

Jamie Hunter

Lead Environmental Specialist Environmental Services & Strategy

June 15, 2012

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

RECEIVED

JUN 18 2012

DIVISION OF AIR
RESOURCE MANAGEMENT

RE:

Progress Energy Florida – Crystal River Power Plant Units 1&2

BART Implementation Plan for Crystal River Power Plant Units 1&2

Facility ID No. 2170004

Dear Mr. Holtom:

Enclosed please find the BART implementation plan for Crystal River Units 1&2.

If you have any questions regarding these documents please contact Jamie Hunter at (727) 820-5764 or at <u>John.Hunter@PGNmail.com</u>.

Sincerely,

Jamie Hunter

Lead Environmental Specialist Environmental Services & Strategy

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BART IMPLEMENTATION PLAN FOR CRYSTAL RIVER POWER PLANT UNITS 1 AND 2

Progress Energy Florida, Inc.

Prepared For: Progress Energy Florida, Inc.

Environmental Services Section 299 First Avenue North, PEB PEF-903

St. Petersburg, FL 33701

Submitted By: Golder Associates Inc.

5100 West Lemon Street

Suite 208

Tampa, FL 33609 USA

Distribution: 4 Copies – Florida Department of Environmental Protection

1 Copy - PEF

1 Copy - Golder Associates Inc.

June 2012

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ATTACHMENT A - Application for Air Permit - Long Form - FDEP Form No. 62-210.900(1)





1.0 BACKGROUND

The 1977 Clean Air Act Amendments established a national goal of "preventing future, and remedying existing, visibility impairment" in 156 national parks and wilderness areas referred to as "mandatory Class I Federal areas." In response to this congressional mandate, the U.S. Environmental Protection Agency (EPA) promulgated its Regional Haze Rule (RHR) on July 1, 1999, codified at 40 CFR 51.300, et seq. 64 Fed. Reg. 35714. The RHR set a long-term ultimate goal of returning visibility in the Class I areas to "natural conditions" by the year 2064. A key component of the RHR was a requirement for certain existing emission sources (i.e., those determined to cause or contribute to visibility impairment in the mandatory Class I areas) to install Best Available Retrofit Technology (BART). BART determinations are made according to EPA guidelines promulgated in July 2005 (70 Fed. Reg. 39104).

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BART determinations consist of three basic components: (1) an identification of all BART-eligible sources; (2) an assessment of whether those BART-eligible sources are in fact subject to BART; and (3) a determination of any BART controls.

A source is BART-eligible if it has the potential to emit 250 tons or more of a visibility-impairing air pollutant, was placed into operation between August 7, 1962 and August 7, 1977, and is included within one of 26 specifically listed source categories. Units 1 and 2 at Progress Energy Florida's (PEF's) Crystal River Power Plant meet these criteria and thus are BART-eligible sources subject to this rule.

BART-eligible sources are subject to BART if they are reasonably anticipated to cause or contribute to any visibility impairment in any Class I area. Thus, a BART-eligible source may be exempt from BART if modeling demonstrates that the source's sulfur dioxide (SO₂), nitrogen oxide (NO_x) and particulate matter (PM) emissions do not contribute to visibility impairment in any Class I area.

A BART determination analysis for PM emissions from the BART-eligible emissions units (i.e., Unit Nos. 1 and 2) at the Crystal River Power Plant was previously submitted to the Florida Department of Environmental Protection (FDEP) in 2007. The visibility assessment only evaluated impacts from PM because Crystal River is subject to EPA's Clean Air Interstate Rule (CAIR) for SO₂ and NO_x, which EPA determined was "better-than-BART," alleviating the need to include SO₂ and NO_x in BART exemption modeling for PM. A BART permit was issued on February 25, 2009 (permit No. 0170004-017-AC), which imposed a revised allowable PM emission limit. Specifically, PM emissions from Unit Nos. 1 and 2 combined are not to exceed 0.04 lb/mmBtu on a weighted average basis of the total heat input during steady state operations and 0.12 lb/mmBtu on a weighted average basis of the total heat input (not to exceed 3 hours in any 24-hour period) during steady state operations. Compliance with these revised standards is to be demonstrated no later than December 31, 2013. Further, the permit assumes that Unit Nos. 1 and 2 will cease to be operated as coal-fired units by December 31, 2020. The permit requires Progress Energy Florida to notify the Department of any developments that would delay the shutdown (or repowering) of Unit Nos. 1 and 2 beyond this date.





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In 2008, CAIR was remanded by the U. S. Circuit Court for the District of Columbia and, in response, on July 6, 2011, EPA issued CAIR's successor, the Cross-State Air Pollution Rule (CSAPR). On December 30, 2011, the court stayed CSAPR, however, leaving CAIR in effect pending judicial review of CSAPR. A decision on CSAPR is expected this Summer.

This circumstance results in some uncertainty for RHR purposes because while EPA issued a final determination that – like CAIR – CSAPR is better-than-BART, CSAPR applies differently in Florida; only regulating ozone-season NO_x and not annual NO_x or SO_2 . As a result, if CSAPR is upheld as is, a BART analysis may be necessary for SO_2 and PM emissions. In light of this uncertainty, FDEP has requested a BART analysis for SO_2 , NO_x and PM emissions from Crystal River Units 1 and 2.

Accordingly, this application is made in a cooperative effort to address RHR implementation issues resulting from recent regulatory developments related to EPA's CAIR and its successor, CSAPR. Depending on the court's decision on CSAPR, Progress Energy Florida may revisit, revise or withdraw this analysis and application.



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2.0 CRYSTAL RIVER BART IMPLEMENTATION PLAN

BART-eligible sources determined to be subject to BART must conduct a five-factor analysis to determine required controls unless it is demonstrated that the source: (1) is subject to a better-than-BART alternative pursuant to 40 CFR 51.308(e)(2)-(3); or, (2) already has top-level controls in use.

The Crystal River Power Plant BART Implementation Plan includes the following components:

- Progress Energy Florida will complete a BART five-factor analysis for Crystal River Unit Nos. 1 and 2 relative to visibility impairment at the Class I areas within 300 km of the plant, including:
 - Saint Marks National Wilderness Area (NWA) 174 km
 - Chassahowitzka NWA 21 km
 - Wolf Island NWA 293 km
 - Okefenokee NWA- 178 km

The analysis will include cost, remaining useful life and visibility improvement factors focusing on maximum level control-technology for SO₂, NOx and PM.

- Progress Energy Florida will make a final decision by January 1, 2015 or within 2 years of EPA's final approval of Florida's final Regional Haze SIP, whichever is later, on the Crystal River BART Implementation Plan which includes, at a minimum, either the installation of BART control equipment or commitment to a unit-specific retirement date in order to meet BART requirements or taking a permit limit sufficient to exempt out of BART. To implement this decision, Progress Energy Florida is applying for a Florida Air Construction Permit for Crystal River Units 1 and 2 to:
 - Install and operate a SO₂ Flue Gas Desulfurization (FGD) scrubber system before January 1, 2018 or within 5 years of EPA's final approval of Florida's final Regional Haze SIP, whichever is later. This system will be designed to meet either 95 percent removal efficiency of SO₂ from Crystal River Units 1 and 2 or an emission rate limit of 0.15 lb/mmBtu (presumptive BART) from Crystal River Units 1 and 2; or
 - Commit to retire the operations of Crystal River Units 1 and 2 by December 31, 2020 based upon a "remaining useful life" cost-effectiveness evaluation; or
 - Agree to a permit limit for SO₂ by January 1, 2018 or within 5 years of EPA's final approval of Florida's final Regional Haze SIP, whichever is later, at a level sufficient to exempt out of BART or meet other control options identified in the BART five-factor analysis.
- Progress Energy Florida will request that such conditions be included in a federally enforceable air construction permit and incorporated into the Crystal River Title V Permit as a specific operating condition.



ATTACHMENT A
APPLICATION FOR AIR PERMIT—LONG FORM
DEP FORM NO. 62-210.900(1)



Department of Environmental Protection Division of Air Resource Management ESOURCE MANAGEMENT DIVISION OF AIR FOR AIR PERMIT - LONG FORM DIVISION OF AIR TON FOR AIR PERMIT - LONG FORM

Air Construction Permit – Use this form to apply for an air construction permit:

- For any required purpose at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air operation permit;
- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment new source review, or maximum achievable control technology (MACT);
- To assume a restriction on the potential emissions of one or more pollutants to escape a requirement such as PSD review, nonattainment new source review, MACT, or Title V; or
- To establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial, revised, or renewal Title V air operation permit.

To ensure accuracy, please see form instructions.

<u>Id</u>	entification of Facility		
	Facility Owner/Company Name: FLORID ENERGY, INC.	DA POWER CORF	PORATION DBA PROGRESS
2.	Site Name: CRYSTAL RIVER POWER PLANT	•	
3.	Facility Identification Number: 0170004		
4.	Facility Location Street Address or Other Locator: NORTH OF	CRYSTAL RIVER	R, WEST OF U.S. 19
	City: CRYSTAL RIVER County: C	ITRUS	Zip Code: 34428
5.	Relocatable Facility? ☐ Yes ⊠No	6. Existing Tit ⊠ Yes	le V Permitted Facility? ☐ No
<u>A</u> p	oplication Contact		
1.	Application Contact Name:		
JA	MIE HUNTER, LEAD ENVIRONMENTAL SPECI	ALIST	
2.	11		
	Organization/Firm: PROGRESS ENERGY FL	ORIDA	
	Street Address: 299 FIRST AVENUE, NO	RTH, PEF 903	
	City: ST. PETERSBURG Sta	te: FL	Zip Code: 33701
3.	Application Contact Telephone Numbers		
	Telephone: (727) 820-5764 ext.	Fax: (727) 82	0-5292
4.	Application Contact E-mail Address: John.	Hunter@PGNma	il.com
Ap	oplication Processing Information (DEP Us	e)	
1.	Date of Receipt of Application:	3. PSD Numb	per (if applicable):
2	Project Number(s) A Month And A	Siting Num	ober (if applicable)

DEP Form No. 62-210.900(1) - Form

Purpose of Application

This application for air permit is being submitted to obtain: (Check one)
Air Construction Permit
Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.
Air Operation Permit
☐ Initial Title V air operation permit.
☐ Title V air operation permit revision.
☐ Title V air operation permit renewal.
☐ Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
☐ Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.
Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)
☐ Air construction permit and Title V permit revision, incorporating the proposed project.
☐ Air construction permit and Title V permit renewal, incorporating the proposed project.
Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:
☐ I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

Florida Power Corporation, doing business as Progress Energy Florida, Inc. (PEF), has conducted a five-factor best available retrofit technology (BART) determination analysis for the Crystal River Power Plant. As part of this analysis, PEF has developed a BART Implementation Plan which includes the installation of BART control equipment or commitment to a unit specific retirement date in order to meet BART requirements or taking a permit limit sufficient to exempt out of BART. PEF is applying for an Air Construction Permit for Crystal River Units 1 and 2 in order to implement the options included in the BART Implementation Plan.

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Processing Fee
001	Unit 1 Fossil Fuel Steam Generator (FFSG)	AC1F	NA
002	Unit 2 FFSG	AC1F	NA
.,			

Application Processing Fee	
Check one: Attached - Amount:	Not Applicable ■

DEP Form No. 62-210.900(1) – Form

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name:

ROBBY ODOM, PLANT MANAGER

2. Owner/Authorized Representative Mailing Address...

Organization/Firm: PROGRESS ENERGY FLORIDA

Street Address: 299 FIRST AVENUE, NORTH, CN77

City: ST PETERSBURG State: FLORIDA Zip Code: 33701

3. Owner/Authorized Representative Telephone Numbers...

Telephone: (352) 501-5682

ext. Fax: (352) 501-5787

4. Owner/Authorized Representative E-mail Address: ROBBY.ODOM@PGNMAIL.COM

5. Owner/Authorized Representative Statement:

I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.

Signature

6/14/12 Date

Application Responsible Official Certification

Complete if applying for an initial, revised, or renewal Title V air operation permit or concurrent processing of an air construction permit and revised or renewal Title V air operation permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1.	. Application Responsible Official	Name:	,		
2.	Application Responsible Official Qualification (Check one or more of the following options, as applicable):				
	charge of a principal business fur decision-making functions for th person if the representative is res	nction, or any other pers e corporation, or a duly sponsible for the overall	on who performs similar policy or authorized representative of such operation of one or more ng for or subject to a permit under		
	For a partnership or sole propriet	-			
	For a municipality, county, state officer or ranking elected official		agency, either a principal executive		
	The designated representative at	an Acid Rain source or	CAIR source.		
3.	. Application Responsible Official Organization/Firm:	Mailing Address			
	Street Address:				
	City:	State:	Zip Code:		
4.	Telephone: ext. Fax:				
5.	Application Responsible Official	E-mail Address:			
6.	. Application Responsible Official Cer	rtification:			
I, th	the undersigned, am a responsible office application. I hereby certify, bas that the statements made in this a of my knowledge, any estimates reasonable techniques for calcula pollution control equipment described to comply with all applicable states statutes of the State of Florida and revisions thereof and all other ap the Title V source is subject. I under the Title V source is subject. I under the transferred without authorizated department upon sale or legal transferred that the facility and each of the state of th	cial of the Title V source ted on information and by application are true, accurate of emissions reported in a ting emissions. The air cribed in this application and ards for control of air and rules of the Department plicable requirements id anderstand that a permit, ion from the department are of the facility or an emissions unit are in control of the department of the facility or an emissions unit are in control of the facility or an emissions unit are in control of the facility or an emissions unit are in control of the facility or an emissions unit are in control of the facility or an emissions unit are in control of the facility or an emissions unit are in control of the facility or an emissions unit are in control of the facility of	relief formed after reasonable inquiry, trate and complete and that, to the best this application are based upon pollutant emissions units and air will be operated and maintained so as pollutant emissions found in the nt of Environmental Protection and entified in this application to which if granted by the department, cannot, and I will promptly notify the my permitted emissions unit. Finally, I		
	Signature		Date		

DEP Form No. 62-210.900(1) – Form

<u>Pr</u>	ofessional Engineer Certification		
1.	Professional Engineer Name: Scott H. Osbourn		
	Registration Number: 57557		
2.	Professional Engineer Mailing Address		
	Organization/Firm: Golder Associates Inc.*		
	Street Address: 5100 West Lemon St., Suite 208		
	City: Tampa State: FL Zip Code: 33609		
3.	Professional Engineer Telephone Numbers		
	Telephone: (813) 287-1717 ext. 53304 Fax: (813) 287-1716		
4.	Professional Engineer E-mail Address: sosbourn@golder.com		
5.	Professional Engineer Statement:		
	I, the undersigned, hereby certify, except as particularly noted herein*, that:		
	(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and		
	(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.		
	(3) If the purpose of this application is to obtain a Title V air operation permit (check here \square , if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.		
	(4) If the purpose of this application is to obtain an air construction permit (check here \boxtimes , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here \square , if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.		
	(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.		
	Signature		
	(seal)		

* Board of Professional Engineers Certificate of Authorization # 00001670

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DEP Form No. 62-210.900(1) – Form Effective: 03/11/2010

II. FACILITY INFORMATION A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates Zone 17 East (km) 334.3 North (km) 3204.5		2. Facility Latitude/Longitude Latitude (DD/MM/SS) 28/57/34 Longitude (DD/MM/SS) 82/42/01		
3. Governmental Facility Code: 0	4. Facility Status Code:	5. Facility Major Group SIC Code: 49	6. Facility SIC(s): 4911	
7. Facility Comment:				

Facility Contact

1.	Facility Contact Name: JAMIE HUNTER, LEAD ENVIRONMENTAL SPECIALIST	
2.	Facility Contact Mailing Address	
	Organization/Firm: PROGRESS ENERGY FLORIDA	
	Street Address: 299 FIRST AVENUE, NORTH, PEF 903	
	City: ST PETERSBURG State: FLORIDA Zip Code: 33701	
3.	Facility Contact Telephone Numbers:	
	Telephone: (727) 820-5764 ext. Fax:	
4.	Facility Contact E-mail Address: John.Hunter@PGNmail.com	

Facility Primary Responsible Official

Complete if an "application responsible official" is identified in Section I that is not the facility "primary responsible official."

1.	Facility Primary Responsible Office	cial Name:		
2.	Facility Primary Responsible Offic Organization/Firm:	cial Mailing Address		
	Street Address:			
	City:	State:	Zip Code:	
3.	Facility Primary Responsible Office	cial Telephone Number	ers	
	Telephone: () - ext.	Fax: () -		
4.	Facility Primary Responsible Office	cial E-mail Address:		
	•			

DEP Form No. 62-210.900(1) – Form

Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a "major source" and a "synthetic minor source."

1. Small Business Stationary Source Unknown	
2. Synthetic Non-Title V Source	
3. Title V Source	
4. Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. Major Source of Hazardous Air Pollutants (HAPs)	
7. Synthetic Minor Source of HAPs	
8. One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9. One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10. ⊠One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11. Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment:	

DEP Form No. 62-210.900(1) – Form

List of Pollutants Emitted by Facility

1. Pollutant Emitted	2. Po.	llutant Classific	cation	3. Emissions Cap [Y or N]?
PM/PM ₁₀ /PM _{2.5}	A			N
CO	A			N
VOC	A			N
SO ₂	A			N
NO _x	A			N
SAM	A			N
<u> </u>				
				
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DEP Form No. 62-210.900(1) – Form Effective: 03/11/2010

B. EMISSIONS CAPS

Facility-Wide or Multi-Unit Emissions Caps

l. Pollutant	2. Facility-	3. Emissions	4. Ho		. Annual	6. Basis for
Subject to	Wide Cap	Unit ID's	Ca		Cap	Emission
Emissions	[Y or N]?	Under Cap	<u>(</u> lb	/hr)	(ton/yr)	Cap
Cap	(all units)	(if not all units)	1			l
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	 	<u> </u>				
	 					
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		-	<u> </u>			
	<u> </u>					
. Facility-W	ide or Multi-Unit	Emissions Cap Con	ıment:			

DEP Form No. 62-210.900(1) – Form

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1.	Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) Attached, Document ID: \omega Previously Submitted, Date: May 20, 2009							
2.	Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) ☐ Attached, Document ID: ☑ Previously Submitted, Date: May 20, 2009							
3.	Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) Attached, Document ID: \omega Previously Submitted, Date: May 20, 2009							
Ad	Additional Requirements for Air Construction Permit Applications							
1.	Area Map Showing Facility Location: Attached, Document ID: Not Applicable (existing permitted facility)							
2.	Description of Proposed Construction, Modification, or Plantwide Applicability Limit (PAL): Attached, Document ID: CR-FI-C2							
3.	Rule Applicability Analysis: Attached, Document ID: NA							
4.	List of Exempt Emissions Units: Attached, Document ID: Not Applicable (no exempt units at facility)							
5.	Fugitive Emissions Identification: Attached, Document ID: Not Applicable							
	Air Quality Analysis (Rule 62-212.400(7), F.A.C.): ☐ Attached, Document ID: Not Applicable							
7.	Source Impact Analysis (Rule 62-212.400(5), F.A.C.): ☐ Attached, Document ID: Not Applicable							
8.	Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.): ☐ Attached, Document ID: Not Applicable							
9.	Additional Impact Analyses (Rules 62-212.400(8) and 62-212.500(4)(e), F.A.C.): Attached, Document ID: Not Applicable							
10.	Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.):							

DEP Form No. 62-210.900(1) – Form

C. FACILITY ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for FESOP Applications -- NA

1.	List of Exempt Emissions Units:
	☐ Attached, Document ID: ☐ Not Applicable (no exempt units at facility)
<u>A</u>	dditional Requirements for Title V Air Operation Permit Applications - NA
1.	List of Insignificant Activities: (Required for initial/renewal applications only) Attached, Document ID: Not Applicable (revision application)
2.	Identification of Applicable Requirements: (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought) Attached, Document ID: Not Applicable (revision application with no change in applicable requirements)
L	Not Applicable (revision application with no change in applicable requirements)
3.	Compliance Report and Plan: (Required for all initial/revision/renewal applications) Attached, Document ID:
	Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.
4.	List of Equipment/Activities Regulated under Title VI: (If applicable, required for initial/renewal applications only) Attached, Document ID:
	Equipment/Activities Onsite but Not Required to be Individually Listed
	□ Not Applicable
5.	Verification of Risk Management Plan Submission to EPA: (If applicable, required for initial/renewal applications only) Attached, Document ID: Not Applicable
_	
6.	Requested Changes to Current Title V Air Operation Permit: Attached, Document ID: Not Applicable

DEP Form No. 62-210.900(1) – Form

C. FACILITY ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for Facilities Subject to Acid Rain, CAIR, or Hg Budget Program

1. Acid Rain Program Forms:					
Acid Rain Part Application (DEP Form No. 62-210.900(1)(a)):					
☐ Attached, Document ID: ☐ Previously Submitted, Date: May 20, 2009					
Not Applicable (not an Acid Rain source)					
Phase II NO _X Averaging Plan (DEP Form No. 62-210.900(1)(a)1.):					
☐ Attached, Document ID: ☐ Previously Submitted, Date: May 20, 2009 ☐ Not Applicable					
New Unit Exemption (DEP Form No. 62-210.900(1)(a)2.):					
Attached, Document ID: Previously Submitted, Date:					
X Not Applicable					
2. CAIR Part (DEP Form No. 62-210.900(1)(b)):					
☐ Attached, Document ID: ☐ Previously Submitted, Date: May 20, 2009					
Not Applicable (not a CAIR source)					
A 1 life and December Comment					
Additional Requirements Comment					