



FLORIDA DEPARTMENT OF Environmental Protection

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Secretary

(Sent by Electronic Mail – Return Receipt Requested)

Michael J. Brost: brosmj@jea.com
Vice President/General Manager, Electric Systems
JEA
21 West Church Street, T-16
Jacksonville, FL 33202

Re: Title V Air Operation Permit Renewal
Proposed Permit No. 0310045-052-AV
Northside Generating Station

Dear Mr. Brost:

One copy of the proposed permit determination for the renewal of the Title V air operation permit for the Northside Generating Station located in Duval County at 4377 Hecksher Drive, Jacksonville, FL 32226, is enclosed. This letter is only a courtesy to inform you that the draft permit has become a proposed permit.

An electronic version of this determination has been posted on the Division of Air Resource Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. Interested persons may view the proposed permit by visiting the following website:

<https://fldep.dep.state.fl.us/air/emission/apds/default.asp> and entering the permit number shown above.

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permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you should have any questions, please contact Scott Lauder, at 850-717-9077, or by email at scott.lauder@dep.state.fl.us.

Sincerely,

For:

Syed Arif, P.E., Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management

SA/dlr/srl

Copies sent by electronic mail to the following:

Mr. Michael J. Brost, JEA: brosmj@jea.com
Mr. Daniel N. Hlaing, P.E., JEA: hlaidn@jea.com
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EPA Region 4: R4TitleVFL@epa.gov

Ms. Lynn Searce, DEP OPC: lynn.searce@dep.state.fl.us

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Clerk Stamp

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

PROPOSED PERMIT DETERMINATION

Permit No. 0310045-052-AV

I. Public Notice.

An Intent To Issue Air Permit issued to JEA for the Northside Generating Station located in Duval County at 4377 Hecksher Drive, Jacksonville, FL 32226, was clerked on August 10, 2018. The Public Notice Of Intent To Issue Air Permit was published in Jacksonville Daily Record on August 14, 2018. The draft Title V air operation permit was available for public inspection at the permitting authority's office in Tallahassee. Proof of publication of the Public Notice Of Intent To Issue Air Permit was received on August 14, 2018.

II. Public Comment(s).

No Comments were received from the public during the 30-day public comment period; however, comments were received from the Permittee. The comments were not considered significant enough to reissue the draft Title V air operation permit and require another Public Notice; therefore, the draft Title V air operation permit was changed. Those comments are addressed below. Additions to the permit are indicated by a double underline. Deletions from the permit are indicated by a ~~strike through~~.

Letter from JEA dated September 12, 2018.

Comment 1. The Permittee requested minor clarification in the Table of Contents that EU No. 059 is also referred to as Diesel Engine No. 7.

Response 1. The Department agrees with this clarification. EU No. 059 appears in Section III., Subsection H. of the Table of Contents appears as follows: EU 059: ~~SJRPP~~ Emergency Fire Pump (Diesel Engine No. 7)

Comment 2. The Permittee requested minor clarifications and typographical error corrections.

Response 2. The Department has made requested clarifications in Specific Conditions A.15, A.19, A.20, A.31, A.33, A.42, B.7, B.10, B.11, B.16, C.10, C.11, C.12, C.13, C.18, C.25, C.46, C.52, C.53, D.11, D.12, D.23, D.24, E.5, E.10, F.7, G.5, G.10, H.11 and the description for EU No. 059. These corrections and clarifications do not change the meaning of these Specific Conditions.

Comment 3. The Permittee requested language in Section I., Subsection C. regarding the NESHAP Subpart UUUUU applicability of EU No. 003 and the removal of EU No. 052 from the subsection dealing with Chapter 62-4, F.A.C., Permits.

Response 3. The Department agrees with this comment. The emission point from EU No. 052 has been enclosed. Therefore, EU No. 052 is deleted from this subsection. EU No. 003 is now the only EU at NGS that may be defined as an oil-fired electric utility steam generating unit (EGU). The language in this subsection is revised as follows:

40 CFR 63, Subpart UUUUU, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Coal- and Oil-Fired Electric Utility Steam Generating Units (these units <u>EU No. 003</u> may be subject to this rule if they it <u>it</u> meets the definition of <u>an</u> oil-fired EGUs)	003, 016, 017, 026, 027
<u>Chapter 62-4, F.A.C., Permits</u>	<u>003, 006, 007, 008, 009, 026, 027, 028, 029, 031, 033, 034, 035, 036, 037, 038, 051, 052, 053, 055, 056, 057, 059</u>

Comment 4. The Permittee inquired as to the presence of Appendix NSPS Subpart IIII and Appendix NESHAP Subpart ZZZZ regarding the emergency engines at NGS.

Response 4. No changes will be made. All applicable requirements from these appendices are present in the body of the permit. Addition of the two appendices is unnecessary.

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Comment 5. The Permittee requested that the first paragraph of Section I., Subsection A., be corrected to reflect that nitrogen oxide (NO_x) emissions from Boiler No. 3 (EU No. 003) are controlled by low NO_x burners. The Permittee also requested removal of the word “residual” from “No. 6 residual fuel oil.”

Response 5. The Department agrees with this comment. No. 6 fuel oil contains acceptable descriptive language. This paragraph has been revised as follows:

The Northside Generating Station (NGS) portion of the combined facility consists of three boilers (Boiler No. 3 and CFB Boiler Nos. 1 and 2) and four combustion turbines. NGS Boiler No. 3 is an existing, pre-NSPS boiler coupled to a steam turbine-electrical generator (STEG) with a nominal rating of 564 megawatts (MW) and fired by natural gas, landfill gas, No. 6 residual fuel oil, and used oil. Emissions from the NGS Boiler No. 3 are uncontrolled NO_x emissions from Boiler No. 3 are controlled by low NO_x burners.

Comment 6. The Permittee requested the removal of citations of Rules 62-214.330 and 62-296.450, F.A.C. in Specific Condition A.1 and clarification of the permitting note following this rule.

Response 6. The Department agrees with this comment. Rules 62-214.330 and 62-296.450, F.A.C. do not contain provisions that establish permitted capacity. Capacity has been changed to “testing capacity” and “test load” has been changed to “test heat input rate” in the permitting note accompanying Specific Condition A.1.

Comment 7. The Permittee requested the addition of Jacksonville Environmental Protection Board (JEPB) citations to several conditions.

Response 7. JEPB citations incorporate state rules in Florida Administrative Code. These citations have been added to specific conditions in this permit wherever applicable and requested.

Comment 8. The Permittee requested language revisions in Specific Condition A.11 that clarify that SO₂ compliance is demonstrated based on an SO₂ CEMS or fuel specifications.

Response 8. The Department agrees with this comment. Specific Condition A.11 has been revised as follows:

A.11. Sulfur Dioxide. Sulfur dioxide (SO₂) emissions shall not exceed 1.98 pounds per million Btu heat input based on a 324-hour block average, as measured by applicable compliance methods stack test or an SO₂ CEMS (see Specific Conditions A.19 and A.31). If SO₂ CEMS data is unavailable, the permittee may monitor fuel consumption rates and sulfur contents. Any calculations or methods used to demonstrate compliance shall be based on the total heat input from all fossil fuels, including natural gas, and the sulfur from all fuels fired. [Rules 62-213.440, and 62-296.405(1)(c)1.a. & 62-297.310(4) & 5(a), F.A.C.; and, Part X, Rule 2.1001, JEPB Rule 2, Part V, 2.501, & Part XI, 2.1101 & Part XII, 2.1201]

Comment 9. The Permittee requested minor language revisions that eliminate redundant language in various subsections of the permit.

Response 9. The Department agrees with this comment. Redundant language has been removed in Specific Conditions A.9, D.4, D.14 and the description for EU No. 057.

Comment 10. The Permittee requested language revisions in Specific Condition A.32. These language revisions maintain consistent language throughout the permit condition and eliminate the requirement to sample fuel sulfur content while conducting particulate matter (PM) and visible emissions (VE) tests.

Response 10. The Department agrees with this request. The sulfur dioxide (SO₂) limit is equal to 1.98 lb of SO₂/MMBtu of heat input. The as-fired heat content of the fuel and sulfur content of the fuel will provide reasonable assurance that this limit can be met. Therefore, Specific Condition A.32 has been revised as follows:

A.32. Fuel Sampling and Analysis. For Boiler No. 3, the following fuel sampling and analysis protocol shall be used if the permittee opts to demonstrate compliance with the sulfur dioxide standard using an alternate sampling procedure authorized by permit, and conducted while performing a compliance test for particulate matter and visible emissions:

- a. Determine and record the as-fired fuel sulfur content, percent by weight, (1) for liquid fuels using either ASTM D2622-92, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or the latest edition method, to analyze a representative sample of the blended fuel oil following each fuel delivery, (2) for

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- gaseous fuels using ASTM D 1072-80, or the latest edition method (the permittee can default to the maximum sulfur content guaranteed by the supplier).
- b. Record hourly fuel totalizer readings with calculated hourly feed rates for each fuel fired, the ratio of fuel oil to gas if co-fired, the density of each fuel, and the percent sulfur content, by weight, of each fuel.
 - c. The analyses of the No. 6 fuel oil, as received from the supplier, shall include the following:
 - (1) Density (ASTM D 1298-80 or the latest edition method).
 - (2) Calorific heat value in Btu per pound (ASTM D240-76 or the latest edition method).
 - d. The analyses of the gaseous fuels, as received from the supplier, shall include the following:
 - (1) Density (ASTM D1137-53, ASTM D1945-64, or the latest edition method).
 - (2) Calorific heat value in Btu per cubic foot (ASTM D1137-53, ASTM D1945-64, ASTM D1826-77, or the latest edition method).
 - e. Utilize the above information in a., b., c. and d. to calculate the SO₂ emission rate.
- [Rules 62-213.440, 62-296.405(1)(e)3., & 62-296.405(1)(f)1.b. and 62-297.440, F.A.C.; and, 40 CFR 60. Appendix A; and, JEPB Rule 2, Part V, 2.501 & Part XI, 2.1101]

Comment 11. The Permittee requested several revisions to Specific Condition **A.47** to change revised language and update language regarding applicability for 40 CFR 63, Subpart UUUUU. In addition, the permittee requested that with regards to Subpart A that NSPS be changed to NESHAP.

Response 11. Appendix 40 CFR 63 is now called Appendix NESHAP to reflect current Title V air operation permit format standards. No changes will be made regarding this requested revision. However, the NSPS citation is incorrect and Specific Condition **A.47** has been revised as follows:

A.47. NESHAP Requirements. In addition to the requirements listed above, this emissions unit shall comply with all applicable provisions of 40 CFR 63, Subpart A – General Provisions and Subpart UUUUU; National Emissions Standards for Hazardous Air Pollutants NESHAP: Coal- and Oil-Fired Electric Utility Steam Generating Units, which are included as enforceable parts of this permit as Appendix 40 CFR 63 NESHAP, Subpart A – General Provisions and Appendix 40 CFR 63 NESHAP, Subpart UUUUU, respectively. If applicable, this emissions unit shall comply with the requirements of 40 CFR 63, Subpart UUUUU no later than 180 days after meeting the definition of an EGU subject to 40 CFR 63, Subpart UUUUU no later than April 16, 2015. [Rule 62-213.440, F.A.C. and 40 CFR 63, Subpart UUUUU]

{Permitting Note: Per §63.9981, §63.9983 and §63.9984, once an oil fired electric utility steam generating unit (EGU) meets the definition of “fossil fuel fired, i.e., any EGU that fired fossil fuels for more than 10.0 percent of the average annual heat input during any 3 consecutive calendar years or for more than 15.0 percent of the annual heat input during any one calendar year after the applicable compliance date, it then must comply henceforth with the applicable existing source provisions of Subpart UUUUU on the date such unit meets the definition of an EGU subject to this subpart (once in always in for MACT standards). The owner or operator shall obtain, make, and keep the records related to the use of actual gas/oil usage in a form suitable for inspection at the facility by the Department. If NGS Unit 3 becomes an oil fired unit, it will be subject to applicable MATS limits.}

Comment 12. The Permittee requested language revisions in Specific Condition **B.1** regarding the replacement of “full load” with “testing capacity” for Combustion Turbine (CT) Nos. 3, 4, 5 and 6.

Response 12. The Department agrees with this request. Testing capacity is defined in Rule 62-297.310, F.A.C. with respect to the maximum operation rate of an emissions unit. Heat input rate adjusted for ambient conditions, which is provided in Appendix NGS, is the correct accurate indicator of testing capacity. Specific Condition **B.1** has been revised as follows:

B.1. Permitted Capacity. The maximum operation heat input rates, based on the lower heating value (LHV) of the fuel, are as follows:

Unit No.	MMBtu/hr Heat Input	Fuel Type
006	901.0 <u>(LHV)</u>	<u>New</u> No. 2 Fuel Oil
007	901.0 <u>(LHV)</u>	<u>New</u> No. 2 Fuel Oil
008	901.0 <u>(LHV)</u>	<u>New</u> No. 2 Fuel Oil

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009

901.0 ~~(LHV)~~

~~New~~ No. 2 Fuel Oil

The attached Appendix NGS: CT Heat Input Nominal Values is a chart of the Base Load MW vs. Temperature to aid in defining full-load testing capacity for visible emissions testing purposes, since the manufacturer's curves are not available. The heat input numbers are only nominal values. An estimated heat input rate can be calculated from fuel records showing the quantity and the heat content of the fuel fired, and shall be provided upon request. [Rules 62-4.160(2) ~~and~~ & 62-210.200 (~~Definitions – Potential to Emit (PTE)~~), F.A.C.; and, JEPB Rule 2, Part III, 2.301]

Comment 13. The Permittee requested the use of language from the previous version of Specific Condition **B.12** regarding testing VE from each CT on a biennial basis, pursuant to Rule 62-297.310(8)(a)5.a., F.A.C.

Response 13. The Department agrees with this request. Biennial testing is not consistent with Rule 62-297.310, F.A.C. However, this language originated from Permit No. AO16-173880, which is treated as a previously established condition. Pursuant to Rule 62-297.310(8)(a)5.a., F.A.C., the Department has revised Specific Conditions **B.12** and **B.13** as follows:

B.12. ~~Visible Emissions Testing – Biennial~~ Annual Compliance Tests Required. ~~By this permit, biennial (odd years) emissions compliance testing for visible emissions VE is required for each emissions unit, but is not required for those emissions units burning No. 2 fuel oil for less than 400 hours during the previous even year or the current odd year in question. During each calendar year (January 1st to December 31st), each CT shall be tested to demonstrate compliance with the emissions standard for VE. Annual testing is not required for any CT that operated for 400 hours or less (including during startup and shutdown) during the calendar year. If a CT operates for more than 400 hours during the calendar year, a VE test shall be completed no later than 60 days after the CT's annual operation exceeds 400 hours, or by the end of the calendar year, whichever is later.~~ [Rules 62-297.310(8)(a)5.ad., F.A.C.; and, Part XI, Rule 2.1101, JEPB Rule 2, Part XII, 2.1201;]

B.13. ~~Visible Emissions VE Testing – Prior to Renewal.~~ A visible emissions VE compliance test that demonstrates compliance with Specific Condition **B.5** shall be conducted for each CT prior to obtaining a renewed operation permit. An emissions test shall not be required for any emissions unit CT that, in the previous five-year period, operated for 400 hours or less (including during startup and shutdown) during each calendar year included in the five-year period of permitted operation. The first time an emission-unit CT subsequently exceeds 400 hours of operation during a calendar year, emissions VE must be tested no later than 60 days after 400 hours of operation is exceeded in that calendar year, or by the end of that calendar year, whichever is later. Emissions units that are required to conduct an annual a biennial compliance test may submit the most recent annual biennial compliance test to satisfy the requirements of this provision, provided such test occurred within the term of the current operating permit. [Rule 62-297.310(8)(b) 2. & 3.c., F.A.C.; and, JEPB Rule 2, Part XII, 2.1201]

Comment 14. The Permittee requested that language revisions in Specific Condition **B.17** be revised to incorporate CT performance and testing capacity variability with ambient temperature.

Response 14. The Department agrees with this comment. Testing capacity for CTs depends on ambient conditions at the time of testing/operation. Additionally, current testing capacity provisions from Rule 62-297.310(3), F.A.C. has been incorporated into Specific Condition **B.17**, which has been revised as follows:

B.17. Operating Rate During Testing. Testing of emissions shall be conducted with the emissions unit operating at testing capacity, which is defined as at least 90% of the maximum operation rate in Specific Condition B.1, adjusted in accordance with Appendix NGS as defined in Rule 62-297-310(3)(b)., F.A.C. If it is impracticable to test at permitted testing capacity, an emissions unit may be tested at less than the minimum testing capacity (i.e., at less than 90 percent of the maximum operation rate allowed by the permit); in this case, subsequent emissions unit operation is limited to 110 percent of the test load. If tested at less than testing capacity, another emissions test shall be conducted and completed no later than 60 days after the emissions unit exceeds 110 percent of the capacity at which its most recent emissions test was conducted. [Rule 62-297.310(3), F.A.C.; and, JEPB Rule 2, Part XII, 2.1201]

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[Permitting Note: The attached Appendix NGS: CT Heat Input Nominal Values is a chart of the Base Load MW vs. Temperature to aid in defining testing capacity full-load for visible emissions testing purposes, since the manufacturer's curves are not available. The heat input numbers are only nominal values.]

[Rules 62-297.310(3), F.A.C.; and, Part XI, Rule 2.1101, JEPB]

Comment 15. The Permittee noted that Specific Condition **B.19** is a duplicate of Specific Condition **B.20**.

Response 15. The Department agrees with this comment. Specific Condition **B.19** has been deleted. The cross-reference in Specific Condition **B.18** has been updated to reflect this change.

Comment 16. The Permittee requested the use of the word “testing capacity” in lieu of “capacity” in Specific Conditions **C.1** and **D.1**.

Response 16. The Department agrees with this change. While existing permit language for this specific condition states that capacity is included only for establishing testing capacity, the requested language additions do not change the meaning of this specific condition. Therefore, “capacity” has been replaced by “testing capacity” throughout Specific Conditions **C.1** and **D.1**.

Comment 17. The Permittee requested language revisions to Specific Condition **C.14** to reflect that compliance with carbon monoxide (CO) emissions standards is used to demonstrate compliance with volatile organic compound (VOC) emissions standards.

Response 17. The Department agrees to revise this condition. References to stack testing, however, will not be deleted. Stack testing for VOC is used as an alternative to CO CEMS compliance requirements. Therefore, Specific Condition **C.14** has been revised as follows:

C.14. Volatile Organic Compounds. As determined by stack test and or compliance with CO emissions standards. ~~Volatile organic compound (VOC)~~ emissions shall not exceed 14 lbs/hour (3-hour average), nor 61.5 tons per year from either CFB Boiler No. 1 or No. 2. [Rule 62-212.400(BACT), F.A.C.; ~~and~~, Permit No. 0310045-003-AC/PSD-FL-265; ~~and~~, JEPB Rule 2, Part IV, 2.401]

Comment 18. The Permittee requested language and citation clarification for Specific Condition **C.18** regarding mercury (Hg) low emitting EGU (LEE) applicability in 40 CFR 63, Subpart UUUUU.

Response 18. The Department agrees to revise the citation of Specific Condition **C.18** and the accompanying permitting note in accordance with the requested revisions. These revisions appear as follows:

[Rule 62-212.400(BACT), F.A.C.; 40 CFR 63.9991(a)(1) & 63.10009(a)(2) & Table 2 to 40 CFR 63, Subpart UUUUU; ~~and~~, Permit No. 0310045-003-AC/PSD-FL-265; and, JEPB Rule 2, Part IV, 2.401]

[Permitting Note: Only initial stack testing was required for the Hg standard in paragraph a. Pursuant to Permit No. 0310045-003-AC/PSD-FL-265, Section III., Specific Condition 40. Initial stack testing has since been performed and no additional compliance testing is required. If CFB Boiler Nos. 1 and 2 are reclassified as LEE units for Hg, compliance may be demonstrated in accordance with applicable NESHAP Subpart UUUUU compliance methods for Hg LEEs.]

Comment 19. The Permittee requested revisions of the citations of Specific Conditions **C.19**, **C.25**, **C.26**, **C.36**, **C.38**, **C.39**, **C.40**, **C.53** and **C.54** to incorporate JEPB Rule 2, Part IV, 2.401. This rule incorporates Rule 62-212.400, F.A.C. by reference.

Response 19. Specific Conditions **C.19** and **C.39** were originally permitted under the authority of Rule 62-4.070(3), F.A.C. Therefore, the citation of JEPB, Rule 2, Part XIV, 2.1401, which adopts Chapter 62-4, F.A.C., has been added to these specific conditions. Specific Conditions **C.25**, **C.26**, **C.36** and **C.40** do not cite Rule 62-212.400, F.A.C. in their original air construction permits. Specific Conditions **C.53** and **C.54** cite Rule 62-204.800, F.A.C. These specific conditions have been updated with the citation of JEPB, Rule 2, Part II, 2.201.

Comment 20. The Permittee requested language removal in Specific Condition **C.29** regarding the requirement to perform VOC compliance tests prior to Title V air operation permit renewal.

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Response 20. The Department agrees with this request. VOC compliance requirements (i.e., CO emissions compliance or stack tests) is addressed in Specific Condition C.30. Specific Conditions C.29 and C.30 have been revised as follows:

C.29. Compliance Tests Prior To Renewal. Prior to permit renewal, compliance tests shall be performed for the following pollutants: VE, PM, CO, VOC, NO_x, and SO₂. Except as provided in subparagraph 62-297.310(8)(b)3., F.A.C. (see condition TR7.b.(3) in Appendix TR – Facility-wide Testing Requirements), in addition to the annual compliance tests specified above, each CFB boiler shall have compliance tests performed for PM₅ and PM₁₀ and VOC prior to obtaining a renewed operation permit to demonstrate compliance with the emission limits in Specific Conditions C.12 – C.14. For the purpose of air operation permit renewal, the permittee may submit the most recent compliance test, as specified in subsection 62-297.310(10), F.A.C., provided such test occurred within the term of the current operating permit. So long as SO₂, NO_x, VE, and CO are measured by a continuous emissions monitoring system that meet the performance specifications of 40 CFR part 60 or 75, annual emissions test shall not be required for SO₂, NO_x, VE, or CO. [Rules 62-210.300(2)(a) & 62-297.310(8)(b), F.A.C.; and JEPB Rule 2, Part III, 2.301 & Part XII, 2.1201]

C.30. Compliance Tests Not Required. Annual compliance tests and compliance tests prior to renewal are not required for SO₂, NO_x, CO and VE. The use of a NO_x CEMS, an SO₂ CEMS and a COMS certified in accordance with 40 CFR 75 and the annual RATA, performed in accordance with 40 CFR 75, shall satisfy compliance testing requirements for these NO_x, SO₂ and visible emissions standards. The use of a CO CEMS that meets performance specifications and quality assurance and quality control measures of 40 CFR 60 shall satisfy compliance testing requirements for CO emissions standards. Annual compliance tests and compliance tests prior to renewal are not required for VOC for any CFB boiler that demonstrates compliance with the CO emissions standards. [Rule 62-297.310(8), F.A.C.; and JEPB Rule 2, Part XII, 2.1201]

Comment 21. The Permittee requested that language in Specific Condition C.36 be revised to consolidate test methods for PM and particulate matter less than 10 microns (PM₁₀).

Response 21. The Department agrees with this request. The current versions of EPA Methods 5, 5B, 8, 17 and 29 utilize the same glass fiber filters with at least 99.95% control efficiency for 0.3 micron dioctyl phthalate smoke particles. This makes all methods in this specific condition suitable for both PM and PM₁₀ testing. Paragraph a of Specific Condition C.36 is obsolete and has been deleted. This specific condition has been revised as follows:

C.36. Particulate Matter (PM/PM₁₀).

- a. Annual compliance tests shall be performed on Units 1 and 2 using EPA Methods 5, 5B, 8, 17 or 29 to demonstrate compliance with the PM limit in paragraph a of Specific Condition C.12 while firing petroleum coke. If petroleum coke has been fired for less than 400 hours during the previous calendar year, the testing may be performed while firing coal.
- b. Annual compliance tests shall be performed on CFB Boilers Nos. 1 and 2 using EPA Methods 5, 5B, 8, 17, 29, 201 or 201A, to determine compliance with the particulate matter 10 microns or smaller (PM and PM₁₀) limits in paragraphs a and b of Specific Condition C.12 G.12.b, while firing petroleum coke. If petroleum coke has been fired for less than 400 hours during the previous calendar year, the annual testing may be performed while firing coal or any blend of coal and petroleum coke.
- c. Compliance with the annual particulate matter (PM) emissions limit in paragraph c Specific Condition C.12 G.12.e, shall be determined using the following formula. This formula shall be used for each fuel consumed by each of CFB Boilers Nos. 1 and 2 and existing Boiler No. 3, and the resulting PM emissions summed to obtain a 12-month total for CFB Boilers Nos. 1 and 2 and existing Boiler No. 3.

PM Emissions = (Fuel Usage^a) x (Emission Factor^b) x unit conversion factors

Where:

- ^a The “Fuel Usage” shall be measured by calibrated fuel flow meters (±5 percent accuracy) and recorded daily when a unit is operated.
- ^b An “Emissions Factor” of [(9.19 x weight percent sulfur content) + 3.22] pounds per thousand gallons (lbs/10³ gal) shall be used for fuel oil burned in existing Boiler No. 3. The

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weight percent sulfur content shall be determined based on an analysis of a representative sample of the fuel oil being consumed. The analysis shall be performed using either ASTM D2622-92, ASTM D4294-90, both ASTM D4057-88 and ASTM D129-91, or the latest edition. An “Emissions Factor” of 5 pounds per million cubic feet (lb/MCF) shall be used for natural gas burned in existing Boiler No. 3. For ~~Repowered Units~~ CFB Boiler Nos. 1 and 2, the “Emissions Factor” shall be based on particulate matter stack test results using EPA Methods 5, 5B, 8, 17, or 29 for the individual units, and shall apply to the quantities of fuel consumed in the individual units during the period immediately following the stack tests for the respective units until subsequent stack tests are completed.

[Permit No. 0310045-003-AC/PSD-FL-265; & ~~Permit No.~~ 0310045-049-AC/PSD-FL-265G]

Comment 22. The Permittee requested the removal of VOC test methods and compliance testing in Specific Condition **C.38** because the CFB Boilers are in compliance with the CO emissions limits.

Response 22. The Department agrees with this request, but will not delete original testing provisions that may be applicable to each emissions unit. Specific Condition **C.38** has been revised with a permitting note to indicate that the Permittee elected to comply with VOC emissions limits using CO CEMS data. This specific condition has been revised as follows:

C.38. Volatile Organic Compounds. Compliance tests shall be performed on Units 1 and 2 using EPA Method 18, 25, or 25A to determine compliance with the volatile organic compound (VOC) emission limit in Specific Condition ~~**C.14.**~~ **C.14** while firing petroleum coke. Compliance testing shall be conducted once within every five (5) years ~~thereafter~~ while firing petroleum coke or coal. Compliance with the CO limits (see Specific Condition **C.13**) based on CEMS data shall be used as surrogates to indicate compliance with the VOC limits (see Specific Condition **C.14**). [Permit No. 0310045-003-AC/PSD-FL-265]

[Permitting Note: The Permittee has elected to comply with VOC emissions limits using CO CEMS data. Compliance testing is not required for each CFB that is in compliance with the CO emissions limits.]

Comment 23. The Permittee requested the deletion of Specific Condition **C.44** because the reporting period ended in 2017.

Response 23. The Department agrees with this comment. Specific Condition **C.44** has been deleted. Specific Condition **C.43** has been updated to reflect the removal of Specific Condition **C.44**.

Comment 24. The Permittee requested that Appendices NSPS Subpart A, NSPS Subpart Da, NESHAP Subpart A and NESHAP Subpart UUUUU in Specific Conditions **C.52**, **C.53** and **C.54** be renamed Appendices 40 CFR 60, Subpart A; 40 CFR 60, Subpart Da; 40 CFR 63, Subpart A; and 40 CFR 63, Subpart Da.

Response 24. The Department disagrees with this request. The appendix nomenclature matches current Title V air operation permit format standards. No changes will be made.

Comment 25. The Permittee requested language revisions to the EU description in Section III., Subsection D to reflect that EU No. 053 also utilizes a fabric filter for PM control.

Response 25. The Department agrees with this request. The requested language change has been made.

Comment 26. The Permittee requested language removal in the permitting note below the EU description in Section III., Subsection D because Rule 62-296.711, F.A.C. only applies to existing emissions units.

Response 26. The Department agrees with this request. In accordance with Rule 62-296.700(1)(a), F.A.C., Rule 62-296.711, F.A.C. applies to existing emissions units that emit PM in a PM air quality maintenance area or in an area of influence of a PM air quality maintenance area. The emissions units in this subsection were constructed after May 30, 1988, making them new emissions units and, therefore, not subject to Rule 62-296.711, F.A.C. The language in the permitting note has been deleted to reflect this.

Comment 27. The Permittee requested changes in the EU description in Section III., Subsection E. to match the EU name.

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Response 27. The Department agrees with this request and has made the changes to the description of EU No. 055.

Comment 28. The Permittee inquired about the removal of language in Specific Condition **E.1** from 40 CFR 63.6640(f)(2)(ii) and (f)(2)(iii).

Response 28. The Department removed these provisions because they were vacated from 40 CFR 63, Subpart ZZZZ per a guidance letter dated April 15, 2016. A minor revision was made to paragraph **c** in this specific condition to remove language that references the vacated provisions.

Comment 29. The Permittee noted that Specific Condition **H.8** is a duplicate of Specific Condition **H.3**.

Response 29. The Department agrees with this comment. Specific Condition **H.3** has been deleted.

III. Conclusion.

The enclosed proposed Title V air operation permit includes the aforementioned changes to the draft Title V air operation permit. The permitting authority will issue the proposed permit No. 0310045-052-AV, with the changes noted above.