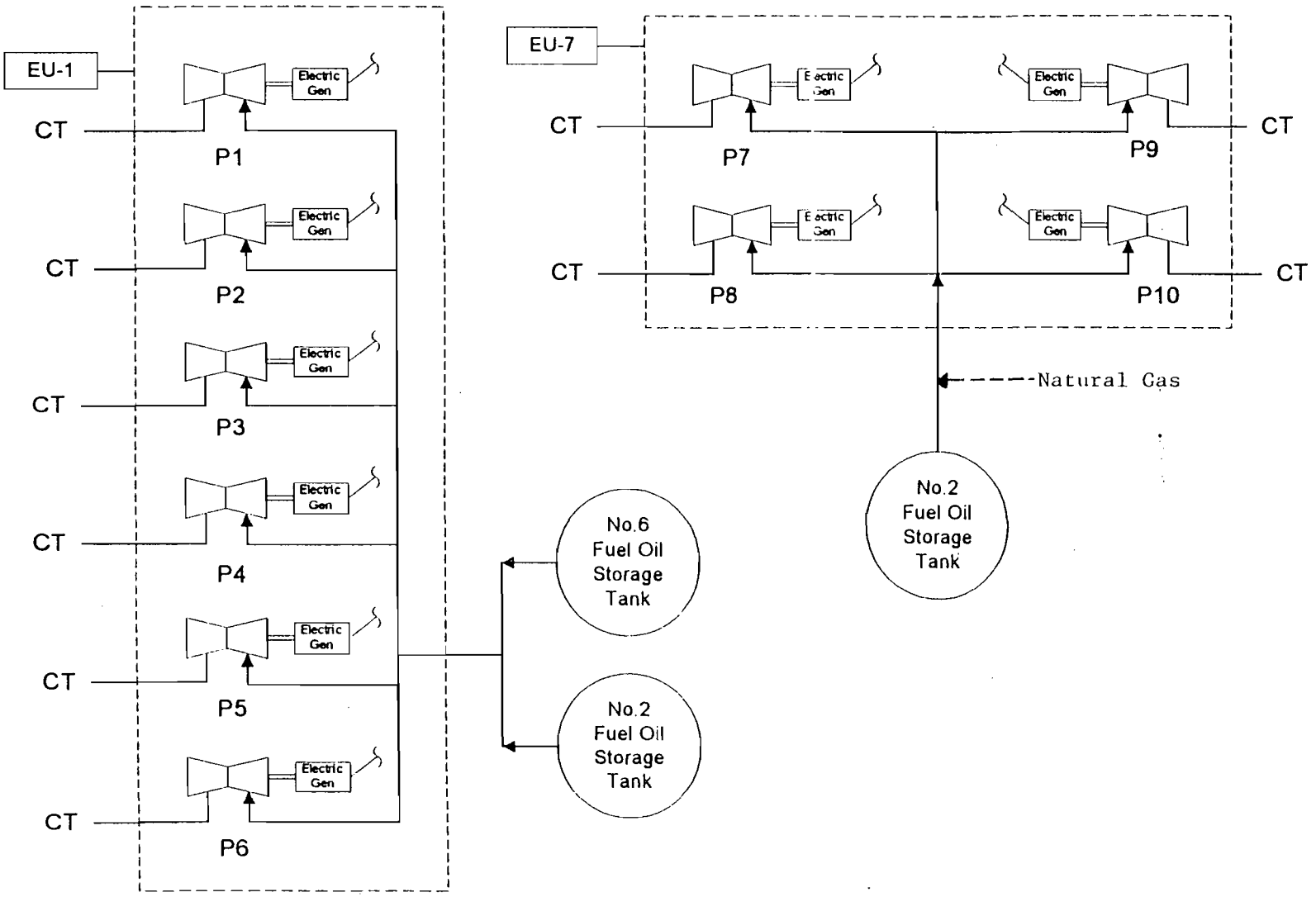
FACILITY PLOT PLAN



NOTE: EU = Emission Unit

ATTACHMENT DB-FI-E3

PROCESS FLOW DIAGRAM



Note:
GT = Gas Turbine
EU = Emission Unit Number
See segment section for the operating rate of each emission unit
EU 3 - Facility-wide Fugitive/Deminimis Emissions not shown.

Attachment Florida Power Corporation DeBary, Florida Facility Process Flow Diagram	Process Flow Legend: Solid / Liquid Gas Steam	Emission Unit: Significant Units Process Area: Overall Plant *Filename:* FPCDB1.VSD *Latest Revision Date:* 6/4/96	KBN Engineering and Applied Sciences, Inc.

Attachment DB-F1-E4

Supplemental Information

Description of Project and Estimated Emissions Increase

The inlet fogging system is useful on hot summer days. A water mist is sprayed into the inlet of the combustion turbine. The mist cools the inlet air by evaporation, resulting in a 20 degrees F. reduction in temperature. The air is therefore denser, and the unit can achieve higher output (nominally, 4 to 6 MW of additional output will be obtained). This also results in slightly higher heat input and NOx emissions, although they are within the allowable limits for the inlet temperature achieved. In addition, the fogging system improves unit efficiency slightly. Efficiency is expected to increase by approximately 1% as a result of the fogging. This will have a nominal offsetting effect on the direct increase in emissions resulting from the use of inlet fogging.

The attached curves, which are a part of the current permit for the facility, show the relationship between inlet temperature and heat input and NOx emissions for the GE Frame 7EA combustion turbines at DeBary. These curves do not take into account the improved efficiency achieved with inlet fogging, so they are conservative.

A typical scenario would occur when the ambient temperature is 90 degrees F. If fogging is used, the inlet air to the combustion turbine would be cooled to approximately 70 deg. NOx emissions could increase from 165 lbs/hr to 176 lbs/hr, which is an increase of 11 lbs/hr per unit. This is a worst-case estimate, because it is based on oil firing. The increase would be only 6 lbs/hr while operating on natural gas. At an increase of 11 lbs/hr, inlet fogging could be used for an aggregate of over 7,000 hrs/year and remain below the PSD significant emissions increase threshold of 40 tons/year. However, as shown below, sulfur dioxide is the controlling pollutant in this case, limiting total inlet fogging time to 4,900 hrs/year.

For the criteria pollutants, the emissions increase due to inlet fogging can be estimated by using the heat input increase associated with a 20 deg. F decrease in temperature. Using the heat input curve, a 20 deg. F temperature decrease results in an increase in heat input of 60 mmBtu/hour. This is then multiplied by the permitted emissions rate in lb/mmBtu in order to obtain the maximum increase in hourly emissions. The following table summarizes the results.

Pollutant	Emission Rate (lb/mmBtu)	Emission Increase (lb/hr)	Tons/Year @ 4,900 hr/yr	PSD Threshold
SO_2	0.27	16.2	39.9	40
NOx	See Curve	11.0	28.1	40
PM	0.015	0.9	2.2	25
PM10	0.015	0.9	2.2	15
CO	0.05	3.0	7.4	100
VOC	0.004	0.2	0.5	40
SAM	0.016	1.0	2.5	7

All pollutant increases will remain less than the respective PSD thresholds at an aggregate fogging use limit of 4,900 hours per year for Units 7 through 10.

Unit Hours of Operation

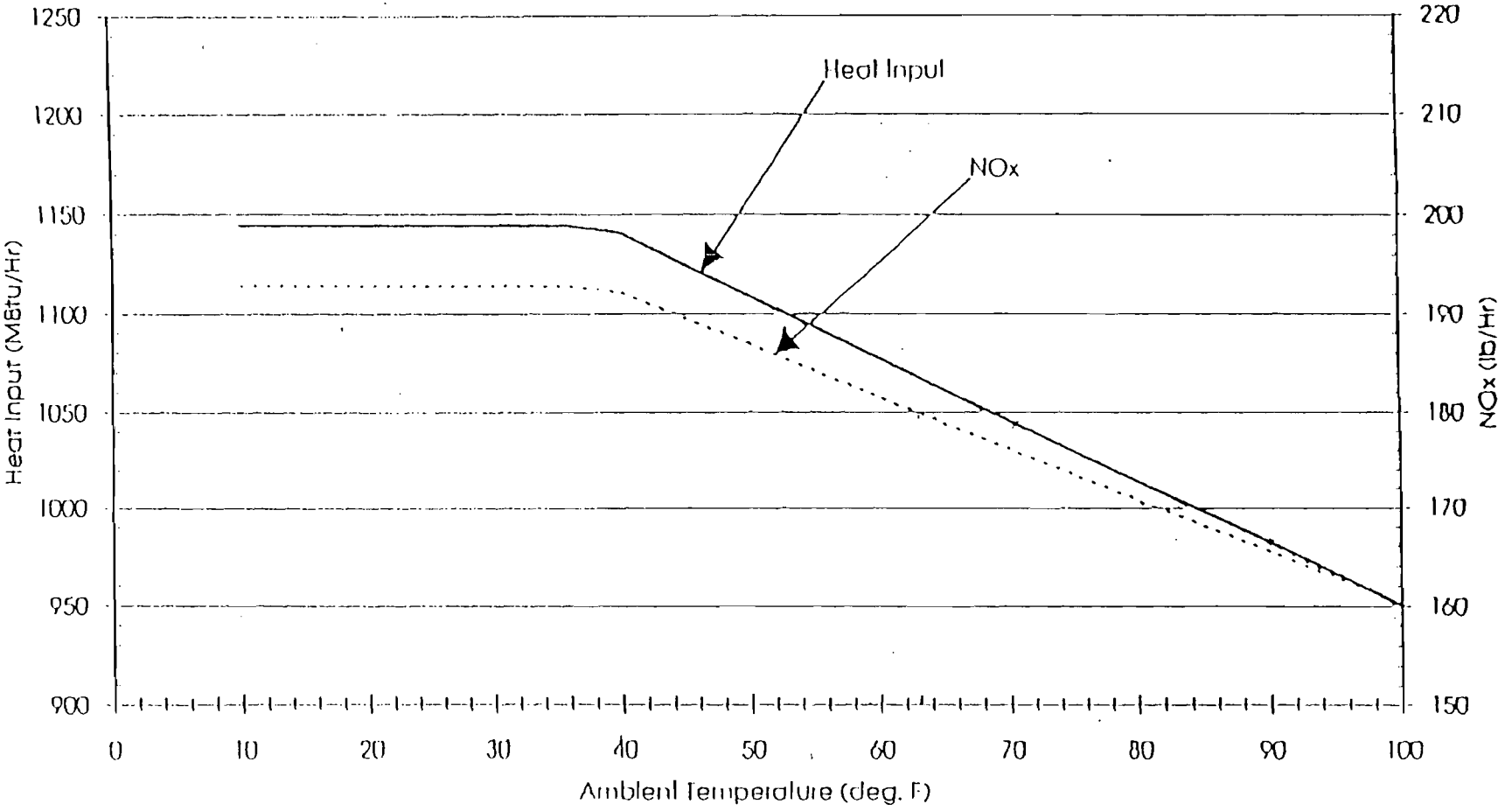
Total annual hours of operation for Units 7 through 10 for 1997 and 1998 are as follows.

Unit	1997 Hours	1998 Hours	1999 Hours
7	1,817	2,563	1,980
8	870	1,114	1,746
9	1,722	2,418	1,969
10	822	1,145	1,019

Units 7 through 10 will continue to be used as peaking units after the installation of inlet fogging.

Florida Power Corporation

GE Frame 7EA Combustion Turbines



Heat Input vs. Ambient Temperature Curve

Florida Power Corporation

III. EMISSIONS UNIT INFORMATION

A. TYPE OF EMISSIONS UNIT
(Regulated and Unregulated Emissions Units)

Emissions Unit Information Section 1

Combustion Turbine (CT) Peaking Unit Nos. 7-10

Type of Emissions Unit Addressed in This Section

1. Regulated or Unregulated Emissions Unit? Check one :

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

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

2. Single Process, Group of Processes, or Fugitive Only? Check one :

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

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

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

Emissions Unit Information Section 1

B. GENERAL EMISSIONS UNIT INFORMATION
(Regulated and Unregulated Emissions Units)

Emissions Unit Description and Status

1. Description of Emissions Unit Addressed in This Section : Combustion Turbine (CT) Peaking Unit Nos. 7-10		
2. Emissions Unit Identification Number : 002 [ ] No Corresponding ID [ ] Unknown		
3. Emissions Unit Status Code : A	4. Acid Rain Unit? [X] Yes [ ] No	5. Emissions Unit Major Group SIC Code : 49
6. Emissions Unit Comment :		

Emissions Unit Information Section 1

Combustion Turbine (CT) Peaking Unit Nos. 7-10

Emissions Unit Control Equipment 1

1. Description : Water Injection
2. Control Device or Method Code :

C. EMISSIONS UNIT DETAIL INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Information Section 1
Combustion Turbine (CT) Peaking Unit Nos. 7-10

Emissions Unit Details

1. Initial Startup Date :	01-Nov-1992		
2. Long-term Reserve Shutdown Date :			
3. Package Unit : Manufacturer : General Electric			Model Number : PG 7111EA
4. Generator Nameplate Rating :	93	MW	
5. Incinerator Information : Dwell Temperature : Dwell Time : Incinerator Afterburner Temperature :			Degrees Fahrenheit Seconds Degrees Fahrenheit

Emissions Unit Operating Capacity

1. Maximum Heat Input Rate :	1144	mmBtu/hr	
2. Maximum Incinerator Rate :		lb/hr	tons/day
3. Maximum Process or Throughput Rate :			
4. Maximum Production Rate :			
5. Operating Capacity Comment : See Attachment DB-EU2-C5			

Emissions Unit Operating Schedule

Requested Maximum Operating Schedule :		
	24 hours/day	7 days/week
	52 weeks/year	3,390 hours/year

D. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)

Emissions Unit Information Section 1
Combustion Turbine (CT) Peaking Unit Nos. 7-10

Rule Applicability Analysis

Not Applicable

List of Applicable Regulations

See Attachment DB-EU2-D

E. EMISSION POINT (STACK/VENT) INFORMATION

Emissions Unit Information Section 1

Combustion Turbine (CT) Peaking Unit Nos. 7-10

Emission Point Description and Type :

1. Identification of Point on Plot Plan or Flow Diagram :	See Attach. DB-FI-E2	
2. Emission Point Type Code :	1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking : (limit to 100 characters per point)		
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common : Combustion turbine gases exhaust through a single stack per turbine.		
5. Discharge Type Code :	V	
6. Stack Height :	50	feet
7. Exit Diameter :	13.8	feet
8. Exit Temperature :	1043	°F
9. Actual Volumetric Flow Rate :	1551317	acfm
10. Percent Water Vapor :	0.00	%
11. Maximum Dry Standard Flow Rate :	0	dscfm
12. Nonstack Emission Point Height :	0	feet
13. Emission Point UTM Coordinates : Zone : 17 East (km) : 467.500 North (km) : 3197.200		

14. Emission Point Comment :

Exit temperature and flow rate given for a single CT at an ambient temperature of 59 deg. F (oil firing).

F. SEGMENT (PROCESS/FUEL) INFORMATION

Emissions Unit Information Section 1

Combustion Turbine (CT) Peaking Unit Nos. 7-10

Segment Description and Rate : Segment 1

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) : Distillate fuel oil.	
2. Source Classification Code (SCC) : 20100101	
3. SCC Units : Thousand Gallons Burned (all liquid fuels)	
4. Maximum Hourly Rate : 8.70	5. Maximum Annual Rate : 29,493.00
6. Estimated Annual Activity Factor :	
7. Maximum Percent Sulfur : 0.50	8. Maximum Percent Ash : 0.10
9. Million Btu per SCC Unit : 132	
10. Segment Comment : Data for one CT at 59 deg. F. Weighted 12-month rolling avg. sulfur content limit of 0.3%.	

F. SEGMENT (PROCESS/FUEL) INFORMATION

Emissions Unit Information Section 1

Combustion Turbine (CT) Peaking Unit Nos. 7-10

Segment Description and Rate : Segment 2

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) : Natural gas	
2. Source Classification Code (SCC) : 20100201	
3. SCC Units : Million Cubic Feet Burned (all gaseous fuels)	
4. Maximum Hourly Rate : 1.05	5. Maximum Annual Rate : 3,553.00
6. Estimated Annual Activity Factor :	
7. Maximum Percent Sulfur :	8. Maximum Percent Ash :
9. Million Btu per SCC Unit : 1,000	
10. Segment Comment : Maximum % sulfur: 1 grain/100 cf. 1) Max. hourly and annual rates at 59 deg. F for one CT. Annual rate based on 3390 hours. However, permitted rate is actually an aggregate of all four units.	

G. EMISSIONS UNIT POLLUTANTS
(Regulated and Unregulated Emissions Units)

Emissions Unit Information Section 1
Combustion Turbine (CT) Peaking Unit Nos. 7-10

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
2 - NOX	028		EL
3 - PM			EL
4 - PM10			EL
5 - CO			EL
6 - VOC			EL
7 - SAM			EL
1 - SO2			EL

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section 1

Combustion Turbine (CT) Peaking Unit Nos. 7-10

Pollutant Potential/Estimated Emissions : Pollutant 1

1. Pollutant Emitted : **SO2**
2. Total Percent Efficiency of Control : %
3. Potential Emissions : 555.0000000 lb/hour 1,925.0000000 tons/year
4. Synthetically Limited? [ ] Yes [X] No
5. Range of Estimated Fugitive/Other Emissions: to tons/year
6. Emissions Factor 1 Units : % S Reference : AC permit limit
7. Emissions Method Code : 0
8. Calculations of Emissions : Oil-firing at 59 deg. F. AC permit limit. Four CTs have an aggregate limit of 1,925 TPY.
9. Pollutant Potential/Estimated Emissions Comment : Max. hourly emissions based on ambient temp. at 59 deg. F. Annual emissions based on 59 deg. and 33% capacity factor.

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section 1

Combustion Turbine (CT) Peaking Unit Nos. 7-10

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section 1

Combustion Turbine (CT) Peaking Unit Nos. 7-10

Pollutant Potential/Estimated Emissions : Pollutant 2

1. Pollutant Emitted : **NOX**
2. Total Percent Efficiency of Control : 80.00 %
3. Potential Emissions : 182.0000000 lb/hour 1,234.0000000 tons/year
4. Synthetically Limited? [ ] Yes [X] No
5. Range of Estimated Fugitive/Other Emissions: to tons/year
6. Emissions Factor 42 Units : ppmvd@15% O2 Reference : Permit limit
7. Emissions Method Code : 0
8. Calculations of Emissions : Oil-firing at 59 deg. F. AC permit limit. 4 CTs have aggregate limit of 1,234 TPY.
9. Pollutant Potential/Estimated Emissions Comment : Max. hourly emissions based on ambient temp. at 59 deg. F. Annual emissions based on 59 deg. and 38.7% capacity factor.

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section 1

Combustion Turbine (CT) Peaking Unit Nos. 7-10

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section 1
Combustion Turbine (CT) Peaking Unit Nos. 7-10

Pollutant Potential/Estimated Emissions : Pollutant 3

1. Pollutant Emitted : **PM**
2. Total Percent Efficiency of Control : %
3. Potential Emissions : 15.0000000 lb/hour 25.4000000 tons/year
4. Synthetically Limited? [ ] Yes [X] No
5. Range of Estimated Fugitive/Other Emissions: to tons/year
6. Emissions Factor 15 Units : lb/hr Reference : AC permit limit
7. Emissions Method Code : 0
8. Calculations of Emissions : Oil-firing at 59 deg. F. AC permit limit. Equivalent TPY for 1 CT; 4CTs have aggregate limit of 102 TPY.
9. Pollutant Potential/Estimated Emissions Comment : Max. hourly emissions based on ambient temp. at 59 deg. F. Annual emissions based on 59 deg. and 38.7% capacity factor.

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section 1

Combustion Turbine (CT) Peaking Unit Nos. 7-10

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section 1

Combustion Turbine (CT) Peaking Unit Nos. 7-10

Pollutant Potential/Estimated Emissions : Pollutant 4

1. Pollutant Emitted : **PM10**
2. Total Percent Efficiency of Control : %
3. Potential Emissions : 15.0000000 lb/hour 25.4000000 tons/year
4. Synthetically Limited? [ ] Yes [X] No
5. Range of Estimated Fugitive/Other Emissions: to tons/year
6. Emissions Factor 15 Units : lb/hr Reference : AC permit limit
7. Emissions Method Code : 0
8. Calculations of Emissions : Oil-firing at 59 deg. F. AC permit limit. Equivalent TPY for single CT; 4 CTs have an aggregate limit of 102 TPY.
9. Pollutant Potential/Estimated Emissions Comment : Max. hourly emissions based on ambient temp. at 59 deg. F. Annual emissions based on 59 deg. F and 38.7% capacity factor.

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section 1

Combustion Turbine (CT) Peaking Unit Nos. 7-10

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section 1
Combustion Turbine (CT) Peaking Unit Nos. 7-10

Pollutant Potential/Estimated Emissions : Pollutant 5

1. Pollutant Emitted : **CO**
2. Total Percent Efficiency of Control : %
3. Potential Emissions : 54.0000000 lb/hour 91.5000000 tons/year
4. Synthetically Limited? [ ] Yes [X] No
5. Range of Estimated Fugitive/Other Emissions: to tons/year
6. Emissions Factor 25 Units : ppmvd Reference : AC permit limit
7. Emissions Method Code : 0
8. Calculations of Emissions : Oil-firing @ 59 deg. F. AC permit limit. Equivalent TPY for 1 CT; 4 CTs limited to 366 TPY.
9. Pollutant Potential/Estimated Emissions Comment : Max. hourly emissions based on ambient temp. @ 59 deg. F. Annual emissions based on 59 deg. F. and 38.7% capacity factor.

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section 1

Combustion Turbine (CT) Peaking Unit Nos. 7-10

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section 1
Combustion Turbine (CT) Peaking Unit Nos. 7-10

Pollutant Potential/Estimated Emissions : Pollutant 6

1. Pollutant Emitted : **VOC**
2. Total Percent Efficiency of Control : %
3. Potential Emissions : 5.0000000 lb/hour 8.5000000 tons/year
4. Synthetically Limited? [ ] Yes [X] No
5. Range of Estimated Fugitive/Other Emissions: to tons/year
6. Emissions Factor 5 Units : ppmvd Reference : AC permit limit
7. Emissions Method Code : 0
8. Calculations of Emissions : Oil-firing @ 59 deg. F. AC permit limit. Equivalent TPY for 1 CT; 4 CTs limited to an aggregate of 34 TPY.
9. Pollutant Potential/Estimated Emissions Comment : Max. hourly emissions based on ambient temp. @ 59 deg. F. Annual emissions based on 59 deg. F and 38.7% capacity factor.

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section 1

Combustion Turbine (CT) Peaking Unit Nos. 7-10

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section 1
Combustion Turbine (CT) Peaking Unit Nos. 7-10

Pollutant Potential/Estimated Emissions : Pollutant 7

1. Pollutant Emitted : **SAM**
2. Total Percent Efficiency of Control : %
3. Potential Emissions : 69.0000000 lb/hour 117.0000000 tons/year
4. Synthetically Limited? [ ] Yes [X] No
5. Range of Estimated Fugitive/Other Emissions: - to tons/year
6. Emissions Factor 1 Units : % S Reference : Permit limit
7. Emissions Method Code : 0
8. Calculations of Emissions : Oil-firing at 59 deg. F. AC permit limit. Equivalent TPY for single CT; four CTs have limit of 469 TPY.
9. Pollutant Potential/Estimated Emissions Comment : Max. hourly emissions based on ambient temp. at 50 deg. F. Annual emissions based on 59 deg. and 33% capacity factor.

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Emissions Unit Information Section 1

Combustion Turbine (CT) Peaking Unit Nos. 7-10

Emissions Unit Information Section 1
Combustion Turbine (CT) Peaking Unit Nos. 7-10

Pollutant Information Section 1

Allowable Emissions 1

1. Basis for Allowable Emissions Code :	OTHER			
2. Future Effective Date of Allowable Emissions :				
3. Requested Allowable Emissions and Units :	0.30	% S avg.		
4. Equivalent Allowable Emissions :	555.00	lb/hour	1,925.00	tons/year
5. Method of Compliance : Fuel analysis				
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) : AC permit limit - oil firing at 59 deg. F. Lb/hr limit for 1 CT . No ann. emiss. limit for single CT; 4 CTs have aggregate limit of 1,925 TPY. 33% cap. fact. limit @ 0.3 %S, 38.7% @ 0.26 %S.				

Emissions Unit Information Section 1
Combustion Turbine (CT) Peaking Unit Nos. 7-10

Pollutant Information Section 2

Allowable Emissions 1

1. Basis for Allowable Emissions Code :		OTHER		
2. Future Effective Date of Allowable Emissions :				
3. Requested Allowable Emissions and Units :		42.00		ppmvd@15% O2
4. Equivalent Allowable Emissions :	182.00	lb/hour	1,234.00	tons/year
5. Method of Compliance : Annual compliance test, EPA Method 20				
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) : AC permit limit - oil firing. No applicable annual emission limit for 1 CT; 4 CTs have a limit of 1,234 TPY @ 38.7% capacity factor.				

Emissions Unit Information Section 1
Combustion Turbine (CT) Peaking Unit Nos. 7-10

Pollutant Information Section 2

Allowable Emissions 2

1. Basis for Allowable Emissions Code :		OTHER		
2. Future Effective Date of Allowable Emissions :				
3. Requested Allowable Emissions and Units :		25.00		ppmvd@15% O2
4. Equivalent Allowable Emissions :	107.00	lb/hour	726.00	tons/year
5. Method of Compliance : Annual compliance test, EPA Method 20				
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) : AC permit limit- natural gas-firing at 59 deg. F.. No applicable annual emission limit for 1 CT; 4 CTs have a limit of 725 TPY @ 38.7% capacity factor.				

Emissions Unit Information Section 1
Combustion Turbine (CT) Peaking Unit Nos. 7-10

Pollutant Information Section 3

Allowable Emissions 1

1. Basis for Allowable Emissions Code :	OTHER			
2. Future Effective Date of Allowable Emissions :				
3. Requested Allowable Emissions and Units :	15.00	lb/hr		
4. Equivalent Allowable Emissions :	15.00	lb/hour	25.40	tons/year
5. Method of Compliance : Annual compliance test, EPA Mthd 5 or VE < 10% at full load				
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) : AC permit limit - oil-firing at 59 deg. F. No applicable annual emission limit for a single CT; 4 CTs have a limit of 102 TPY at a 38.7% capacity factor.				

Emissions Unit Information Section 1
Combustion Turbine (CT) Peaking Unit Nos. 7-10

Pollutant Information Section 4

Allowable Emissions 1

1. Basis for Allowable Emissions Code :		OTHER		
2. Future Effective Date of Allowable Emissions :				
3. Requested Allowable Emissions and Units :		15.00		lb/hr
4. Equivalent Allowable Emissions :				
	15.00	lb/hour	25.40	tons/year
5. Method of Compliance : VE, EPA Method 9				
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) : If VE < 10%, stack test not required. AC permit limit - oil-firing @ 59 deg. F. No applicable annual emission limit for 1 CT; 4 CTs limited to 102 TPY.				

Emissions Unit Information Section 1
Combustion Turbine (CT) Peaking Unit Nos. 7-10

Pollutant Information Section 5

Allowable Emissions 1

1. Basis for Allowable Emissions Code :	OTHER			
2. Future Effective Date of Allowable Emissions :				
3. Requested Allowable Emissions and Units :	25.00	ppm		
4. Equivalent Allowable Emissions :	54.00	lb/hour	91.50	tons/year
5. Method of Compliance : Annual compliance test, EPA Method 10				
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) : AC permit limit - oil-firing @ 59 deg. F. No applicable annual emissions limit for 1 CT; 4 CTs limited to 366 TPY.				

Emissions Unit Information Section 1
Combustion Turbine (CT) Peaking Unit Nos. 7-10

Pollutant Information Section 6

Allowable Emissions 1

1. Basis for Allowable Emissions Code :	OTHER			
2. Future Effective Date of Allowable Emissions :				
3. Requested Allowable Emissions and Units :	5.00	lb/hr		
4. Equivalent Allowable Emissions :	5.00	lb/hour	8.50	tons/year
5. Method of Compliance : Annual test, EPA Method 25A. Test not req'd if CO met.				
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) : AC permit limit - oil-firing @ 59 deg. F. No applicable annual emission limit for 1 CT; 4 CTs limited to aggregate of 34 TPY. VOC test not req'd if CO limit met.				

Emissions Unit Information Section 1
Combustion Turbine (CT) Peaking Unit Nos. 7-10

Pollutant Information Section 7

Allowable Emissions 1

1. Basis for Allowable Emissions Code :	OTHER			
2. Future Effective Date of Allowable Emissions :				
3. Requested Allowable Emissions and Units :	0.50	% S max.		
4. Equivalent Allowable Emissions :	69.00	lb/hour	469.00	tons/year
5. Method of Compliance : Annual test (EPA Method 8) or fuel sulfur content				
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) : AC permit limit - oil firing. 0.3% S 12-mo. rolling avg limit; 4 CTs have limit of 469 TPY. If S content met, SAM test not req'd. 33% cap. fact., 38.7% if S content 0.16% or less.				

I. VISIBLE EMISSIONS INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Information Section 1
Combustion Turbine (CT) Peaking Unit Nos. 7-10

Visible Emissions Limitation : Visible Emissions Limitation 1

1. Visible Emissions Subtype :	10	
2. Basis for Allowable Opacity :	OTHER	
3. Requested Allowable Opacity :		
Normal Conditions :	10	%
Exceptional Conditions :	20	%
Maximum Period of Excess Opacity Allowed :		min/hour

4. Method of Compliance :

Annual compliance test, EPA Method 9

5. Visible Emissions Comment :

AC permit limit. VE limit under normal conditions at full load; exceptional conditions are specified for other loads.

I. VISIBLE EMISSIONS INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Information Section 1
Combustion Turbine (CT) Peaking Unit Nos. 7-10

Visible Emissions Limitation : Visible Emissions Limitation 2

1. Visible Emissions Subtype :		
2. Basis for Allowable Opacity : RULE		
3. Requested Allowable Opacity :		
Normal Conditions :		%
Exceptional Conditions :	100	%
Maximum Period of Excess Opacity Allowed :	60	min/hour
4. Method of Compliance : EPA Method 9		
5. Visible Emissions Comment : 1. Rule 62-210.700. 2. Max. period of excess opacity allowed - 2 hours/24 hours.		

J. CONTINUOUS MONITOR INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Information Section 1
Combustion Turbine (CT) Peaking Unit Nos. 7-10

Continuous Monitoring System Continuous Monitor 1

1. Parameter Code : EM	2. Pollutant(s):
3. CMS Requirement : RULE	
4. Monitor Information Manufacturer : Model Number : Serial Number :	
5. Installation Date :	01-Nov-1992
6. Performance Specification Test Date :	01-Nov-1992
7. Continuous Monitor Comment : Water/fuel ratio monitored on continuous basis (40 CFR 60.334). Monitoring incorporated into CT control system and recorded on hourly basis.	

Continuous Monitoring System Continuous Monitor 2

1. Parameter Code : EM	2. Pollutant(s):
3. CMS Requirement : RULE	
4. Monitor Information Manufacturer : Model Number : Serial Number :	
5. Installation Date :	01-Nov-1992
6. Performance Specification Test Date :	01-Nov-1992
7. Continuous Monitor Comment : 40 CFR 75, Appendix E.	

K. PREVENTION OF SIGNIFICANT DETERIORATION (PSD) INCREMENT TRACKING INFORMATION

Emissions Unit Information Section 1

Combustion Turbine (CT) Peaking Unit Nos. 7-10

PSD Increment Consumption Determination

1. Increment Consuming for Particulate Matter or Sulfur Dioxide?

[X] The emissions unit is undergoing PSD review as part of this application, or has undergone PSD review previously, for particulate matter or sulfur dioxide. If so, emissions unit consumes increment.

[ ] The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after January 6, 1975. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after January 6, 1975, but before December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] For any facility, the emissions unit began (or will begin) initial operation after December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] None of the above apply. If so, the baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

2. Increment Consuming for Nitrogen Dioxide?

[X] The emissions unit addressed in this section is undergoing PSD review as part of this application, or has undergone PSD review previously, for nitrogen dioxide. If so, emissions unit consumes increment.

[ ] The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after February 8, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after February 8, 1988, but before March 28, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] For any facility, the emissions unit began (or will begin) initial operation after March 28, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.

[ ] None of the above apply. If so, baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

3. Increment Consuming/Expanding Code :		
PM : C	SO2 : C	NO2 : C
4. Baseline Emissions :		
PM :	lb/hour	tons/year
SO2 :	lb/hour	tons/year
NO2 :		tons/year
5. PSD Comment :		

L. EMISSIONS UNIT SUPPLEMENTAL INFORMATION

Emissions Unit Information Section 1

Combustion Turbine (CT) Peaking Unit Nos. 7-10

Supplemental Requirements for All Applications

1. Process Flow Diagram :	DB-EO2-L1
2. Fuel Analysis or Specification :	DB-EO2-L2
3. Detailed Description of Control Equipment :	DB-EO2-L3
4. Description of Stack Sampling Facilities :	DB-EO2-L4
5. Compliance Test Report :	7/28/99
6. Procedures for Startup and Shutdown :	DB-EO2-L6
7. Operation and Maintenance Plan :	NA
8. Supplemental Information for Construction Permit Application :	Attachment DB-F1-E4
9. Other Information Required by Rule or Statue :	NA

Additional Supplemental Requirements for Category I Applications Only

10. Alternative Methods of Operations :
11. Alterntive Modes of Operation (Emissions Trading) :

12. Identification of Additional Applicable Requirements :
13. Compliance Assurance Monitoring Plan :
14. Acid Rain Application (Hard-copy Required) : Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) New Unit Exemption (Form No. 62-210.900(1)(a)2.) Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)

ATTACHMENT DB-E02-D

EMISSION UNIT REGULATIONS

ATTACHMENT DB-E02-D
APPLICABLE REQUIREMENTS LISTING - POWER PLANTS

EMISSION UNIT: Combustion Turbines 7-10 - FPC DeBary Plant

FDEP Rules:

Air Pollution Control-General Provisions:
62-204.800(7)(b)37.(State Only) - NSPS Subpart GG
62-204.800(7)(d) (State Only) - NSPS General Provisions
62-204.800(12) (State Only) - Acid Rain Program
62-204.800(13) (State Only) - Allowances
62-204.800(14) (State Only) - Acid Rain Program Monitoring

Stationary Sources-General:
62-210.700(1) - Startup/shutdown/malfunction
62-210.700(4) - maintenance
62-210.700(6)

Acid Rain:
62-214.300 - Acid Rain Units (Applicability)
62-214.320 - Acid Rain Units (Application Shield)
62-214.330 - Compliance Options (if 62-214.430)
62-214.350(2),(3),(6) - Acid Rain Units (Certification)
62-214.370 - Revisions; corrections; (potentially applicable)
62-214.430 - Acid Rain Units (Compliacne Options)

Stationary Sources-Emission Monitoring (where stack test is required):
62-297.310(1) - Test Runs-Mass Emission
62-297.310(2)(b) - Operating Rate; other than CTs
62-297.310(3) - Calculation of Emission
62-297.310(4)(a) - Applicable Test Procedures;Sampling time
62-297.310(4)(b) - Sample Volume
62-297.310(4)(c) - Required Flow Rate Range-PM/H2SO4/F
62-297.310(4)(d) - Calibration
62-297.310(4)(e) - EPA Method 5-only
62-297.310(5) - Determination of Process Variables
62-297.310(6)(a) - Permanent Test Facilities-general
62-297.310(6)(c) - Sampling Ports
62-297.310(6)(d) - Work Platforms
62-297.310(6)(e) - Access
62-297.310(6)(f) - Electrical Power
62-297.310(6)(g) - Equipment Support
62-297.310(7)(a)2. - FFSG excess emissions
62-297.310(7)(a)3. - Permit Renewal Test Required

62-297.310(7)(a)4.	
62-297.310(7)(a)5.	- PM exemption if <400 hrs/yr
62-297.310(7)(a)6.	- PM exemption if < 200 hrs/6 month
62-297.310(7)(a)9.	- FDEP Notification - 15 days
62-297.310(7)(c)	- Waiver of Compliance Tests (fuel sampling)
62-297.310(8)	- Test Reports

Federal Rules:
NSPS General Requirements:

40 CFR 60.7(b)	- Notification/Recordkeeping (startup/shutdown/malfunction)
40 CFR 60.7(f)	- Notification/Recordkeeping (maintain records-2 years)
40 CFR 60.8(c)	- Performance Tests (representative conditions)
40 CFR 60.8(e)	- Performance Tests (Provide stack sampling facilities)
40 CFR 60.8(f)	- Test Runs
40 CFR 60.11(a)	- Compliance (ref. S. 60.8)
40 CFR 60.11(d)	- Compliance (maintain air pollution control equipment)
40 CFR 60.12	- Circumvention

NSPS Subpart GG:

40 CFR 60.332(a)(1)	- NOx for Electric Utility CTs
40 CFR 60.333	- SO2 limits (0.8% sulfur)
40 CFR 60.334	- Monitoring of Operations (WTF ratio)
40 CFR 60.335	- Test Methods

Acid Rain-Permits:

40 CFR 72.9(a)	- Permit Requirements
40 CFR 72.9(b)	- Monitoring Requirements
40 CFR 72.9(c)(1)	- SO2 Allowances-hold allowances
40 CFR 72.9(c)(2)	- SO2 Allowances-violation
40 CFR 72.9(c)(1)(iv)	- SO2 Allowances- other utility units
40 CFR 72.9(c)(4)	- SO2 Allowances-allowances held in ATS
40 CFR 72.9(c)(5)	- SO2 Allowances-no deduction for 72.9(c)(1)(i)
40 CFR 72.9(e)	- Excess Emission Requirements
40 CFR 72.9(f)	- Recordkeeping and Reporting
40 CFR 72.9(g)	- Liability
40 CFR 72.20(a)	- Designated Representative; required
40 CFR 72.20(b)	- Designated Representative; legally binding
40 CFR 72.20(c)	- Designated Representative; certification requirements
40 CFR 72.21	- Submissions
40 CFR 72.22	- Alternate Designated Representative
40 CFR 72.23	- Changing representatives; owners
40 CFR 72.30(a)	- Requirements to Apply (operate)
40 CFR 72.30(c)	- Requirements to Apply (reapply before expiration)
40 CFR 72.30(d)	- Requirements to Apply (submittal requirements)

40 CFR 72.32	- Permit Application Shield
40 CFR 72.33(b)	- Dispatch System ID;unit/system ID
40 CFR 72.33(c)	- Dispatch System ID;ID requirements
40 CFR 72.33(d)	- Dispatch System ID;ID change
40 CFR 72.40(a)	- General; compliance plan
40 CFR 72.40(b)	- General; multi-unit compliance options
40 CFR 72.40(c)	- General; conditional approval
40 CFR 72.40(d)	- General; termination of compliance options
40 CFR 72.51	- Permit Shield
40 CFR 72.90	- Annual Compliance Certification

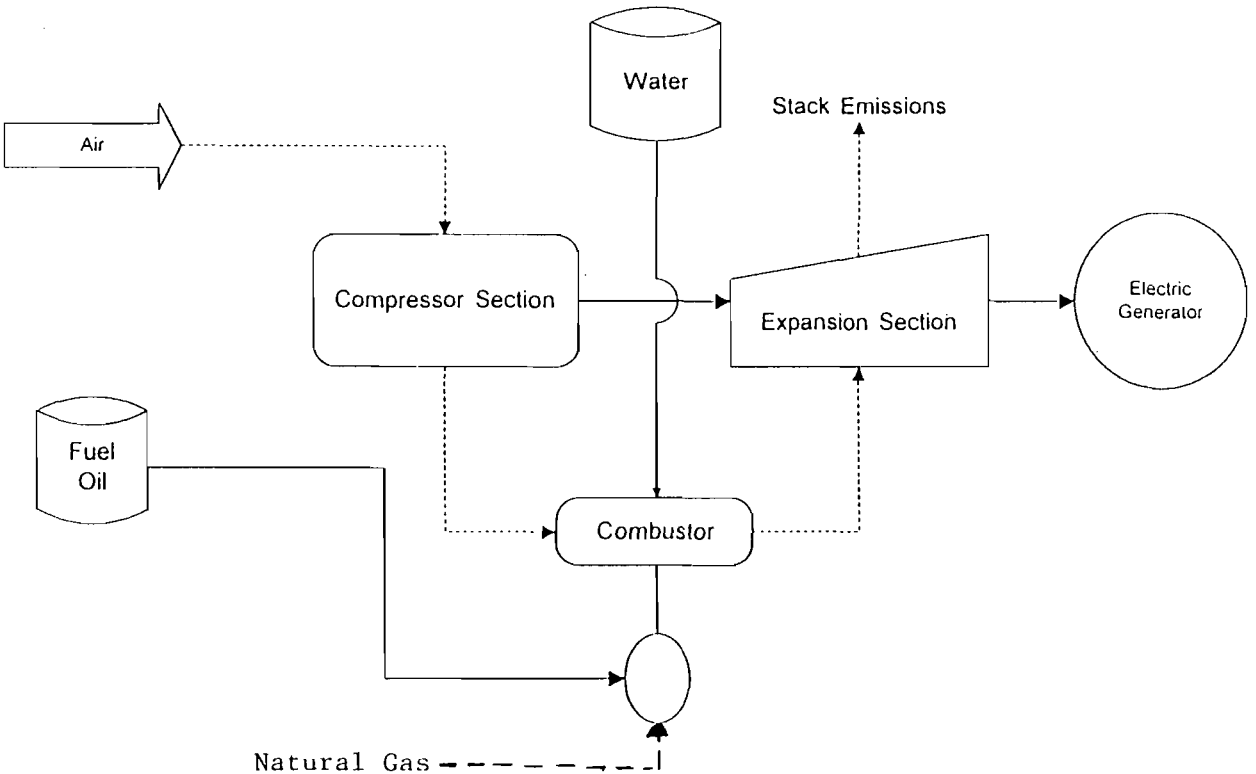
Monitoring Part 75:

40 CFR 75.5	- Prohibitions
40 CFR 75.10(a)(2)	- Primary Measurement; NOx; except 75.12&.17; Subpart E
40 CFR 75.10(b)	- Primary Measurement; Performance Requirements
40 CFR 75.10(c)	- Primary Measurement; Heat Input; Appendix F
40 CFR 75.10(f)	- Primary Measurement; Minimum Measurement
40 CFR 75.10(g)	- Primary Measurement; Minimum Recording
40 CFR 75.11(d)	- SO2 Monitoring; Gas- and Oil-fired units
40 CFR 75.11(e)	- SO2 Monitoring; Gaseous fuel firing
40 CFR 75.12(b)	- NOx Monitoring; Determination of NOx emission rate; Appendix F
40 CFR 75.20(a)(5)	- Initial Certification Approval Process; Loss of Certification
40 CFR 75.20(b)	- Recertification Procedures
40 CFR 75.20(c)	- Certification Procedures
40 CFR 75.20(g)	- Exceptions to CEMS; oil/gas/diesel; Addendix D & E
40 CFR 75.21(a)	- QA/QC; CEMS;
40 CFR 75.21(b)	- QA/QC; Opacity;
40 CFR 75.21(c)	- QA/QC; Calibration Gases
40 CFR 75.21(d)	- QA/QC; Notification of RATA
40 CFR 75.21(e)	- QA/QC; Audits
40 CFR 75.21(f)	- QA/QC; CEMS
40 CFR 75.22	- Reference Methods
40 CFR 75.24	- Out-of-Control Periods; CEMS
40 CFR 75.30(a)(3)	- General Missing Data Procedures; NOx
40 CFR 75.32	- Monitoring Data Availability for Missing Data
40 CFR 75.33	- Standard Missing Data Porcedures
40 CFR 75.36	- Missing Data Procedures for Heat Input
40 CFR 75.53	- Monitoring Plan (revisions)
40 CFR 75.54(a)	- Recordkeeping-general
40 CFR 75.54(b)	- Recordkeeping-operating parameter
40 CFR 75.54(d)	- Recordkeeping-NOx
40 CFR 75.55(c);(e)	- Recordkeeping; Special Situations (gas & oil firing)
40 CFR 75.56	- Certification; QA/QC Provisions

40 CFR 75.60	- Reporting Requirements-General
40 CFR 75.61	- Reporting Requirements-Notification cert/recertification
40 CFR 75.63	- Reporting Requirements-Certification/Recertification
40 CFR 75.64(a)	- Reporting Requirements-Quarterly reports; submission
40 CFR 75.64(b)	- Reporting Requirements-Quarterly reports; DR statement
40 CFR 75.64(c)	- Rep. Req.; Quarterly reports; Compliance Certification
40 CFR 75.64(d)	- Rep. Req.; Quarterly reports; Electronic format
Appendix A-3.	- Performance Specifications
Appendix A-4.	- Data Handling and Acquisition Systems
Appendix A-5.	- Calibration Gases
Appendix A-6.	- Certification Tests and Procedures
Appendix B	- QA/QC Procedures
Appendix C-1.	- Missing Data; SO2/NOx for controlled sources
Appendix C-2.	- Missing Data; Load-Based Procedure; NOx & flow
Appendix F	- Conversion Procedures
Appendix G-2.	- Determination of CO2; from combustion sources
Appendix H	- Traceability Protocol
40 CFR Part 77.3	- Offset Plans (future)
40 CFR Part 77.5(b)	- Deductions of Allowances (future)
40 CFR Part 77.6	- Excess Emissions Penalties SO2 and NOx

ATTACHMENT DB-E02-L1

PROCESS FLOW DIAGRAM



Florida Power Corporation		*Emission Unit:* Turbines No. 7, 8, 9, 10	KBN Engineering and Applied Sciences, Inc.
		Process Area: Overall Plant	
Emission Units	DeBary	*Filename:* FPCDB!.VSD	
		Latest Revision Date: 6/20/95 01:12 PM	

ATTACHMENT DB-E02-L2

FUEL ANALYSIS OR SPECIFICATION

ATTACHMENT DB-E02-L2

FUEL ANALYSIS
NO. 2 FUEL OIL

Parameter	Typical Value	Max Value
API gravity @ 60 F	30[1]	-
Relative density	7.09 lb/gal [2]	
Heat content	18,550 Btu/lb (LHV)	
% sulfur	0.3 [2]	0.5 [3]
% nitrogen	0.025-0.030	
% ash	negligible	0.10 [1]

Note: The values listed are "typical" values based upon 1) information gathered by laboratory analysis, and 2) FPC's fuel purchasing specifications. However, analytical results from grab samples of fuel taken at any given point in time may vary from those listed.

[1] Data taken from the FPC fuel procurement specification

[2] Data from laboratory analysis

[3] Data from current air permit.

ATTACHMENT DB-E02-L3

DETAILED DESCRIPTION OF CONTROL EQUIPMENT

GE Mark IV Nox Control Algorithm Description

The GE Mark IV Nox control algorithm utilizes data from digital temperature and humidity monitors located at each combustion turbine. The algorithm receives and processes the ambient temperature and humidity on a continuous basis. A temperature/humidity correction is used in determining the amount of water to inject for Nox control. This correction accounts for the ambient water entering the combustion chamber, and then it adds the correct amount of injection water in order to ensure compliance with the unit's required water to fuel ratio as determined from the water/fuel curve. This algorithm ensures compliance on a continuous basis regardless of the unit load and ambient weather conditions.

ATTACHMENT DB-E02-L4

DESCRIPTION OF STACK SAMPLING FACILITIES

ATTACHMENT DB-E02-L4

Description of Stack Sampling Facilities

The DeBary Combustion Turbine No. 7, 8, 9, and 10 are required by Permit AO64-233544 to perform annual stack testing in accordance with standard EPA reference methods. Pursuant to Rule 62-297.310, F.A.C., the annual stack test required is performed with the required stack sampling facilities. A diagram depicting stack sampling facilities is presented as an attachment. As specified by Rule 62-297.310(6) , the permanent test facilities meet the following:

- The sampling ports have a minimum effective diameter of 3 inches.
- The location of the sampling ports are 2 stack diameters downstream and 0.5 stack diameters upstream of flow disturbances.
- Sampling ports are provided to allow access to each sampling point in the cross sectional area of the rectangular stack.
- The working platform is at least 24 square feet in area, at least three feet wide, extends 180 degrees around the stack, has safety rails, toeboards, and a hinged floor opening attached to it. There are no obstructions 14 inches below the port and 6 inches on either side of the port.
- The platform access ladder is equipped with a safety cage.

Rectangular Stack Sampling Traverse Point Layout
(EPA Method 1)

Intercession City Power Station

Date:_____ Port + Stack ID: 129 in.

Plant: Florida Power Corporation Port Extension (Ref. Pt.) 25 in.

Source: P-7,8,9,10 Stack ID: 104 in.

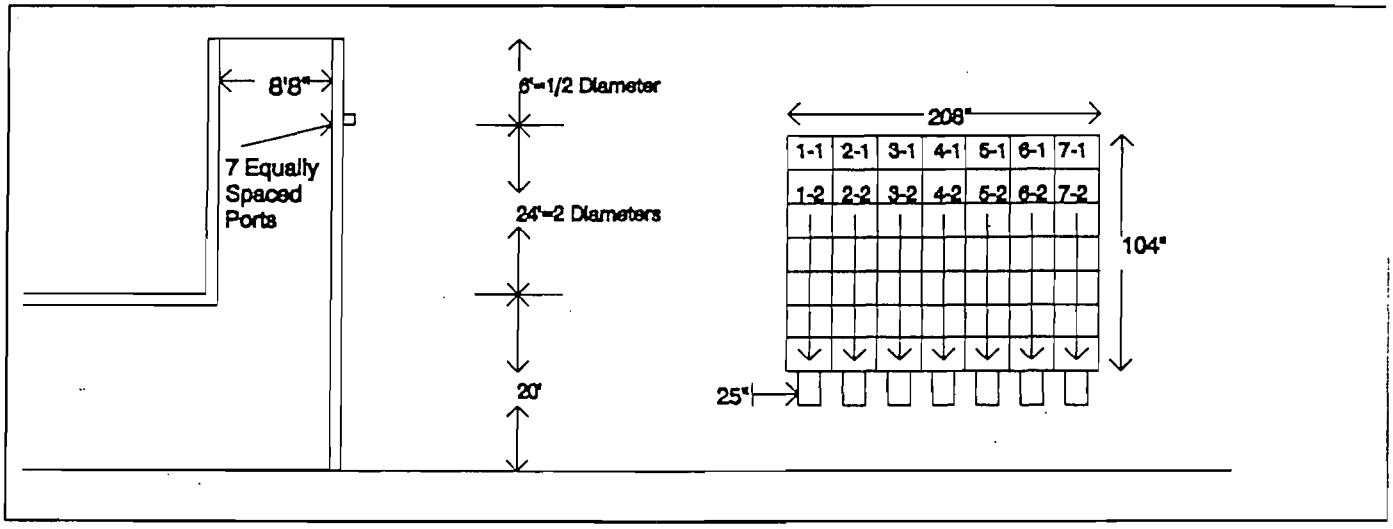
Technician(s)_____ Stack Area 150.2 ft.^{2}.

Stack Length (L) 104 in. Total Req'd Trav. Pts (P). 49

Stack Width (W) 208 in. No. of Traverse Pts. 7 /dimen.

No. of Traverse Pts. 7 /port

Stack Diagram (Side View showing major unit components, dimensions and nearest upstream & downstream flow disturbances. Top view showing length, width, and sample ports.



Calculate the Equivalent Diameter of Rectangular Stack

$$De = \frac{2 \times L \times W}{(L + W)} \qquad 140 \text{ in.} = \frac{2 \times (104 \text{ in}) \times (208 \text{ in.})}{((104 \text{ in.}) + (208 \text{ in.}))}$$

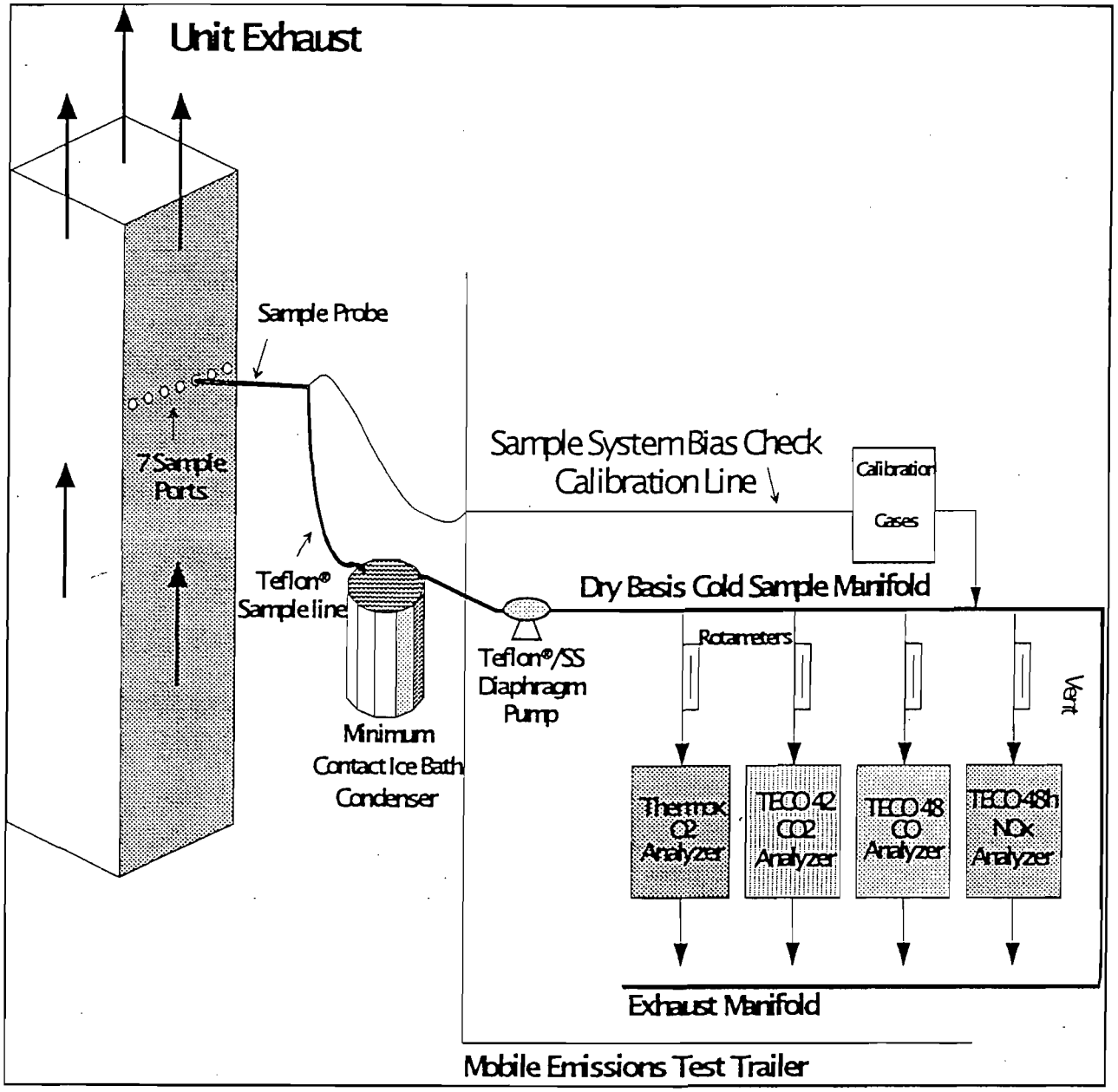
Calculte Distance from Stack Wall to Traverse Points

(Example for Point No. 2)

$$\text{Distance} = \frac{L \times 1.5}{P} \qquad 22.3 \text{ in.} = \frac{(104 \text{ in}) \times 1.5}{7}$$

Point No.	Length Factor	Distance from Ref. Point (inches)	Distance Sample Pt. to Probe Tip
1	0.5	7.4	32.4
2	1.5	22.3	47.3
3	2.5	37.1	62.1
4	3.5	52.0	77.0
5	4.5	66.9	91.9
6	5.5	81.7	106.7
7	6.5	96.6	121.6

Figure 1
Gaseous Sampling and Analysis Diagram



ATTACHMENT DB-E02-L6

PROCEDURES FOR STARTUP AND SHUTDOWN

ATTACHMENT DB-E02-L6

PROCEDURES FOR STARTUP/SHUTDOWN

Startup for the combustion turbines begins with "lighting off" of the machines on distillate oil.

If excess emissions are encountered during startup or shutdown, the nature and cause of any malfunction is identified, along with the corrective actions taken or preventative measures adopted. Corrective actions may include switching the unit from automatic (remote) to local control. Best Operating Practices are adhered to and all efforts to minimize both the level and duration of excess emissions are undertaken.

Shutdown is performed by reducing the unit load (electrical production) to a minimum level, opening the breaker (which disconnects the unit from the system electrical grid), shutting off the fuel and coasting down to stop. The CT is then put "on turning gear" to prevent possible disfiguration of the turbine components.

ATTACHMENT DB-E02-L10

ALTERNATIVE METHODS OF OPERATION

ATTACHMENT DB-EU2-L10

ALTERNATIVE METHODS OF OPERATION - COMBUSTION TURBINES P-7 TO P-10

The DeBary Facility's four combustion turbines, P-7, P-8, P-9, and P-10, rated at 92.9 megawatts (MW) at 59 degrees Fahrenheit (°F) (GE PG7111EA), were limited in the air construction permit to an average maximum capacity factor of 38.7 percent (3,390 hours per year operating time) (It should be noted that the air construction permit included six combustion turbines). In addition, the capacity factors for these turbines were limited to 33 percent based on a weighted 12 month rolling maximum sulfur content of 0.3 percent. However, if the weighted rolling average sulfur content of the fuel oil is less than 0.3 percent, the capacity factor may be adjusted using the following table:

Percent Average Sulfur Content	Percent Capacity Factor
0.3 - 0.295	33.0
0.29 - 0.285	34.4
0.28 - 0.275	35.8
0.27 - 0.265	37.2
0.26 - or less	38.7

The four combustion turbines (GE Frame 7EA) were also limited in fuel oil consumption and heat input rate on a per unit basis, per aggregate units, or prorated consumption based on the table as described above.

Therefore, any combination of the four combustion turbines may operate for up to 8,760 hours per year provided that both the hourly and annual emission limitations, aggregate annual capacity factors, and aggregate fuel oil consumption limits are met.

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
Mr. Jeffrey Pardue, CEP
FPC
P O Box 14042-MAC BB1A
St. Petersburg, Fl
33733

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* B. Date of Delivery
APR 03 20[illegible]

C. Signature
X
☐ Agent
☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☑ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number *(Copy from service label)* Z 031 391 895

PS Form 3811, July 1999 Domestic Return Receipt 102595-99-M-1789

Z 031 391 895

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

Sent to Jeffrey Pardue	
Street & Number FPC	
Post Office, State, & ZIP Code St. Pete Fl	
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	
TOTAL Postage & Fees	$
Postmark or Date 3-31-00	
1270028-004-AC PSO-Fl-167J	

PS Form **3800**, April 1995

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:
Jeffrey Pardue, CEP
FPC
PO Box 14042, MAC BBIA
St. Pete, FL
33733

4a. Article Number
Z 031 391 862

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

7. Date of Delivery
FEB 16 2000

5. Received By: *(Print Name)*

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

6. Signature: *(Addressee or Agent)*
X

PS Form **3811,** December 1994 102595-98-B-0229 Domestic Return Receipt

Is your RETURN ADDRESS completed on the reverse side?

Thank you for using Return Receipt Service.

Z 031 391 862

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

Sent to Jeffrey Pardue	
Street & Number FPC	
Post Office, State, & ZIP Code St. Pete FL	
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	
TOTAL Postage & Fees	$
Postmark or Date 1270028-004-AE PSO-FL-167C 2-14-00	

PS Form **3800,** April 1995

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION

STATE OF FLORIDA, DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No. 1270028-004-AC (PSD-FL-167 C)

Florida Power Corporation DeBary Plant, Units 7-10 Inlet Fogger Project, Volusia County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit modification to Florida Power Corporation (FPC). The permit is to install foggers at the compressor inlets of four 93-megawatt natural gas and No. 2 fuel oil-fired General Electric PG7111EA combustion turbine-electrical generators at the DeBary Plant in Volusia County. A Best Available Control Technology (BACT) determination was not required pursuant to Rule 62-212.400, F.A.C. The applicant's name and address are Florida Power Corporation, Post Office Box 14042, MAC BBIA, St. Petersburg, Florida 33733.

These units normally achieve their maximum rated output on cold days because the greater compressor inlet density allows greater throughput in the rotor or expansion section of the combustion turbine. The maximum power output is lower on hot days because of the lower compressor inlet density. The foggers increase hot-day power output by approximately 4-6 MW through evaporative cooling of the compressor inlet air although maximum output over all temperatures will remain 93 MW or below. The foggers provide no benefit on very humid or cold days and will not be used under those conditions. The result is that maximum hourly air pollution emissions will not increase although actual annual emissions will increase within their permitted limits because more fuel will be used on hot, relatively dry days.

Although the number of days during which the foggers can economically operate probably limits emissions increases to levels below significance for the purposes of PSD applicability, FPC proposes enforceable conditions to insure non-applicability. FPC asserts and the Department accepts that the modification will not cause any meaningful change in the hours of operation of these simple cycle peaking units. They are already limited to 3390 hours of operation per unit. The maximum increase in annual emissions caused by project in tons per year is summarized below along with the PSD-significant levels.

Pollutants	Annual Emission Increase	PSD Significant Levels
PM/PM_{10}	2.2	25/15
SAM	2.5	7
SO_2	39.9	40
NO_x	28.1	40
VOC	0.5	40
CO	7.4	100

An air quality impact analysis was not required or conducted. No significant impacts are expected to occur as a result of this project. It will not cause or contribute to a violation of any ambient air quality standard or increment.

The Department will issue the FINAL permit modification with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of thirty (30) days from the date of publication of "Public Notice of Intent to Issue Air Construction Permit Modification." Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen (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 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department'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 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, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department'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.

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 notice. 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.

A complete project file is available for public inspection during normal business hours, 8:00 am to 5:00 pm, Monday through Friday, except legal holidays, at:

Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Ste. 4, Tallahassee, FL 32301
Telephone: 850/488-0114; Fax: 850/922-6979

Department of Environmental Protection
Central District Office
3319 Maguire Boulevard, Ste. 232, Orlando, FL 32803-3767
Telephone: 407/894-7555; Fax: 407/897-5963

The complete project file includes the application, technical evaluation, Draft Permit Modification, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Source Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301 or call 850/488-0114, for additional information.