



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

July 10, 2009

ELECTRONIC MAIL - READ RECEIPT REQUESTED

Mr. Larry Hatcher – larry.hatcher@pgnmail.com
Plant Manager
Florida Power Corporation dba Progress Energy Florida
299 First Avenue, North
Mail Code CN77
St. Petersburg, FL 33701

Re: Request for Additional Information Regarding Title V Renewal Application
File No. 0170004-024-AV
Crystal River Power Plant
Citrus County

Dear Mr. Hatcher:

On May 21, 2009 the Department received your application for a Title V air operation permit renewal for the Crystal River Power Plant. The application is incomplete. In order to continue processing your application, the Department will need the additional information requested below pursuant to Rule 62-213.420(1)(b)3., Florida Administrative Code (F.A.C.), and Rule 62-4.070(1), F.A.C. Should your response to any of the items below require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. The Acid Rain Part Application and the Phase II NO_x Averaging Plan Form submitted with the application were not the current application and form. Please re-submit the Acid Rain Part Application and the Phase II NO_x Averaging Plan Form using the current forms that were effective 3/08. These forms may be found at the following website: <http://www.dep.state.fl.us/Air/forms/acidrain.htm>.
2. A Phase II NO_x Compliance Plan Form does not appear to have been submitted with the application. Please submit the Phase II NO_x Compliance Plan Form. This form may be found at the following website: <http://www.dep.state.fl.us/Air/forms/acidrain.htm>. Please note that the DEP version of this form was inadvertently deleted. Until it is replaced, we will be accepting EPA's form number 7610-28, which can be accessed from the above referenced link.
3. Except as specified in item 1, above, the submitted Phase II NO_x averaging plan meets the requirements for approval under the EPA guidelines. However, under the State requirements, Florida can not approve and issue a permit containing a multi-state averaging plan until the Designated Representative (DR) provides a certification that the plan has been approved by all other permitting authorities with jurisdiction over a given plan. Please provide a letter, signed by the DR, confirming that the permitting authorities in North Carolina and South Carolina have approved the averaging plan for the emissions units on this plan that are under their jurisdiction.
4. The Compliance Assurance Monitoring (CAM) Plan submitted with the application appeared to be the one submitted with the facility's 2004 Title V renewal application. Please submit a current CAM Plan, including recent test data correlations to justify the chosen excursion indicator ranges.

5. A review of Department files appeared to indicate that compliance testing for EU003 may not have been conducted for particulate matter (PM) and visible emissions (VE). Please provide PM and VE test reports which show results demonstrating compliance or submit a compliance plan.
6. The application indicated that the diesel generator on the unregulated emission unit list is subject to 40 CFR 63 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.
 - a. Please verify if this diesel generator is also subject to NSPS Subpart IIII.
 - b. Please specify how the facility is complying with the applicable subpart(s).
 - c. Please provide the following information for each emission unit subject to the referenced subparts: in-service date, cylinder displacement, and rule applicability.

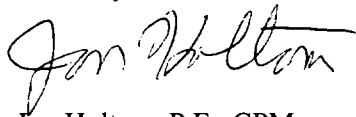
Responsible Official (R.O.) Certification Statement: Rule 62-213.420, F.A.C. requires that all Title V permit applications must be certified by a responsible official. Due to the nature of the information requested in Item number(s) 1, 3, 4 and 5 above, your response should be certified by the responsible official. Please complete and submit a new R.O. certification statement page from the long application form, DEP Form No. 62-210.900(1), effective March 16, 2008.

Professional Engineer (P.E.) Certification Statement: Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. As a result, at a minimum your response to Item number(s) 1, 3, 4, and 5 above should be certified by a professional engineer registered in the State of Florida. Please complete and submit a new P.E. certification statement page from the long application form, DEP Form No. 62-210.900(1), effective March 16, 2008.

The Department must receive a response from you within 90 (ninety) days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)5., F.A.C. In order to ensure that your acid rain permit is effective by January 1, 2010, you are highly encouraged to respond to this request as soon as possible.

If you should have any questions, please call Susan Machinski, Engineering Specialist IV, at 239/332-6975, ext. 109.

Sincerely,



Jon Holtom, P.E., CPM
Title V Program Administrator
Bureau of Air Regulation

JH/sm

Copy to:

Mr. Dave Meyer, Progress Energy Florida, Inc. – dave.meyer@pgnmail.com
Mr. Scott Osbourn - Golder Associates, Inc. – sosbourn@golder.com
Ms. Cyndy Wilkinson, Progress Energy Florida – cyndy.wilkinson@pgnmail.com
Ms. Danielle Henry, DEP – danielle.d.henry@dep.state.fl.us
Ms. Susan Machinski, DEP – susan.machinski@dep.state.fl.us
Ms Vickie Gibson, DEP – victoria.gibson@dep.state.fl.us (for reading file)

Livingston, Sylvia

From: Livingston, Sylvia
Sent: Friday, July 10, 2009 11:42 AM
To: 'larry.hatcher@pgnmail.com'
Cc: 'dave.meyer@pgnmail.com'; 'sosbourn@golder.com'; 'cyndy.wilkinson@pgnmail.com'; Henry, Danielle D.; Machinski, Susan; Gibson, Victoria; Holtom, Jonathan; Friday, Barbara; Walker, Elizabeth (AIR)
Subject: Request for Additional Information - FL Power Corp dba Progress Energy - Crystal River Power Plant (0170004-024-AV)

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software, *noting that you can view the documents*, and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <<http://www.adobe.com/products/acrobat/readstep.html>> .

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506
sylvia.livingston@dep.state.fl.us



RAI

0170004-024-AV.pdf

Tracking:

Livingston, Sylvia

From: Hatcher, Larry [Larry.Hatcher@pgnmail.com]
Sent: Monday, July 13, 2009 2:05 PM
To: Livingston, Sylvia
Subject: RE: Request for Additional Information - FL Power Corp dba Progress Energy - Crystal River Power Plant (0170004-024-AV)

I have received this email. We will be sending you a response to your questions/comments soon.

Larry

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Friday, July 10, 2009 11:42 AM
To: Hatcher, Larry
Cc: Meyer, Dave; sosbourn@golder.com; cyndy.wilkinson@pgnmail.com; Henry, Danielle D.; Machinski, Susan; Gibson, Victoria; Holtom, Jonathan; Friday, Barbara; Walker, Elizabeth (AIR)
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Thank you,

Sylvia Livingston

Bureau of Air Regulation

Division of Air Resource Management (DARM)

850/921-9506

Livingston, Sylvia

From: Meyer, Dave [Dave.Meyer@pgnmail.com]
Sent: Monday, July 13, 2009 1:54 PM
To: Livingston, Sylvia
Subject: RE: Request for Additional Information - FL Power Corp dba Progress Energy - Crystal River Power Plant (0170004-024-AV)

Hi Sylvia,

I have received the following e-mail... I also received the attachment. Thank you very much, Dave 727-820-5295

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Friday, July 10, 2009 11:42 AM
To: Hatcher, Larry
Cc: Meyer, Dave; sosbourn@golder.com; cyndy.wilkinson@pgnmail.com; Henry, Danielle D.; Machinski, Susan; Gibson, Victoria; Holtom, Jonathan; Friday, Barbara; Walker, Elizabeth (AIR)
Subject: Request for Additional Information - FL Power Corp dba Progress Energy - Crystal River Power Plant (0170004-024-AV)

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Thank you,

Sylvia Livingston

Bureau of Air Regulation

Division of Air Resource Management (DARM)

850/921-9506

Livingston, Sylvia

From: Machinski, Susan
Sent: Monday, July 13, 2009 8:18 AM
To: Livingston, Sylvia
Subject: RE: Request for Additional Information - FL Power Corp dba Progress Energy - Crystal River Power Plant (0170004-024-AV)

Sylvia,

I have received and can view.

Thanks,
Susan

From: Livingston, Sylvia
Sent: Friday, July 10, 2009 11:42 AM
To: larry.hatcher@pgnmail.com
Cc: dave.meyer@pgnmail.com; sosbourn@golder.com; cyndy.wilkinson@pgnmail.com; Henry, Danielle D.; Machinski, Susan; Gibson, Victoria; Holtom, Jonathan; Friday, Barbara; Walker, Elizabeth (AIR)
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Sylvia Livingston
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Division of Air Resource Management (DARM)
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sylvia.livingston@dep.state.fl.us

<< File: RAI 0170004-024-AV.pdf >>