



April 29, 2009

Mr. Jeffrey F. Koerner, Administrator  
New Source Review Section  
Air Quality Division  
Florida Department of Environmental Protection  
2600 Blair Stone Road, MS 5000  
Tallahassee, Florida 32399-2400

RECEIVED

MAY 01 2009

Re: **Comments on Draft Permit**  
Progress Energy Florida, Crystal River Power Plant  
Project No. 01700004-022-AC (PSD-FL-383B)

BUREAU OF AIR REGULATION

Dear Mr. Koerner:

This letter is written provides comments from Progress Energy (Progress) on the subject draft permit and notice of intent to issue. Progress Energy published notice of the department's intent to issue on April 21, 2009.

Progress had requested that Condition 15 of Section 3.A be modified to allow for the necessary time required to complete the commissioning, start up and tuning of the Flue Gas Desulfurization System (FGD). In our letter dated February 25, 2009 responding to the department's request for additional information, Progress requested that the following sentence be inserted into condition 15.

During the period between certification of the SO<sub>2</sub> CEMS and the completion of initial shakedown of the FGD, the unit will comply with SO<sub>2</sub> emissions limits set forth in existing Title V permit condition B.5.a.(2) {Permit #017004-015-AV}

In the draft permit, the department wrote:

During the period between certification of the SO<sub>2</sub> CEMS and the completion of initial shakedown of the FGD, the unit will comply with SO<sub>2</sub> emissions limits set forth in current Title V permit, which requires diligent monitoring of the fuel sulfur content.

Progress appreciates the department's effort to accommodate this issue. However, the current Title V permit contains two interlocking conditions, specifying an emissions limit (1.2 lb SO<sub>2</sub>/mmBtu – condition B.5.a) and a coal sulfur specification (0.68% sulfur in the coal – Condition B.5.b). These interlocking conditions were based on the existing situation prior to installation of the FGD, with no SO<sub>2</sub> emission controls. During the period under consideration, the FGD will be in operation, although it may not yet be up to its full removal potential. In addition, as part of the FGD shakedown, Progress would like to utilize some alternate coals to prove out the FGD operation. Accordingly, Progress requests that the commitment to maintain compliance with the limits contained in the current Title V permit be imposed as an emissions limit, verified by the CEMS, but with flexibility from the fuel sulfur standard, recognizing that the FGD will provide removal of SO<sub>2</sub> during this period.

Progress request that the subject sentence be changed to read as follows:

During the period between certification of the SO<sub>2</sub> CEMS and the completion of initial shakedown of the FGD, the unit will comply with SO<sub>2</sub> emissions limits set forth in the current Title V permit condition B.5.a.

PEF appreciates your consideration of this issue. For additional information or to discuss any issues regarding this application, please contact Mr. David Meyer in our St. Petersburg office by telephone at (727) 820-5295 or via email at [dave.meyer@pgnmail.com](mailto:dave.meyer@pgnmail.com).

Sincerely,

Larry E. Hatcher  
Plant Manager

Progress Energy Florida, Inc.  
Crystal River Steam Plant  
15760 W. Powerline Street  
Crystal River, FL 34428