



November 12, 1997

Mr. Scott M. Sheplak, P.E.
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Florida Power Corporation, Crystal River Facility
DRAFT Title V Permit No. 0170004-004-AV

Dear Mr. Sheplak:

On behalf of Florida Power Corporation (FPC), attached are comments regarding the DRAFT Title V permit for the Crystal River Facility, as identified above. 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, DEP agreed to grant FPC's Request for Extension of Time until December 8, 1997. If we are unable to reach a resolution of these comments 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 a chance to review these comments to set up either a telephone or in-person conference. Thank you again for your consideration of our comments.

Sincerely, *J. Michael King for*
J. Michael King for

Scott H. Osbourn,
Senior Environmental Engineer

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

FLORIDA POWER CORPORATION
COMMENTS ON DRAFT TITLE V PERMIT
CRYSTAL RIVER FACILITY

General Comments

1. FPC understands that Appendix TV-1, Title V Conditions, is expected to be revised within the next few weeks. FPC requests that its Title V permit reflect the most up-to-date version of this Appendix.

2. FPC understands that DEP will publish the Intent to Issue Title V Air Operation Permit. Because the applicant is ultimately responsible for the publication of the Intent to Issue, FPC requests that DEP provide a copy of the Notice intended to be published, as well as proof of publication.

Section I., Facility Information, Subsection A.

1. FPC requests the following revisions to the description to reference FPC's authorization at Crystal River to burn new and used-oil: "This facility consists of four coal-fired fossil fuel steam generating (FFSG)"

Section I., Facility Information, Subsection B.

1. FPC requests that the following activity be added to the chart describing the Unregulated Emissions Units and/or Activities: "Two 3500 kW diesel generators associated with Unit 3." These units were included in Appendix U-1, but were inadvertently not included in subsection B.

Section II., Facility-wide Conditions.

1. Condition 3. For clarity and to make this Condition specific to FPC's Crystal River Plant, FPC requests that Condition 3. be edited as follows:

~~Except as otherwise provided in this permit for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause~~

Also, because the reference to Chapter 62-297 in the last sentence of Condition 2. appears to be misplaced, FPC requests Condition 2. be edited as follows: "EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C."

2. Condition 6. In the context of this permit, how does DEP intend to respond to EPA's comments regarding the need to change the phrase "exempt" to "insignificant"?

3. Condition 7. For clarity, FPC requests that the first sentence of this Condition be edited as follows: "The permittee shall not allow no person to store, pump,"

4. Condition 8. For clarity, FPC requests that this Condition be revised as follows: "... Reasonable precautions to prevent emissions of unconfined particulate matter at this facility shall may include, as needed:"

Section III. Subsection A.

1. FPC requests that the descriptions for Units 1 and 2 each include a reference to FPC's authorization to burn on-spec used oil in these units.

2. Condition A.6. For clarification and to correspond with FPC's Title V application, FPC requests that this Condition be revised as follows: "Particulate matter emissions shall not exceed 0.1 pound per million Btu heat input, 3-hour average, as measured in accordance with Condition A.9. ~~by applicable compliance methods.~~"

3. Condition A.10 and A.11. The first sentence in Condition A.11. is redundant to language in Condition A.10. and should therefore be deleted. The second sentence in Condition A.11. should be move into Condition A.10. as follows: "... the permittee may demonstrate compliance using fuel sampling and analysis. This protocol is allowed because the emissions unit does not have an operating flue gas desulfurization device. If the permittee elects to discontinue fuel sampling and analysis"

4. Condition A.13. FPC requests that the annual test date be changed to July 1st.

5. Conditions A.15. This Condition should be revised to mirror the provisions associated with burning used oil in FPC's other Title V permits, as discussed between FPC and DEP on September 24, 1997.

Section III. Subsection B.

1. Condition B.8. FPC performs annual RATA testing for the NO_x and SO₂ monitors at full load on Units 4 and 5. The test results are obtained by performing instrumental Methods 7E and 6C, respectively. Therefore, FPC requests that the Title V permit allow the use of these test results as the annual compliance demonstrations. Note that the RATA tests may not necessarily be performed during the 60 day period prior to the compliance test date, however they are performed at approximately 12-month intervals.

2. Condition B.11. The reference to Condition B.3. at the end of this Condition should be changed to Condition B.1.

3. Condition B.12. FPC requests that the annual test date be changed to October 1st.

4. Conditions B.15 through B.17. The requirement for PM_{2.5} monitoring has no basis in rules or the previous site certification. FPC understands that the EPA will be funding a national PM_{2.5} monitoring program, so this monitoring will be the responsibility of the EPA and DEP. These conditions should not be considered as part of the Title V permit, since the monitoring was a requirement of the site certification application only. In fact, the original PSD permit did not involve DEP, but was issued by the EPA. The monitoring was part of the continuation of the monitoring performed prior to the site certification being issued. Over the years, the monitoring was reduced

from four to two stations. FPC requests that the requirement for these monitoring stations be deleted.

Section III. Subsection E.

1. The provisions governing the operation of these relocatable generators when they are located at the Crystal River facility should be essentially identical to the provisions contained in the Title V permits for Bartow, Andote, and Higgins. Accordingly, FPC requests the following revisions: (1) the description should be revised to state "These relocatable units will have a maximum combined heat input of 25.74 mmBtu/hr while being fueled by 186.3 gallons of new No. 2 fuel oil per hour with a maximum combined rating of 2460 kilowatts," (2) add a new Condition E.1. to state "These conditions become active and enforceable once FPC has given notification to the Department's Southwest District Office, in accordance with Condition E.16., that a unit(s) will be relocated to this facility.", (3) the permit references in Conditions E.4., E.5., E.9., E.11., E.12., E.13., E.14., and E.15. should be to the AC instead of the AO, (4) in Condition E.13., the third line should be revised as follows: "of operation expressed as "engine-hours," and a cumulative total hours of operation expressed as "engine-hours" for each month.", (5) Condition E.15. should be deleted because it imposes no requirements on the source, and (6) the last sentence in Condition E.16. ("If a diesel generator is to be relocated within Pinellas County") should be deleted because the Crystal River facility is not located in Pinellas County (similarly, the reference to Pinellas County in Condition E.12. should be deleted as well.)

Section III. Subsection F.

1. Condition F.1. The seawater flow was never characterized in the PSD permit as a maximum. It is described as "approximately" 735,000 gpm in the descriptive language at the beginning of the construction permit. FPC requests that the adjective "maximum" be deleted.

2. Condition F.2. The amount of hours was not previously expressed as a 12 month rolling total. This is not an effective way to characterize their operation as the cooling towers are operated the most during the high ambient temperature months.

3. Condition F.3. FPC requests that the permit "Note" be deleted to avoid the basis of the limit being confused and imposed as independent limits. Further, the purpose of including this Note is unclear; if an understanding of the basis for the PM limit is needed, the BACT determination can simply be referred to.

4. Condition F.5. FPC requests that the language in the second sentence be changed to "Testing shall be conducted on one cell, selected by the owner in consultation with the Department, of ..."

5. Condition F.6. FPC requests that the language in the first sentence be changed to require testing by June 30, 1998.

Section III. Subsection G.

1. Condition G.1. The flow rate listed should be described as "per cooling tower".
2. Condition G.4. FPC requests that the testing window for both cooling towers be changed to the period between May 1 and October 1. This will avoid the times of year in which unit outages normally occur.

Section III. Subsection H.

1. In the "Permitting note(s)," FPC requests the following clarification: "This emissions unit is regulated partially under Power Plant Siting Certification PA77-09; NSPS 40 CFR 60 Subpart Y (Units 4 and 5 only); and PSD permit AC 09-162037, PSD-FL-139."
2. Condition H.6. For clarification, FPC requests the following revisions: "This emissions unit is also subject to conditions I.1 through I.15, except for I.3, I.5, I.7 and I.8 (conditions I.2 and I.4 are also not applicable to activities at units subject to NSPS 40 CFR 60 (i.e., activities at Units 4 and 5)), contained in Subsection I. Common Conditions."
3. Condition H.7. For clarification, FPC requests the following revisions: "These emissions units are also subject to conditions J.1, J.2, J.3(b), (c) and (d) and J.4 contained in subsection J. NSPS Common Conditions." [Ken - J.1 seems to be a judgement call; J.2 contains the excess emissions provisions, so you definitely want it included.]

Section III. Subsection I.

1. Because many of the requirements under this subsection are superseded by more specific conditions in Subsections A. - H., FPC requests the following revision to the introductory language of this subsection: "Except as otherwise specified under Subsections A. through H., the following conditions apply to the emissions units listed above:"
2. Condition I.3. For clarification, FPC requests the following revision: "(This condition applies to emissions units 001 and 002 - Units 1 and 2, and therefore supersedes condition I.2.)"

Section III. Subsection J.

1. For clarification, FPC requests the following revision to the description "016 Material handling activities for coal-fired steam units 4 and 5."

Section IV. Acid Rain Part

1. Condition A.1.a. should reference the actual application that FPC submitted rather than DEP's form number.
2. Conditions A.4. and B.2. This condition imposes no requirements and therefore should be deleted.

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

1. FPC requests the following additions and revisions to this list: (1) Vehicle diesel and gasoline refueling and storage tanks. (2) Grounds maintenance.

Appendix S. Permit summary Tables]

Table 1-1

1. FPC requests that these Tables be revised to reflect the requested revisions in comments above.



October 28, 1997

Ms. Kim Tober
Florida Department of Environmental Protection
2600 Blair Stone Rd.
Tallahassee, Florida 32399-2400

Dear Ms. Tober:

Re: FPC Crystal River Facility
Public Notice of Intent to Issue Draft Title V Air Permit

Enclosed please find the original public notice and notarized proof of publication regarding the Department's Intent to Issue a Draft Title V Permit for Florida Power Corporation's Crystal River facility. The legal notice ran on Monday, October 13, 1997 in the Citrus County Chronicle.

If you should have any questions or require additional information, please do not hesitate to contact me at (813) 866-5158.

Sincerely,

Scott H. Osbourn
Senior Environmental Engineer

Attachment

cc: Jerry Kissel, DEP SW District
Joe Kahn, DEP DARM
Ken Kosky, Golder Associates

RECEIVED

OCT 31 1997

**BUREAU OF
AIR REGULATION**

Proof Of Publication

from the
CITRUS COUNTY CHRONICLE
Crystal River, Citrus County, Florida
PUBLISHED DAILY

STATE OF FLORIDA
COUNTY OF CITRUS

Before the undersigned authority personally
appeared FELICIA H. SATCHELL

of the Citrus County Chronicle, a newspaper
published daily at Crystal River, in Citrus County,
Florida, that the attached copy of advertisement
being a public notice in the matter of the

DEPARTMENT OF ENVIRONMENTAL PROTECTION
PERMIT # 0170004-004-AV

Court, was published in said newspaper in the issues
of

OCTOBER 13, 1997

Affiant further says that the Citrus County Chronicle
is a newspaper published at Crystal River in said
Citrus County, Florida, and that the said newspaper
has heretofore been continuously published in Citrus
County, Florida, each week and has been entered
as second class mail matter at the post office in
Inverness in said Citrus County, Florida, for a period
of one year next preceding the first publication of
the attached copy of advertisement; and affiant
further says that he/she has neither paid nor
promised any person, firm or corporation any
discount, rebate, commission or refund for the
purpose of securing this advertisement for
publication in the said newspaper.

Felicia H. Satchell
The forgoing instrument was acknowledged before
me this 13th day of OCT 19 97

by FELICIA H. SATCHELL
who is personally known to me and who did take
an oath.

Jeanette A. Schmidt
Notary Public
Jeanette A. Schmidt
Notary Public, State of Florida
Commission No. CC 669909
My Commission Exp. 08/16/2001
1-800-3-NOTARY - Fla. Notary Service & Binding Co.

4611013 MCRN
PUBLIC NOTICE OF INTENT TO ISSUE
TITLE V AIR OPERATION PERMIT
STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
Title V DRAFT Permit No.: 0170004-004-AV
Crystal River Plant
Citrus County

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit to Florida Power Corporation for the Crystal River Plant located at Power Line Road, West of U.S. Hwy. 19, Crystal River, FL 34428, Citrus County. The applicant's name and address is: Mr. W. Jeffrey Parolus, C.E.P., Director, Environmental Services Department, 3201 34th Street South, St. Petersburg, FL 33711.

The permitting authority will issue Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the Title V DRAFT Permit unless a response is received in accordance with the following procedures results in a different decision or significant changes of terms or conditions.

The permitting authority will accept written comments concerning the proposed Title V DRAFT Permit issuance action for a period of 30 (thirty) days from the date of publication of the Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station # 5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the DRAFT Permit, the permitting authority shall issue a Revised a DRAFT Permit and require, if applicable, another Public Notice.

The permitting authority will issue the permit with attached conditions unless a timely petition for an administrative hearing is filed pursuant to Section 120.569 and 120.57, Florida Statutes (F.S.). Mediation under Section 120.573, F.S., will not be available for this proposed action.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 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 of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000 (Telephone: 904/488-9730; Fax: 850/487-4938). Petitions must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of the notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the applicable time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207 of the Florida Administrative Code.

A petition must contain the following information:
(a) The name, address, and telephone number of each petitioner; the applicant's name and address, the 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 permitting authority's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the permitting authority's action or proposed action;

(d) A statement of the material facts disputed by the petitioner, if any;

(e) A statement of the facts that the petitioner contends warrant reversal or modification of the permitting authority's action or proposed action;

(f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the permitting authority's action or proposed action; and

(g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the permitting authority to take with respect to the action or proposed action addressed in this notice of intent.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661(a)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661(a)(1), to object to the issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661(a)(2) and must be filed with the Administrator of the EPA at 401 M. Street, S.W. Washington, D.C. 20460.

A complete project file 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:

Permitting Authority:
Department of Environmental Protection
Bureau of Air Regulation
1111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-1344
Fax: 850/922-6979

Affected District/Local Program
Department of Environmental Protection
Southwest District Office
8407 Laurel Fair Circle
Tampa, FL 33619
Telephone: 813/744-6100
Fax: 813/744-6458

The complete project file includes the DRAFT Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Scott M. Sheplek, P.E., at the above address, or call 850/488-1344, for additional information.

Published on (1) time in the Citrus County Chronicle, Monday, October 13, 1997.