



Environmental Consulting & Technology, Inc.

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BUREAU OF AIR REGULATION

May 14, 2002

Ms. Cindy Phillips, P.E.
Florida DEP
Bureau of Air Regulation
Twin Towers Office Bldg. M.S. 5505
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400

Re: **MACT Hammer Applicability Determination for Lake and St. Lucie County Facilities**

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Dear Ms. Phillips:

This letter is submitted by Environmental Consulting and Technology (ECT), on behalf of our client, Duke Energy North America (Duke), to document the minor source status of the two simple cycle combustion turbines with respect to Section 112 of the Clean Air Act Amendments of 1990. This documentation is important as it enables Duke to clarify that the provisions of Section 112(j), the MACT Hammer, do not apply to these two facilities. Additional information is also provided in the basic format of the FDEP request of April 5, 2002 from Mr. Scott Sheplak.

Duke currently has construction permits for two simple cycle combustion turbine facilities in Florida. These two facilities are sister facilities, namely have the same basic equipment configuration. The main equipment at each facility consists of eight (8) General Electric model 7EA (GE 7EA) combustion turbines, operated in simple cycle mode. Additionally, an internal combustion engine to supply fire deluge water is permitted for each facility. As the Professional Engineer who directed the work on the Lake County air quality application, I am familiar with the potential HAP emissions from each facility. As was reported in the air quality permit applications for these facilities (e.g., refer to Table 2-6 of the Lake County construction permit application text), the HAP emissions from each facility is considerably less than the major source threshold of 10 tons per year for any individual HAP, and 25 tons per year for total HAP emissions. Because the Section 112(j) program only applies to facilities that are classified as a major source for HAP emissions, this program does not apply to either of these two facilities.

Although this rule does not apply to these facilities, the remainder of this letter is structured along the lines of the FDEP request of April 5, 2002. This information is submitted to give FDEP information in the spirit of what was requested, even though the 112(j) program does not apply to these units.

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The **Lake County** facility is located approximately 5 miles east of the City of Eustis on State Road 44. The **St. Lucie County** facility is located approximately one-half mile east of the Florida Turnpike and one mile north of Midway Road

The equipment at each facility that would be subject to 112(j) requirements, if located at a major facility, consists of the combustion turbines and the fire water supply pump engine. The combustion turbines belong to the NESHAP source category Combustion Turbines. The fire water supply pump engine belongs to the source category Reciprocating Internal Combustion Engines (RICE). Each facility has eight combustion turbines and one fire water supply pump engine.

Because each facility is a minor source for HAP emissions, a Section 112(g) new source MACT determination was not required as part of the permitting process. Therefore, there are no units at either facility that were subject to the Section 112(g) requirements.

Sincerely,

ENVIRONMENTAL CONSULTING & TECHNOLOGY, INC.



Mitchell J. Hait, Ph.D., P.E.
Office Manager

CC: Mr. Nathan Plagens, Duke Energy North America
Mr. Doug Neely, USEPA Region IV