



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

June 25, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. W. Jeffrey Pardue, Director
Environmental Services Department
Florida Power Corporation
3201 Thirty-fourth Street South
St. Petersburg, Florida 33711

Re: Crystal River Plant Units 1 and 2
Coal and Petcoke Blend
0170004-003-AC

Dear Mr. Pardue:

Enclosed is one copy of the Department's Intent to Deny a permit for the proposed project to burn a blend of petroleum coke and coal in the existing coal-fired Units 1 and 2 at the Crystal River Power Plant. The "Public Notice" is also included. You are not required to publish this "Public Notice" unless you wish to contest the Intent to Deny. In such a case, the "Public Notice" must be published within 30 days of receipt of this letter.

The reason for denial is given in the Intent to Deny. According to information in Department files, both Units 1 and 2 operated on liquid fuel prior to January 6, 1975. Very substantial modifications of the boilers and pollution control equipment were implemented thereafter by Florida Power Corporation to convert the units to coal-firing mode. Therefore the project does not qualify for the exemption from PSD Review claimed by the company.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. A. A. Linero, P.E. Administrator, New Source Review Section at the above address. If you have any questions, please contact Mr. Linero at (904)488-1344.

Sincerely,

Howard L. Rhodes, Director
Division of Air Resources
Management

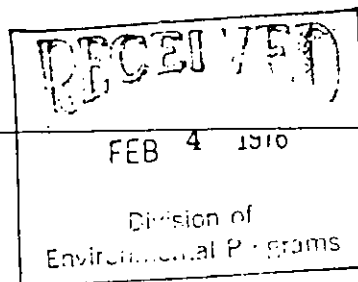
HLR/aal/l

Enclosures

cc: J. Harper, EPA
E. Porter, NPS
R. Garrity, SWD
W. Thomas, SWD
H. Owen, DEP
D. Beason, DEP



**Florida
Power**
CORPORATION



RECEIVED
D. E. R.
FEB 10 1976

FEB 16 1976

SOUTH WEST DIVISION OF ENFORCEMENT
FEB 16 1976

Mr. Paul J. Traina, Director
Enforcement Division
United States Environmental Protection Agency
Region IV
1421 Peachtree Street, N.E.
Atlanta, Georgia 30309

RECEIVED DER

FEB 3 1976

Re: Application for Compliance Date Extension
for Crystal River Units 1 and 2

Dear Mr. Traina:

Your letter of January 13, 1976 was received on January 15th. The information contained herein is predicated on the assumptions that EPA will approve the revised Florida SO₂ emission limitation applicable to the Crystal River plant and your approval of our coal supply contract which is scheduled for submittal by June 30, 1976. The numbered responses follow the numbers in your letter of January 13th.

1. Description of control devices for reducing particulate emissions:

The existing electro-static precipitator on Unit 2 is Buell two-field precipitator designed to operate at an efficiency of 98% burning 11,700 BTU coal with a 9.8% moisture and 10% ash. The precipitator will be renovated and upgraded by adding an additional field. After the renovation, it is expected to operate at an efficiency which will meet the particulate emission limitation.

The existing mechanical dust collector installed on Unit 1 will be removed. An electro-static precipitator designed to meet the State and Federal emission standards will be installed.

2. Time schedule for installing particulate control equipment:

An engineering contract has been awarded to Black and Veatch to perform the necessary engineering for the entire coal conversion project. They are presently working on preparing the necessary design, specification and bid documents for the project. Preliminary information



January 30, 1976

indicates that the precipitators can be designed, fabricated, constructed and tied into the units in time to meet the scheduled final compliance dates.

3. Scheduled outage times:

It is anticipated that the unit outage time required for each unit will be three months. This outage time is dictated by the necessary major boiler modifications, the installation of the ash handling systems and the electrostatic precipitator installations. The present planned outage times for the conversion are:

Unit 2 March 30, 1978 through June 30, 1978

Unit 1 December 31, 1978 through March 31, 1979

4. Long lead items:

The following is a schedule covering the long-lead items associated with the coal conversion:

<u>Description</u>	<u>Engineering Procurement and Delivery</u>	<u>Begin Construction</u>
Unit 2 - ash handling system	22 mos.	3/78.
Unit 1 - electro-static precipitator	25 mos.	3/78
Unit 1 - ash handling system	22 mos.	3/78

Contract dates on these items cannot be scheduled until our receipt of your approval of the coal supply contract.

In our November 24, 1975 letter we indicated that both units would be in compliance with the air pollution requirements in effect on November 24, 1975 and as stated in EPA's letter of November 4, 1975. Unit 2 will be converted by June 30, 1978 and certified for compliance within 90 days of start-up. Unit 1 will be converted by March 31, 1979 and certified for compliance within 90 days of start-up. Because Unit No. 1 will be shut down by December 31, 1978, it will, therefore, be in compliance with all emission limitations.

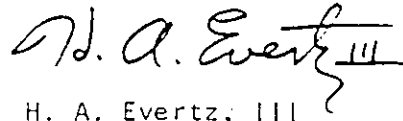
Mr. Paul J. Traina, Director

-3-

January 30, 1976

The Company has instructed its Consulting Engineer to study the feasibility of expediting the conversion of Crystal River No. 2 to burning coal in advance of the June, 1978 date set forth above. We will keep you advised as this study progresses.

Very truly yours,



H. A. Evertz, III
Corporate Counsel

HAE:gc

cc: Messrs. Jack E. Ravan, EPA
Randy Mayfield, EPA
G. T. Helms, EPA
Ray Cunningham, EPA
J. W. Landers, FDER
David G. Wilson, FEA
Warren Zurn, FEA
Ms. Judith M. Liersch, FEA

← THIS COPY FOR →

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF INTENT TO DENY

File No. 0170004-003-AC
Citrus County

The Department of Environmental Protection (Department) gives notice of its intent to deny a permit to Florida Power Corporation (FPC), 3201 Thirty-fourth Street South, St. Petersburg, Florida 33711, to burn a blend of petroleum coke (petcoke) and coal at existing coal-fired Units 1 and 2 located at the Crystal River Plant, West of U S 19, Crystal River, Citrus County. The burning of the coal and petcoke blend would result in increases of sulfur dioxide emissions of approximately 8,200 tons per year (TPY) from Unit 1 and 10,500 TPY from Unit 2, although the units would not exceed their present allowable limits.

The Department has determined that a construction permit pursuant to F.A.C. 62-212.400, Prevention of Significant Deterioration (PSD), would be required for the proposed project. This would necessitate very substantial emissions reductions to be accomplished by installation of additional air pollution control equipment which has not been proposed for the project. The Department intends to deny a construction permit because the project does not qualify for an exemption claimed by the applicant pursuant to F.A.C. 62-212.400(2)(c)4 regarding "use of an alternative fuel (coal and petcoke blend) which the facility was capable of accommodating before January 6, 1975."

Any person whose substantial interests are affected by this proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000 within 14 (fourteen) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information; (a) The name, address, and the telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action, (d) A statement of the material facts disputed by petitioner, if any; (e) A statement of facts which petitioner contends warrants reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or

Notice of Intent to Deny
Page Two
Florida Power Corporation

modification of the Department's action or proposed action; and, (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this notice, in the Office of General Counsel, at the above address, of the Department. Failure to petition within the allotted time frame constitutes a waiver of any rights such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 60Q-2.010, Florida Administrative Code.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Tel: (904) 488-1344

Department of Environmental Protection
Southwest District Office
3804 Coconut Palm Drive
Tampa, Florida 33619-8218

Any person may send written comments on the proposed agency action to Mr. A. A. Linero, P.E. Administrator, New Source Review Section at the Department of Environmental Protection, Bureau of Air Regulation, Mail Station 5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. All comments received within 14 days of the publication of this notice will be considered in the Department's final determination.

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

In the Matter of an
Application for Permit by:

Mr. W. Jeffrey Pardue
Florida Power Corporation
3201 Thirty-fourth Street South
St. Petersburg, Florida 33711

DEP File No. 0170004-003-AC
Citrus County

INTENT TO DENY

The Department of Environmental Protection (Department) gives notice of its intent to deny a permit for the proposed project as detailed in the application specified above, for the reasons stated below.

The applicant, Florida Power Corporation, applied on December 26, 1995 to the Department for a permit to burn a blend of petroleum coke and coal at existing coal-fired Units 1 and 2 located at the Crystal River Plant, West of U S 19, Crystal River, Citrus County.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-212 and 62-296. The project is not exempt from permitting procedures. The Department has determined that a construction permit pursuant to F.A.C. 62-212.400, Prevention of Significant Deterioration (PSD) is required for the proposed project.

The Department intends to deny a construction permit because the project does not qualify for an exemption from PSD review claimed by the applicant pursuant to F.A.C. 62-212.400(2)(c)4 regarding use of an alternative fuel which the facility was capable of accommodating before January 6, 1975.

Pursuant to Sections 403.815 and 403.0872, F.S., and Rules 62-103.150 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed "Public Notice." The notice shall be published one time only within 30 (thirty) days in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below.

Mr. W. Jeffrey Pardue
Intent to Deny
Florida Power Corporation

The applicant shall provide proof of publication to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will deny the permit unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S. in accordance with the following procedures and results in a different decision.

Any person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant and the parties listed below must be filed within 14 (fourteen) days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of the receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

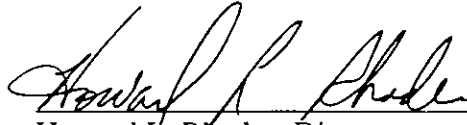
The petition shall contain the following information: (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the proposed source will operate; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by petitioner, if any; (e) A statement of facts which the petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes the petitioner contends require reversal or modification of the Department's action or proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this intent. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above, and be filed (received) within 14 days of receipt of this intent in the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 60Q-2.010, F.A.C.

Mr. W. Jeffrey Pardue
Intent to Deny
Florida Power Corporation

Executed in Tallahassee, Florida.

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**



Howard L. Rhodes, Director
Division of Air Resources
Management


2600 Blair Stone Road
Tallahassee, Florida 32399-2400
(904)488-0114

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this **INTENT TO DENY** and all copies were mailed before the close of business on 6-25-96 to the listed persons.

FILING AND ACKNOWLEDGMENT

FILED, on this date, pursuant to
§120.52(11), Florida Statutes, with the
designated Department Clerk, receipt of
which is hereby acknowledge.

 6-25-96
(Clerk) (Date)

Copies furnished to:

J. Harper, EPA
J. Bunyak, NPS
R. Garrity, SWD
W. Thomas, SWD
H. Oven, DEP
D. Beason, DEP

S
elope to

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- ☐ Addressee's Address
- ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
*Jeffrey Pardue, CEP
 Fla. Power Corp.
 P O BOX 14042
 St. Petersburg, FL
 33733*

4a. Article Number
P 339 251 115

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

7. Date of Delivery

5. Signature (Addressee)

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1991 U.S. GPO: 1993-352-714 **DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service.

P 339 251 116

US Postal Service
Receipt for Certified Mail
 No Insurance Coverage Provided.
 Do not use for International Mail (See reverse)

Sent to *Jeffrey Pardue*

Street & Number *PO BOX 14042*

Post Office, State & ZIP Code *St. Pete FL*

Postage \$

Certified Fee

Special Delivery Fee

Restricted Delivery Fee

Return Receipt Showing to Whom & Date Delivered

Return Receipt Showing to Whom, Date, & Addressee's Address

TOTAL Postage & Fees \$

Postmark or Date *6-25-96*

0170004-003-AC

PS Form 3800, April 1995

Technical Evaluation
and
Preliminary Determination

Florida Power Corporation
Crystal River Plant
Citrus County
Crystal River, Florida

Construction Permit Number
0170004-003-AC

Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation

June 21, 1996

I. Application

A. Applicant and Address

Florida Power Corporation
Crystal River Plant
3201 34th Street South
St. Petersburg, Florida 33711

B. Project and Location

The applicant proposes to burn a blend of up to seven (7) percent petroleum coke (petcoke) at existing coal-fired Units 1 and 2 at the Crystal River Plant in Crystal River, Citrus County. This action will result in an actual increase in the sulfur dioxide (SO₂) emissions from Crystal River Units 1 and 2. There will be no increase in the total heat input to either Unit 1 or 2. The UTM coordinates of the project are Zone 17, 334.3 km East and 3204.5 km North.

C. Process and Controls

The maximum rated heat inputs of Units 1 and 2 are 3,750 million Btu per hour and 4,795 million Btu per hour, respectively. These units currently are permitted to burn coal and utilize oil as a startup fuel. The units are equipped with electrostatic precipitators as the only air pollution control device. The air operating permits for these units currently specify an SO₂ limit of 2.1 pounds per million Btu heat input (lb/10⁶ Btu). These limits were derived from an EPA permit issued pursuant to Prevention of Significant Deterioration (PSD permit) in 1978 for the construction of Units 4 and 5.

Units 1 and 2 have historically burned a coal supply which results in emissions of 1.6 lb/10⁶ Btu or less SO₂. Florida Power Corporation is requesting to burn petroleum coke, which produces 6.57 lb/10⁶ Btu SO₂, with the same coal supply while remaining within the 2.1 lb/10⁶ Btu limit specified in their current permits.

The proposed burning of a coal and petroleum coke mixture will result in an emissions increase of sulfur dioxide. The applicant states in their application and also in a response to a request for additional information that there will be no increases in the emissions of particulate matter (PM or PM₁₀), nitrogen oxides, carbon monoxide or sulfuric acid mist as a result of this change.

D. SIC and SCC

1. The Standard Industrial Code is:

4911: Electric Services

2. The Source Classification Code is:

1-01-002-12 Pulverized Coal: Dry Bottom (Tangential) Tons Burned

II. Rule Applicability

The facility is located in Citrus County which is an area designated as attainment for all pollutants pursuant to Florida Administrative Code (FAC) Rule 62-204.340 (1).

The proposed project is a change in the method of operation which results in an increase in actual emissions thereby meeting the definition of modification in Rule FAC 62-210.200 (183) and an air construction permit is required for a modified facility prior to beginning the modification pursuant to Rule FAC 62-210.300. In addition, the proposed project is subject to the Reports, Circumvention and Excess Emissions requirements of Rules FAC 62-210.370, 62-210.650 and 62-210.700, respectively.

The proposed project is subject to the General Preconstruction Review Requirements of Rule FAC 62-212.300. However, the applicant has stated that the proposed project will not require any physical change or addition to the facility. Although there will be a significant increase in emissions from the project, the applicant has requested (in accordance with Rule FAC 62-212.400(2)(c)4) exemption from PSD review because the units were capable of accommodating a coal and petcoke blend as an alternative fuel before January 6, 1975 and not prohibited through any permit condition from doing so since that time.

The proposed project is subject to the requirements of Rule FAC 62-296.405, Fossil Fuel Steam Generators with more than 250 million Btu per Hour Heat Input. In addition, the applicant has previously petitioned the Secretary and was granted a visible emissions limit of 40 percent opacity for Units 1 pursuant to Rule FAC 62-296.405 (1) (a). Unit 2 has a visible emissions limit of 20 percent opacity. Both Units 1 and 2 are subject to the particulate matter emission standard of 0.1 pound per million Btu heat input per of Rule FAC 62-296.405 (1) (b). The SO₂ standard of 6.17 pounds per million Btu heat input in Rule FAC 62-296.405 (1) (c) is superseded by a PSD and Site Certification condition for Units 4 and 5. The SO₂ limit for Units 1 and 2 is 2.1 lb/10⁶ Btu. The nitrogen oxide (NO_x) standard in Rule FAC 62-296.405 (1) (d) does not apply to Units 1 and 2.

The proposed project is to be conducted at acid rain emissions units. The requirements for the installation, calibration operation and maintenance of continuous monitors for sulfur dioxide, nitrogen oxides, carbon dioxide and flow contained in 40 CFR 72 and 40 CFR 75 apply to this project.

The application package was received on December 26, 1995 and deemed complete on March 29, 1996.

III. Summary of Emissions

The proposed project will have allowable emission limits for the pollutants PM, SO₂, and visible emissions. The maximum allowable emissions from Units 1 and 2 shall not exceed the following limits except during periods of startup, shutdown and malfunction pursuant to Rule 62-210.700, FAC.

MAXIMUM ALLOWABLE EMISSION LIMITS UNIT 1

<u>Pollutant</u>	<u>Standard or Basis</u>	<u>lbs/hr</u>	<u>TPY</u>
PM	0.1 lb/10 ⁶ Btu (@ 3,750 MM Btu)	469	2,053
SO ₂	2.1 lb/10 ⁶ Btu (@ 3,750 MM Btu)	7,875	34,492.5
Visible Emissions	40% opacity		

MAXIMUM ALLOWABLE EMISSION LIMITS UNIT 2

<u>Pollutant</u>	<u>Standard or Basis</u>	<u>lbs/hr</u>	<u>TPY</u>
PM	0.1 lb/10 ⁶ Btu (@ 4,795 MM Btu)	599	2,625
SO ₂	2.1 lb/10 ⁶ Btu (@ 4,795 MM Btu)	10,070	44,104
Visible Emissions	20% opacity		

In addition to the regulated pollutants, the applicant has estimated emissions of nitrogen oxides (NO_x), carbon monoxide (CO), and volatile organic compounds (VOC). These estimates for Units 1 and 2 are summarized below.

UNIT 1

<u>Pollutant</u>	<u>Basis</u>	<u>lbs/hr</u>	<u>TPY</u>
NO _x	14.4 lb/ton (AP-42)	2,250	9,855
CO	0.5 lb/ton (AP-42)	78	342
VOC	0.06 lb/ton (AP-42)	9.4	41

The facility's actual SO₂ emission rate has been lower than its permitted emission rate. Even with the projected increase, the emission rates for Units 1 and 2 will remain at the current permitted level of 2.1 pounds per million Btu each. Furthermore, the Department has always used FPC's permitted SO₂ emission rates instead of the lower actual emission rates when modeling increment consumption at the CWA.

IV. Conclusion

Based on the information provided by Florida Power Corporation, the Department has reasonable assurance that the modification of the facility by burning a coal and petcoke blend in Crystal River Plant Units 1 and 2, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapters 62-212 and 62-296 of the Florida Administrative Code.

Notwithstanding the above, the Bureau of Air Regulation staff is concerned about the exemption of the project from PSD and a Best Available Control Technology (BACT) Determination through a provision designed for situations current in the late 1970's and early 1980's such as energy crises. Widespread use of such practices to facilitate industries running at their permitted maximum emissions limits would have an overall deleterious effect on ambient air quality and pollutant deposition. Therefore the Bureau recommends that FPC reconsider its plan to burn the petcoke and coal blend.

Permittee:
Florida Power Corporation
3201 34th Street South
St. Petersburg, Florida 33711

Permit Number: 0170004-003-AC
Expiration Date: 12/31/96
County: Citrus
Latitude/Longitude: 28°57'34"
82°42'01"
Project: Crystal River Plant Units 1
and 2 Coal / Petroleum Coke Fuel
Blend

This permit is issued under the provision of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4 and 62-212, Florida Administrative Code (F.A.C.). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto and specifically described as follows:

For use of a petroleum coke and coal blend as an alternative fuel at the existing coal-fired Units 1 and 2. The project is located at the Crystal River Plant in Crystal River, Citrus County, Florida. The UTM coordinates of the site are Zone 17, 334.3 km E and 3204.5 km N. Unit 1 has a maximum heat input of 3,750 million Btu per hour and is equipped with a Buell Model BA 1.6X40 K 343-12.3P electrostatic precipitator to control particulate matter emissions. Unit 2 has a maximum heat input of 4,795 million Btu per hour and is equipped with a Buell Model B1.2X43K333-4.2P electrostatic precipitator to control particulate matter emissions.

The operation of these existing emission units shall be modified in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachment listed below:

1. Application received December 26, 1995
2. A. A. Linero's letter dated January 24, 1996
3. A. A. Linero's letter dated February 9, 1996
4. J. M. Kennedy's letter dated March 25, 1996

PERMITTEE:
Florida Power Corporation

PERMIT NUMBER: 0170004-003-AC

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of F.S. and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises where the permitted activity is located or conducted to:
 - a. Have access to and copy any records that must be kept under the conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

PERMITTEE:
Florida Power Corporation

PERMIT NUMBER: 0170004-003-AC

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. A description of and cause of non-compliance; and,
- b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the F.S. or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and F.S. after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by F. S. or Department rules.

11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards (NSPS)

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

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b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- The date, exact place, and time of sampling or measurements;
- The person responsible for performing the sampling or measurements;
- The dates analyses were performed;
- The person responsible for performing the analyses;
- The analytical techniques or methods used; and,
- The results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS:

1. The maximum heat input for Unit 1 is 3,750 million Btu per hour. The maximum heat input for Unit 2 is 4,795 million Btu per hour [Existing permit conditions].

2. Unit 1 and Unit 2 are permitted to burn only coal or a blend of coal and petroleum coke as the primary fuel. Number 2 fuel oil with a maximum sulfur content of 0.5 percent is the permitted startup fuel. The petroleum coke content the blend shall not exceed seven (7) percent by weight. [Requested in permit application]

3. Unit 2 is permitted to burn on-specification used (waste) oil with the following restrictions:

A. Only on-specification used oil generated by Florida Power Corporation shall be burned in this unit;

B. The maximum burn rate of the on-specification used oil shall not exceed 50 gallons per minute;

C. The on-specification used oil shall not be burned during periods of unit startup or shutdown;

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D. The on-specification used oil shall only be burned during periods of unit operation at 75 percent of full load or greater;

E. In order to be considered on-specification, the used oil shall meet the following specifications [40 CFR 279 Subpart B]:

1. Arsenic shall not exceed 5.0 ppm;
2. Cadmium shall not exceed 2.0 ppm;
3. Chromium shall not exceed 10.0 ppm;
4. Lead shall not exceed 100.0 ppm;
5. Total halogens shall not exceed 1,000.0 ppm;
6. Flash point shall not be less than 100.0 ° F.

F. The PCB concentration in the on-specification used oil shall be less than 50 ppm (thus exempting it from the requirements of 40 CFR 761 Subpart D).

[Amendment to permit AO 09-191820 dated February 11, 1994.]

4. Except as provided in specific condition number 7, the particulate matter emission rate from Unit 1 or Unit 2 shall not exceed 0.1 pound per million Btu heat input. [Rule 62-296.405(1)(b), FAC].

5. Except as provided in specific condition number 7, visible emissions from Unit 1 shall not exceed 40 percent opacity as specified in the Order Granting Petition for Reduced Frequency of Particulate Testing (OGC File No.: 86-1576) dated December 12, 1986. [Rule 62-296.405(1)(a), FAC].

6. Except as provided in specific condition number 7, visible emissions from Unit 2 shall not exceed 20 percent opacity. [Rule 62-296.405(1)(a), FAC].

7. Excess Emissions:

A. Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), FAC].

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B. Excess emissions from existing fossil fuel steam generators resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of the excess emissions shall be minimized. [Rule 62-210.700(2), FAC].

C. Excess emissions from existing fossil fuel steam generators resulting from boiler cleaning (soot blowing) and load change shall be permitted provided the duration of such excess emissions shall not exceed 3 hours in any 24-hour period and visible emissions shall not exceed Number 3 of the Ringlemann Chart (60 percent opacity), and providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of the excess emissions shall be minimized. A load change occurs when the operational capacity of a unit is in the 10 percent to 100 percent capacity range, other than startup or shutdown, which exceeds 10 percent of the unit's rated capacity and which occurs at a rate of 0.5 percent per minute or more. Visible emissions above 60 percent opacity shall be allowed for not more than 4, six (6) -minute periods, during the 3-hour period of excess emissions allowed by this subparagraph, for boiler cleaning and load changes, at units which have installed and are operating, or have committed to install or operate, continuous opacity monitors. Particulate matter emissions shall not exceed an average of 0.3 lbs. per million BTU heat input during the 3-hour period of excess emissions allowed by this subparagraph. [Rule 62-210.700(3), FAC].

D. Excess emissions which are caused entirely or in part by poor maintenance, poor operation or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), FAC].

E. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, FAC. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), FAC].

8. The sulfur dioxide emission rate from Unit 1 or Unit 2 shall not exceed 2.1 pounds per million Btu heat input. [Conditions To Approval No. 12 contained in PSD-FL-007].

9. Initial and annual compliance with the particulate matter emission limitations of Specific Conditions Numbers 4 and 7 shall be determined using EPA Methods 1,2 3 and 17. [Rule 62-296.405(1)(e)2, FAC and 40 CFR 60 Appendix A].

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10. Initial and annual compliance with the opacity limitations of Specific Conditions Numbers 5, 6 and 7 shall be determined using DEP Method 9. [Rules 62-296.405(1)(e)1., and 62-297.401, FAC and 40 CFR 60 Appendix A].

11. Initial and annual compliance with the sulfur dioxide emission limitation of Specific Condition Number 8 shall be determined using EPA Methods 6, 6A, 6B or 6C. Fuel sampling and analysis may be used as an alternate sampling procedure if such a procedure is incorporated in the operation permit for the emissions unit. [Rule 62-296.405(1)(e)3, FAC and 40 CFR 60 Appendix A].

12. A continuous opacity monitoring system shall be installed, calibrated, operated and maintained. [Rule 62-296.405(1)(f)a, FAC].

13. Continuous monitoring systems for sulfur dioxide, nitrogen oxides, carbon dioxide and flow shall be installed, calibrated operated and maintained. [40 CFR 72 and 40 CFR 75]

14. Seven (7) continuous reference or equivalent sulfur dioxide monitors will be installed, operated and maintained. One monitor will be placed on the northern edge of the Chassahowitzka National Wilderness Area and the other six monitors will be located approximately three to four kilometers from the plant at approximately 30 degree intervals. [Rule 62-296.405 (1) (c) 3., FAC]

15. Within 30 days of the issuance date of this permit, submit your monitoring plan to the Bureau of Air Monitoring and Mobile Sources for approval. The data shall be collected and verified in accordance with the State-Wide Quality Assurance Air Program Plan including using state approved standard operating procedures meeting 40 CFR Part 58. The data shall be submitted at least quarterly on 3.5 inch IBM-compatible floppy disks or other approved electronic media. Data shall be submitted in AIRS format.

16. The compliance test reports shall be submitted to the Department's Southwest District office within 45 days of completion of the last test run.

17. The Department's Southwest District office shall be notified in writing at least 15 days in advance of any emission test required by this permit. Testing of emissions shall be conducted with the source operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at the permitted capacity, then sources may be tested at less than capacity; in this case, subsequent source operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the permitted capacity.

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18. An annual operation report shall be submitted to the Department's Southwest District office by March 1 of each year pursuant to Rule 62-210.370(2), FAC.

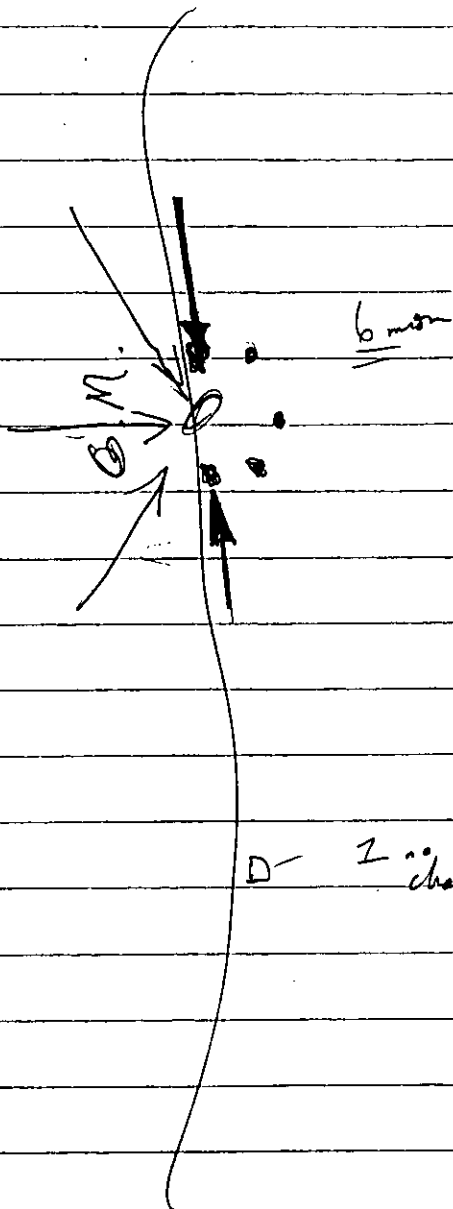
19. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration of the permit (Rule 62-4.090, FAC).

20. An Application for an operation permit must be submitted to the Department's Tallahassee office. "Pursuant to Rule 62-213.420, FAC, the source shall apply for a Title V permit not later than 180 days after commencing operation and not later than 90 days before expiration of this air construction permit."

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**

Howard L. Rhodes, Director
Division of Air Resources
Management

Seven continuous reference or equivalent SO_2 monitors, with one monitor placed on the northern edge of the Chassahowitzka National Wilderness Area. Submit your monitoring plan to the Bureau of Air Monitoring and Mobile Sources for approval. The data should be collected and verified in accordance with the Statewide-wide Quality Assurance Air Program Plan including using state approved standard operating procedures meeting 40 CFR Part 58. The data should be submitted at least quarterly on 3.5 inch IBM-compatible floppy disks or other approved electronic media. Data should be submitted in Airs Format.



plen
quality assessed
30° apart, points of location
3-4 klm

D- 1 chest

2. The Source Classification Code is:

1-01-002-12 Pulverized Coal: Dry Bottom (Tangential) Tons Burned

II. Rule Applicability

The facility is located in Citrus County which is an area designated as attainment for all pollutants pursuant to Florida Administrative Code (FAC) Rule 62-204.340 (1).

The proposed project is a change in the method of operation which results in an increase in actual emissions thereby meeting the definition of modification in Rule FAC 62-210.200 (183) and an air construction permit is required for a modified facility prior to beginning the modification pursuant to Rule FAC 62-210.300. In addition, the proposed project is subject to the Reports, Circumvention and Excess Emissions requirements of Rules FAC 62-210.370, 62-210.650 and 62-210.700, respectively.

The proposed project is subject to the General Preconstruction Review Requirements of Rule FAC 62-212.300. However, the applicant has stated that the proposed project will not require any physical change or addition to the facility. Although there will be a significant increase in emissions from the project, the applicant has requested (in accordance with Rule FAC 62-212.400(2)(c)4) exemption from PSD review because the units were capable of accommodating a coal and petcoke blend as an alternative fuel before January 6, 1975 and not prohibited through any permit condition from doing so since that time.

The proposed project is subject to the requirements of Rule FAC 62-296.405, Fossil Fuel Steam Generators with more than 250 million Btu per Hour Heat Input. In addition, the applicant has previously petitioned the Secretary and was granted a visible emissions limit of 40 percent opacity for Units 1 pursuant to Rule FAC 62-296.405 (1) (a). Unit 2 has a visible emissions limit of 20 percent opacity. Both Units 1 and 2 are subject to the particulate matter emission standard of 0.1 pound per million Btu heat input per of Rule FAC 62-296.405 (1) (b). The SO₂ standard of 6.17 pounds per million Btu heat input in Rule FAC 62-296.405 (1) (c) is superseded by a PSD and Site Certification condition for Units 4 and 5. The SO₂ limit for Units 1 and 2 is 2.1 lb/10⁶ Btu. The nitrogen oxide (NO_x) standard in Rule FAC 62-296.405 (1) (d) does not apply to Units 1 and 2. Additionally, Florida Power Corporation will install, maintain and operate SO₂ monitors as provided by FAC Rule 62-296.405(1) (c) 3.

The proposed project is to be conducted at acid rain emissions units. The requirements for the installation, calibration operation and maintenance of continuous monitors for sulfur dioxide, nitrogen oxides, carbon dioxide and flow contained in 40 CFR 72 and 40 CFR 75 apply to this project.

The application package was received on December 26, 1995 and deemed complete on March 29, 1996.