

Florida
Power
CORPORATION

October 10, 1997

Ms. Kathy Carter
Office of General Counsel
Florida Department of Environmental Protection
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400

Dear Ms. Carter:

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

On September 26, 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. Mr. Scott Osbourn of my staff has had discussions with Mr. Scott Sheplak of the Department who agreed that an extension of time to resolve 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 on the above-referenced draft Title V permit under Sections 120.569 and 120.57, Fla. Stat., up to and including November 6, 1997.

If you should have any questions, please contact Mr. Scott Osbourn 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
Charles Logan, DEP



October 2, 1997

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BUREAU OF
AIR REGULATION

Scott M. Sheplak, P.E.
Florida Department of Environmental Regulation
2600 Blair Stone Rd.
Tallahassee, Florida 32399-2400

Dear Mr. Sheplak:

Re: Relocatable Diesel Generators Associated with FPC's Crystal River, Bartow,
Anclote and Higgins Plant Sites

Please find enclosed a revised air permit for relocatable diesel generators to be used at the above-referenced facilities. Originally, the permit was written for three specific diesel generators that were leased for an outage at FPC's Crystal River nuclear unit. The federally enforceable limit on fuel flow (i.e., 186.3 gal/hr total) was necessary to avoid new source review. As the diesel generators specifically referenced in the permit may not always be necessary or even available, FPC had requested that the permit be amended to make the language more generic. The intent of the federal enforceability is still preserved.

Language in this revised permit is consistent with the comments that have been made by FPC regarding these generators as they have been described in Title V permits for the above-referenced facilities. Transmittal of this permit is intended to supplement FPC's original applications for these plant sites and to further support previous comments made regarding these generators.

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

Sincerely,

Scott H. Osbourn
Senior Environmental Engineer

Enclosure

cc: Ken Kosky, Golder Associates
Robert Manning, HGS&S

10/9/97 cc: Scott Sheplak
Joe Kahn
Ed Svec
Charles Logan



Department of Environmental Protection

JMK
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SEP 30 1997

Environmental Svcs
Department

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

NOTICE OF PERMIT ISSUANCE

CERTIFIED MAIL

In the matter of an
Application for Permit by:

Mr. W. Jeffrey Pardue, CEP
Director, Environmental Services
Department
Florida Power Corporation
3201 34th Street South
St. Petersburg, FL 33711 /

DEP File No.: 0170004-006-AO
Counties: Citrus, Pasco,
Pinellas, Polk, &
Sumter

Enclosed is permit number 0170004-006-AO for the operation of the relocatable diesel generators which can operate in the above counties. Procedures for administrative hearing, mediation, and variance/waiver are described below.

Administrative Hearing

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative hearing in accordance with sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this permit. 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 (or a request for mediation, as discussed below) within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 of the Florida Statutes, 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:

- (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 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 the petitioner if any;
- (e) A statement of the facts that the petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement identifying the rules or statutes that 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 that the petitioner wants the Department to take with respect to the permit.

Because the administrative action or proposed action addressed in this hearing process is designed to formulate final agency action, the filing of a petition means that the Department'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 Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation

A person whose substantial interests are affected by the Department's permitting decision, may elect to pursue mediation by asking all parties to the proceeding to agree to such mediation and by filing with the Department a request for mediation and the written agreement of all such parties to mediate the dispute. The request and agreement must be filed in (received by) the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, by the same deadline as set forth above for the filing of a petition.

A request for mediation must contain the following information:

- (a) The name, address, and telephone number of the person requesting mediation and that person's representative, if any;
- (b) A statement of the preliminary agency action;
- (c) A statement of the relief sought; and
- (d) Either an explanation of how the requester's substantial interests will be affected by the action or proposed action addressed in this permit or a statement clearly identifying the petition for hearing that the requester has already filed, and incorporating it by reference.

The agreement to mediate must include the following:

- (a) The names, addresses, and telephone numbers of any persons who may attend the mediation;
- (b) The name, address, and telephone number of the mediator selected by the parties, or a provision for selecting a mediator within a specified time;
- (c) The agreed allocation of the costs and fees associated with the mediation;

- (d) The agreement of the parties on the confidentiality of discussions and documents introduced during mediation;
- (e) The date, time, and place of the first mediation session, or a deadline for holding the first session, if no mediator has yet been chosen;
- (f) The name of each party's representative who shall have authority to settle or recommend settlement; and
- (g) The signatures of all parties or their authorized representatives.

As provided in section 120.573 of the Florida Statutes, the timely agreement of all parties to mediate will toll the time limitations imposed by sections 120.569 and 120.57 for requesting and holding an administrative hearing. Unless otherwise agreed by the parties, the mediation must be concluded within sixty days of the execution of the agreement. If mediation results in settlement of the administrative dispute, the Department must enter a final order incorporating the agreement of the parties. Persons whose substantial interests will be affected by such a modified final decision of the Department have a right to petition for a hearing only in accordance with the requirements for such petitions set forth above. If mediation terminates without settlement of the dispute, the Department shall notify all parties in writing that the administrative hearing processes under sections 120.569 and 120.57 remain available for disposition of the dispute, and the notice will specify the deadlines that then will apply for challenging the agency action and electing remedies under those two statutes.

Variance/Waiver

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under section 120.542 of the Florida Statutes. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to this permit.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
- (c) Each rule or portion of a rule from which a variance or waiver is requested;
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
- (e) The type of action requested;
- (f) The specific facts that would justify a variance or waiver for the petitioner;

- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in section 120.542(2) of the Florida Statutes, and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

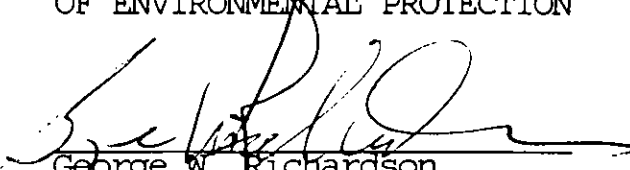
Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of EPA and by the person under the Clean Air Act unless and until Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

This permit is final and effective on the date filed with the Clerk of the Department unless a timely petition for an administrative hearing is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 62-103.070, F.A.C., or a party requests mediation as an alternative remedy before the deadline for filing a petition. Choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement. Upon timely filing of a petition or a request for an extension of time to file the petition or a request for mediation, this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate procedure, with the Clerk of the Department in the Office of General Counsel, Douglas Building, Mail Station 35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Tampa, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


George W. Richardson
Air Permitting Engineer
Southwest District

cc: Kennard F. Kosky, P.E., Golder Associates, Inc.
Pinellas County Department of Environmental Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT ISSUANCE was sent to the addressee by certified mail and all copies were sent by regular mail before the close of business on 9/29/97 to the listed persons, unless otherwise noted.

Clerk Stamp

FILING AND ACKNOWLEDGEMENT FILED,
on this date, pursuant to Section
120.52(7), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.


Clerk

9/29/97
Date



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

PERMITTEE:

Florida Power Corporation
3201 34th Street South
St. Petersburg, FL 33711 /

Permit No.: 0170004-006-AO
Amendment Date:
Expiration Date: 3/31/97
Counties: Citrus, Pasco,
Pinellas, Polk &
Sumter
Project: Relocatable Diesel
Generators

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-204 through 62-297 and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the operation of one to three relocatable diesel generators rated at a maximum total of 2,460 kw (2.46 mw). The maximum total heat input rate is 25.74 MMBTU/hour (186.3 gallons/hour of diesel fuel). The diesel generators burn new/virgin No 2 diesel fuel oil having a maximum sulfur content of 0.5% by weight. The diesel generators may be located at any Florida Power Corporation facility listed below:

- Locations:
- (1) The Crystal River Plant, Powerline Road
Red Level, Citrus County.
 - (2) The Anclote Plant, Anclote Road, west of Alternate
19, Tarpon Springs, Pinellas County.
 - (3) The Bartow Plant, Weedon Island,
St. Petersburg, Pinellas County.
 - (4) The Higgins Plant, Shore Drive, Oldsmar,
Pinellas County.
 - (5) The Bayboro Plant, 13th Avenue & 2nd Street South,
St. Petersburg, Pinellas County.
 - (6) The Wildwood Reclamation Facility, State Road 462,
1 mile east of US 301, Wildwood, Sumter County.
 - (7) The FPC Polk County Site, County Road 555, 1 mile
southwest of Homeland, Polk County.

Facility ID No.: 0004

Emission Unit ID No.:
012-Diesel Generators

PERMITTEE:
Florida Power Corporation

Permit No.: 0170004-006-AO
Project: Relocatable Diesel
Generators

Amends Permit No.: AO09-205952

Note: Please reference Permit No., Facility No., and Emission Unit ID in all correspondence, test report submittals, applications, etc.

1. A part of this permit is the attached 15 General Conditions [Rule 62-4.160, F.A.C.].
2. Visible emissions from each of the diesel generators shall not be equal to or exceed 20% opacity [Rule 62-296.320((4)(b), F.A.C.].
3. Florida Power Corporation shall not discharge air pollutants which cause or contribute to an objectionable odor [Rule 62-296.320(2), F.A.C.].
4. The hours of operation expressed as "engine-hours" shall not exceed 2,970 in any consecutive 12 month period. The hours of operation expressed as "engine-hours" shall be the summation of the individual hours of operation of each diesel generator [Permit AC09-202080].
5. Florida Power corporation is permitted to burn only new/virgin No. 2 diesel fuel oil having a maximum sulfur content not to exceed 0.5% by weight in the diesel generators [Permit AC09-202080].
6. The total heat input rate to all diesel generators shall not exceed 25.74 MMBTU/hour (186.3 gallons/hour) [Permit AC09-202080].
7. Florida Power Corporation shall notify the Department, in writing, at least 15 days prior to the date on which any diesel generator is to be relocated. The notification shall specify:
 - (A) which diesel generator, by serial number, is being relocated;
 - (B) which location the diesel generator is being relocated from;
 - (C) which location the diesel generator is being relocated to; and
 - (d) the approximate startup date at the new location.

If a diesel generator is to be relocated within Pinellas County, then Florida Power Corporation shall provide the same notice to the Pinellas County Department of Environmental Management, Air Quality Division [Rule 62-4.070(3), F.A.C.].

PERMITTEE:
Florida Power Corporation

Permit No.: 0170004-006-AO
Project: Relocatable Diesel
Generators

8. Test each diesel generator for the following pollutants on an annual basis within 30 days of the relocation date. Within 45 days of testing, submit a copy of the test data to the Air Compliance Section of the Department's Southwest District Office and the Pinellas County Department of Environmental Management, Air Quality Division for each diesel generator located in Pinellas County [Rules 62-297.310(7) and 62-297.310(8) (b), F.A.C.].

- (X) Opacity
- (X) Fuel Sulfur Analysis

9. After each relocation, test each relocated diesel generator for then following pollutants within 30 days of startup. Within 45 days of testing, submit a copy of the test data to the Air Compliance Section of the Department's Southwest District Office and the Pinellas County Department of Environmental Management, Air Quality Division for each diesel generator located in Pinellas County [Rules 62-297.310(7) and 62-297.310(8) (b), F.A.C.].

- (X) Opacity
- (X) Fuel Sulfur Analysis

10. Compliance with the emission limitations specified in Specific Condition No. 2 shall be determined using EPA Method 9. The test method is contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. The Method 9 compliance test shall be conducted by a certified observer and be a minimum of 30 minutes. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A.

11. Testing of each diesel generator shall be accomplished while the diesel generator is being operated within 90 to 100% of the maximum fuel firing rate in gallons per hour. Failure to submit the actual operating rate during the test may invalidate the test data [Rule 62-4.070(3), F.A.C.].

12. The permittee shall notify the Air Compliance Section of the Department's Southwest District Office and the Pinellas County Department of Environmental Management, Air Quality Division, if applicable, at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted (Rule 62-297.340(1) (i), F.A.C.).

PERMITTEE:
Florida Power Corporation

Permit No.: 0170004-006-AO
Project: Relocatable Diesel
Generators

13. Compliance with Specific Condition No. 4 shall be documented by record keeping. At a minimum, the records shall indicate the daily hours of operation of each individual diesel generator expressed as "engine-hours", and a cumulative total hours of operation expressed as "engine-hours" for each month. The records shall be recorded in a permanent form suitable for inspection and shall be retained for at least the most recent 2 years and be made available for inspection by the Department or the Pinellas County Department of Environmental Management, Air Quality Division, if applicable, upon request [Rule 62-4.070(3), F.A.C.,].

14. In order to document continuing compliance with the sulfur content limitations, in % by weight, the permittee shall keep records of either vendor provided as-shipped analysis or an analysis of as-received samples taken at the plant. The analysis shall be determined by ASTM Methods ASTM D4057-88 and ASTM D129-91, ASTM D2622-94 or ASTM D4294-90 adopted by reference in Rule 62-297.440(1), F.A.C. The records shall be recorded in a permanent form suitable for inspection and shall be retained for at least the most recent 2 years and be made available for inspection by the Department or the Pinellas County Department of Environmental Management, Air Quality Division, if applicable, upon request [Rule 62-4.070(3), F.A.C.,].

15. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provisions in Rule 62-296.320(4)(c), F.A.C. These provisions are applicable to any source, including but not limited to, vehicular movement, transportation of materials, construction, alterations, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling.

16. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Florida Administrative Code Rules 62-204, 62-210, 62-212, 62-296, 62-297 & 62-4 or any other requirements under federal, state, or local law [Rule 62-210.300, F.A.C.,].

17. Florida Power Corporation shall submit to the Air Section of the Department's Southwest District Office each calendar year on or before March 1, completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility," for the preceding calendar year (Rule 62-210.370(3)(a)2., F.A.C.). The Report shall contain at a minimum the following information:

- (A) the location of each diesel generator, by serial number, at the end of the preceding calendar year;

PERMITTEE:
Florida Power Corporation

Permit No.: 0170004-006-AO
Project: Relocatable Diesel
Generators


Specific Condition No. 17 continued:

- (B) the annual amount of fuel burned in each diesel generator, by serial number;
- (C) the annual hours of operation of each diesel generator, by serial number;
- (D) the annual hours of operation expressed in "engine-hours", as defined in Specific Condition No. 4;
- (E) a copy of the fuel sulfur content records required by Specific Condition No. 14 for the preceding calendar year;
- (F) annual emissions of particulate, PM_{10} , carbon monoxide, SO_2 , and NO_x based on actual diesel generator operation and fuel usage (provide a copy of the calculation sheets and the basis for calculations);
- (G) any changes in the information contained in the permit application.

If any diesel generator operated within Pinellas County at any time during the preceding calendar year, then Florida Power Corporation shall provide a copy of the AOR to the Pinellas County Department of Environmental Management, Air Quality Division.

18. At least 60 days prior to the expiration date of this operation permit, the permittee shall submit at least two copies of DEP Short Form No. 62-210.900(2), for the renewal of this operating permit along with the processing fee established in Rule 62-4.050(4), F.A.C., and a copy of the latest compliance tests to the Air Permitting Section of the Department's Southwest District Office and one copy to the Pinellas County Department of Environmental Management, Air Quality Division, if applicable [Rule 62-4.090(1), F.A.C.].

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


W.C. Thomas, P.E.
District Air Program
Administrator
Southwest District

ATTACHMENT - 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 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. 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 acknowledgement 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 Florida Statutes 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:

GENERAL CONDITIONS:

- 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.

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 Florida Statutes 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 Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, 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.

GENERAL CONDITIONS:

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.
- 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.

Date: 10/13/97 12:09:19 PM
From: Elizabeth Walker TAL
Subject: Revised posting
To: See Below

There is a revision to a draft permit on the web to reduce the quantity of used oil burned, clarify that all boilers may burn used oil, and to correct a couple of typographical errors.

FLORIDA POWER CORPORATION Crystal River Plant 0170004004AV

If you have any questions, please let me know.

Thanks,
Elizabeth

To: adams yolanda
To: pierce carla
To: Barbara Boutwell TAL
To: Scott Sheplak TAL
To: Terry Knowles TAL
To: gates kim
CC: Joseph Kahn TAL



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

October 9, 1997

Mr. W. Jeffrey Pardue, C.E.P.
Director, Environmental Services Department
Florida Power Corporation
3201 34th Street South
St. Petersburg, FL 33711

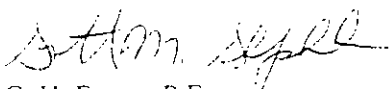
Re: Corrections to DRAFT Title V Permit No.: 0170004-004-AV
Crystal River Plant

Dear Mr. Pardue:

We recently mailed to you the draft Title V permit for the Crystal River plant. Subsequently, the Department met with FPC staff regarding the burning of used oil at the plant. That meeting resulted in several changes to that permit. Attached are revised pages for the draft permit that properly reflect the limitations on burning used oil and that also correct some minor errors in the draft. Please consider these pages, and not the corresponding provisions previously mailed to you, when reviewing the draft permit.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to Scott M. Sheplak, P.E., at the above letterhead address. If you have any other questions, please contact Joseph Kahn, P.E., at 850/488-1344.

Sincerely,

for 
C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/jk

Enclosures

cc: Mr. Scott H. Osbourn, FPC
Mr. Kennard F. Kosky, Golder Associates
Mr. Bill Thomas, P.E., DEP Southwest District, Air Section
Ms. Carla E. Pierce, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)
Ms. Yolanda Adams, U.S. EPA, Region 4 (INTERNET E-mail Memorandum)

10/9/97 cc: Joe Kahn

Initial Title V Air Operation Permit
DRAFT Permit No.: 0170004-004-AV

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Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions units.

E.U. ID No.	Brief Description
001	Fossil Fuel Steam Generator, Unit 1, rated at 440.5 MW, 3750 mmBtu/hr, capable of burning bituminous coal, with number 2 fuel oil as a startup fuel, with emissions exhausted through a 499 ft. stack.
002	Fossil Fuel Steam Generator, Unit 2, rated at 523.8 MW, 4795 mmBtu/hr, capable of burning bituminous coal, with number 2 fuel oil as a startup fuel, with emissions exhausted through a 502 ft. stack.

Fossil Fuel Steam Generators, Units 1 and 2, are pulverized coal dry bottom boilers, tangentially-fired. Emissions are controlled from each unit with a high efficiency electrostatic precipitator, manufactured by Buell Manufacturing Company, Inc.

{Permitting Notes: These emissions units are regulated under Acid Rain, Phase I and II and Rule 62-296.405, F.A.C.; Fossil Fuel Steam Generators with More than 250 million Btu per Hour Heat Input, and Power Plant Siting Certification PA 77-09 conditions. Fossil fuel fired steam generator Unit 1 began commercial operation in 1966. Fossil fuel fired steam generator Unit 2 began commercial operation in 1969.}

The following specific conditions apply to the emissions units listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The maximum operation heat input rates are as follows:

Unit No.	mmBtu/hr Heat Input	Fuel Type
001	3750	Bituminous Coal
002	4795	Bituminous Coal

[Rules 62-4.160(2), 62-210.200(PTE) and 62-296.405, F.A.C.]

A.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition I.11.
[Rule 62-297.310(2), F.A.C.]

A.3. Methods of Operation. Fuels. The only fuel allowed to be burned is bituminous coal, with the exception that number 2 fuel oil may be used as an ignitor fuel. These emissions units may also burn used oil in accordance with other conditions of this permit (see **Subsection K**). Emissions units 001 and 002 may also burn oily flyash in accordance with specific condition A.15 of this permit.

[Rule 62-213.410, F.A.C., 0170004-002-AO and 0170004-005-AO]

quarter. The nature and cause of the excess emissions shall be explained. This report does not relieve the owner or operator of the legal liability for violations.
[Rules 62-213.440 and 62-296.405(1)(g), F.A.C.]

Oily Flyash

A.15. Oily Flyash. These emissions units may burn oily flyash ("flyash") from Bartow Unit 1 in accordance with the following:

- a. Only flyash from Bartow Unit 1 shall be burned in these emissions units. Once the accumulated backlog of Bartow Unit 1 flyash (estimated at approximately 13,000 tons) is burned, only the additional flyash generated at Bartow Unit 1 shall be burned in these emissions units.
- b. The maximum flyash blend rate shall not exceed 2% of the total boiler feed on a weight basis.
- c. The owner or operator shall make and maintain the following records for each day that flyash is burned in the boiler:
 1. Date and Unit number;
 2. Time period of flyash burning and start and end times;
 3. Total quantity of flyash burned in tons per day;
 4. Maximum flyash blend rate during period of flyash burn (percent flyash in total emissions unit fuel feed on a weight basis).

[Rules 62-4.070(3) and 62-213.440, F.A.C., and 0170004-005-AO]

Common Conditions

A.16. This emissions unit is also subject to conditions **I.1** through **I.15** contained in **Subsection I. Common Conditions**.

A.17. These emissions units are also subject to condition **K.1** contained in **Subsection K. Used Oil Common Condition**.

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Subsection B. This section addresses the following emissions unit.

E.U. ID No.	Brief Description
004	Fossil Fuel Steam Generator, Unit 4, rated at 760 MW, 6665 mmBtu/hr, capable of burning bituminous coal , with number 2 fuel oil as a startup fuel, and natural gas as a startup and low-load flame stabilization fuel, with emissions exhausted through a 600 ft. stack.
003	Fossil Fuel Steam Generator, Unit 5, rated at 760 MW, 6665 mmBtu/hr, capable of burning bituminous coal , with number 2 fuel oil as a startup fuel, and natural gas as a startup and low-load flame stabilization fuel, with emissions exhausted through a 600 ft. stack.

Fossil Fuel Steam Generators, Units 4 and 5, are pulverized coal dry bottom boilers, wall-fired. Emissions are controlled from each unit with a high efficiency electrostatic precipitator, manufactured by Combustion Engineering.

{Permitting Notes: These emissions units are regulated under Acid Rain, Phase I and II and Rule 62-210.300, F.A.C., Permits Required and are subject to 40 CFR 60 Subpart D, Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction Is Commenced After August 17, 1971, and Power Plant Siting Certification PA 77-09 conditions. Fossil fuel fired steam generator Unit 4 began commercial operation in 1982. Fossil fuel fired steam generator Unit 5 began commercial operation in 1984.}

The following specific conditions apply to the emissions units listed above:

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The maximum operation heat input rates are as follows:

Unit No.	mmBtu/hr Heat Input	Fuel Type
004	6665	Bituminous Coal
003	6665	Bituminous Coal

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

B.2. Emissions Unit Operating Rate Limitation After Testing. See specific condition **I.11.**
[Rule 62-297.310(2), F.A.C.]

B.3. Methods of Operation. Fuels. The only fuel allowed to be burned is bituminous coal, with the exception that number 2 fuel oil may be used as an ignitor fuel, and natural gas may be used as a startup and low-load flame stabilization fuel. Fuel oil shall not contain more than 0.73% sulfur by weight. These emissions units may also burn used oil in accordance with other conditions of this permit (see **Subsection K**).

[Rule 62-213.410, F.A.C. and PPSC PA 77-09 and modified conditions]

a manner so as to meet the Department's minimum quality assurance requirements as delineated in 40 CFR Parts 50 and 58.14; Part 58, Appendices A, C, D and E; and the Department's *State-Wide Quality Assurance Air Program Plan (Plan)*. Changes to the *Plan* will be distributed by the Department's Bureau of Air Monitoring and Mobile Sources (BAMMS) to the owner or operator. The owner or operator shall comply with *Plan* changes as soon as practicable, but no later than upon renewal of this permit.

The owner or operator shall, within 90 days of the effective permit date, submit to the Department for review and approval standard operating procedures for each monitor, calibrator and ancillary piece of equipment utilized in the production of the required ambient air quality data.

The owner or operator shall submit the required monitoring data and quality assurance results to BAMMS within ninety (90) days after the end of each calendar quarter in an electronic medium and format: either Aerometric Information Retrieval System (AIRS) or Storage and Retrieval of Aerometric Data (SAROAD) for the monitoring data, and the Precision and Accuracy Data (PADATA) format for the quality assurance data, unless other formats are specified by the Department.

The owner or operator shall allow Department auditors, with a minimum of seven (7) days prior notification, access to the monitoring locations for the purpose of the performance of accuracy audits which may be completed in lieu of, or in addition to, the owner or operator's quarterly accuracy audits as specified in 40 CFR, Part 58, Appendix A, 3.2 and 3.4. The owner or operator shall also submit to an annual systems audit as specified in 40 CFR, Part 58, Appendix A, 2.5. The systems audit, which reviews the quality assurance and monitoring effort for the preceding year, shall be conducted between February and June of the year following the year in which the audited data were produced. In addition, the Department staff shall be allowed access to the monitoring locations, with a minimum of seven (7) days prior notification, on an annual basis, for the purpose of determining compliance with the siting requirements as specified in 40 CFR, Part 58, Appendix E.

[PPSC PA 77-09, and order modifying conditions of certification, OGC Case No. 83-0818, dated February 2, 1984, and Rules 62-213.440 and 62-296.405(1)(c)3., F.A.C.]

B.18. Flue Gas Desulfurization (FGD) equipment. Prior to the installation of any FGD equipment, plans and specifications for such equipment shall be submitted to the Department for review and approval.

[PPSC PA 77-09]

Common Conditions

B.19. This emissions unit is also subject to conditions **I.1** through **I.15**, except for **I.2** and **I.3**, contained in **Subsection I. Common Conditions**.

B.20. These emissions units are also subject to conditions **J.1** through **J.5** contained in **Subsection J. NSPS Common Conditions**.

B.21. These emissions units are also subject to condition **K.1** contained in **Subsection K. Used Oil Common Condition**.

Emission Limitations and Standards

C.2. Emission Limitations. Emissions of particulate matter from the following emissions units shall not exceed:

Emissions Unit	Emission Limit (pounds per hour)	Emission Limit (tons per year)
006	3.5 ^a	15.4 ^a
008	0.6 ^a	2.6 ^a
009	2.2 ^b	9.6 ^{b, c}
010	2.2 ^b	9.6 ^{b, c}

Notes:

- a Emission limits based on a BACT Determination proposed 1/26/79, ordered 2/5/79. BACT for emissions units 006 and 007 included a VE limit of 5% opacity.
- b Emission limits based on a BACT Determination ordered 8/16/79.
- c The tons per year limits for emissions units 009 and 010 have been corrected to two decimal places.

[AC 09-256791]

C.3. VE in Lieu of Stack Test. Because the ash handling system emissions units are controlled with baghouses, the Department has waived particulate matter testing requirements and specified an alternate standard of 5% opacity. If the Department has reason to believe that the particulate emission standard applicable to each emissions unit (006, 008, 009 and 010) is not being met, it may require that compliance be demonstrated by stack testing in accordance with rule 62-297, F.A.C.

[Rule 62-297.620(4), F.A.C., AC 09-256791]

C.4. Additional Reasonable Precautions for Control of Particulate Matter Emissions. The owner or operator shall take the following reasonable precautions to control emissions of particulate matter from transport of ash from emissions unit 008 for disposal or use. Ash for transport shall be wetted before loading into open trucks, or dry ash shall be transferred to enclosed tanker trucks.

[Rule 62-4.070(3), F.A.C., AC 09-256791]

Monitoring of Operations

C.5. Annual VE Tests Required. Each emissions unit (006, 008, 009 and 010) shall be tested for visible emissions annually by June 1st using EPA Method 9. Each test shall be a minimum of thirty minutes in duration from each exhaust point, while transferring fly ash from both Units 1 and 2 to the silo (emissions unit 008) at the same time. The tests shall be conducted during a period when both Units 1 and 2 are operating at 90 to 100% of full load while sootblowing. A statement of the Unit loads, verifying the tests were conducted during sootblowing shall be submitted with the test reports.

[Rule 62-4.070(3), F.A.C., AC 09-256791]

Common Conditions

C.6. This emissions unit is also subject to conditions **I.1** through **I.15**, except for **I.3**, contained in **Subsection I. Common Conditions**.

Subsection K. Used Oil Common Condition.

E.U. ID No.	Brief Description
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: The owner or operator shall sample and analyze each batch of used oil to be burned 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.

- 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 279.61 and 761.20(e)]

- (1) The gallons of on-specification used oil accepted and burned each month in each unit. (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 in each unit. (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 batch 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, Air Section, within thirty days of the end of each calendar quarter, the analytical results and the total amount of on-specification used oil generated and burned during the quarter.

The owner or operator shall submit, with the Annual Operation Report form, the analytical results and the total amount of on-specification used oil burned during the previous calendar year.

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

Appendix S
Permit Summary Tables

Table 1-1, Continued

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

Emissions Unit	Brief Description
001	Fossil Fuel Steam Generator, Unit No. 1
002	Fossil Fuel Steam Generator, Unit No. 2

Pollutant	Fuel(s)	Hours per Year	Allowable Emissions			Equivalent Emissions ¹		Regulatory Citations	See Permit Condition(s)
			Standard(s)	lb./hour	TPY	lb./hour	TPY		
PM	Coal No. 2 fuel oil as ignitor ^a	8760	0.1 lb/mmBtu			375 (Unit 1) 479.5 (Unit 2)	1642.5 (Unit 1) 2100.2 (Unit 2)	Rule 62- 296.405(1)(b), F.A.C.	A.6.
PM Soot Blowing & Load Change	Coal No. 2 fuel oil as ignitor ^a	8760	0.3 lb/mmBtu during the 3- hours in any 24-hour period of excess emissions.			1125 (Unit 1) 1438.5 (Unit 2)	615.9 (Unit 1) 787.6 (Unit 2)	Rule 62- 210.700(3), F.A.C.	A.7.
SO ₂	Coal No. 2 fuel oil as ignitor ^a	8760	2.1 lb/mmBtu heat input			7875 (Unit 1) 10,069.5 (Unit 2)	34,492.5 (Unit 1) 44,104.4 (Unit 2)	Rules 62- 213.440, F.A.C. and PPSC PA 77-09	A.8.

Note for Units 1 and 2:

a Used oil may be used as a fuel for Units 1 and 2 pursuant to specific condition K.1 and other conditions of this permit.

Appendix S
Permit Summary Tables

Table 1-1, Continued

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

Emissions Unit	Brief Description
004	Fossil Fuel Steam Generator, Unit No. 4
003	Fossil Fuel Steam Generator, Unit No. 5

Pollutant	Fuel(s)	Hours per Year	Allowable Emissions			Equivalent Emissions ^{1, b}		Regulatory Citations	See Permit Condition(s)
			Standard(s)	lb./hour	TPY	lb./hour	TPY		
PM	Coal ^a	8760	0.10 lb/mmBtu			666.5	2919.3	40 CFR 60.42(a)(1) & (2)	B.4.
VE	Coal ^a	8760	20% opacity (except for one six-minute period per hour of 27% opacity)					40 CFR 60.42(a)(1) & (2)	B.4.
SO ₂	Coal ^a	8760	0.80 lb/mmBtu for liquid fossil fuel 1.2 lb/mmBtu for solid fossil fuel			5332 (liquid) 7998 (solid)	23,354.2 (liquid) 35,031.2 (solid)	40 CFR 60.43(a), (b) and (c), and PPSC PA 77-09	B.5.
NO _x	Coal ^a	8760	0.30 lb/mmBtu for liquid fossil fuel 0.70 lb/mmBtu for solid fossil fuel			1999.5 (liquid) 4665.5 (solid)	8757.8 (liquid) 20,434.9 (solid)	40 CFR 60.44(a)(2) and (3), and (b), and PPSC PA 77-09	B.6.

Notes for Units 4 and 5:

a Number 2 fuel oil allowed as a startup fuel and natural gas allowed as a startup and low-load flame stabilization fuel. Used oil may be used as a fuel for Units 3 and 4 pursuant to specific condition K.1 and other conditions of this permit.

b Equivalent emissions are for each emission unit.

Appendix S
Permit Summary Tables

Table 1-1, Continued

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

Emissions Unit	Brief Description
006	Fly ash transfer (Source 1) from Fossil Fuel Steam Generator (FFSG) Unit 1.
008	Fly ash storage silo (Source 3) for FFSG Units 1 and 2.
009	Fly ash transfer (Source 4) from FFSG Unit 2.
010	Fly ash transfer (Source 5) from FFSG Unit 2.

Pollutant	Fuel(s)	Hours per Year	Allowable Emissions			Equivalent Emissions ¹		Regulatory Citations	See Permit Condition(s)
			Standard(s)	lb./hour	TPY	lb./hour	TPY		
PM for Unit 006		8760		3.5	15.4			BACT, AC 09-256791	C.2.
PM for Unit 008		8760		0.6	2.6			BACT, AC 09-256791	C.2.
PM for Unit 009		8760		2.2	9.6			BACT, AC 09-256791	C.2.
PM for Unit 010		8760		2.2	9.6			BACT, AC 09-256791	C.2.
VE for Units 006, 008, 009 & 010		8760	5% opacity					Rule 62-297.620(4), F.A.C., AC 09-256791	C.2. & C.3.

Appendix S
Permit Summary Tables

Table 2-1, Summary of Compliance Requirements

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

Emissions Unit	Brief Description
001	Fossil Fuel Steam Generator, Unit No. 1
002	Fossil Fuel Steam Generator, Unit No. 2

Pollutant or Parameter	Fuel(s)	Compliance Method	Testing Frequency	Frequency Base Date ¹	Minimum Compliance Test Duration	CMS ²	See Permit Condition(s)
PM VE	Coal No. 2 fuel oil as ignitor ^a	EPA Methods 17 or 5 EPA Method 9	Annual Annual	June 1st June 1st	3 hours 1 hour	-- Yes	A.9, A.13
SO ₂	Coal No. 2 fuel oil as ignitor ^a	EPA Methods 6, 6A, 6B, or 6C.	Each year fuel sampling not performed	June 1st, if required	3 hours	No	A.10
SO ₂	Coal No. 2 fuel oil as ignitor ^a	Fuel sampling and analysis	As fired			--	A.11, A.12

Note for Units 1 and 2:

a Used oil may be used as a fuel for Units 1 and 2 pursuant to specific condition K.1 and other conditions of this permit.

Appendix S
Permit Summary Tables

Table 2-1, Continued

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

Emissions Unit	Brief Description
004	Fossil Fuel Steam Generator, Unit No. 4
003	Fossil Fuel Steam Generator, Unit No. 5

Pollutant or Parameter	Fuel(s)	Compliance Method	Testing Frequency	Frequency Base Date ¹	Minimum Compliance Test Duration	CMS ²	See Permit Condition(s)
VE	Coal ^a	EPA Method 9	Annual	June 1st	1 hour	Yes	B.8, B.12
PM	Coal ^a	EPA Methods 5 and 17	Annual	June 1st	3 hours	--	B.8, B.12
SO ₂	Coal ^a	EPA Methods 6, 6A, 6C	Annual	June 1st	3 hours	Yes	B.8, B.12
NOx	Coal ^a	EPA Methods 7, 7A, 7C, 7D, 7E	Annual	June 1st	3 hours	Yes	B.8, B.12

Note for Units 4 and 5:

a Number 2 fuel oil allowed as a startup fuel and natural gas allowed as a startup and low-load flame stabilization fuel. Used oil may be used as a fuel for Units 3 and 4 pursuant to specific condition K.1 and other conditions of this permit.

Date: 9/29/97 12:17:09 PM
From: Elizabeth Walker TAL
Subject: New postings
To: See Below

There is a new posting available on the Florida Website.

FLORIDA POWER CORPORATION
Crystal River

0170004004AV Draft

If you have any questions please let me know.

Thanks
Elizabeth