# STATEMENT OF BASIS

Florida Power Corporation dba Progress Energy Florida, Inc. (PEF)
Intercession City Plant

Final Permit No. 0970014-016-AV, Title V Air Operation Permit Renewal

## APPLICANT

The applicant for this project is Florida Power Corporation dba Progress Energy Florida, Inc. (PEF). The applicant's responsible official and mailing address are: Mr. Martin Drango, Plant Manager, Intercession City Plant, Progress Energy Florida, Inc., 6525 Osceola Polk County Line Road, Intercession City, Florida 33848.

## FACILITY DESCRIPTION

The Intercession City Plant is located in Osceola County at 6525 Osceola Polk County Line Road, Intercession City, Florida.

This existing facility is a nominal 1,169.4 megawatts (MW) power plant that consists of fourteen simple cycle intermittent duty combustion turbines (CTs) firing natural gas or distillate oil. All of the CTs are considered to be peaking units used during periods of greatest daily demand. Also included in this permit are miscellaneous insignificant emissions units and/or activities.

## PROJECT DESCRIPTION

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

## PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Renewal received Electronic Permit Submittal and Processing System (EPSAP) on May 15, 2012.

Draft/Proposed Title V Air Operation Permit Renewal posted onto web site on August 10, 2012.
Public Notice published on August 28, 2012.
Notification to U.S. EPA Region 4 of Publication of Public Notice on August 30, 2012.

## PRIMARY REGULATORY REQUIREMENTS

Title I: This facility is a major source of hazardous air pollutants (HAP), based on the Title V air operation permit renewal application.

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

Since the facility is a major source of HAP, the NESHAP (MACT) - 40 CFR 63, Subpart YYYY, Stationary Combustion Turbines, applies to the combustion turbine units.

Title IV: This facility does operate units subject to the acid rain provisions of the Clean Air Act.

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

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

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

The combustion turbine units are regulated under NSPS - 40 CFR 60, Subpart GG, Standards of Performance for Stationary Gas Turbines. Since the combustion turbine units commenced construction before February 18, 2005, they are not regulated under 40 CFR 60 Subpart KKKK, Standards of Performance for Stationary Combustion Turbines.

CAIR: This facility does operate units subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

Siting: This facility does not operate units subject to the power plant siting provisions of Chapter 62-17, F.A.C.

CAM: The emissions units at this facility are not subject to CAM for one or more of the following reasons: they do not trigger the potential pre-air pollution control device major source emission thresholds; they demonstrate continuous compliance with a continuous emission monitoring system (CEMS); they are not equipped with air pollution control device(s); they are equipped with device(s) which are considered to be inherent to the process/operation; or, they satisfy CAM by meeting the post-1990 40 CFR 60 Subparts Cb/Eb federal monitoring requirements for the same or similar air pollutants.

GHG: This facility is identified as a major source of green house gas (GHG) pollutants.

## PROJECT REVIEW

Changes were made in the format of this renewed Title V air operation permit.

Permit

- This project includes the revised permit specific condition language pertaining to excluding excess emissions data from Permit No. 0970014-014-AV.
- Engines. Engines in the previous permit, Permit No. 0970014-010-AV, were listed in Appendix I. An E.U. ID No. of 014 had been assigned to the general purpose engines. The fire pump engine is now a 'regulated' emissions unit under recently promulgated federal regulations; specifically, 40 CFR 63 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE). The fire pump is included in this permit as a 'regulated' emissions unit within the body of the permit in Subsection D. An E.U. ID No. of 021 was assigned to the fire pump engine.
- Appendix I, List of Insignificant Emissions Units and/or Activities. Included the applicant's requested miscellaneous changes to the list of insignificant emissions units and/or activities.

## CONCLUSION

This project renews Title V air operation permit No. 0970014-010-AV, which was effective January 1, 2008.

**Intercession City Plant**

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