



RECEIVED  
SEP 24 1999  
BUREAU OF AIR REGULATION

September 20, 1999

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

Dear Mr. Linero:

Re: Crystal River Helper Cooling Towers

0170004-007-AC  
PSD-FI-139A

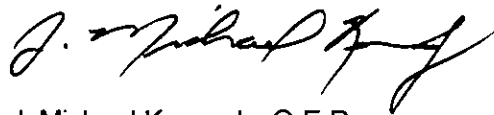
I have enclosed four copies of the pertinent permit application forms and application fee check in the amount of \$250.00 for the processing of a request to remove the requirement to test for particulates from the helper cooling towers at the Florida Power Corporation (FPC) Crystal River plant.

Over the past several months, coordination between FPC and DEP's Southwest District, Mr. Martin Costello of DEP's Tallahassee office, and EPA Region IV has resulted in a consensus that Method 5 particulate testing of the mechanical draft helper cooling towers at Crystal River is not an appropriate application of that reference method. In addition, testing of the cooling towers is impractical. The cooling tower exhaust is powered by very large fans, making it quite turbulent. Therefore, isokinetic sampling is difficult, if not impossible, to achieve. In addition, the towers are very short, so testing the required two stack diameter distance from the disturbance to the flow (fans) is not possible.

FPC requests the removal of the particulate testing requirement contained in Specific Condition 4 of construction permit number AC 09-162037 (PSD-FL-139) and Specific Condition 7 of operation permit number AO 09-236827. In order to ensure compliance, Hamon, which is the cooling tower manufacturer, performs a comprehensive inspection of the towers at the end of each operating season. Any necessary repairs are then made prior to the following operating season. Note that operation of each of the towers is limited to 4,320 hours/year, and they typically operate only from May to October.

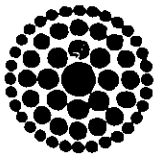
Thank you for your consideration of this request. Please contact me at (727) 826-4334 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Michael Kennedy". The signature is fluid and cursive, with a large, stylized "J" and "K".

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

cc: Joe Kahn, BAR  
SWD  
EPA  
NPS  
M. Costello, BAMMS



**Florida  
Power**  
CORPORATION

ACCOUNTS PAYABLE DEPT. CX1K

P. O. BOX 14042

ST. PETERSBURG, FL 33733-4042 **REMITTANCE ADVICE**

(727) 820-5257

89

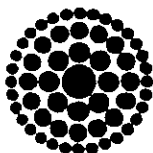
CHECK DATE 08/25/1999 VENDOR FLA DEPT OF ENVIRONMENTAL

VENDOR NO. 278473 CHECK NO. 2089170

| INVOICE NO. | DATE     | OUR<br>ORDER NO. | VOUCHER    | GROSS AMOUNT | DISCOUNT     | NET AMOUNT       |
|-------------|----------|------------------|------------|--------------|--------------|------------------|
| CK139607    | 08/20/99 |                  | 9908137616 | 250.00       | .00<br>TOTAL | 250.00<br>250.00 |

THE ATTACHED REMITTANCE IS IN FULL SETTLEMENT OF ACCOUNT AS STATED. IF NOT CORRECT PLEASE RETURN TO ABOVE ADDRESS.

Accounts Payable Department CX1K  
P.O. Box 14042  
St. Petersburg, FL 33733-4042



**Florida  
Power**  
CORPORATION

63-115  
631

DATE 08/25/1999 CHECK NO. **2089170**

PAY:

\$250\*DOLLARS AND 00 CENTS

**\$\*\*\*\*\*250.00**

SunTrust / Mid-Florida

TO  
THE  
ORDER  
OF

FLA DEPT OF ENVIRONMENTAL  
PROTECTION  
2600 BLAIR STONE RD  
TALLAHASSEE FL 32399-2400

Void after 60 days

*Pamela A. Janni*  
Treasurer

⑈1002089170⑈ ⑆063101153⑆6990032052736⑈



**Owner/Authorized Representative or Responsible Official**

1. Name and Title of Owner/Authorized Representative or Responsible Official :

Name : W. Jeffrey Pardue, C.E.P.  
Title : Director, Environmental Services

2. Owner or Authorized Representative or Responsible Official Mailing Address :


Organization/Firm : Florida Power Corporation  
Street Address : P.O. Box 14042, MAC BB1A  
City : St. Petersburg  
State : FL Zip Code : 33733

3. Owner/Authorized Representative or Responsible Official Telephone Numbers :

Telephone : (727)826-4301 Fax : (727)826-4216

4. Owner/Authorized Representative or Responsible Official Statement :

*I, the undersigned, am the owner or authorized representative\* of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions units.*

  
Signature

9/16/99  
Date

\* Attach letter of authorization if not currently on file.

I. Part 2 - 1

DEP Form No. 62-210.900(1) - Form  
Effective : 3-21-96

**Purpose of Application and Category**

Category I: All Air Operation Permit Applications Subject to Processing Under Chapter 62-213, F.A.C.

This Application for Air Permit is submitted to obtain :

- ☐ Initial air operation permit under Chapter 62-213, F.A.C., for an existing facility which is classified as a Title V source.
  
- ☐ Initial air operation permit under Chapter 62-213, F.A.C., for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number :

- ☐ Air operation permit renewal under Chapter 62-213, F.A.C., for a Title V source.

Operation permit to be renewed :

- ☐ Air operation permit revision for a Title V source to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number :

Operation permit to be revised :

- ☐ Air operation permit revision or administrative correction for a Title V source to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application.

Operation permit to be revised/corrected :

I. Part 4 - 1

- ☐ ] Air operation permit revision for a Title V source for reasons other than construction or modification of an emissions unit.

Operation permit to be revised :

Reason for revision :

**Category II : All Air Operation Permit Applications Subject to Processing Under Rule 62-210.300(2)(b), F.A.C.**

This Application for Air Permit is submitted to obtain :

- ☐ ] Initial air operation permit under Rule 62-210.300(2)(b), F.A.C., for an existing facility seeking classification as a synthetic non-Title V source.

Current operation/construction permit number(s) :

- ☐ ] Renewal air operation permit under Rule 62-210.300(2)(b), F.A.C., for a synthetic non-Title V source.

Operation permit to be renewed :

- ☐ ] Air operation permit revision for a synthetic non-Title V source.

Operation permit to be revised :

Reason for revision :

**Category III : All Air Construction Permit Applications for All Facilities and Emissions Units**

This Application for Air Permit is submitted to obtain :

- ☒ ] Air construction permit to construct or modify one or more emissions units within a facility (including any facility classified as a Title V source).

I. Part 4 - 2

DEP Form No. 62-210.900(1) - Form

Effective : 3-21-96

Current operation permit number(s), if any :  
0970014-001-AV

- ☐ Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.

Current operation permit number(s) :

- ☐ Air construction permit for one or more existing, but unpermitted, emissions units.



**Application Processing Fee**

Check one :

☒ Attached - Amount : \$250.00☐ Not Applicable.**Construction/Modification Information**

1. Description of Proposed Project or Alterations :

Application to remove the requirement to test the helper cooling towers for particulate every 5 years using EPA Method 5.

2. Projected or Actual Date of Commencement of Construction :

3. Projected Date of Completion of Construction :

**Professional Engineer Certification**1. Professional Engineer Name : Jennifer L. Tillman  
Registration Number : 0052125

2. Professional Engineer Mailing Address :

Organization/Firm : Florida Power Corporation

Street Address : P.O. Box 14042, MAC BB1A

City : St. Petersburg

State : FL Zip Code : 33733

3. Professional Engineer Telephone Numbers :

Telephone : (727)826-4132

Fax : (727)826-4216

I. Part 5 - 1

DEP Form No. 62-210.900(1) - Form

Effective : 3-21-96

4. Professional Engineer Statement :

*I, the undersigned, hereby certify, except as particularly noted herein\*, that :*

*(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollutant control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and*

*(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.*

*If the purpose of this application is to obtain a Title V source air operation permit (check here [ ] if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.*

*If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [ \* ] if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.*

*If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [ ] if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.*

*Jennifer L. Tillma*  
Signature  
(seal)

*9/17/99*  
Date

I. Part 6 - 1

DEP Form No. 62-210.900(1) - Form

Effective : 3-21-96

\* The purpose of this application is to obtain an amendment to the PSD construction permit for the helper cooling towers.

### **Application Contact**

|  |                            |
|--|----------------------------|
| 1. Name and Title of Application Contact : |                            |
| Name :                                     | J. Michael Kennedy, Q.E.P. |
| Title :                                    | Manager, Air Programs      |
| 2. Application Contact Mailing Address :   |                            |
| Organization/Firm :                        | Florida Power Corporation  |
| Street Address :                           | P.O. Box 14042, MAC BB1A   |
| City :                                     | St. Petersburg             |
| State :                                    | FL                         |
| Zip Code :                                 | 33733                      |
| 3. Application Contact Telephone Numbers : |                            |
| Telephone :                                | (727)826-4334              |
| Fax :                                      | (727)826-4216              |

### **Application Comment**

This application is to request removal of the requirement to test the helper cooling towers for particulate every 5 years using EPA Method 5.

A.

|   |                    |                      |
|---|--------------------|----------------------|
| 1. Basis for Allowable Emissions Code:<br><b>OTHER</b>  |                    |                      |
| 2. Future Effective Date of Allowable Emissions:  |                    |                      |
| 3. Requested Allowable Emissions and Units:   |                    |                      |
| 4. Equivalent Allowable Emissions:  | <b>428 lb/hour</b> | <b>925 tons/year</b> |
| 5. Method of Compliance (limit to 60 characters):   |                    |                      |
| 6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode)<br>(limit to 200 characters):<br><br><b>1. Permit limit; BACT determination. 2. Total emissions from 36 cells; each cell estimated to emit 11.89 lb/hr.</b> |                    |                      |

B.

|   |         |           |
|---|---------|-----------|
| 1. Basis for Allowable Emissions Code:  |         |           |
| 2. Future Effective Date of Allowable Emissions:  |         |           |
| 3. Requested Allowable Emissions and Units:   |         |           |
| 4. Equivalent Allowable Emissions:  | lb/hour | tons/year |
| 5. Method of Compliance (limit to 60 characters):   |         |           |
| 6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode)<br>(limit to 200 characters): |         |           |

A.

|  |                    |                      |
|--|--------------------|----------------------|
| 1. Basis for Allowable Emissions Code:<br><b>OTHER</b>   |                    |                      |
| 2. Future Effective Date of Allowable Emissions:   |                    |                      |
| 3. Requested Allowable Emissions and Units:  |                    |                      |
| 4. Equivalent Allowable Emissions:   | <b>214 lb/hour</b> | <b>462 tons/year</b> |
| 5. Method of Compliance (limit to 60 characters):  |                    |                      |
| 6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode)<br>(limit to 200 characters):<br><b>1. Permit limit; BACT determination. 2. Total emissions from 36 cells; each cell estimated to emit 5.94 lb/hr.</b> |                    |                      |

B.

|  |                |                  |
|--|----------------|------------------|
| 1. Basis for Allowable Emissions Code: <b>OTHER</b>  |                |                  |
| 2. Future Effective Date of Allowable Emissions:   |                |                  |
| 3. Requested Allowable Emissions and Units:<br><b>462 tons/yr</b>  |                |                  |
| 4. Equivalent Allowable Emissions:   | <b>lb/hour</b> | <b>tons/year</b> |
| 5. Method of Compliance (limit to 60 characters):  |                |                  |
| 6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode)<br>(limit to 200 characters):<br><b>1. Permit limit; BACT determination. 2. Total emissions from all 36 cells.</b> |                |                  |