



# Department of Environmental Protection

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Governor

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Virginia B. Wetherell  
Secretary

February 24, 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 February 10, 1997 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 A.

1. Upon review of this issue, we agree that the descriptions for Units 1 and 2 may be changed to include a reference to on-specification used oil as a fuel. We will add this to the description for these units.

## Section III. Subsection B.

1. Since FPC's request to allow the use of the RATA test results to serve as the annual compliance demonstrations without an alternate sampling procedure (ASP) is similar to that approved for the Kissimmee Utility Authority (KUA), we will make the requested change. A condition will be added to the Test Methods and Procedures section as follows (conditions will be appropriately renumbered):

**B.x. Annual RATA Tests May Substitute for Annual NO<sub>x</sub> and SO<sub>2</sub> Tests.** Annual RATA tests performed for nitrogen oxides and sulfur dioxide may be substituted for the annual compliance tests for these pollutants. To substitute for the annual compliance tests, the owner or operator must notify the Department of the RATA tests and the results must be submitted as the compliance tests, in accordance with the requirements of specific conditions I.6.(a)9. and I.15 of this permit. The requirements of specific conditions I.9 and I.12.(a)1. shall not apply to these

tests. The test runs shall be consecutively completed in a manner that fulfills the test length requirements of the EPA test methods.

2. The annual test date will be changed from October 1st to "no later than April 1st" in condition B.12.
3. The Department is not yet prepared to respond to this comment. The Department will respond to this in the future. We agree that this may prevent issuance of a Proposed permit that satisfies your request.

### **Section III. Subsection C.**

1. The annual test date will be changed from June 1st to July 1st in condition C.5.

### **Section III. Subsection F.**

1. We received revised pages of the application to change the adjective "maximum" to "approximately", but the Department needs the RO certification for these pages to make the requested change. We apologize for not specifically pointing this out in previous correspondence. Please resubmit the revised pages with an original RO certification statement and we will make the requested change.
2. We disagree that a cumulative annual total is practically enforceable. 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. A cumulative annual total limit could allow significant time to pass before a violation of the limit is noted or reported. We do not believe the monthly record keeping required is burdensome. 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 G.**

1. We were not aware that the Unit 4 cooling tower was testing in 1988 instead of 1989. The base year of the tests for the Unit 4 cooling tower will be adjusted in the permit and the condition will be revised to reflect that next test year from the effective date of the permit will be 2003. The condition will read as follows:

**G.4. Test Every Five Years.** The Unit 4 cooling tower shall be tested every five years from 1988 (the next required year from the effective date of this permit is 2003) between May 1st and October 1st. The Unit 5 cooling tower shall be tested every five years from 1992 (the next required year from the effective date of this permit is 2002) between May 1st and October 1st. [Rule 62-213.440, F.A.C.; Modified PSD permit, PSD-FL-007, issued by EPA 11/30/88, request of applicant]

### **Section III. Subsection H.**

1. Condition H.6. will include the requested exception for conditions I.9., I.10., I.11., and I.13. The Department will reserve its authority to require a special compliance test pursuant to condition

I.6.(b), so that condition and conditions I.6.(a)9, I.12(a)2 and I.15.(a) & (b) will remain applicable to these sources. The requested exception will refer to the other parts of these conditions as follows:

**H.6.** This emissions unit is also subject to conditions **I.1, I.4, I.5, and I.14** contained in **Subsection I. Common Conditions**. This emissions unit is also subject to conditions **I.6.(a)9 & (b), I.12(a)2 and I.15.(a) & (b)**; the other provisions of conditions **I.6, I.12 and I.15** are not applicable to this emissions unit.

### Section III. Subsection I.

1. Upon further review we agree that condition I.2. is applicable to Units 4 and 5. This condition is based on the authority of Florida's SIP and may, for some pollutants, be in conflict with the provisions of the NSPS Subpart D. In other words, compliance with this condition does not relieve the facility from complying with the NSPS provisions. This condition is also applicable to all other emissions units as allowed by the underlying rule. We believe that deleting the preface to this condition will be confusing or misleading to facility and Department staff. For clarity and to address your comments, the preface and the condition will be reworded as follows:

**I.2. (This condition is applicable to all emissions units. However, this condition is applicable to emissions units 004 and 003 - Units 4 and 5 - pursuant to Florida's SIP; the excess emissions provisions of the NSPS, described in Subsections B and J, also apply to emissions units 004 and 003 - Units 4 and 5.)** 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), F.A.C.]

2. We will add the reference to sootblowing and load change to condition I.3. pursuant to the requirements of Rule 62-210.700(3), F.A.C. The revised condition will be as follows:

**I.3. (This condition applies to emissions units 001 and 002 - Units 1 and 2.)** Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized.  
[Rule 62-210.700(2), F.A.C.]

Excess emissions 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 60 percent opacity, and providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized. Also see specific conditions A.5 and A.7 of this permit.  
[Rule 62-210.700(3), F.A.C.]

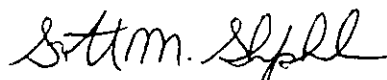
### Section III. Subsection K.

1. We have made appropriate changes to Subsection K to appear more consistent with other Florida Power permits. This permit will not be identical to others, because the requirements for Crystal

River are derived, in part, from previous facility requirements and reasonable assurances required for the Crystal River plant. The revised Subsection K is attached to this letter.

Please advise if your comments have been adequately addressed, or if you have comments on the other changes so that we may proceed to the Proposed permit stage. If you should have any questions, please call Joseph Kahn, P.E., or Susan DeVore at 850/921-9519.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott M. Sheplak".

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

SMS/jk

attachment

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

**Subsection K. Used Oil Common Condition.**

<b>E.U. ID No.</b>	<b>Brief Description</b>
001	Fossil Fuel Steam Generator, Unit 1
002	Fossil Fuel Steam Generator, Unit 2
004	Fossil Fuel Steam Generator, Unit 4
003	Fossil Fuel Steam Generator, Unit 5

{Permitting Notes: The emissions units above are subject to the following condition which allows the burning of on-specification used oil pursuant to the requirements of this permit and this subsection.}

**The following condition applies to the emissions units listed above:**

**K.1. Used Oil.** Burning of on-specification used oil is allowed in emissions units 001, 002, 004 and 003 in accordance with all other conditions of this permit and the following conditions:

- a. **On-specification Used Oil Allowed as Fuel:** This permit allows the burning of used oil fuel meeting EPA "on-specification" used oil specifications, with a PCB concentration of less than 50 ppm. Used oil that does not meet the specifications for on-specification used oil shall not be burned at this facility.

On-specification used oil shall meet the following specifications: [40 CFR 279, Subpart B.]

Arsenic shall not exceed 5.0 ppm;  
Cadmium shall not exceed 2.0 ppm;  
Chromium shall not exceed 10.0 ppm;  
Lead shall not exceed 100.0 ppm;  
Total halogens shall not exceed 1000 ppm;  
Flash point shall not be less than 100 degrees F.

- b. **Quantity Limited:** The maximum quantity of used oil that may be burned in all four emissions units combined is 10 million gallons in any consecutive 12-month period.
- c. **Used Oil Containing PCBs Not Allowed:** Used oil containing a PCB concentration of 50 or more ppm shall not be burned at this facility. Used oil shall not be blended to meet this requirement.
- d. **PCB Concentration of 2 to less than 50 ppm:** On-specification used oil with a PCB concentration of 2 to less than 50 ppm shall be burned only at normal source operating temperatures. On-specification used oil with a PCB concentration of 2 to less than 50 ppm shall not be burned during periods of startup or shutdown.

Before accepting from each marketer the first shipment of on-specification used oil with a PCB concentration of 2 to 49 ppm, the owner or operator shall provide each marketer with a one-time written and signed notice certifying that the owner or operator will burn the used oil in a qualified combustion device and must identify the class of combustion device. The notice must state that EPA or a RCRA-delegated state agency has been given a description of the used oil management activities at the facility and that an industrial boiler or furnace will be used to burn

the used oil with a PCB concentration of 2 to 49 ppm. The description of the used oil management activities shall be submitted to the EPA or may be submitted to the Administrator, Hazardous Waste Regulation Section, Florida Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. A copy of the notice provided to each marketer shall be maintained at the facility. [40 CFR 279.61 and 761.20(e)]

- e. Certification Required: The owner or operator shall receive from the marketer, for each load of used oil received, a certification that the used oil meets the specifications for on-specification used oil and contains a PCB concentration of less than 50 ppm. This certification shall also describe the basis for the certification, such as analytical results.

Used oil to be burned for energy recovery is presumed to contain quantifiable levels (2 ppm) of PCB unless the marketer obtains analyses (testing) or other information that the used oil fuel does not contain quantifiable levels of PCBs. Note that a claim that used oil does not contain quantifiable levels of PCBs (that is, that the used oil contains less than 2 ppm of PCBs) must be documented by analysis or other information. The first person making the claim that the used oil does not contain PCBs is responsible for furnishing the documentation. The documentation can be tests, personal or special knowledge of the source and composition of the used oil, or a certification from the person generating the used oil claiming that the used oil contains no detectable PCBs.

- f. Testing Required: If the owner or operator does not receive certification from the marketer as described above, and for used oil generated by the owner or operator, the owner or operator shall sample and analyze each load of used oil received, and each load to be burned that was generated by the owner or operator, for the following parameters:

Arsenic, cadmium, chromium, lead, total halogens, flash point, PCBs\*, and specific gravity.

Testing (sampling, extraction and analysis) shall be performed using approved methods specified in EPA Publication SW-846 (Test Methods for Evaluating Solid Waste, Physical/Chemical Methods), latest edition.

\* Analysis for PCBs is not required if a claim is made that the used oil does not contain quantifiable levels of PCBs.

If the owner or operator relies on certification from the marketer, the owner or operator shall be responsible for ensuring that the certification complies with all the requirements of this condition and all conditions of this permit.

If the analytical results show that the used oil does not meet the specification for on-specification used oil, or that it contains a PCB concentration of greater than or equal to 50 ppm, the owner or operator shall immediately notify and provide the analytical results to the Department's Southwest District office. The owner or operator shall immediately cease burning of the used oil.

- g. Record Keeping Required: The owner or operator shall obtain, make, and keep the following records related to the use of used oil in a form suitable for inspection at the facility by the Department: [40 CFR 761.20(e)]

- (1) The gallons of on-specification used oil received, generated and burned each month. (This record shall be completed no later than the fifteenth day of the succeeding month.)
- (2) The total gallons of on-specification used oil burned in the preceding consecutive 12-month period. (This record shall be completed no later than the fifteenth day of the succeeding month.)
- (3) Results of the analyses required above, including documentation if a claim is made that the used oil does not contain quantifiable levels of PCBs.
- (4) The source and quantity of each load of used oil received each month, including the name, address and EPA identification number (if applicable) of all marketers that delivered used oil to the facility, and the quantity delivered.
- (5) Records of the operating rate of each unit while burning used oil and the dates and time periods each unit burns used oil.

h. Reporting Required: The owner or operator shall submit to the Department's Southwest District office, with the Annual Operation Report form, the analytical results and the total amount of on-specification used oil burned during the previous calendar year. The AOR shall include the total amount of lead emitted as a result of burning on-specification used oil during the calendar year.

[Rules 62-4.070(3) and 62-213.440, F.A.C., 40 CFR 279 and 40 CFR 761, 0170004-002-AO, and request of applicant, unless otherwise noted]