



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road, MS#5505
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

September 9, 2011

Electronically Sent – Received Receipt Requested

Mr. Robert Odom, Plant Manager
Progress Energy Florida
299 First Avenue North, CN77
St. Petersburg, FL 33701

Re: Project No. 0170004-032-AC
Supplements Permit No. 0170004-026-AC
Crystal River Power Plant, Units 4 and 5
Collection of Supplemental Baseline Sulfuric Acid Mist (SAM) Emissions Data
Letter of Authorization

Dear Mr. Odom:

The Department acknowledges receipt of the Crystal River Power Plant's email request (August 30, 2011) for authorization to temporarily discontinue lime injection for up to two weeks to establish a meaningful baseline SAM emission rate. In accordance with Permit No. 0170004-026-AC, the plant is in the process of evaluating the injection of lime (and other sorbents) to control SAM emissions. Previous authorizations allow the plant to discontinue ammonia injection for a period of time in order to purge residual ammonia and reestablish baseline SAM emissions with the only control being from the new wet flue gas desulfurization (FGD) system. Preliminary tests with lime injection show excellent results ranging from 0.0010 to 0.0015 lb/MMBtu, which is well below the permit limit of 0.009 lb/MMBtu. One of these runs was conducted with no ammonia or lime injection. This indicates that residual ammonia and/or lime may be interfering with establishing a true baseline SAM emission rate. This current request is similar to what has been previously authorized for temporarily discontinuing ammonia injection to establish baseline SAM emissions used to develop meaningful performance curves that identify the appropriate injection rate for mitigating SAM emissions.

The request is granted and the plant is authorized to temporarily discontinue the injection of ammonia and/or lime (or other previously authorized sorbents) for up to 14 days to establish a baseline SAM emission rate (prior to control by the acid mist mitigation systems). During this period, SAM emissions will continue to be reduced by the wet FGD system. The plant shall observe the Breen probes for estimated changes in the SAM emission rates. After this purging period, the plant will conduct stack tests as necessary to establish the baseline SAM emission rate and performance curves that identify the appropriate lime injection rates for given operational conditions. This authorization supplements the current permit requirements and previous authorizations for conducting SAM performance tests.

The Department will consider this action final unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, of the 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 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

Letter of Authorization

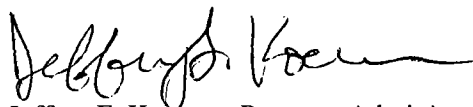
below and must be filed (received) in the Department's Office of General Counsel, MS #35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this notice. Petitions filed by any other person must be filed within 14 days of receipt of this proposed action. 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 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, 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 28-106.205, F.A.C. A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative 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. 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.

Any party to this order has the right to seek judicial review of it under Section 120.68, F.S., by the filing of a Notice of Appeal, under Rule 9.110 of the Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station #35, 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 thirty days from the date this notice is filed with the Clerk of the permitting authority.

Executed in Tallahassee, Florida.



Jeffery F. Koerner, Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management

Letter of Authorization

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this authorization was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on 9-9-2011 to the persons listed below.

Mr. Robert Odom, Progress Energy Florida (robby.odom@pgnmail.com)
Mr. John Hunter, Progress Energy Florida (john.hunter@pgnmail.com)
Ms. Cindy Zhang-Torres, SWD Office (cindy.zhang-torres@dep.state.fl.us)
Ms. Danielle Henry, SWD Office (danielle.d.henry@dep.state.fl.us)
Ms. Cindy Mulkey, DEP Siting Office (cindy.mulkey@dep.state.fl.us)
Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)
Ms. Heather Abrams, EPA Region 4 (abrams.heather@epa.gov)
Ms. Anne Harvey, Earthjustice (aharvey@earthjustice.org)
Ms. Lynn Searce, DEP OPC Reading File (lynn.searce@dep.state.fl.us)

Clerk Stamp

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

Lynn Searce
(Clerk)

September 9, 2011
(Date)

Scearce, Lynn

From: Scearce, Lynn
Sent: Friday, September 09, 2011 10:51 AM
To: 'robby.odom@pgnmail.com'
Cc: 'john.hunter@pgnmail.com'; 'Zhang-Torres'; Henry, Danielle D.; Mulkey, Cindy; 'forney.kathleen@epa.gov'; 'abrams.heather@epa.gov'; Koerner, Jeff; 'aharvey@earthjustice.org'; Scearce, Lynn; Friday, Barbara
Subject: 0170004-032-AC, Crystal River Power Plant, Letter of Authorization, 9-9-11
Attachments: 0170004-032-AC, Crystal River Power Plant, LOA, signature page 9-9-11.pdf

Tracking:	Recipient	Delivery	Read
	'robby.odom@pgnmail.com'		
	'john.hunter@pgnmail.com'		
	'Zhang-Torres'		Read: 9/9/2011 10:55 AM
	Henry, Danielle D.	Delivered: 9/9/2011 10:51 AM	
	Mulkey, Cindy	Delivered: 9/9/2011 10:51 AM	
	'forney.kathleen@epa.gov'		
	'abrams.heather@epa.gov'		
	Koerner, Jeff	Delivered: 9/9/2011 10:51 AM	Read: 9/9/2011 10:52 AM
	'aharvey@earthjustice.org'		
	Scearce, Lynn	Delivered: 9/9/2011 10:51 AM	Read: 9/9/2011 10:51 AM
	Friday, Barbara	Delivered: 9/9/2011 10:51 AM	Read: 9/9/2011 10:51 AM
	Zhang-Torres	Delivered: 9/9/2011 10:51 AM	

Dear Mr. Odom:

Attached is the official **Letter of Authorization** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; 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".

Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Owner/Company Name: FLORIDA POWER CORPORATION D/B/A PROGRESS
Facility Name: CRYSTAL RIVER POWER PLANT
Project Number: 0170004-032-AC
Permit Status: FINAL
Permit Activity: CONSTRUCTION
Facility County: CITRUS

Click on the following link to access the permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0170004.032.AC.F_pdf.zip

The Office of Permitting and Compliance 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. Access these documents by clicking on the link provided above, or search for other project documents using the "Air Permit Documents Search" website at <http://www.dep.state.fl.us/air/emission/apds/default.asp>.

Permit project documents addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Office of Permitting and Compliance.

Note: The attached 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>> .

Regards,

Lynn Searce

Office of Permitting and Compliance (OPC)

Division of Air Resources Management

850-717-9025

Scearce, Lynn

From: Odom, Robby A [Robby.Odom@pgnmail.com]
Sent: Saturday, September 10, 2011 12:39 PM
To: Scearce, Lynn
Subject: RE: 0170004-032-AC, Crystal River Power Plant, Letter of Authorization, 9-9-11

I have received and can view the documents.

Thanks you

From: Scearce, Lynn [mailto:Lynn.Scearce@dep.state.fl.us]
Sent: Friday, September 09, 2011 10:51 AM
To: Odom, Robby A
Cc: Hunter, John J (Jamie); Zhang-Torres; Henry, Danielle D.; Mulkey, Cindy; forney.kathleen@epa.gov; abrams.heather@epa.gov; Koerner, Jeff; aharvey@earthjustice.org; Scearce, Lynn; Friday, Barbara
Subject: 0170004-032-AC, Crystal River Power Plant, Letter of Authorization, 9-9-11

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Lynn Searce

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Division of Air Resources Management

850-717-9025

Please take a few minutes to share your comments on the service you received from the department by clicking on this link. [DEP Customer Survey](#).

Scearce, Lynn

From: Hunter, John J (Jamie) [John.Hunter@pgnmail.com]
Sent: Friday, September 09, 2011 10:55 AM
To: Scearce, Lynn
Subject: RE: 0170004-032-AC, Crystal River Power Plant, Letter of Authorization, 9-9-11
Attachments: image001.jpg

received...

From: Scearce, Lynn [Lynn.Scearce@dep.state.fl.us]
Sent: Friday, September 09, 2011 10:50 AM
To: Odom, Robby A
Cc: Hunter, John J (Jamie); Zhang-Torres; Henry, Danielle D.; Mulkey, Cindy; forney.kathleen@epa.gov; abrams.heather@epa.gov; Koerner, Jeff; aharvey@earthjustice.org; Scearce, Lynn; Friday, Barbara
Subject: 0170004-032-AC, Crystal River Power Plant, Letter of Authorization, 9-9-11

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Owner/Company Name: FLORIDA POWER CORPORATION D/B/A PROGRESS Facility Name: CRYSTAL RIVER POWER PLANT Project Number: 0170004-032-AC Permit Status: FINAL Permit Activity: CONSTRUCTION Facility County: CITRUS

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http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0170004.032.AC.F_pdf.zip

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Lynn Searce
Office of Permitting and Compliance (OPC) Division of Air Resources Management
850-717-9025

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Scearce, Lynn

From: Henry, Danielle D.
To: Scearce, Lynn
Sent: Monday, September 12, 2011 8:42 AM
Subject: Read: 0170004-032-AC, Crystal River Power Plant, Letter of Authorization, 9-9-11

Your message was read on Monday, September 12, 2011 8:41:37 AM (GMT-05:00) Eastern Time (US & Canada).

Scearce, Lynn

From: Odom, Robby A [Robby.Odom@pgnmail.com]
To: Scearce, Lynn
Sent: Friday, September 09, 2011 10:52 AM
Subject: Read: 0170004-032-AC, Crystal River Power Plant, Letter of Authorization, 9-9-11

Your message was read on Friday, September 09, 2011 10:51:41 AM (GMT-05:00) Eastern Time (US & Canada).

Scearce, Lynn

From: Hunter, John J (Jamie) [John.Hunter@pgnmail.com]
To: Scearce, Lynn
Sent: Friday, September 09, 2011 10:52 AM
Subject: Read: 0170004-032-AC, Crystal River Power Plant, Letter of Authorization, 9-9-11

Your message was read on Friday, September 09, 2011 10:51:41 AM (GMT-05:00) Eastern Time (US & Canada).

Scearce, Lynn

From: Zhang-Torres
To: Scearce, Lynn
Sent: Friday, September 09, 2011 10:55 AM
Subject: Read: 0170004-032-AC, Crystal River Power Plant, Letter of Authorization, 9-9-11

Your message was read on Friday, September 09, 2011 10:54:39 AM (GMT-05:00) Eastern Time (US & Canada).

Scearce, Lynn

From: Anne Harvey [aharvey@earthjustice.org]
To: Scearce, Lynn
Sent: Friday, September 09, 2011 2:05 PM
Subject: Read: 0170004-032-AC, Crystal River Power Plant, Letter of Authorization, 9-9-11

Your message was read on Friday, September 09, 2011 2:04:58 PM (GMT-05:00) Eastern Time (US & Canada).