

INTEROFFICE MEMORANDUM

Date: 12-Oct-1999 09:01am
From: Joseph Kahn TAL
KAHN_J
Dept: Air Resources Management
Tel No: 850/921-9519

To: Martin Costello TAL (COSTELLO_M)

Subject: FPC Helper Cooling Towers -- Comments

Marty,

I sent the request for additional information out yesterday without the question regarding why FPC is proposing to cease testing. Thanks for your comments on the incompleteness letter.

I understand that you and Mike Harley recommended that FPC stop testing the tower cells altogether, and favored this approach over approving an ASP for a different test method that FPC proposed some time ago. I would like to get your concurrence that it is acceptable to allow FPC to cease testing these sources, and that at least part of the basis for your opinion is that Method 5 and any other isokinetic method is not appropriate for the cooling towers. I understand also that you believe that an operation and maintenance plan is likely to be more effective at minimizing drift emissions than the current requirement to test two of the 36 cells every five years. Please write me back so that I have something on record from the Emissions Monitoring section regarding this permitting action. Thanks.

-Joe

INTEROFFICE MEMORANDUM

Sensitivity: COMPANY CONFIDENTIAL

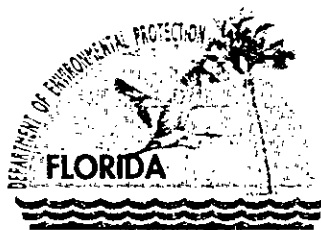
Date: 12-Oct-1999 02:46pm
From: Martin Costello TAL
COSTELLO_M
Dept: Air Resources Management
Tel No: 850/488-0114

To: Joseph Kahn TAL (KAHN_J)
CC: Mike Harley TAL (HARLEY_M)

Subject: Re: FPC Helper Cooling Towers -- Comments

You have correctly summarized my opinion on the stack tests for particulates on the Crystal River plant's Helper Cooling Towers. The current stack test requirement should be replaced with an work practice type of compliance method as allowed pursuant to Rule 62-210.200(42), the definition of BACT. The original control efficiency (drift limit) should be retained in the permit. I recommend a permit amendment which would require periodic operating and maintenance standard practices to ensure that the original design control efficiency is maintained. When blockages or broken sections of the drift eliminators are identified, the permittee should correct these problems in a timely manner. The permit language should also identify the number of layers and design type of drift eliminators in the original design (I think the slang terminology is " zig zag zig zag" for a 2 turn type design).

Ed's - Marty,
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Ed's - --Joe



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

October 11, 1999

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. W. Jeffrey Pardue, C.E.P.
Director, Environmental Services
Florida Power Corporation
PO Box 14042, MAC BB1A
St. Petersburg, Florida 33733

Re: Request for Additional Information
DEP File No. 0170004-007-AC (PSD-FL-139A)
Crystal River Helper Cooling Towers – Removal of Requirement to Test

Dear Mr. Pardue:

On September 24, 1999 the Department received your application and complete fee for an air construction permit for to revise PSD permit PSD-FL-139 to remove the requirement to test the helper cooling towers at the Crystal River plant. The application is incomplete. In order to continue processing your application, the Department will need the additional information requested below. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. Please provide a summary of test results for any of the cells previously tested. Please include the date tested, the results in pounds per hour, an identification of the cell(s) tested and the operating parameters recorded during the test. Our database does not have any records of test results for the helper cooling tower cells, although we understand that testing has been conducted.
2. Martin Costello of DEP indicated that he recommended to Mike Kennedy of FPC that consideration for elimination of testing the tower cells would require a proposal for a regular and frequent program of inspection and maintenance to ensure that the drift eliminators are functioning properly and that emissions are limited. Your application did not propose such a plan, and referred only to an annual inspection. Please propose efforts that FPC can undertake on a more frequent basis to ensure proper control of drift.
3. Have changes been made to the drift elimination system since its original installation, other than routine repair and replacement of component parts, since construction of the cooling towers? If so, please describe the changes.

The Department will resume processing your application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to

Mr. Pardue
Request for Additional Information
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Department requests for additional information of an engineering nature. Material changes to the application should also be accompanied by a new certification statement by the authorized representative or responsible official. Permit applicants are advised that Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days. If there are any questions, please call me at 850/921-9519.

Sincerely,

A handwritten signature in black ink, appearing to read 'Joseph Kahn', written over a horizontal line.

Joseph Kahn, P.E.

New Source Review Section

/jk

cc: Gregg Worley, EPA
John Bunyak, NPS
Bill Thomas, DEP SWD
J. Michael Kennedy, FPC

Z 031 392 019

US Postal Service

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|---|----|
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| FPC | |
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| Postage | \$ |
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| Restricted Delivery Fee | |
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| Return Receipt Showing to Whom, Date, & Addressee's Address | |
| TOTAL Postage & Fees | \$ |
| Postmark or Date | |
| 0170004-007-AC 10-11-99 | |
| PSO-FI-139A | |
| Helder Cooling Towers | |

PS Form 3800, April 1995

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- The Return Receipt will show to whom the article was delivered and the date delivered.

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- ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Jeffrey Pardue, CEP
Director, Env. Serv.
FPC
PO Box 14042, MAC BB1A
St. Pete, FL 33733

4a. Article Number
Z 031 392 019

4b. Service Type
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☐ Express Mail ☐ Insured
☐ Return Receipt for Merchandise ☐ COD

7. Date of Delivery OCT 14 1999

5. Received By: (Print Name)

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6. Signature: (Addressee or Agent)

X [Signature]

PS Form 3811, December 1994

102595-97-B-0179

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