PERMITTEE

Anclote Power Plant
Duke Energy Florida, Inc. (DEF)
1729 Baillies Bluff Road
Holiday, Florida 34691-9753

PERMITTING AUTHORITY

Florida Department of Environmental Protection (Department)
Division of Air Resource Management
Office of Permitting and Compliance
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400

PROJECT

Permit No. 1010017-014-AC/PSD-FL-419A
Application for Minor Source Air Construction Permit
Revisions to Previously Issued AC/PSD Permits

PUBLIC NOTICE

The Department distributed a draft air construction permit package on August 8, 2014. The applicant published the Public Notice in the Pasco Times edition of the Tampa Bay Times in Pasco County, Florida on August 15, 2014. The Department received the proof of publication on August 18, 2014.

No requests for an administrative hearing or requests for an extension of time in which to file a petition for an administrative hearing were received by the Agency Clerk in the Department's Office of General Counsel.

COMMENTS

No comments on the permit were received from the public or the U.S. EPA Region 4 Office during the 14-day public comment period. Comments on the permit were received from the Applicant during the 14-day public comment period. The comments are addressed below.

All changes are emphasized with yellow highlight in this document only. Additions to the permit are indicated below by double underline. Deletions from the permit are indicated below by ~~strike through~~

Comments from the Applicant submitted via email on August 27, 2014

Comments

1. In Section 1.2 Facility Description and Location of the *Technical Evaluation & Preliminary Determination (TE&PD)* document the latitude and longitude require minor corrections. Please make the following substitutions:

> **1.2. Facility Description and Location**
>
> This facility is an existing electrical generation plant categorized under Standard Industrial Classification No. 4911. This existing plant is located in Pasco County at 1729 Baillies Bluff Road, Holiday, Florida; UTM Coordinates are: Zone 17, 324.4 km East and 3118.7 km North; and, Latitude: 28° ~~48' 17"~~ 11' 04" North and Longitude: 82° 47' ~~08"~~ 19" West.

***Response*:** The Department notes the corrections. The TE&PD document is not an enforceable part of the permit, instead it is a supporting document on file with the Department. The facility's latitude and longitude coordinates do appear on the placard page of the permit (first page). The corrections are made to the TE&PD document and the project description of the permit as follows:

TE&PD Document

> "…

1.2. Facility Description and Location

This facility is an existing electrical generation plant categorized under Standard Industrial Classification No. 4911. This existing plant is located in Pasco County at 1729 Baillies Bluff Road, Holiday, Florida; UTM Coordinates are: Zone 17, 324.4 km East and 3118.7 km North; and, Latitude: 28° ~~48' 17"~~11' 04" North and Longitude: 82° 47' ~~08"~~19" West.

…"

Permit

"…

Project

This is the final air construction permit, which authorizes revisions to the previously issued air construction (AC)/Prevention of Significant Deterioration (PSD) permits, Permit Nos. 1010017-013-AC/PSD-FL-419 (Project). This facility is an existing electrical generation plant categorized under Standard Industrial Classification No. 4911. This existing plant is located in Pasco County at 1729 Baillies Bluff Road, Holiday, Florida; UTM Coordinates are: Zone 17, 324.4 km East and 3118.7 km North; and, Latitude: 28° ~~48' 17"~~11' 04" North and Longitude: 82° 47' ~~08"~~19" West.

…"

2. In Paragraphs 4 and 5 of Section 2.1 of the *Technical Evaluation & Preliminary Determination (TE&PD)* the name Suwanee appears several times. Please make the following substitutions:

2.1. General PSD Applicability

The list given in the citation includes the category of "fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input". This category applies to the ~~Suwanee~~ Anclote Plant before and after the proposed project. The ~~Suwanee~~ Anclote Plant is a major stationary source based on actual emissions of and potential to emit 100 TPY or more of several individual PSD pollutants.

For major stationary sources such as the ~~Suwanee~~ Anclote Plant, PSD applicability for modification projects is based on thresholds known as the significant emission rates (SER) as defined in Rule 62-210.200(274), F.A.C. Any "net emissions increase" as defined in Rule 62-210.200(204), F.A.C. of a PSD pollutant from the project that equals or exceeds the respective SER is considered "significant". SER also means any emissions rate or any net emissions increase of a PSD pollutant associated with a major stationary source or major modification which would construct within 10 km of a Class I area and have an impact on such area equal to or greater than 1 gram per cubic meter, 24-hour average.

***Response*:** The Department notes the corrections. The corrections are made to the TE&PD document as follows:

TE&PD Document

"…

2.1. General PSD Applicability

…

The list given in the citation includes the category of "fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input". This category applies to the ~~Suwanee~~ Anclote Power Plant before and after the proposed project. The ~~Suwanee~~ Anclote Power Plant is a major stationary source based on actual emissions of and potential to emit 100 TPY or more of several individual PSD pollutants.

For major stationary sources such as the ~~Suwanee~~ Anclote Power Plant, PSD applicability for modification projects is based on thresholds known as the significant emission rates (SER) as defined in Rule 62-210.200(274), F.A.C. Any "net emissions increase" as defined in Rule 62-210.200(204), F.A.C. of a PSD pollutant from the project that equals or exceeds the respective SER is considered "significant". SER also

means any emissions rate or any net emissions increase of a PSD pollutant associated with a major stationary source or major modification which would construct within 10 km of a Class I area and have an impact on such area equal to or greater than 1 gram per cubic meter, 24-hour average.

…"

3. In Condition No. 2 of Se*ction II - Administrative Requirements* of the draft Permit Nos. 1010017-014-AC/PSD-FL-419A the listed contact phone and fax numbers for the Compliance Authority (FDEP's Southwest District Office (SWD)) are incorrect. The correct main and fax numbers are 813-470-5700 and (813) 470-5995, respectively. By mutual agreement in addition to submitting reports U.S. Mail or courier the Southwest District Compliance Authority also accepts reports submitted electronically at the following email address - SWD_AIR@dep.state.fl.us. As a result, DEF request the addition of this method of report submission to the FDEP/SWD as an option.

2. Compliance Authority: All documents related to compliance activities, such as reports, tests, and notifications, shall be submitted to the Department's Southwest District Office at: 13051 North Telecom Parkway, Temple Terrace, Florida 33637-0926, Telephone: (813) ~~632-7600~~ 470-5700, Fax: (813) ~~632-7665~~ 470-5994 or electronically at SWD_AIR@dep.state.fl.us.

***Response*:** The Department notes the corrections. The fax number for the SWD Office is (813) 470-5995. The corrections are made to Specific Condition II.2. of the permit as follows:

Permit

"…

2. Compliance Authority: All documents related to compliance activities, such as reports, tests, and notifications, shall be submitted to the Department's Southwest District Office at: 13051 North Telecom Parkway, Temple Terrace, Florida 33637-0926, Telephone: (813) ~~632-7600~~ 470-5700, Fax: (813) ~~632-7665~~470-5995 or electronically at SWD_AIR@dep.state.fl.us.

…"

4. In the *Facility Description* Section of the draft Permit Nos. 1010017-014-AC/PSD-FL-419A the emergency diesel fire pump has been omitted as an emissions unit. Please make the following insertion:

FACILITY DESCRIPTION

This existing facility consists of two fossil fuel fired steam generators, designated as Unit Nos. 1 and 2. These two units share a common stack. The facility also includes two 12-cell mechanical draft helper cooling towers, two natural gas-fired process heaters, emergency diesel fire pump and an emergency diesel generator. Also located at the facility are miscellaneous unregulated/insignificant emissions units and/or activities.

***Response*:** The Department notes the correction. The correction is made to the facility description of the permit as follows:

Permit

"…

FACILITY DESCRIPTION

This existing facility consists of two fossil fuel fired steam generators, designated as Unit Nos. 1 and 2. These two units share a common stack. The facility also includes two 12-cell mechanical draft helper cooling towers, two natural gas-fired process heaters, an emergency diesel fire pump and an emergency diesel generator. Also located at the facility are miscellaneous unregulated/insignificant emissions units and/or activities.

…"

CONCLUSION

The final action of the Department is to issue the permit with the administrative corrections and/or clarifications as noted above. The original TE&PD document associated with this project dated August 8, 2014 is corrected as noted above.