



Robby A. Odom  
Plant Manager  
Crystal River Fossil Plant & Fuel Operations

March 21, 2011

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BUREAU OF  
AIR REGULATION

Mr. Jon Holtom, P.E.  
Title V Administrator  
Florida Department of Environmental Protection  
Bureau of Air Regulation  
2600 Blair Stone Road, MS#5505  
Tallahassee, Florida 32399-2400

RE: Progress Energy Florida – Crystal River Energy Complex  
Draft/Proposed Title V Air Operation Permit Revision (Permit No. 0170004-25-AV)  
Comments on the Draft/Proposed Title V Permit Revision

Dear Mr. Holtom:

Progress Energy Florida (PEF) is in receipt of the draft/proposed Title V Air Operations Permit Revision issued on February 4, 2011 and published for comment on February 21, 2011. PEF has the following comments:

**Comment 1:**

Section I. Subsection A. – In the last sentence of the first paragraph, change “units 4 and 5” to “Units 4 and 5”.

**Comment 2:**

Section III. Subsection B. – The second sentence (“These units began commercial operation in 1984.”) in the newly proposed description should be stricken, as it is inaccurate and un-necessary. The correct information is already contained in the existing Permitting Notes that follow the newly proposed description language.

**Comment 3:**

Section III. Condition B.26. – The phrase “to demonstrate compliance with the emission limits in Specific Conditions B.6. – B.14” should be changed to “to demonstrate compliance with the emission limit in Specific Conditions B.12.”, as this condition now only applies to VOC.

Progress Energy Florida – Crystal River Energy Complex  
Comments on the Draft/Proposed Tile V Permit Revision  
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**Comment 4:**

Section III. Condition B.28. – Please remove the words “opacity and” in the first sentence of this new condition, as there are no new standards for opacity being added to the revised permit that are based on continuous monitoring systems. Alternatively, specify that the opacity standard related to this condition is the opacity standard currently found in Condition B.6.b. only, as the additional opacity standard being added to this permit (in the new Condition B.13.) has compliance shown via Method 9 stack testing only.

**Comment 5:**

Section III. Condition B.33.a. – Please strike the first sentence, as it is historical in nature and does not provide useful information.

**Comment 6:**

Section III. Condition B.33.b. – Suggest that this subsection of Condition 33 become a stand-alone condition to ensure clarity.

**Comment 7:**

Section IV. Appendix F Condition 12.c. – Change “the arithmetic average of all valid hourly averages occurring within that day and the prior 29 operating days” to “the arithmetic average of all valid hourly averages occurring within that month and the prior 11 operating months”, as this is the correct methodology to calculate a 12-month rolling average.

**Comment 8:**

Section IV. Appendix CAM – The application related to this permit revision included a revised Particulate Matter (PM) CAM Plan and a proposed new Sulfuric Acid Mist (SAM) CAM Plan. Neither of these CAM Plans seems to have been addressed in the draft/proposed version of the permit. Please include these new/revised plans in the final version of the permit when issued.

Thank you for the opportunity to provide comments on the draft/proposed permit revision. If you have any questions regarding these comments please contact Jamie Hunter at (727) 820-5764 or at [John.Hunter@PGNmail.com](mailto:John.Hunter@PGNmail.com).

Sincerely,



Robby A. Odom  
Plant Manager & Responsible Official  
Crystal River Fossil Plant & Fuel Operations

xc : Joe Attalla, FDEP Tallahassee (via email only)  
Ana Oquendo, EPA Region 4 (via email only)