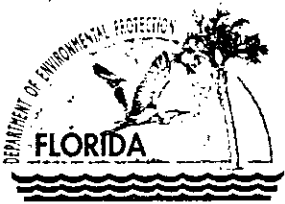


File



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

May 27, 1998

Mr. Scott H. Osbourn
Senior Environmental Engineer
Florida Power Corporation
P.O. Box 14042
St. Petersburg, FL 33733

Re: Comments on DRAFT Title V Permit
File No. 0170004-004-AV
Crystal River Facility, Citrus County

Dear Mr. Osbourn:

We received your comments dated April 14, 1998, on the Draft Title V permit for the Crystal River Facility. The following comments are in response to your comments. We included revised language where necessary to clearly show the revisions or changes to the permit. We often did not include the revised language when we agreed with the requested change. Nothing in the following changes will require the publication of a new Notice of Intent to Issue, nor will they prevent the issuance of the Proposed permit.

Section III. Subsection B.

1. We agree that this issue may prevent issuance of a Proposed permit that satisfies your request.

Section III. Subsection F.

1. We received the revised pages with an original RO certification statement and we will delete the adjective "maximum", describing the seawater flow in condition F.1.
2. We still disagree that a cumulative annual total is practically enforceable as that term is used by EPA. EPA is quite clear that for a limit to be practically enforceable, the maximum length of time between compliance determinations is one month. EPA allows for rolling 12-month totals for sources with significant seasonal variation where record keeping demonstrates compliance with a limit. This source seems to fit that requirement. We do not believe the monthly record keeping required is burdensome. In fact, it appears that your existing records could easily be modified to account for a rolling 12-month total. Furthermore, the permit does not require reporting of the records, only making and keeping the records. Therefore, the condition will not be revised.

Section III. Subsection I.

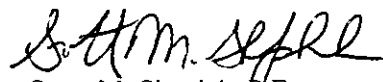
1. We agree to leave conditions I.2. and I.3. as we wrote in our Draft permit. This is consistent with other permits that the Department has issued. As you can imagine, the Department is working to clarify the excess emission provisions, so a change may be made in the future to all Title V permits, perhaps at renewal, if rule-making is completed in this regard.

Section III. Subsection K.

1. We did make appropriate changes to Subsection K to appear more consistent with other Florida Power permits, including the requirements of condition K.1.h. We will, however, make your currently requested changes. We have, however, reworded this condition slightly to clarify the Department's intent with reporting for used oil. The revised condition K.1.h will read:
 - h. Reporting Required: The owner or operator shall submit to the Department's Southwest District office, with the Annual Operation Report form, an attachment showing the total amount of on-specification used oil burned during the previous calendar year. The quantity of used oil shall be individually reported and shall not be combined with other fuels.

Please advise if you have comments on these changes. If you should have any questions, please call Joseph Kahn, P.E., or Susan DeVore at 850/921-9519.

Sincerely,



Scott M. Sheplak, P.E.
Administrator
Title V Section

SMS/jk

copy to:

Mr. W. Jeffrey Pardue, C.E.P., FPC
Ken Kosky, P.E., Golder Associates
Mr. Bill Thomas, P.E., DEP Southwest District, Air Section



April 28, 1998

RECEIVED

MAY 01 1998

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, Crystal River Plant
REQUEST FOR EXTENSION OF TIME on the *Intent to Issue Title V Air Operation Permit*,
Draft Permit No. 0170004-004-AV

On October 9, 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 April 30, 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,

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

Please file w/

THE VIRGINIAN INTEROFFICE MEMORANDUM

1 Teresa
2 Bruce
3 Ed
4 Ed
5 Sue

Date: 10-Apr-1997 03:43pm EST
From: Tom Cascio TAL
CASCIO_T
Dept: Air Resources Management
Tel No: 904/488-1344

TO: 10 addressees

Subject: NOX EARLY ELECTION COMPLIANCE PLANS

We received in the mail today Phase I Permits from EPA with NOx Early Election Compliance Plans for:

- 1 Deerhaven Generating Station (Gainesville Regional Utilities) — 0010006-001-AV
- 2 St. Johns River Power Park (Jacksonville Electric Authority) — 0310001-001-AV
- 3 C.D. McIntosh Power Plant (City of Lakeland)
- 4 Seminole Power Plant (Seminole Electric Cooperative)
- 5 Crystal River Plant (Florida Power Corporation)

We will need to include these as attachments to the Draft Permits.
I'll give the originals to Barb for filing.

Tom

Will need special subsection B.
{ see Example from
Lakeland McIntosh 1050004-003-AV }
SRA 7/21

Subsection B. This subsection addresses Acid Rain, Phase I.

{Permitting note: The U.S. EPA issues Acid Rain Phase I permit(s)}

The emissions unit listed below is regulated under Acid Rain Part, Phase I

E.U.

<u>ID No.</u>	<u>Brief Description</u>
-006	Boiler - McIntosh Unit 3

The provisions of the federal Acid Rain, Phase I permit(s), including Early Election Plans for NO_x, govern(s) the above listed emissions unit(s) from the date of issuance of this Title V permit through December 31, 1999. The provisions of the Phase II permit govern(s) those emissions unit(s) from January 1, 2000 through the expiration date of this Title V permit. The Phase II permit governs all other affected units for the effective period of this permit.

B.1. The Phase I permit(s), including Early Election Plans for NO_x, issued by the U.S. EPA, is a part of this permit. The owners and operators of these Phase I acid rain unit(s) must comply with the standard requirements and special provisions set forth in the permit(s) listed below:

- a. Phase I permit dated 03/27/97.
[Chapter 62-213, F.A.C.]

B.2. Comments, notes, and justifications: none

for original



RECEIVED

APR 17 1998

**BUREAU OF
AIR REGULATION**

April 14, 1998

Scott M. Sheplak, P.E.
Administrator, Title V Section
Florida Department of Environmental Protection
2600 Blair Stone Rd.
Tallahassee, Florida 32399-2400

Dear Mr. Sheplak:

Re: Comments on Draft Title V Permit; Crystal River Facility, Citrus County
File No. 0170004-004-AV

This letter serves to provide responses to the Department's letter, dated February 24, 1998, concerning Florida Power Corporation's (FPC) Crystal River Facility. The Department's letter was in response to a comment letter submitted by FPC on February 10, 1998. The issues discussed are addressed in the same order in which they are encountered in the draft permit.

Section III. Subsection B.

Regarding conditions B.15 through B.17, FPC had commented that not only should the requirement for PM_{2.5} monitoring be eliminated, but the requirement for *any* monitoring stations should be deleted. The Department's response was that it did not have a comment at this time, but that it would respond separately to this issue in the future. *All parties cannot proceed to the Proposed Permit stage until this issue has been adequately addressed.*

Section III. Subsection F.

1. FPC had requested that the adjective "maximum", describing the seawater flow, be deleted in condition F.1. The Department responded that, although the current permit language uses the term "approximately", FPC had described the flow as a maximum process or throughput rate in the Title V application; therefore, this part of the application must be revised if the Department is to grant our request. Accordingly, in order to support our request, FPC previously submitted a revised process description; however, the Department

has further indicated that a Responsible Official (RO) certification needed to accompany this submittal in order to make the requested change. Therefore, FPC is resubmitting the revised pages with an original RO certification statement (Attachment 1).

2. The allowable number of operating hours in condition F.2 is currently expressed as an annual, not-to-exceed number. The Department claims that a change to a 12-month rolling average would be consistent with other permits and also meet EPA's requirements for practical enforceability, in that, for a limit to be practically enforceable, the maximum length of time between compliance determinations should be one month or less. However, annual caps on emissions or, in this case operating hours, are by their nature determined annually. As part of the recordkeeping and reporting requirements under NPDES Permit No. FL0000159 for the helper cooling towers, FPC currently tracks pump run times on both a daily and a monthly basis. FPC has included two logs detailing our recordkeeping for both daily and monthly hours (Attachment 2). Therefore, in spite of the Department's claims, no significant time would pass before a violation of the limit is noted and reported. FPC requests that the condition's language be left as is. Tracking a cumulative annual total is just as "practically enforceable" and avoids the additional burden of continuously tracking, calculating and reporting a 12-month rolling average.

Section III. Subsection I.

The excess emissions regulations are confusing and we appreciate the Department's continuing efforts to provide clarity when applying them as a specific condition in a Title V permit. The intent of FPC's original comment was simply to clarify that Condition I.2. only be applied to Units 1 and 2 for purposes of malfunctions, because Condition I.3. applied to Units 1 and 2 for purposes of startup and shutdown. If the Department believes that the original draft language already clearly provides for this interpretation, FPC does not believe that any revisions should be made to Conditions I.2 and I.3 as contained in the original Draft Title V permit.

In response to the Department's suggested revisions, FPC does not believe that it makes sense to say that a unit is subject to both Rule 62-210.700(1), Fla. Admin. Code, and the NSPS excess emission provisions (applicable under Rule 62-204.800, Fla. Admin. Code). Because Units 4 and 5 are subject to the NSPS (Subpart D), and because the emissions limits to which Units 4 and 5 are subject are the limits imposed under the NSPS, the NSPS excess emissions provisions must govern these units. By proposing to clarify that the excess emission provision under Rule 62-210.700(1), Fla. Admin. Code applies to these units, the Department is unnecessarily restricting the emission limits imposed by the NSPS. Accordingly, FPC requests that the Department not revise Condition I.2. (or its preface); rather, this language should remain as initially contained in the Draft Title V permit. It is FPC's understanding that other Title V permits have been issued by the Department that specifically apply the NSPS excess emission provisions to NSPS limits at NSPS units; FPC's request is consistent with this.

Mr. Sheplak
April 14, 1998
Page 3

Section III. Subsection K.

The language in the conditions for the burning of on-spec used oil has been reviewed and, for the most part, is consistent with FPC's other permits. The only inconsistency that FPC requests be revised is under K.1.h. *Reporting Required*. FPC does not now currently calculate annual lead emissions in the AOR and requests that this be deleted. Also, as the analytical results will be maintained on file for a period of five years, they will be available for agency inspection. Requiring that they be provided with the AORs is burdensome and will result in voluminous transmittals.

FPC appreciates the Department's efforts in processing this permit and understands the need to resolve these issues in as timely a manner as possible. In this regard, the Department agreed to grant FPC's Request for Extension of Time until April 30, 1998. If we are unable to reach a resolution of these remaining issues within this time period, we would appreciate the opportunity to file an additional Request for Extension of Time. Accordingly, please contact me at (813) 866-5158 as soon as you have had the opportunity to review these comments.

Sincerely,



Scott H. Osbourn
Senior Environmental Engineer

Enclosures

cc: Clair Fancy, P.E., DEP
Joseph Kahn, P.E., DEP
Ken Kosky, P.E., Golder Associates
Robert Manning, HGS&S

ATTACHMENT 1

Owner/Authorized Representative or Responsible Official

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

W.Jeffrey Pardue, C.E.P., Director, Env Services Dept

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

Organization/Firm: Florida Power Corporation

Street Address: 3201 34th Street South

City: St. Petersburg

State: FL

Zip Code: 33711

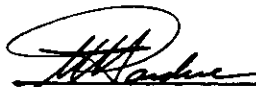
3. Owner/Authorized Representative or Responsible Official Telephone Numbers:

Telephone: (813) 866-4387

Fax: (813) 866-4926

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 unit.*



Signature

4/15/98

Date

* Attach letter of authorization if not currently on file.

C. EMISSIONS UNIT DETAIL INFORMATION (Regulated Emissions Units Only)

Emissions Unit Details

1. Initial Startup Date:		
2. Long-term Reserve Shutdown Date:		
3. Package Unit: Manufacturer:	Model Number:	
4. Generator Nameplate Rating:	MW	
5. Incinerator Information:		
Dwell Temperature:		°F
Dwell Time:		seconds
Incinerator Afterburner Temperature:		°F

Emissions Unit Operating Capacity

1. Maximum Heat Input Rate:	mmBtu/hr	
2. Maximum Incineration Rate:	lbs/hr	tons/day
3. Maximum Process or Throughput Rate:	*	
4. Maximum Production Rate:		
5. Operating Capacity Comment (limit to 200 characters):		
<p>*Seawater flow. The approximate throughput for all four towers (36 cells) based on an average of 20,417 gallons/minute/cell is 735,000 gal/min.</p>		

Emissions Unit Operating Schedule

1. Requested Maximum Operating Schedule:			
	hours/day		days/week
	weeks/yr	4,320	hours/yr

F. SEGMENT (PROCESS/FUEL) INFORMATION
(Regulated and Unregulated Emissions Units)**Segment Description and Rate:** Segment 1 of 1

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters): Seawater/Machinery, miscellaneous, not classified	
2. Source Classification Code (SCC): 3-12-999-99	
3. SCC Units: Tons Processed	
4. Maximum Hourly Rate: 183,897*	5. Maximum Annual Rate: 794,435,040
6. Estimated Annual Activity Factor:	
7. Maximum Percent Sulfur:	8. Maximum Percent Ash:
9. Million Btu per SCC Unit:	
10. Segment Comment (limit to 200 characters): *This is an approximate hourly rate, based on an estimate of 735,000 gal/min, and an average seawater density of 8.34 lb/gal.	

ATTACHMENT 2

Data for:

Month:	3
Day:	31
Year:	98

31 31 31 31 31

CRYSTAL RIVER 1,2 & 3 HELPER COOLING TOWERS 1997 RUN TIMES													
RUN TIMES (HOURS)							Through Put (MG)						
MONTH	PUMP 1	PUMP 2	PUMP 3	PUMP 4			MONTH	Tower 1&2	Tower 3&4				
1	0.0	0.0	0.0	0.0			1	0.0	0.0				
2	0.0	0.0	0.0	0.0			2	0.0	0.0				
3	0.0	0.0	0.0	0.0			3	0.0	0.0				
4	2.5	3.3	1.0	1.8			4	60.9	29.4				
5	4.7	3.2	4.2	1.4			5	83.0	58.8		32	2131	
6	18.2	0.0	131.6	136.9			6	191.2	2,820.4		5502.4	5522.2	
7	309.9	6.3	250.0	241.4			7	3,321.4	5,161.7		8821.7	8793.2	
8	139.4	40.0	191.3	70.5			8	1,884.4	2,750.0		8209.4	8209.7	
9	0.0	0.0	0.0	4.5			9	0.0	47.3				
10	0.0	0.0	0.0	0.0			10	0.0	0.0				
11	0.0	0.0	0.0	0.0			11	0.0	0.0				
12	0.0	0.0	0.0	0.0			12	0.0	0.0				
TOTAL	474.7	52.8	578.1	456.5			TOTAL	5,540.9	10,867.6				