



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

ATLANTA FEDERAL CENTER  
61 FORSYTH STREET, SW  
ATLANTA, GEORGIA 30303-8909

MAY 4 1998

4APT-ARB

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

SUBJ: EPA's Review of Proposed Title V Permit  
City of Gainesville - J.R. Kelly  
Generating Station  
Permit no. 0010005-001-AV

Dear Mr. Rhodes:

The purpose of this letter is to provide comments to the Florida Department of Environmental Protection (DEP) on the proposed title V operating permit for City of Gainesville - J.R. Kelly Generating Station, which was posted on DEP's web site on March 19, 1998. Based on the Environmental Protection Agency's (EPA's) review of the proposed permit and the supporting information for this facility, EPA formally objects, under the authority of Section 505(b) of the Clean Air Act (the Act) and 40 C.F.R. § 70.8(c) (see also Florida Regulation 62-213.450), to the issuance of the title V permit for this facility on the basis that the permit does not fully meet the periodic monitoring requirements of § 70.6(a)(3)(i).

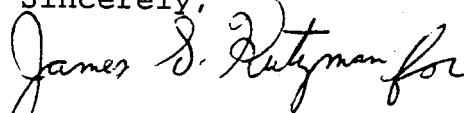
As you know, 40 C.F.R. § 70.8(c) requires EPA to object to the issuance of a proposed permit in writing within 45 days of receipt of the proposed permit (and all necessary supporting information) if EPA determines that the permit is not in compliance with the applicable requirements under the Act or 40 C.F.R. Part 70. Section 70.8(c)(4) and Section 505(c) of the Act further provide that if the State fails to revise and resubmit a proposed permit within 90 days to satisfy the objection, the authority to issue or deny the permit passes to EPA and EPA will act accordingly. Because the objection issues must be fully addressed within the 90 days, we suggest that the revised permit be submitted in advance in order that any outstanding issues may be addressed prior to the expiration of the 90-day period.

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

With regard to the imposition of periodic monitoring in title V permits, we also refer you to our objection letter of December 11, 1997, which clearly states EPA's position with regard to requiring additional monitoring in order to establish a credible basis for compliance certification.

If you have any questions or wish to discuss this further, please contact Ms. Carla Pierce, Chief, Operating Source Section at (404) 562-9099. Should your staff need additional information they may contact Ms. Gracy R. Danois, Florida Title V Contact, at (404) 562-9119, Mr. David McNeal, Regional Monitoring Expert, at (404) 562-9102, or Ms. Lynda Crum, Associate Regional Counsel, at (404) 562-9524.

Sincerely,



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

cc: Mr. Michael L. Kurtz  
General Manager  
City of Gainesville, GRU

regard to requiring additional monitoring in order to establish a credible basis for compliance certification.

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Winston A. Smith  
Director  
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Management Division

cc: Mr. Michael L. Kurtz  
General Manager  
City of Gainesville, GRU

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J. Walke - OGC  
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R. Dresdner - OECA

File:jrkelly.gdl/grdanois/x9119

YRO 5/1/98	YRO fm 5/1/98	AD 5/1/98	CEB 5/1/98
DANOIS	ADAMS/MCNEAL	CRUM, EAD	PIERCE 5/1/98
Neeley 5/1/98	5/1/98		
NEELEY	FOX	SMITH	

JR  
Cox

Enclosure

U.S. EPA Region 4 Objection  
Proposed Part 70 Operating Permit  
City of Gainesville, GRU  
J.R. Kelly Generating Station  
Permit no. 0010005-001-AV

EPA objects to the issuance of this permit due to the following reasons:

- (1) Periodic Monitoring - Conditions A.1. and B.1. describe the maximum operation heat input rate for units 006, and 007 and 008, respectively. In the past, the State has asserted that these types of conditions were included for purposes of establishing the baseline for determining the percent operating capacity at the time of testing. However, the permitting note in condition B.1. seems to imply that, at least, for units 007 and 008, the permittee is expected to demonstrate compliance with the heat input rate limitation. The State needs to explain the origin of these conditions (i.g., PSD permit conditions) either in the permit or the statement of basis and, if EPA's interpretation of condition B.1. is correct, the permit needs to include appropriate monitoring or recordkeeping to demonstrate compliance with the maximum operating heat input rate established by the condition. In order to satisfy the latter, the permit must require that the facility maintain fuel usage records to demonstrate compliance with the applicable heat input limit. Since this recordkeeping will be used to determine compliance with an hourly heat input rate limitation, the permit should contain an hourly fuel usage recordkeeping requirement in order to ensure that the facility remains in compliance with the hourly heat input limit.
- (2) Periodic Monitoring - Conditions A.6. and A.7. establish that the emissions of particulate matter and sulfur dioxide will be controlled by the firing of natural gas. The rule citation (62-296.406(2) and (3)) refers to a BACT determination. The permit or the statement of basis needs to contain further explanation regarding these BACT determinations (i.e., date, PSD permit no.) and the reason why there are no monitoring or recordkeeping requirements associated with these conditions.
- (3) Periodic Monitoring - The permit does not require sufficient periodic monitoring to ensure compliance with the applicable opacity standard. The J.R. Kelly permit only requires an annual one hour Method 9 visible emission reading. In most cases this does not constitute adequate periodic monitoring to ensure continuous compliance with the opacity standard.

We recommend that the source be required to conduct visible emissions readings on a daily basis for unit 007 when this unit is burning fuel oil, or a description in the statement of basis demonstrating why the State has chosen not to require any additional visible emissions testing. For unit 008, the continuous opacity monitor (COM) installed on the unit, should be used to ensure compliance with the opacity standard. Requiring that the opacity monitor be used for conducting periodic monitoring imposes little or no additional burden on the source. For unit 006, the statement of basis needs to include the reasons why no additional monitoring is needed.

- (4) Periodic Monitoring - Condition B.7. allows particulate matter emissions up to an average of 0.3 lbs. per million BTU heat input during a 3-hour period in any 24-hour period for soot blowing and load change. In addition, Condition A.5 allows visible emissions up to 60 percent opacity during soot blowing and load changes. A load change is defined to occur when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more. There does not, however, appear to be any conditions that require the source to record the time, date, and duration of these events. The permit must require that the facility keep records of these events to ensure compliance with this requirement or the statement of basis must describe the reasons why recordkeeping is not necessary.

In addition to the above objections, our review has identified the following concerns regarding this permit:

- (1) Condition 12 - Please replace "Operating Source Section" with "Air & EPCRA Enforcement Branch, Air Compliance Section."
- (2) Conditions B.1. and B.3. - Condition B.1. describes that units 007 and 008 are allowed to burn new residual fuel oil nos. 4 and 5. However, condition B.3. limits this facility to only burn new residual fuel oil no. 6. The statement of basis needs to justify why these units are being limited to only burn fuel oil no. 6. Also, the State should consider rewording condition B.1. to avoid any confusion.
- (3) Conditions B.13. and B.14. - The State should consider merging these two conditions into one since condition B.13. seems to be providing background information for condition B.14.

- (4) Appendix I-1 - Items 6, 7, and 9 need to be more specific as to the characteristics of the emission units that are found in this facility.
- (5) Appendix U-1 - The statement of basis needs to contain a description of the combustion turbines listed in this appendix. It is unclear in the permit what makes these units not subject to any unit specific requirement.