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February 10, 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 January 6, 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 November 12, 1997. The issues discussed are addressed in the same order in which they are encountered in the draft permit.

Section III. Subsection A.

FPC had requested that the descriptions for Units 1 and 2 each include a reference to FPC's authorization to burn on-spec used oil. The Department responded that "the descriptions for Units 1 and 2 would not be changed since sufficient authorization to burn on-spec used oil in these units is found in condition A.3 and Subsection K." As there are many other instances in the permit where the language is redundant and repetitive, the fact that used oil burning is mentioned elsewhere in the permit should not preclude its mention in the unit description. FPC requests that it be added.

Section III. Subsection B.

1. FPC had requested that the Title V permit allow the use of the RATA test results to serve as the annual compliance demonstrations. The Department responded that the requested change could not be made without an alternate sampling procedure (ASP) approved by the DEP and EPA. FPC is aware of similar requests being made (e.g., the Kissimmee Utility Authority or KUA) and approval being granted without invoking the ASP procedure. In fact, since the sampling methods used for the RATA tests are the reference methods indicated in the draft permit, an ASP would not be necessary. FPC is simply proposing to increase efficiency by making the best use of the test data. In order to assist you in discussions with Mike Harley's office on this issue, I have enclosed copies of pertinent correspondence between the Department and KUA.

2. FPC had requested that the annual test date in condition B.12 be changed to October 1st. The Department indicated that they would grant this request; however, if the use of RATA test data is acceptable for annual compliance demonstrations and, given that the RATA testing is required annually in the first quarter, FPC requests that, in conjunction with the approval to use RATA test data, that this date be changed to "no later than April 1st."
3. 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 C.

Condition C.5 of Subsection C (covering the flyash transfer and storage sources associated with Units 1 and 2) requires that annual VE testing be done by June 1st. The Department granted FPC's earlier request to change that annual compliance test date for Units 1 and 2 from June 1st to July 1st (Department's Response 4 under Section III, Subsection A). As the annual testing for these sources is usually done in conjunction with the testing on Units 1 and 2, FPC asks that this date also be changed to July 1st.

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 is submitting a revised process description with this letter.
2. The allowable number of operating hours in condition F.2 is currently expressed as an annual, not-to-exceed number. In spite of the Department's 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, 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 G.

Regarding condition G.4, FPC had requested that the testing window for both cooling towers be changed to the period between May 1st and October 1st. The Department granted this

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request, but further stated that the base year for the tests would not change. This presents a problem, in that the Unit 4 cooling tower was originally tested in 1988 (not the year 1989 cited by the Department), and is scheduled for retesting in 1998 (not the year 1999 cited by the Department, which is also the proposed effective date for the Title V permit). FPC would like to discuss how to effectively reword this condition.

Section III. Subsection H.

FPC had previously requested that certain exceptions to applicability be made in the text of condition H.6 (i.e., the references to conditions I.2, I.4 and I.5). The Department agreed that the exception for I.2 was appropriate, but that conditions I.4 and I.5 were applicable to the sources and should not be excepted. FPC agrees with the Department's determination, but asks that the Department further consider excepting conditions I.6, I.9, I.10, I.11, I.12, I.13 and I.15. FPC had neglected to list these conditions in our earlier request.

Section III. Subsection I.

FPC agrees with the Department's response to our comment on condition I.3. Clearly condition I.3 does not supercede condition I.2. However, problems with the wording in these conditions remain. The preface to condition I.2 states that the condition does *not* apply to Units 4 and 5, when it clearly does. Further, the malfunction provision in I.2 also applies to Units 1 and 2, so just removing the offending word "not", will not solve the problem. Therefore, FPC requests that the entire sentence at the beginning of condition I.2 be deleted. Finally, condition I.3 should include mention of "permitted excess emissions for soot blowing and load changes", in addition to those from startup and shutdown.

Section III. Subsection K.

The language in the conditions for the burning of on-spec used oil has been discussed at great length with the permit engineer (Charles Logan) who is writing FPC's Ancote, Turner, and Higgins Title V permits. For consistency among FPC's permits, it is requested that the used oil language reflect other discussions that have already occurred with the Department.

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 February 27, 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.

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Sincerely,

A handwritten signature in black ink, appearing to read "Scott H. Osbourn". The signature is fluid and cursive, with the first name "Scott" and last name "Osbourn" clearly distinguishable.

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



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

January 6, 1998

Mr. Scott H. Osbourn
Senior Environmental Engineer
Florida Power Corporation
3201 Thirty-fourth Street South
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 November 12, 1997 on the Draft Title V permit for the Crystal River Facility. The following comments are in response to your comments, with additional comments where we identified additional changes required to the Draft permit. 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.

General Comments

1. The Final Title V permit will reflect the most up-to-date version of Appendix TV-1, Title V Conditions. Currently the most up-to-date version has a version date of 12/2/97.
2. From Scott Osbourn's letter dated October 28, 1997, proof was enclosed that FPC published the Intent to Issue Title V Air Operation Permit on October 13, 1997, so apparently FPC has the proof of publication.

Section I., Facility Information, Subsection A.

1. The sentence will not be changed since there is sufficient description that references FPC's authorization at Crystal River to burn fuel oils in conditions A.3 and B.3.

Section I., Facility Information, Subsection B.

1. Emissions Unit 019, two 3500 kW diesel generators associated with Unit 3, will be added to the chart describing the Unregulated Emissions Units and/or Activities.

Section II., Facility-wide Conditions.

1. The requested change to condition 3 is not consistent with other permits issued by this office, and the condition as written is clear, so no change will be made.
2. Pursuant to rule change, the term "exempt" will be changed to "insignificant" where appropriate throughout the permit.
3. The requested change to condition 7 is not consistent with other permits issued by this office, and the condition as written is clear, so no change will be made.
4. We will make the requested change to condition 8. Also, the note will be changed to read as follows:

“{Note: This condition implements the requirements of Rules 62-296.320(4)(c)1., 3., & 4. F.A.C., (condition 58. of APPENDIX TV-1, TITLE V CONDITIONS.)}”

Section III. Subsection A.

1. The descriptions for Units 1 and 2 will not be changed since sufficient reference to FPC's authorization to burn on-spec used oil in these units is found in condition A.3 and Subsection K.
2. The requested change is not consistent with other permits issued by this office, so no change will be made.
3. The requested change is not consistent with other permits issued by this office, so conditions A.10. and A.11. will remain unchanged.
4. The annual test date will be changed from June 1st to July 1st.
5. Condition A.15. was replaced with condition K.1. Subsection K was sent previously as a correction to the Draft permit. This adequately addresses the agreement between the Department & FPC.

Section III. Subsection B.

1. The NSPS allows Methods 6C and 7E as reflected in condition B.8. However, the requested change can not be made without an alternate sampling procedure approved by the DEP and EPA. Please request an alternate sampling procedure separately.
2. Condition B.11. refers to condition B.3. to demonstrate that only the allowed fuels are fired in appropriate quantities. The requested change is thus not appropriate.
3. The annual test date will be changed from June 1st to October 1st in condition B.12.
4. The Department does not have a response to this comment at this time. The Department will respond separately to this in the future.

Section III. Subsection E.

1. (1) The description will be revised as requested. A note will be added below the description to note that this subsection is applicable only when the generators are located at the Crystal River Plant.
- (2) Condition E.1. will not be revised. No notice is required to initiate the permit conditions. FPC shall comply with the permit requirements any time the units are located at the Crystal River facility.
- (3) Citations for conditions E.4., E.5., E.9., E.13., E.14. and E.15. will be changed to refer to the AC permit. Condition E.11. refers to the AO permit, since this condition is an operating requirement and first appeared in the AO permit.
- (4) Condition E.13. will be changed to : "... each of the generators, and the cumulative "engine-hours" for each month."
- (5) Condition E.15 will not be deleted, as it was a condition of both the AC and previous AO permits. This condition imposes future restrictions should FPC request a relaxation of emission limits for these relocatable units. For clarity the condition will be revised to refer only to relaxation of the emissions limits of this subsection.
- (6) Condition E.16. has requirements that are applicable to the Crystal River Plant pertaining to possible relocation from Crystal River to Pinellas County, so this condition will not be changed. Condition E.12. is only applicable to sources in Pinellas County, so it will be deleted as requested. Subsequent conditions have been renumbered.

Section III. Subsection F.

1. You are correct, PSD-FL-139 does state "approximately" 735,000 gpm in the descriptive language, but pursuant to your application, which states under Emission Unit 10, C. Emissions Unit Detail Information, Emissions Unit Operating Capacity, 3. Maximum Process or Throughput Rate: **735,000 gal/min* (*seawater flow. Maximum throughput for all four towers (36 cells) based on 20,417 gallons/minute/cell.)**, the adjective "maximum" can not be deleted, unless this part of the application is revised.
2. In condition F.2. the 12-month rolling total is consistent with other permits issued by this office, and meets EPA's requirements for practical enforceability, so it will not be changed as requested. Please note that the total limit does not limit each month to 1/12 of the total, so monthly fluctuations in usage will not necessarily cause the facility to be out of compliance.
3. The permit note in condition F.3. will not be deleted since it is not enforceable and it provides clarification for the compliance authority. It specifically relates the BACT determination to the imposed emission limit.
4. Condition F.5. will not be changed. The Department will reserve its ability to choose a cell independently of the owner, as was explicitly specified by specific condition 4 of permit number AC 09-162037.
5. Condition F.6. will be changed as requested.

Section III. Subsection G.

1. The application is not clear whether the flow rate is for each or both cooling towers, since both were combined as one emissions unit. In condition G.1. the flow rate will be listed as "per cooling tower" since FPC has made this clarification.

2. The testing window for the cooling towers will be changed as requested, but the base year of the tests will not change. It will be revised to reflect that the effective date will be 1/1/99. The condition will read as follows:

G.4. Test Every Five Years. The Unit 4 cooling tower shall be tested every five years from 1989 (the next required year from the effective date of this permit is 1999) 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. The "Permitting notes" will include the requested clarification for "Units 4 and 5 only."
2. Condition H.6. will include the requested exception for condition I.2. Conditions I.4. & I.5. are applicable to these sources, so the requested change for these will not be made.
3. The requested changes to condition H.7. will be made, as well as clarification that Subsection J applies only to activities at units subject to NSPS (i.e. activities at units 4 & 5).

Section III. Subsection I.

1. "Except as otherwise specified under Subsections A. through H.," will be added to the introductory language of this subsection as requested.
2. The requested revision to condition I.3. will not be made since condition I.3. does not supersede condition I.2. Condition I.2. includes malfunctions, which are not addressed in condition I.3.

Section III. Subsection J.

1. The requested change to add units "4 and 5" to the description will be made.

Section IV. Acid Rain Part

1. Condition A.1.a refers to the application submitted by referencing the date of FPC's application, so no change will be made.
2. The requested deletion of conditions A.4. and B.2. is not consistent with other permits issued by this office, so the conditions will not be deleted.

Appendices

Appendix E-1, List of Exempt Emissions Units and/or Activities

1. Please note that Appendix E-1 will be changed to I-1 to reflect rule changes that now refer to insignificant units instead of exempt units. Language will be added to match the revised rules

regarding insignificant units. The requested revision will be made to add "refueling & storage". Grounds maintenance will also be added.

Appendix S. Permit Summary Tables, Table 1-1

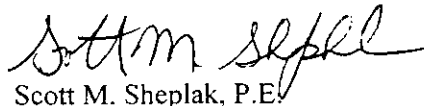
1. Summary Tables will be changed to reflect revisions made.

Appendix P

1. Appendix P will be added to include information on the sensitive paper test method based on information provided by FPC. This appendix will be referenced in the permit where appropriate.

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 850/488-1344.

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