

## STATEMENT OF BASIS

Title V Air Operation Permit Renewal  
Permit No. 0050014-040-AV

### APPLICANT

The applicant for this project is Florida Power and Light Company. The applicant's responsible official and mailing address are: Mr Dirk Hunt., PGD Plant Manager, Florida Power and Light, Smith Energy Generating Plant, 4300 Road 2300, Southport, Florida 32409.

### FACILITY DESCRIPTION

The applicant operates the existing Smith Energy Generating Plant, which is in Bay County at 4300 County Road 2300, Lynn Haven, Florida.

The Smith Plant is an existing electric generating plant operated by Gulf Power Company. This facility consists of a Pratt & Whitney Twin-Pac combustion turbine peaking unit; and two gas-fired combined-cycle combustion turbine (CCCT) electrical generators with duct-fired heat recovery steam generators (HRSG). The Twin-Pac system, designated as Unit A, has a maximum heat input of 542 million British thermal units per hour (MMBtu/hour) and is authorized to fire No. 2 fuel only. The two combined-cycle combustion turbines, designated as Units 3A & 3B, can achieve a nominal 610 megawatts (MW), at annual average site conditions, with duct burners, while firing exclusively natural gas. Units 3A & 3B are Acid Rain units.

The facility also includes emergency and non-emergency reciprocating internal combustion engines (RICE).

This facility also includes miscellaneous unregulated/insignificant emissions units and/or activities.

### REGULATED EMISSIONS UNIT IDENTIFICATION NUMBERS AND DESCRIPTIONS

EU No.	Brief Description
003	Twin-Pac Combustion Turbine Peaking Unit (Unit A)
004	Gas Combustion Turbine with HRSG and Duct Burner (Unit 3A)
005	Gas Combustion Turbine with HRSG and Duct Burner (Unit 3B)
012	550 HP Emergency Diesel Generator at CCCT
013	153 HP Emergency Diesel Sump Pump (Big Blue)
015	Fire Pump Engine
016	Two 49 HP Emergency Diesel Generators for Hurricane Shelter
017	PSM Emergency Generator

### APPLICABLE REGULATIONS

Based on the Title V air operation permit renewal application received on July 8, 2024, this facility is not a major source of hazardous air pollutants (HAP). The existing facility is a prevention of significant deterioration (PSD) major source of air pollutants in accordance with Rule 62-212.400, F.A.C. A summary of applicable regulations is shown in the following table:

Regulation	EU No(s).
<i>Federal Rule Citations</i>	
40 CFR 60, Subpart A, NSPS, General Provisions	004, 0012, 013, 015 016, 017
40 CFR 60, Subpart IIII, NSPS, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	012, 013, 015, 016
40 CFR 60, Subpart JJJJ, NSPS, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	017
40 CFR 60, Subpart KKKK, NSPS, Standards of Performance for Stationary	004, 005

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Regulation	EU No(s).
Combustion Turbines	
40 CFR 63, Subpart A, NESHAP, General Provisions	012, 013, 015, 016, 017
40 CFR 63, Subpart ZZZZ, NESHAP, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	012, 013, 015, 016
40 CFR 75 Acid Rain Monitoring Provisions	004, 005
<i>State Rule Citations</i>	
Chapter 62-4, F.A.C., Permits	All
Chapter 62-204, F.A.C., Air Pollution Control – General Provisions	00.3, 004, 005, 006, 008, 012, 013, 015, 016
Rule 62-210.300, F.A.C., General Preconstruction Review Requirements	
Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD)	004, 005
Chapter 62-213, F.A.C., Operation Permits for Major Sources of Air Pollution	003, 004, 005, 006, 08, 012, 013
Chapter 62-214, F.A.C., Requirements for Sources Subject to the Federal Acid Rain Program	001, 002 (Retired) 004, 005 (Active)
Chapter 62-297, F.A.C., Stationary Sources – Emissions Monitoring	003, 004, 005, 006, 008, 012, 013, 015, 016

This facility also includes miscellaneous unregulated/insignificant emissions units and/or activities.

### PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V permit for the above referenced facility.

### PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Renewal received **July 8, 2024**

Additional Information Request dated **July 16, 2024**

Additional Information Response received **August 21, 2024**

Draft Title V permit renewal package was issued on **October 3, 2024**

Proposed Title V permit renewal package was issued on **November 19, 2024**

Final Title V permit renewal package was issued on **January 9, 2025**

### PRIMARY REGULATORY REQUIREMENTS

Standard Industrial Classification (SIC) Code: 4911 – Electrical Generation.

North American Industry Classification System (NAICS): 221112 - Fossil Fuel Electric Power Generation.

HAP: The facility is not identified as a major source of hazardous air pollutants (HAP).

Title IV: The facility operates units subject to the acid rain provisions of the Clean Air Act.

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility operates units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility operates units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

GHG: The facility is identified as a major source of greenhouse gas (GHG) pollutants.

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### PROJECT REVIEW

In addition to the standard renewal format and rule updates, renumbering of conditions, FPL requests to incorporate the PSM emergency generator addition and a gas turbine/HRSG combined cycle operation.

1. Changes throughout the Title V air operation permit that do not alter the intent or underlying language of any permit conditions include:
  - The renewal permit is based on the Department's updated formats for a Title V air operation permit.
  - Updated the permit rule citations and identified acronyms.
  - Updated facility and emissions unit descriptions.
  - Renumbering of permit conditions.

### **Section III. Emissions Unit and Conditions**

*Subsection B, EU 004 & 005 – Gas Combustion Turbine Peaking Unit (Unit A)*

2. As requested by applicant, added Condition **B.5.** (Combined Cycle Operation with Steam Dumped to Condenser) to maintain consistency with FPL's Turkey Point Fossil Plant's 4 on 1 combined cycle operations.

*Subsection D, EU 017, PSM Emergency Generator*

3. As requested by applicant, added Subsection D (EU 017, PSM Emergency Generator) to incorporate newly installed equipment.

### **Section IV. Acid Rain Part**

4. Removed the CAIR Retired Unit Exemption section (DEP Form No. 62-210.900(1)(c) as being obsolete.

### CONCLUSION

This project renews Title V air operation permit No. 0050014-033- AV, which was effective on FEBRUARY 24, 2020. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, and 62-213, F.A.C.