FLORIDA DEPARTMENT OF
Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

(Sent by Electronic Mail – Return Receipt Requested)

Jeffrey Hart
Station Manager
Duke Energy Florida, LLC
176 West Highbanks Road
DeBary, Florida 32753

Re: Title V Air Operation Permit Renewal
Proposed Permit No. 1270028-014 -AV
DeBary Power Plant

Dear Mr. Hart:

One copy of the proposed permit determination for the renewal of the Title V air operation permit for the DeBary Power Plant located in Volusia County at 176 West Highbanks Road, DeBary, Florida, 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 (US EPA) 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 US EPA 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 US EPA. If US EPA 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permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.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 John Dawson, at 850-717-9085, or by email at John.Dawson@dep.state.fl.us.

Sincerely,

David Lyle Read, P.E.
2018.08.15 08:52:07 -04'00'

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

SA/dlr/jpd

Copies sent by electronic mail to the following:

Jeffrey Hart, Duke Energy Florida, LLC, Jeffrey.Hart@duke-energy.com
Jamie Hunter, Duke Energy Florida, LLC, Jamie.Hunter@duke-energy.com
Michael Ballenger, P.E., Trinity Consultants, MBallenger@trinityconsultants.com
Lisa-Marie Clarke, Trinity Consultants, LClarke@trinityconsultants.com
DEP Central District, DEP_CD@dep.state.fl.us
EPA Region 4, R4TitleVFL@epa.gov
Lynn Scearce, DEP OPC, lynn.scearce@dep.state.fl.us

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

2018.08.15 09:45:03 -04'00'

Permit No. 1270028-014 -AV

I. Public Notice.

An Intent To Issue Air Permit issued to Duke Energy Florida, LLC, for the DeBary Power Plant located in Volusia County at 176 West Highbanks Road, DeBary, Florida, was clerked on July 2, 2018. The Public Notice Of Intent To Issue Air Permit was published in the Orlando Sentinel on July 13, 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 July 23, 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[1]. 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. Changes to the permit are highlighted in yellow with additions in double underline text and deletions in ~~strikethrough~~ text.

Letter from Duke Energy Florida, LLC, dated July 25, 2018.

Comment 1. The permittee noted that the word "standard" was inadvertently removed from Specific Condition A.13.

Response 1. The Department agrees with the comment. Condition No. A.13. has been changed as follows:

> A.13. Annual Compliance Tests Required. Each CT that is operated 400 hours or more in a calendar year (January 1st to December 31st) shall be tested for compliance with the visible emission standard. [Rules 62-297.310(8) and 62-297.310(8)(a)5., F.A.C.]

Comment 2. The permittee requests that the phrase "2.0 hours or" be removed from Specific Condition B.12.

Response 2. The wording of this specific condition is taken from Permit No. 1270028-013-AC, which includes the words in question. Therefore, the Department will not make the requested change.

Comment 3. The permittee requests a change to Specific Condition B.22, as noted:

> B.22. Operating Rate During Testing: Testing of emissions shall be conducted with the combustion turbine operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum heat input rate allowed by the permit, corrected for the average compressor inlet temperature during the test (with 100 percent represented by a curve depicting heat input vs. compressor inlet temperature). If it is impracticable to test at permitted capacity, the source may be tested at less than permitted capacity. In this case, subsequent operation is limited by adjusting the entire heat input vs. compressor inlet temperature curve downward by an increment equal to the difference between the maximum permitted heat input (corrected for compressor inlet temperature) and 110 percent of the value reached during the test until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 60 days for the purposes of additional compliance testing to regain the permitted capacity. The ~~turbine manufacturer's capacity~~ turbine's heat input vs. compressor inlet temperature ~~(ambient)~~ curve shall be included with the compliance test results. [Rule 62-297.310(3), F.A.C.]

Response 3. The Department agrees with the request. The new wording clarifies the intent of this condition. Further, since this condition is not directly from an air construction permit, the Department has flexibility in its wording.

III. Conclusion.

The enclosed proposed Title V air operation permit includes the aforementioned changes to the draft Title V air operation permit. Additionally, Appendix U (Unregulated Emissions Units and/or Activities) was referred to in the Draft Permit but was inadvertently omitted from the Draft Appendices. Appendix U, which covers only the

[1] Comments available in Oculus. (Choose "Public Oculus Login.")

one unregulated emergency engine, has been added to the Proposed Appendices. The permitting authority will issue the proposed permit No. 1270028-014-AV, with the changes noted above.