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AUG 03 1999

BUREAU OF AIR REGULATION

July 30, 1999

Ms. Kathy Carter, Clerk
Office of General Counsel
Florida Department of Environmental Protection
Room 638
3900 Commonwealth Blvd.
Tallahassee, FL 32399-3000

Dear Ms. Carter:

RE: Florida Power Corporation, University of Florida Cogeneration Plant
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air Operation Permit*,
Draft Permit No. 0010001-001-AV

On June 27, 1997, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues remain to be resolved. Accordingly, FPC requests an extension of time, pursuant to Florida Administrative Code Rule 62-110.106(4), to and including September 1, 1999, in which to file a Petition for Administrative Proceedings in the above-styled matter. Granting of this request will not prejudice either party, but will further both parties' mutual interest by hopefully avoiding the need to actually file a Petition for Administrative Proceeding in this matter. If the Department denies this request, FPC requests the opportunity to file a Petition for Administrative Proceeding within 10 days of such denial.

If you should have any questions, please contact Mr. Scott Osbourn of FPC at (727) 826-4258.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Jeffrey Pardue".

W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Title V Responsible Official

A handwritten signature in black ink, appearing to read "Robert A. Manning".

Robert A. Manning, Esq.
Hopping Green Sams & Smith

cc: Scott Sheplak, DEP
Jeffrey Brown, DEP OGC



Bruce Mitchell

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MAR 26 1999

BUREAU OF
AIR REGULATION

March 18, 1999

Ms. Kathy Carter, Clerk
Office of General Counsel
Florida Department of Environmental Protection
Room 638
3900 Commonwealth Blvd.
Tallahassee, FL 32399-3000

Dear Ms. Carter:

RE: Florida Power Corporation, University of Florida Cogeneration Plant
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air Operation Permit*,
Draft Permit No. 0010001-001-AV

On June 27, 1997, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues remain to be resolved. Accordingly, FPC requests an extension of time, pursuant to Florida Administrative Code Rule 62-110.106(4), to and including May 1, 1999, in which to file a Petition for Administrative Proceedings in the above-styled matter. Granting of this request will not prejudice either party, but will further both parties' mutual interest by hopefully avoiding the need to actually file a Petition for Administrative Proceeding in this matter. If the Department denies this request, FPC requests the opportunity to file a Petition for Administrative Proceeding within 10 days of such denial.

If you should have any questions, please contact Mr. Scott Osbourn of FPC at (727) 826-4258.

Sincerely,

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W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Title V Responsible Official

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Robert A. Manning, Esq.
Hopping Green Sams & Smith

cc: Scott Sheplak, DEP
Jeffrey Brown, DEP OGC



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February 24, 1999

MAR 02 1999

Mr. Clair Fancy, Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Rd.
Tallahassee, Florida 32399-2400

BUREAU OF AIR REGULATION

BAR conference room

Dear Mr. Fancy:

March 17 (10-12 noon, 1-3 p.m.)

Re: Status of Title V Permits

As you know, several of Florida Power Corporation's (FPC) Title V permits remain in the Initial Draft or Revised Draft stages and progress is being made very slowly. This is no one's fault in particular; it's difficult to establish any momentum when the involved parties are processing so many permits and some of the issues (e.g., periodic monitoring) are moving targets. As you and Mr. Scott Osbourn recently discussed, it may be helpful if all involved parties at FPC and the Department were to meet at one time to discuss any remaining unresolved issues.

FPC proposes, with your concurrence, to arrange for a one- or two-day meeting between FPC and the Department to resolve issues associated with the following Title V permits that remain in either the Initial Draft or Revised Draft stage: Anclote, Bartow, Crystal River, Suwannee, Tiger Bay, Bayboro and the University of Florida. It would be desirable to have you, Scott Sheplak and the permit engineers responsible for these facilities in attendance. Mr. Scott Osbourn and I will represent FPC.

It is FPC's desire to advance these Title V permits to the Final Permit stage as expeditiously as possible. FPC has recently requested additional extensions of time on the above-mentioned permits until April 1, 1999 and would like to resolve these permits prior to that date. We will contact you in the next day or two to coordinate a meeting date. If you should have any questions in the meantime, please contact either Scott Osbourn at (727) 826-4258 or me at (727) 826-4334.

Sincerely,

J. Michael Kennedy (signature)

J. Michael Kennedy, Q.E.P.
Manager, Air Programs

cc: Scott Sheplak
Doug Beason, OGC
Jeffrey Brown, OGC
Robert Manning, HGS&S

processor

Anclote Mike
Bartow Ed
Crystal Ed
Suwannee Bruce
Tiger Bay Jonathan
Bayboro Ed
UofF Bruce

See responses to
KFC comments for
Bartow or Crystal
River for
consistency

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NOV 23 1998

BUREAU OF
AIR REGULATION

November 23, 1998

Ms. Kathy Carter, Clerk
Office of General Counsel
Florida Department of Environmental Protection
Room 638
3900 Commonwealth Blvd.
Tallahassee, FL 32399-3000

Dear Ms. Carter:

RE: Florida Power Corporation, University of Florida Cogeneration Plant
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air Operation Permit*,
Draft Permit No. 0010001-001-AV

On June 27, 1997, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues remain to be resolved. Accordingly, FPC requests an extension of time, pursuant to Florida Administrative Code Rule 62-110.106(4), to and including February 1, 1999, in which to file a Petition for Administrative Proceedings in the above-styled matter. Granting of this request will not prejudice either party, but will further both parties' mutual interest by hopefully avoiding the need to actually file a Petition for Administrative Proceeding in this matter. If the Department denies this request, FPC requests the opportunity to file a Petition for Administrative Proceeding within 10 days of such denial.

If you should have any questions, please contact Mr. Scott Osbourn of FPC at (727) 826-4258.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Pardue", written over a horizontal line.

W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Title V Responsible Official

A handwritten signature in black ink, appearing to read "Robert A. Manning", written in a cursive style.

Robert A. Manning, Esq.
Hopping Green Sams & Smith

cc: Scott Sheplak, DEP
Jeffrey Brown, DEP OGC
Brown



8/31 Scott Steplak
 pls handle. If
 this is a problem, pls
 advise.
 ↓ Clair
 Bayboro
 Crystal River
 DeBary
 Groves
 Turner
 Barton
 Suwannee
 Uoff
 Tiger Bay

August 27, 1998

Mr. Clair Fancy, P.E.
 Chief, Bureau of Air Regulation
 Florida Department of Environmental Protection
 2600 Blair Stone Rd.
 Tallahassee, Florida 32399-2400

Dear Mr. Fancy:

Re: Periodic Monitoring in Title V Permits: Heat Input Limits

As you know, a meeting was held between the EPA, the Department and utility representatives at the Florida Electric Power Coordinating Group (FCG) offices on July 14, 1998. The purpose of the meeting was to discuss the periodic monitoring requirements of 40 CFR 70.6(a)(3)(i) as applied to Title V permits. The meeting presented an opportunity for all parties to represent their views, and it was clear that there remains considerable disagreement as to the proper application of the periodic monitoring guidance.

In addition to the July 14, 1998 meeting, FPC has also reviewed DEP's March 10, 1998 letter to EPA (Re: Proposed Changes to FPL Proposed Title V Permits to Satisfy EPA Objections). FPC has still not formalized its position on periodic monitoring, including all of the issues raised in the March 10, 1998 letter. However, the resolution outlined in the March 10th letter regarding heat input limitations appears to be reasonable and one that FPC is willing to accept. This resolution required adding a note to the "permitted capacity" condition for each Title V permit, and an explanation that regular record keeping is not required for heat input. Specifically, the Department stated that they would add the following language to the statement of basis:

The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emissions limits and to aid in determining future rule applicability. A note below the permitted capacity condition clarifies this. Regular record keeping is not required for heat input. Instead, the owner or operator is expected to determine heat input whenever emission testing is required, to demonstrate at what percentage of the rated capacity that the unit was tested. Rule 62-297.310(5), F.A.C., included in the permit, requires measurement of process variables for emissions tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop

Mr. Fancy
August 27, 1998
Page 2

measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate average hourly heat input during the test.

Also, the Department added the following language to each permit condition titled Permitted Capacity:

{Permitting note: The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability.}

Accordingly, FPC requests that this language regarding heat input be added to all of FPC's Title V permits currently being processed by the Department. FPC intends to notify the Department as soon as possible after formalizing its position on the remainder of periodic monitoring issues. If you should have any questions concerning the above, please do not hesitate to contact me at (727) 826-4258.

Sincerely,



Scott H. Osbourn
Senior Environmental Engineer

cc: Robert Manning, HGS&S



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JUL 31 1998

BUREAU OF AIR REGULATION

to file Barbara

Bruce

KUI

July 29, 1998

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JUL 29 1998

Dept. of Environmental Protection
Office of General Counsel

Ms. Kathy Carter, Clerk
Office of General Counsel
Florida Department of Environmental Protection
Room 638
3900 Commonwealth Blvd.
Tallahassee, FL 32399-3000

Dear Ms. Carter:

RE: Florida Power Corporation, University of Florida Cogeneration Plant
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air Operation Permit*,
Draft Permit No. 0010001-001-AV OGC Cell No. 97-1208

On June 27, 1997, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues remain to be resolved. The Department previously agreed to grant an Order extending the time to file a petition until August 1, 1998. Mr. Scott Osbourn of my staff has had discussions with Mr. Scott Sheplak of the Department who agreed that an additional extension of time to discuss these issues is appropriate. Therefore, based upon the Department's concurrence and pursuant to Rules 62-103.050 and 28-106.111, Fla. Admin. Code, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing under Sections 120.569 and 120.57, Fla. Stat., up to and including October 1, 1998.

If you should have any questions, please contact Mr. Scott Osbourn of FPC at (727) 826-4258.

Sincerely,

W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Title V Responsible Official

Robert A. Manning, Esq.
Hopping Green Sams & Smith

cc: Scott Sheplak, DEP
Jeffrey Brown, DEP OGC



Blue

5/28

May 27, 1998

Ms. Kathy Carter, Clerk
Office of General Counsel
Florida Department of Environmental Protection
Room 638
3900 Commonwealth Blvd.
Tallahassee, FL 32399-3000

Dear Ms. Carter:

RE: Florida Power Corporation, University of Florida Cogeneration Plant
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air Operation Permit*,
Draft Permit No. 0010001-001-AV

On June 27, 1997, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues remain to be resolved. The Department previously agreed to grant an Order extending the time to file a petition until June 1, 1998. Mr. Scott Osbourn of my staff has had discussions with Mr. Scott Sheplak of the Department who agreed that an additional extension of time to discuss these issues is appropriate. Therefore, based upon the Department's concurrence and pursuant to Rules 62-103.050 and 28-106.111, Fla. Admin. Code, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing under Sections 120.569 and 120.57, Fla. Stat., up to and including August 1, 1998.

If you should have any questions, please contact Mr. Scott Osbourn of FPC at (813) 866-5158.

Sincerely,

A handwritten signature in cursive script, appearing to read "W. Jeffrey Pardue".

W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Title V Responsible Official

A handwritten signature in cursive script, appearing to read "Robert A. Manning".

Robert A. Manning, Esq.
Hopping Green Sams & Smith

cc: Scott Sheplak, DEP
Jeffrey Brown, DEP OGC



Charles Logan

March 24, 1998

Ms. Kathy Carter, Clerk
Office of General Counsel
Florida Department of Environmental Protection
Room 638
3900 Commonwealth Blvd.
Tallahassee, FL 32399-3000

Dear Ms. Carter:

RE: Florida Power Corporation, University of Florida Cogeneration Plant
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air Operation Permit*,
Draft Permit No. 0010001-001-AV

On June 27, 1997, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues remain to be resolved. The Department previously agreed to grant an Order extending the time to file a petition until March 31, 1998. Mr. Scott Osbourn of my staff has had discussions with Mr. Scott Sheplak of the Department who agreed that an additional extension of time to discuss these issues is appropriate. Therefore, based upon the Department's concurrence and pursuant to Rules 62-103.050 and 28-106.111, Fla. Admin. Code, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing under Sections 120.569 and 120.57, Fla. Stat., up to and including June 1, 1998.

If you should have any questions, please contact Mr. Scott Osbourn of FPC at (813) 866-5158.

Sincerely,

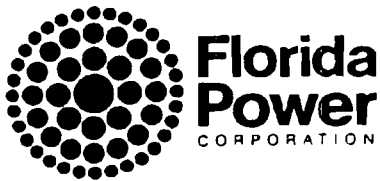
A handwritten signature in black ink, appearing to read "W. Jeffrey Pardue", written over a circular scribble.

W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Title V Responsible Official

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Robert A. Manning, Esq.
Hopping Green Sams & Smith

cc: Scott Sheplak, DEP
Jeffrey Brown, DEP OGC



August 8, 1997

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AUG 13 1997

**BUREAU OF
AIR REGULATION**

Mr. Clair H. Fancy, P.E., Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
111 South Magnolia Drive, Suite 4
Magnolia Park Courtyard
Tallahassee, FL 32301

RE: Florida Power Corporation - University of Florida Cogeneration Plant
Draft Title V Permit No. 0010001-001-AV

Dear Clair:

Florida Power Corporation (FPC) is in receipt of the draft Title V permit for the above referenced facility and appreciates the Department's efforts in issuing the draft permit. FPC has reviewed the draft permit and is submitting the comments relative to the itemized specific conditions. FPC has requested, and the Department has agreed, to an extension of time until August 12, 1997 to resolve these issues or file a Petition for Administrative Hearing. Accordingly, FPC looks forward to the Department's response at the earliest convenience. As a minor editorial comment, please check the spelling of "Gainesville" throughout the document. In many places it was misspelled. Detailed comments are listed below:

Page 3 of 30:

Facility Condition 5, Appendix U-1--Since the emergency generator is listed as an unregulated emissions unit, with no other limitations, the reference to a 32,000 gallons/year limitation should be deleted.

Facility Condition 6, Appendix E-1--The reference to "Lube Oil Vent" should be changed to "Lube Oil Vents", since both the gas turbine and electric generator have vents which were listed in the application. Regarding storage tanks, it would be more specific for future reference to list the type and size of tanks with the designation of "Fuel Oil Storage Tanks". This could be listed as: Fuel Oil Storage Tanks (2-193,200 gallon No. 2 fuel oil and emergency generator diesel tank) in Appendix E-1. The reference to "Vehicles" should be deleted since such sources are not regulated under Title V; the exception is for fugitive dust which is regulated under a separate condition. FPC is aware that the Department is undergoing rule changes to

Mr. Fancy
August 8, 1997
Page 2

change the term "Exempt" to "Insignificant". FPC requests information on how this change may affect the Title V list.

Facility Condition 7--FPC understands that this condition has been promulgated as part of the State Implementation Plan (SIP) and is federally enforceable.

Page 4 of 30:

Facility Condition 8--FPC suggests the words "and could" be added to the condition, i.e. "...particulate matter at this facility and could include..". Reasonable precautions may not include all of these actions in all areas of the facility. Moreover, other actions deemed reasonable should not be excluded. The suggested wording would provide flexibility in assuring that the intent of the rule is met.

Facility Condition 11--This condition should be deleted for several reasons. First, there are no existing permit conditions that would require such a condition (see AC 01-204652; PSD-FL-181). Second, the facility has demonstrated compliance with the federally enforceable emissions cap of 194.3 tons NOx per year over the last several years. If the emissions cap is exceeded, then the Department has mechanisms for enforcement. At this point in time, reference to the 39.7 tons/year is not an applicable requirement. Finally, if FPC, as the applicant, requires to increase the cap, then the Department's rules in 62-212.400 would apply regarding contemporaneous emissions increases and decreases over a five year period. If a modification is triggered, then the Department has the authority to establish BACT pursuant to its rules. If the Department desires to provide historical information for future review, it could be added to Appendix H-1.

Facility Condition 12--It would appear that this condition is unnecessary since these emissions units were not referenced in the Title V application and FPC would have no authority to operate these units. Moreover, this condition has already been complied with and is therefore obsolete and should be deleted.

Facility Condition 13--Similar to Facility Condition 11, the wording of this condition has no historical basis. The words "all", "and all relevant data" and "at any time" do not appear in any previous condition. This condition should be reworded to reflect the intent of Specific Condition 5 of AC 01-204652/PSD-FL-181. Suggested language would be:

13. The permittee shall maintain fuel use and other records to demonstrate compliance with Facility Condition 10 for a period of 5 years.

Page 5 of 30:

Emission Unit (E.U.) 001, Condition A.1.--This condition also has no historical basis and is not necessary and should be deleted. The nameplate capacity is referenced in the emission unit description.

E.U. 001, Condition A3--The permit history for this emission unit and the application cites "natural gas and distillate oil (including on-specification used oil) with a maximum sulfur content

of 0.5 percent" as the appropriate fuels. The condition should better reflect the historical language. The phrase "at all times" seems unnecessary for the intent of this condition. Also, the rule citation does not seem appropriate. This should be checked.

Page 6 of 30:

E.U. 001, Condition A.5--The term "allowables" should be changed to "emission limits" for clarity. This condition includes many items listed as "standards" which were not standards or emission limits in the original and subsequent changes to the construction permit and should only be centered over the lbs/hr and tons/yr columns. The column "Standard" should be changed to "Basis" as in the previous construction permits. The column titled "Fuel" should also reflect the actual construction conditions which reference "Oil" rather than "No. 2 fuel oil". The opacity limitations cited in the table are limits that should be listed as such. Also, the basis for the CO emission limits are "@ 15% O₂". The table should be changed as follows:

Pollutant	Fuel	Basis	Emission Limit (lb/hr)	Emission Limit (tons/year)
NOx	Gas	25 ppmvd @ 15% O ₂	39.6	142.7
	Oil	42 ppmvd @ 15% O ₂	66.3	7.3
SO ₂	Oil	0.5% S by Weight		
VE	Gas/Oil		10%/20%	Opacity
CO	Gas	42 ppmvd @ 15% O ₂	38.8	158.8
	Oil	75 ppmvd @ 15% O ₂	70.5	7.7

E.U. 001, Condition A.6.--This condition also does not have any historical basis, since the construction permit did not include particulate emission limits. Also, Condition A.3. coupled with the opacity limits in Condition A.5. more than provide for the intent of this condition. Therefore, this condition should be deleted.

E.U. 001, Condition A.7.--This condition should reflect that it applies to non-NSPS emission limits, e.g., "For non-NSPS emission limits, excess emissions"

For the NSPS emission limits, the excess emissions provisions of 40 CFR Part 60, 60.8(c) should be included as a condition. The relevant portions of this condition states: "Operation during periods of startup, shutdown and malfunction shall not constitute representative conditions for the purpose of a performance test under 40 CFR 60.8, nor shall emissions in excess of the level of the applicable emission limit during periods of startup, shutdown and malfunction be considered a violation of the applicable emission limit."

Mr. Fancy
August 8, 1997
Page 4

This suggestion would provide clarity to the various limits and is consistent with representation made by Department personnel at the public rulemaking workshops.

E.U. 001, Condition A.11--FPC recommends that this condition be replaced with an alternate which reflects a more stringent monitoring method and is consistent with the proposed construction permit amendment and future rulemaking, i.e., Compliance Assurance Monitoring. It should be noted that the reference to water-to-fuel monitoring does not specifically apply to this emission unit since water is not used as a control technique. This emission unit uses steam for NO_x control. There is no definition or other implication in these outdated NSPS that water and steam are equivalent. Further evidence of the outdated nature of this NSPS would be its application to dry low NO_x (DLN) combustors, where the units could not possibly meet the intent of the language in question. The proposed alternate method is more stringent than the current condition and is consistent with Department policy. The proposed condition is as follows:

A.11. The NO_x emission rate in lb/hr and tons/year from the cogeneration facility stack shall be calculated using the 40 CFR Part 75 continuous emission monitoring (CEM) system to determine lbs/mmBtu and fuel flow monitoring to determine heat input. Excess emissions pursuant to 40 CFR 60.334 shall be determined using the Part 75 CEM system.

Page 8 of 30:

E.U. 001, Condition A.14.--Several of the ASTM methods listed are not listed as current methods for sulfur analysis. The current methods are ASTM D1072-90(94) and ASTM D4084-94 and should be added.

Page 10 of 30:

E.U. 001, Condition A.18.--The performance tests required under 40 CFR 60.8 have already been conducted and compliance with the less stringent NSPS emission limits have been demonstrated. This condition is therefore unnecessary based on the Department's policy of eliminating less stringent requirements. FPC proposes alternate language for performing compliance testing. Also, in accordance with Section 403.0872(13)(b) Florida Statutes, FPC requests that compliance with the NO_x emissions limits be determined on a 30-day rolling average.

A.18. Compliance with the lb/hr NO_x emissions limits listed in Condition A.5. and B. 4. shall be determined as a 30-day rolling average using the Part 75 CEM system. The emission limit shall be based on either Condition A.5. if the turbine is operating alone or the numerical addition of the NO_x limits in Conditions A.5. and B.4. if both the turbine and duct burners are operating. Compliance with emission limits for sulfur content, CO and VE limits shall be determined annually using fuel analysis for sulfur content, EPA Method 10 for CO and EPA or DEP Method 9 for VE.

Mr. Fancy
August 8, 1997
Page 5

E.U. 001, Condition A.19.--The current ASTM methods for sulfur analysis are: D 129-95, D 1266-91, D 1552-95 and D 4294-90(1995).

E.U. 001, Condition A.20.--This condition is unnecessary based on the approval of the Custom Fuel Monitoring Schedule in Condition A.14.

Page 11 of 30:

E.U. 001, Condition A.22. The reference to "110 percent" in the fourth line should be changed to "105 percent", based on the Department's recent policy guidance on combustion turbines.

Page 13 of 30:

E.U. 001, Condition A.24.--Section (b), (c) and (e) should be deleted since there is neither a PM limit nor requirement for particulate matter tests using EPA or DEP Method 5.

Page 15 of 30:

E.U. 001, Condition A.27.--The word "submit" should be added to the third line of paragraph a. to clarify the meaning, i.e., "... period, submit only the summary..."

Page 16 of 30:

E.U. 001, Condition A.30.--FPC proposes that this condition be replaced to reflect the alternate language of Condition A.11. In addition, Section b. needs to be changed to reflect the applicable sulfur content of 0.5 percent and that BACT was not established for sulfur dioxide. The recommended condition is as follows:

A.30. For the purpose of reports under 40 CFR 60.7(c) and monitoring emissions pursuant to Facility Condition 13, periods of excess emissions that shall be reported are defined as follows:

a. Nitrogen Oxides. Any period in which the averaged NOx emissions exceed the emission rates listed in Condition A.5. for the combustion turbine. When the duct burner (Emission Unit 002) is operating with the combustion turbine, the excess emission shall be any one-hour period in which the average NOx emissions exceed the sum of the emission rates listed in Condition A.5. and Condition B.4.

b. Sulfur Dioxide. Any daily period during which the sulfur content of the fuel being fired in the turbine exceeds 0.5 percent by weight.

Page 17 of 30:

E.U.002, Description--This emission unit is not an Acid Rain Unit as defined in 40 CFR Part 72 since none of the steam produced through the use of the duct burners is used to produce electricity. All the steam produced in the HRSG goes to supply the steam needs of the University of Florida. Under the definitions in 40 CFR 72.2, the duct burner is not an "Utility Unit" since no electric energy is produced from its use.

E.U. 002, Condition B.1.--The permitted capacity for the duct burners was expressed in the construction permit as 197.7 thousand (M)cf/hr, which is equivalent to 188 MMBtu/hr (LHV) as noted in the source description. The 187.3 MMBtu/hr should be changed to 188 MMBtu/hr to reflect this authorized heat input.

Page 18 of 30:

E.U. 002, Condition B.4.--Similar to comments made for Condition A.5., the term "Allowable" should be changed to "Emission Limits" and "Standard" should be changed to "Basis". Opacity should be listed as an emission limit. In the introductory sentence and in the table the reference to fuel is redundant to Condition B.2 and should be deleted from the table. The proposed changes to the table are as follows:

Pollutant	Basis	Emission Limit (lb/hr)	Emission Limit (tons/year)
NOx	0.1 lb/mmBtu	18.7	24.6
VE		10% Opacity	
CO	015 lb/MMBtu	28.1	36.9

E.U. 002, Condition B.6.--There are no particulate or opacity limitations under 40 CFR 60.43b for natural gas firing [see 60.43b(a), (b), (c) and (d)]. Therefore, this condition should be deleted.

E.U. 002, Condition B. 7.--This condition is taken out of context of the precise NSPS applicable to duct burner systems and should be deleted. The actual NSPS condition states: "*For purposes of paragraph (i) of this section, the nitrogen oxides standard under this section applies at all times including periods of startup, shutdown, or malfunction.*" 60.44b(h). Section 60.44b(i) states: "Except as provided under paragraph (j) of this section, compliance under this section is determined on a 30-day rolling average basis." Under Section 60.48b(h), duct burner systems are not required to install a CEM system to measure NOx, thus only an initial performance test is required. Therefore, there is no way to determine a 30-day rolling average making 60.44b(h), 60.44b(i) and this condition non applicable requirements.

Page 19 of 30:

E.U. 002, Condition B.10--This condition states the conditions under which the performance tests under 40 CFR 60.8 shall be conducted. These tests have been previously conducted and accepted by the Department as meeting the NSPS requirement under 60.8. Therefore, monitoring should be conducted as proposed in Condition A.11. FPC proposes that this condition be replaced with the following:

B.10. Monitoring for NOx emissions from the duct burner system shall be conducted as described in Condition A.11.

E.U. 002, Condition B.11.-- As noted above in the comments to Condition B.7., this condition is not applicable and should be deleted.

E.U. 002, Condition B.13.--This condition is not applicable since a CEM system for NOx is not required by Section 60.48b(h). This condition should be deleted.

Page 21 of 30:

Emission Unit Description--The reference to "69.9 mmBtu/hr" should be "69.6 MMBtu/hr" to be consistent with the application.

E.U. 003/004, Condition C.1.--The reference to "Low Sulfur" in the context of the No. 2 fuel oil should be deleted from the table. The sulfur content of the fuel (i.e., 0.5 percent) could be included since this is the standard specification for No. 2 Fuel Oil (ASTM D 366-92, Table 1).

E.U. 003/004, Condition C.1.--The second sentence should be deleted, since Condition D.1. does not include any fuel usage limitation for these emission units.

Page 22 of 30:

E.U. 003/004, Condition C.4.--The first sentence is not consistent with the construction permit for the cogeneration facility that describes the usage for these emission units. The words "purposes only" should be deleted.

E.U. 003/004, Condition C.5.--The applicable visible emissions limit for these emission units is provided for in Rule 62-296.406(1). This rule allows 20 percent opacity except for either one six-minute period per hour which opacity shall not exceed 40 percent for a two-minute period.

Page 23 of 30:

E.U. 003/004, Condition C.12.--This condition should include the methods currently used to record fuel usage and calculate emissions for that portion of the NOx emissions cap that Boilers 4 and 5 would contribute. It is recommended that a paragraph (c) be added as follows:

(c) For the purposes of determining annual NOx emissions from Boilers 4 and 5, the fuel usage shall be recorded. The fuel usage would be used along with the applicable EPA AP-42 emission factors to calculate annual NOx emissions from these emission units.

E.U. 003/004, Condition C.13.--FPC requests that EPA Method 9 also be included as a test method of opacity for flexibility in performing compliance tests.

Page 24 of 30:

E.U. 003/004, Condition C.15.--This condition reflects the previous case-by-case BACT established under Rule 62-296.406(3) which established a 1.5 percent sulfur limit for these emission units. Since FPC has accepted the use of No. 2 fuel oil for these units, thereby limiting sulfur to 0.5 percent or less, it appears that this condition and Condition C.16. are unnecessary. An alternate condition is proposed as follows:

C.15. Fuel Monitoring. The permittee shall demonstrate compliance with Condition C.3. by the vendor providing verification that No. 2 fuel oil or oil meeting ASTM requirements for No. 2 fuel oil is being supplied.

Page 28 of 30:

Common Condition D.1.--The hourly natural gas usage for the combustion turbine was amended in the construction permit to 420.3 M ft³/hr from 367.9 M ft³/hr. Also, the conditions referenced in the footnote as double asterisk (**) are A.5. and B.4. rather than No. 1 and No. 2 as listed.

Common Condition D.2.--This condition, which is from the construction permit for the cogeneration facility, is obsolete. Compliance with the emission limits have already been demonstrated. If the emission limits are not met, it should be treated as any other non-compliance situation within the rules of the Department.

Page 29 of 30:

Common Condition D.3.--This condition should be changed to reflect the proposed language for monitoring in Conditions A.11. and C.12. FPC proposes the following language:

D.3. To demonstrate compliance with the facility NOx emission cap of 194.3 tons/year, the NOx emissions determined through Condition A.11. and C.12. shall be added and provided to the Department in each annual operating report required by Rule 62-210.370(3).

Section IV. Acid Rain Part--Based on our discussion in the description of E.U. 002, the phrase "and duct burner with a common stack" in the table should be deleted. The duct burner is not an Acid Rain Unit.

Table 1-1, Air Pollutant Emission Allowables and Terms--This table needs to be modified consistent with the comments made to specific conditions (i.e., Conditions A.5. and B.4.). Also, this Table should clearly state that it is for information purposes only. The items which require change are listed below:

1. Change "Allowable" to "Emission Limit".
2. Change "Standard(s)" to "Basis"
3. Clearly distinguish "Basis" and "Emission Limits" in columns.
4. Change "35.0" under lb/hr for NOx and gas firing to "39.6".

The "regulations" listed in the table do not accurately reflect the authority for emission limits. BACT was only established for CO. The emissions limits for NOx, SO₂ and VE were proposed by FPC and listed in the construction permit as Established by Manufacturer (EBM). Moreover, since BACT has already been conducted and an emission limit established for CO, the Department's general authority should be the appropriate citation.

Table 2-1, Compliance Testing Requirements--This table should also state that it is for information purposes only. Changes to the table should reflect to our previous comments.

Appendix TV-1, Title V Conditions--FPC is not providing comments to these conditions as part of this application. Comments regarding this appendix are being submitted through the Florida Electric Power Coordinating Group and are applicable to this application as if submitted with this letter.

Mr. Fancy
August 8, 1997
Page 9

Your consideration of our comments is greatly appreciated.

Sincerely,



Scott H. Osbourn
Senior Environmental Engineer

cc: Chris Kirts, NE District
Charles Logan, DEP
Ken Kosky, Golder Associates
Robert Manning, HGS&S

Charles Sagar



October 23, 1997

Ms. Kathy Carter
Office of General Counsel
Florida Department of Environmental Protection
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400

Dear Ms. Carter:

RE: Florida Power Corporation, University of Florida Cogeneration Plant
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air Operation Permit*,
Draft Permit No. 0010001-001-AV

On June 27, 1997, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues remain to be resolved. The Department previously agreed to grant an Order extending the time to file a petition until October 24, 1997. Mr. Scott Osbourn of my staff has had discussions with Mr. Scott Sheplak of the Department who agreed that an additional extension of time to discuss these issues is appropriate. Therefore, based upon the Department's concurrence and pursuant to Rules 62-103.050 and 28-106.111, Fla. Admin. Code, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing under Sections 120.569 and 120.57, Fla. Stat., up to and including November 7, 1997.

If you should have any questions, please contact Mr. Scott Osbourn at (813) 866-5158.

Sincerely,

Handwritten signature of W. Jeffrey Pardue in cursive.

W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Title V Responsible Official

Handwritten signature of Robert A. Manning in cursive.

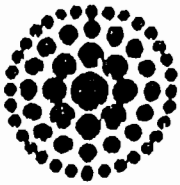
Robert A. Manning, Esq.
Hopping Green Sams & Smith

cc: Scott Sheplak, DEP
Jeffrey Brown, DEP OGC

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OCT 27 1997

BUREAU OF
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Florida
Power
CORPORATION

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OCT 13 1997

BUREAU OF
AIR REGULATION

October 10, 1997

Ms. Kathy Carter
Office of General Counsel
Florida Department of Environmental Protection
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400

Dear Ms. Carter:

RE: Florida Power Corporation, University of Florida Cogeneration Plant
REQUEST FOR EXTENSION OF TIME on *Intent to Issue Title V Air Operation Permit*
Draft Permit No. 0010001-001-AV

On June 27, 1997, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues remain to be resolved. The Department previously agreed to grant an Order extending the time to file a petition until October 10, 1997. Mr. Scott Osbourn of my staff has had discussions with Mr. Scott Sheplak of the Department who agreed that a further extension of time is appropriate. Therefore, based upon the Department's concurrence and pursuant to Rules 62-103.050 and 28-106.111, Fla. Admin. Code, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing on the above-referenced draft Title V permit under Sections 120.569 and 120.57, Fla. Stat., up to and including October 24, 1997.

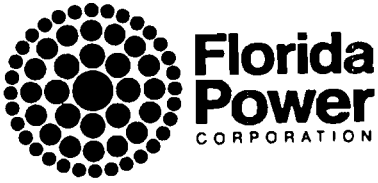
If you should have any questions, please contact Mr. Scott Osbourn at (813) 866-5158.

Sincerely,

W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Title V Responsible Official

Robert A. Manning, Esq.
Hopping Green Sams & Smith

cc: Scott Sheplak, DEP
Charles Logan, DEP



W. Jeffrey Pardue, C.E.P.
Director
Environmental Services Department

September 12, 1997

Ms. Kathy Carter
Office of General Counsel
Florida Department of Environmental Protection
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400


Dear Ms. Carter:


RE: Florida Power Corporation, University of Florida Cogeneration Plant
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air Operation Permit - Draft Permit No. 0010001-001-AV*

On June 27, 1997, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. The Department had previously granted an Order under OGC Case No. 97-1208 extending the time to file a petition until August 12, 1997. On August 29, 1997, FPC obtained agreement and filed a Request for Extension of Time until September 12, 1997. A review of the permit conditions has revealed that several issues remain to be resolved. Mr. Scott Osbourn of my staff has had discussions with Messrs. Scott Sheplak and Charles Logan of the Department and they have agreed that an additional extension of time to discuss these issues is appropriate. Therefore, based upon the Department's concurrence and pursuant to Rules 62-103.050 and 28-106.111, Fla. Admin. Code, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing under Sections 120.569 and 120.57, Fla. Stat., up to and including September 26, 1997.

If you should have any questions, please contact Mr. Scott Osbourn at (813) 866-5158.

Sincerely,


W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Title V Responsible Official

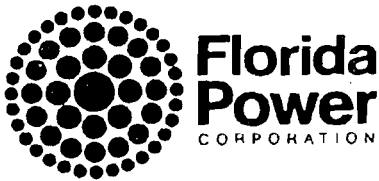

Robert A. Manning, Esq.
Hopping Green Sams & Smith

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cc: Scott Sheplak, DEP
✓ Charles Logan, DEP

SEP 15 1997

BUREAU OF
AIR REGULATION



August 28, 1997

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AUG 29 1997

Ms. Kathy Carter
Office of General Counsel
Florida Department of Environmental Protection
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400

BUREAU OF
AIR REGULATION

Dear Ms. Carter:

RE: Florida Power Corporation, University of Florida Cogeneration Plant
REQUEST FOR EXTENSION OF TIME on *Amendment to Permit No. AC01-204652, PSD-FL-181(A)* and the *Intent to Issue Title V Air Operation Permit, Draft Permit No. 1270028-001-AV*

On March 20, 1997, Florida Power Corporation (FPC) received the above-referenced air construction permit amendment. A review of the permit conditions has revealed that several issues remain to be resolved. Similar permit conditions have been written into the above-referenced Draft Title V permit. Therefore, resolution of both permitting actions is linked. The Department previously granted Orders under OGC Case Nos. 97-0618 (PSD permit) and 97-1208 (Title V permit), extending the time to file a petition until September 2, 1997 and August 29, 1997, respectively. Mr. Scott Osbourn of my staff has had discussions with Mr. Charles Logan of the Department and he has agreed that an extension of time for 14 days to discuss these issues is appropriate. Therefore, based upon the Department's concurrence and pursuant to Rules 62-103.050 and 28-106.111, Fla. Admn. Code, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing on both the PSD permit amendment and the draft Title V permit under Sections 120.569 and 120.57, Fla. Stat., up to and including September 12, 1997.

If you should have any questions, please contact Mr. Scott Osbourn at (813) 866-5158.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Jeffrey Pardue", written over a circular scribble.

W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Title V Responsible Official

A handwritten signature in black ink, appearing to read "Robert A. Manning", written in a cursive style.

Robert A. Manning, Esq.
Hopping Green Sams & Smith

cc: Al Linero, DEP
Scott Sheplak, DEP

**RECEIVED**

AUG 11 1997

BUREAU OF
AIR REGULATION

August 11, 1997

Ms. Kathy Carter
Office of General Counsel
Florida Department of Environmental Protection
2500 Blair Stone Rd.
Tallahassee, FL 32399-2400

Dear Ms. Carter:

RE: Florida Power Corporation, University of Florida Cogeneration Plant
REQUEST FOR EXTENSION OF TIME on Intent to Issue Title V Air Operation Permit
Draft Permit No. 0010001-001-AV

On June 27, 1997, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues remain to be resolved. Mr. Charles Logan with the Department has agreed with Mr. Scott Osbourn of my staff that an extension of time to discuss these issues is appropriate. Therefore, based upon Mr. Logan's concurrence and pursuant to Rules 62-103.050 and 28-106.111, Fla. Admin. Code, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing under Sections 120.569 and 120.57, Fla. Stat., up to and including August 29, 1997.

If you should have any questions, please contact Mr. Scott Osbourn at (813) 866-5158.

Sincerely,

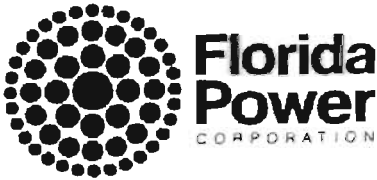
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W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Title V Responsible Official

A handwritten signature in black ink, appearing to read "Robert A. Manning".

Robert A. Manning, Esq.
Hopping Green Sams & Smith

cc: Scott Shepiak, DEP
Charles Logan, DEP



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JUL 14 1997
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AIR REGULATION

July 11, 1997

Ms. Kathy Carter
Office of General Counsel
Florida Department of Environmental Protection
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400

Dear Ms. Carter:

RE: Florida Power Corporation, University of Florida Cogeneration Plant
REQUEST FOR EXTENSION OF TIME on Intent to Issue Title V Air Operation Permit
Draft Permit No. 0010001-001-AV

On June 27, 1997, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues remain to be resolved. Mr. Scott Sheplak with the Department has agreed with our attorney Robert Manning that an extension of time for 30 days to discuss these issues is appropriate. Therefore, based upon Mr. Sheplak's concurrence and pursuant to Rules 62-103.050 and 28-106.111, Fla. Admin. Code, FPC respectfully requests an extension of time in which to file a petition for an administrative hearing under Sections 120.569 and 120.57, Fla. Stat., up to and including August 12, 1997.

If you should have any questions, please contact Mr. Scott Osbourn at (813) 866-5158.

Sincerely,

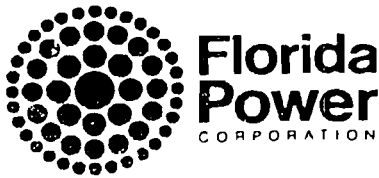
A handwritten signature in black ink, appearing to read "W. Jeffrey Pardue".

W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Title V Responsible Official

A handwritten signature in black ink, appearing to read "Robert A. Manning".

Robert A. Manning, Esq.
Hopping Green Sams & Smith

cc: Scott Sheplak, DEP
Charles Logan, DEP



Bruce Mitchell

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June 29, 1999

JUL 02 1999

BUREAU OF
AIR REGULATION

Ms. Kathy Carter, Clerk
Office of General Counsel
Florida Department of Environmental Protection
Room 638
3900 Commonwealth Blvd.
Tallahassee, FL 32399-3000

Dear Ms. Carter:

RE: Florida Power Corporation, University of Florida Cogeneration Plant
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air Operation Permit*,
Draft Permit No. 0010001-001-AV

On June 27, 1997, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues remain to be resolved. Accordingly, FPC requests an extension of time, pursuant to Florida Administrative Code Rule 62-110.106(4), to and including August 2, 1999, in which to file a Petition for Administrative Proceedings in the above-styled matter. Granting of this request will not prejudice either party, but will further both parties' mutual interest by hopefully avoiding the need to actually file a Petition for Administrative Proceeding in this matter. If the Department denies this request, FPC requests the opportunity to file a Petition for Administrative Proceeding within 10 days of such denial.

If you should have any questions, please contact Mr. Scott Osbourn of FPC at (727) 826-4258.

Sincerely,

Handwritten signature of W. Jeffrey Pardue in cursive.

W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Title V Responsible Official

Handwritten signature of Robert A. Manning in cursive.

Robert A. Manning, Esq.
Hopping Green Sams & Smith

cc: Scott Sheplak, DEP
Jeffrey Brown, DEP OGC



April 30, 1999

Bruce Mitchell

Ms. Kathy Carter
Office of General Counsel
Florida Department of Environmental Protection
Room 638
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000

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MAY 03 1999

BUREAU OF
AIR REGULATION

Re: Florida Power Corporation, University of Florida Cogeneration Plant
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air
Operation Permit*
Draft Permit No. 0010001-001-AV

Dear Ms. Carter:

On June 27, 1998, Florida Power Corporation (FPC) received the above-referenced Intent to Issue Title V Air Operation Permit. A review of the permit conditions has revealed that several issues need to be resolved. Accordingly, FPC requests an enlargement of time, pursuant to Florida Administrative Code Rule 62-110.106(4), to and including June 1, 1999, in which to file a Petition for Administrative Proceedings in the above-styled matter. Granting of this request will not prejudice either party, but will further both parties mutual interest by hopefully avoiding the need to actually file a Petition for Administrative Proceeding in this matter. If the Department denies this request, FPC requests the opportunity to file a Petition for Administrative Proceeding within 10 days of such denial.

If you should have any questions, please contact Scott Osbourn at (727) 826-4258, or Robert Manning at Hopping Green Sams & Smith, P.A. at (850) 222-7500.

Sincerely,

A handwritten signature in cursive script that reads "Robert Manning".

Robert A. Manning, Esq.
Hopping Green Sams & Smith

cc: Scott Sheplak, DEP
Jeff Brown, DEP OGC

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