

Gibson, Victoria

From: Gibson, Victoria
Sent: Wednesday, January 05, 2011 1:48 PM
To: Zhang-Torres; McWade, Tammy; Koerner, Jeff
Cc: Walker, Elizabeth (AIR)
Subject: Florida Power Corporation D/B/A Progress Energy Florida - Crystal River - 0170004-026-AC

A **new application** has been received at FL Department of Environmental Protection Division of Air Resource Management and is currently under review.

Link to Permit Application Documents:

<http://arm-permit2k.dep.state.fl.us/psd/0170004/000055F2.pdf>

ARMS PA Project ID:	0170004-026-AC
Facility Name:	Florida Power Corporation D/B/A Progress Energy Florida - Crystal River
Florida County:	Citrus
Project Description:	AC Permit Application
Permit Application Processor:	Tammy McWade
Processor Phone:	(850) 488-1906
Processor Email Address:	Tammy.McWade@dep.state.fl.us
Received in-house:	1/3/2011

Please direct any questions regarding this permit application to the permit application processor. If you have any problems accessing these documents please let me know.

Thanks,

Vickie

Victoria Gibson, Administrative Secretary for
Trina Vielhauer, Chief, Bureau of Air Regulation
Division of Air Resource Management
victoria.gibson@dep.state.fl.us
850-921-9504 fax 850-921-9533



Larry E. Hatcher
Plant Manager
Crystal River Fossil Plant & Fuel Operations

January 4, 2011

RECEIVED

JAN 07 2011

BUREAU OF
AIR REGULATION

Mr. Jeff Koerner, P.E.
Florida Department of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Road MS 5500
Tallahassee, Florida 32399-2400

Re: Crystal River Energy Complex
Permit No. 0170004-023-AC
Alkaline Injection System Testing Allowance

Dear Mr. Koerner:

As you are aware, Progress Energy Florida (PEF) currently operates an Acid Mist Mitigation (AMM) system at the Crystal River Energy Complex (CREC) Units 4 and 5 as required by the above referenced permit. As required by Condition 16 of the permit, initial Sulfuric Acid Mist (SAM) performance testing was conducted under various operational configurations and an AMM operating protocol was developed and implemented. Subsection f. of Condition 16 states the following:

"The permittee shall operate the alkali injection system in accordance with the operating protocol determined by the performance tests. The permittee may request that additional performance tests be conducted to establish new operating conditions for the alkali injection system due to changes with the fuel blends, the SCR catalyst, or other circumstances."

Operation of the AMM system at injection levels currently outlined in the operating protocol has resulted in limited flexibility to address certain operational issues created by the use of ammonia in the AMM process. The primary operational issues relate to the handling and storage of fly ash containing ammonia constituents by plant personnel, as well as limiting the beneficial reuse opportunities for the ash.

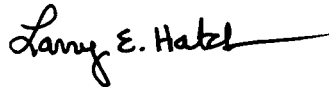
Due to the above circumstances, PEF is requesting to conduct additional performance testing (at full load, with SCR reactor in service) of the system with varying rates of ammonia injection (as contemplated in Condition 16.f, noted above). The objective of the additional testing is to determine an acceptable range of AMM injection rates that maintain compliance while providing flexibility to address operational issues.

Progress Energy Florida, Inc.
Crystal River Steam Plant
15760 W. Powerline Street
CN77
Crystal River, FL 34428

If you have any questions or concerns, please contact Jamie Hunter at (727) 820-5764 or John.Hunter@PGNmail.com. Thank you very much for your consideration of this testing request.

I, the undersigned, am the responsible official as defined in Chapter 62-210.200, F.A.C., of the Title V source for which this document is being submitted. I hereby certify, based on the information and belief formed after reasonable inquiry, that the statements made and data contained in this document are true, accurate, and complete. is

Best regards,

A handwritten signature in black ink that reads "Larry E. Hatcher" followed by a horizontal flourish.

Larry Hatcher
Manager, Crystal River Fossil Plant & Fuel Operations

cc: Bill Schroeder, FDEP SW District

Gibson, Victoria

From: Gibson, Victoria
Sent: Tuesday, February 01, 2011 4:11 PM
To: Zhang-Torres; McWade, Tammy; 'forney.kathleen@epa.gov'
Cc: Walker, Elizabeth (AIR)
Subject: Florida Power Corporation d/b/a Progress Energy Florida - Crystal River Power Plant -- 0170004-026-AC

CORRESPONDENCE has been received at the FL Department of Environmental Protection Div. of Air Resource Management and is currently under review.

Link to Correspondence Documents:

<http://arm-permit2k.dep.state.fl.us/psd/0170004/00005833.pdf>

ARMS PA Project ID:	0170004-026-AC
Facility Name:	Florida Power Corporation d/b/a Progress Energy Florida - Crystal River Power Plant
Florida County:	Citrus
Project Description:	Additional Correspondence
Permit Application Processor:	Tammy McWade
Processor Phone:	850-717-9086
Processor Email Address:	Tammy.McWade@dep.state.fl.us
Received in-house:	2/1/2011

Please direct any questions regarding this correspondence to the permit application processor. If you have any problems accessing these documents please let me know.

Thanks.

Vickie

Victoria Gibson, Administrative Secretary for
Trina Vielhauer, Chief, Bureau of Air Regulation
Division of Air Resource Management
victoria.gibson@dep.state.fl.us
850-717-9091 fax 850-717-9097



Florida Department of Environmental Protection

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

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard, Jr.
Secretary

February 1, 2011

Electronic Mail – Received Receipt Requested

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

Re: **Request for Additional Information**
Project No. 0170004-026-AC (PSD-FL-383D)
Progress Energy Florida, Inc., Crystal River Power Plant
Request for Alternative Acid Mist Mitigation Trials

Dear Mr. Odom:

On January 3, 2011, we received your application and sufficient fee for an air construction permit to implement the changes described below in existing Permit No. 0170004-023-AC (PSD-FL-383C) for Units 4 and 5 at the Crystal River Energy Complex, which is located in Citrus County, north of Crystal River and west of U.S. Highway 19. The original permit authorized the installation of the following new equipment and air pollution controls for existing Units 4 and 5: new selective catalytic reduction (SCR) systems to reduce nitrogen oxides (NO_x); new low-NO_x burners (LNB); new wet flue gas desulfurization (FGD) systems to reduce sulfur dioxide (SO₂) and other acid gas emissions; a new alkali injection system to reduce sulfuric acid mist (SAM) emissions; upgraded electrostatic precipitators (ESP) to reduce particulate matter emissions; and new stack configurations for Units 4 and 5. The application indicates that the project is subject to general preconstruction review pursuant to rule 62-212.300 of the Florida Administrative Code (F.A.C.).

The application is incomplete. In order to continue processing your application, please provide the additional information requested below. At Mr. Hunter's request, we have been trying to schedule a meeting to discuss and resolve these items. This has been difficult since the plant is busy responding to issues related to the transformer failure for Unit 1. Currently, both Unit 1 and 2 are off line. We would still appreciate a meeting. Please contact us when your schedule allows. Should your response to any of the requested items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. Issue: Condition 8e in Permit No. 0170004-023-AC (PSD-FL-383C) specifies the following emissions standards for particulate matter (PM) based on the Best Available Control Technology (BACT):

- As determined by EPA Method 5 or 5b, PM emissions shall not exceed 0.03 lb/MMBtu and 216.0 lb/hour based on a 3-run test average conducted at permitted capacity; and
- As determined by EPA Method 9, the stack opacity shall not exceed 10% based on a 6-minute block average, except for one 6-minute period per hour of not more than 20%.

Request: The application requests an increase of the opacity standard to 15% based on a 6-minute block average, except for one 6-minute period per hour of not more than 20%.

REQUEST FOR ADDITIONAL INFORMATION

Questions: The application indicates actual PM emissions of 0.0066 and 0.0074lb/MMBtu for units 4 and 5 based on compliance stack testing. Corresponding opacity levels were indicated as 7.7% and 6.9%, respectively. The tests demonstrate compliance with the both the PM and opacity BACT standards.

- a) Were these tests conducted after successful completion of the ESP modifications?
- b) Was opacity determined by EPA Method 9? Are there continuous opacity monitoring systems (COMS) installed on either Unit 4 or 5?
- c) Please provide any additional information that indicates technical reasons for difficulty in complying with the current opacity standard.

2. Issue: Condition 8c in Permit No. 0170004-023-AC (PSD-FL-383C) specifies the following emissions standards for sulfuric acid mist (SAM) based on the Best Available Control Technology (BACT), "As determined by EPA Method 8 or 8A, SAM emissions shall not exceed 0.009 lb/MMBtu and 64.8 lb/hour based on a 3-run test average conducted at permitted capacity. This standard applies at all times except during periods of maintenance and repair as authorized by this permit." The technology selected and implemented by Progress Energy Florida, Inc. was an alkali injection system, which injects ammonia after the SCR system and before the ESP and wet scrubber. Although the system successfully mitigates SAM emissions, it has greatly increased the ammonia concentration of fly ash collected by the ESP. Fly ash has beneficial re-use in the production of Portland cement; however, cement plants have begun rejecting fly ash with high concentrations of ammonia due to worker issues.

Request: To investigate further reductions of SAM emissions, the application requests:

- Authorization to apply the following fuel additives directly to coal prior to combustion to reduce the sulfur trioxide (SO_3) from the boiler furnace: Coaltreat 500, Coaltreat 700, magnesium oxide and magnesium hydroxide. The proposed fuel additives are predicted to reduce SO_3 emissions directly as SO_3 sorbents and indirectly by reducing furnace slag, which can increase SO_3 formation.
- As an initial demonstration project, authorization to install temporary equipment to inject the following alternative materials: sodium bicarbonate, calcium hydroxide (hydrated lime), Trona, dry magnesium oxide, sodium bisulfate (SBS), calcium carbonate, micronized limestone and ammonia. The purpose of the trial period is to evaluate successful SAM reduction methods that will improve the fly ash quality for beneficial re-use. During the trial period, the plant requests flexibility from the requirement to comply with the SAM emissions standards. In addition, the application requests authorization to operate the final selected option with the temporary equipment until permanent equipment is installed under a subsequent permit authorizing the new option and equipment.

Questions:

- a) Please provide a brief summary of the SAM emissions test results for each test run conducted to date on Units 4 and 5 including: date of test, test run number, unit capacity (MMBtu/hour), coal blend sulfur content, actual SO_2 emissions rate, ammonia injection rate and actual SAM emissions.
- b) Will fuel additive trials be conducted separately from trials of ammonia alternative injection materials?
- c) Describe how SAM emission reductions will be measured and evaluated with regard to the following trials: fuel additives; ammonia alternative injection materials; and combinations of fuel additives in conjunction with ammonia alternative injection materials.
- d) Define the period of time requested for each defined trial during which the unit may not be able to comply with the SAM BACT emissions limit.
- e) Estimate the predicted increase in SAM emissions from this proposed project.

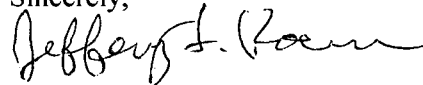
REQUEST FOR ADDITIONAL INFORMATION

- f) Other than the EPA Method 8 or 8A stack test, identify other available techniques for continuously measuring and evaluating SAM emission reductions during the trials.
- g) You are proposing to run multiple trials during a six to eight month period of time. If the demonstration project is successful and Progress Energy of Florida (PEF) chooses to convert some of the successful components to a permanent system, the Department will require a modification to the permit prior to the permanent system being installed. Please comment.
- h) Previous conversations with Jamie Hunter indicated that the plant would be revising this application to include a revised carbon monoxide (CO) BACT emissions standard pursuant to Condition 9 in Permit No. 0170004-023-AC. In addition, this request should address the spike in CO emissions from Unit 5, which appeared to peak in July of 2010.

The above information is requested pursuant to the following F.A.C. regulations: Rule 62-4.050 (Procedures to Obtain Permits and Other Authorizations; Applications); 62-4.055 (Permit Processing); 62-4.070 (Standards for Issuing or Denying Permits; Issuance; Denial); 62-4.120 (Construction Permits); 62-204.800 (Federal Regulations Adopted by Reference); 62-212.300 (Permits Required); 62-210.370 (Emissions Computations and Reporting); 62-210.900 (Forms and Instructions); 62-212.300 (General Preconstruction Review); and 62-212.400 (Prevention of Significant Deterioration). All applications for a Department permit must be certified by a professional engineer registered in the State of Florida pursuant to Rule 62-4.050(3), F.A.C. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the authorized representative or responsible official.

We will resume processing your application after receipt of the requested information. You are reminded that Rule 62-4.055(1), F.A.C. requires applicants to respond to requests for information within 90 days or to provide a written request for an additional period of time to submit the information. If you have any questions regarding this matter, please contact the project engineer, Tammy McWade, at 850/717-9086 or me at 850/717-9083.

Sincerely,



Jeffery F. Koerner, Administrator
New Source Review Section

JFK/ttm

This letter was sent to the following people by electronic mail with received receipt requested.

Mr. Robby Odom, Progress Energy Florida (robby.odom@pgnmail.com)
Mr. John Hunter, Progress Energy Florida (john.hunter@pgnmail.com)
Mr. Scott H. Osbourn, P.E., Golder Associates, Inc. (sosbourn@golder.com)
Ms. Cindy Zhang-Torres, SWD Office (cindy.zhang-torres@dep.state.fl.us)
Mr. Mike Halpin, DEP Siting Office (mike.halpin@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. Ana M. Oquendo, EPA Region 4 (oquendo.ana@epa.gov)
Ms. Vickie Gibson, DEP BAR Reading File (victoria.gibson@dep.state.fl.us)

Walker, Elizabeth (AIR)

From: Walker, Elizabeth (AIR)
Sent: Tuesday, February 01, 2011 3:08 PM
To: 'robby.odom@pgnmail.com'
Cc: 'john.hunter@pgnmail.com'; 'sosbourn@golder.com'; Zhang-Torres; Halpin, Mike; 'Forney.Kathleen@epamail.epa.gov'; 'abrams.heather@epamail.epa.gov'; 'Oquendo.Ana@epamail.epa.gov'; Gibson, Victoria; Koerner, Jeff; McWade, Tammy
Subject: 0170004-026-AC(PSD-FL-383D)/Request for Additional Information
Attachments: RAI_0170004-026-AC.pdf

Dear Sir/Madam:

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

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 accessibility for these document(s).** Your prompt reply will preclude subsequent e-mail transmissions to verify receipt.

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,

Elizabeth Walker
Bureau of Air Regulation
Division of Air Resource Management (DARM)
(850)717-9093

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>> .

Walker, Elizabeth (AIR)

From: Microsoft Exchange
To: 'robby.odom@pgnmail.com'; 'john.hunter@pgnmail.com'
Sent: Tuesday, February 01, 2011 3:08 PM
Subject: Relayed: 0170004-026-AC(PSD-FL-383D)/Request for Additional Information

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

'robby.odom@pgnmail.com'

'john.hunter@pgnmail.com'

Subject: 0170004-026-AC(PSD-FL-383D)/Request for Additional Information

Sent by Microsoft Exchange Server 2007

Walker, Elizabeth (AIR)

From: Mail Delivery System [MAILER-DAEMON@mx3.golder.com]
To: sosbourn@golder.com
Sent: Tuesday, February 01, 2011 3:09 PM
Subject: Relayed: 0170004-026-AC(PSD-FL-383D)/Request for Additional Information

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

sosbourn@golder.com

Subject: 0170004-026-AC(PSD-FL-383D)/Request for Additional Information



Progress Energy

May 6, 2011

Mr. Jeff Koerner, P.E.
Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road, MS#5505
Tallahassee, Florida 32399-2400

RECEIVED

MAY 09 2011

**BUREAU OF
AIR REGULATION**

RE: Progress Energy Florida – Crystal River Energy Complex
Air Construction Permit Revision (Project No. 0170004-26-AC / PSD-FL-383D)
Public Notice of Intent to Issue Air Permit
Proof of Publication

Dear Mr. Koerner:

Pursuant to the processing requirements of the above noted permit revision, Progress Energy Florida has published the public notice of intent related to the draft air permit revision in the Citrus County Chronicle. Please find enclosed the original notarized Affidavit of Publication related to the notice that was published on April 28, 2011.

If you have any questions regarding this submittal please contact me at (727) 820-5764 or at John.Hunter@PGNmail.com.

Sincerely,

Jamie Hunter
Lead Environmental Specialist
Progress Energy Florida

Enclosure

C (w/enc.): Tammy McWade, FDEP Tallahassee (via email only)
Ana Oquendo, EPA Region 4 (via email only)

Progress Energy Florida, Inc.
P.O. Box 14042
St. Petersburg, FL 33733

Proof of Publication
from the
CITRUS COUNTY CHRONICLE
Crystal River, Citrus County, Florida
PUBLISHED DAILY

STATE OF FLORIDA
COUNTY OF CITRUS

Before the undersigned authority personally appeared

Mary Ann Naczi

Of the Citrus County Chronicle, a newspaper published daily at Crystal River, Citrus County, Florida, that the attached copy of advertisement being a public notice in the matter of the

1075-0428 THCRN PUBLIC NOTICE PUBLIC NOTICE
OF INTENT TO ISSUE AIR PERMIT Florida Department
of Environmental Protection Division of Air Resource
Management, Bureau of Air Regulation Project No.
0170004-026-AC / PSD-FL-383D Progress Energy Florida,
Inc.,

Court, was published in said newspaper in the issues of

April 28th, 2011.

Affiant further says that the Citrus County Chronicle is a Newspaper published at Crystal River in said Citrus County, Florida, and that the said newspaper has heretofore been continuously published in Citrus County, Marion County and Levy County, Florida, each week and has been entered as second class mail matter at the post office in Inverness in said Citrus County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he/she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

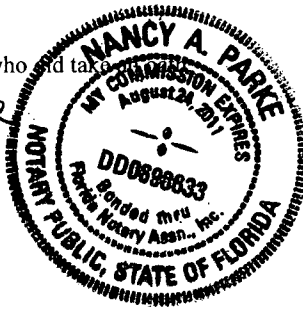
Mary Ann Naczi
The forgoing instrument was acknowledged before me

This 28th day of April 2011

By: Mary Ann Naczi

who is personally known to me and who said take

Nancy A. Parke
Notary Public



1075-0428 THCRN
PUBLIC NOTICE
PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT
Florida Department of Environmental Protection
Division of Air Resource Management, Bureau of Air Regulation
Project No. 0170004-026-AC / PSD-FL-383D
Progress Energy Florida, Inc., Crystal River Power Plant
Citrus County, Florida

Applicant: The applicant for this project is Progress Energy Florida, Inc. The applicant's authorized representative and mailing address is: Mr. Robby Odom, Plant Manager, Crystal River Power Plant, Progress Energy Florida, Inc., 299 First Avenue, North, CN77, St. Petersburg, FL 33701.

Facility Location: The existing Crystal River Power Plant is located north of Crystal River and west of U.S. Highway 19 in Citrus County, Florida.

Project: In accordance with original permit PSD-FL-383 (as modified), the plant is currently installing several air pollution control systems. For this current project, the original permit will be revised to: authorize installation and operation of a temporary demonstration system to evaluate sulfuric acid mist reduction methods for several alternative sorbents; conduct coal additive trials to assess reductions in slag formation, which may reduce the formation of sulfur trioxide and thereby sulfuric acid mist; temporarily increase the stack opacity limit from 10% to 15% during the trials; and revise the current 3.13% maximum sulfur content to an equivalent standard of 5.5 lb of sulfur dioxide per million British thermal units. A successful alternative sorbent will reduce the ammonia levels in fly ash to improve beneficial re-use and potentially mitigate a visible plume from ammonia byproducts. This project is subject to the general preconstruction review requirements in Rule 62-212.300, Florida Administrative Code (F.A.C.), but will not trigger any new preconstruction review requirements in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212, F.A.C. The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Bureau of Air Regulation in the Department of Environmental Protection's Division of Air Resource Management. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/717-9000.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the physical address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S.). Interested persons may contact the Permitting Authority's project engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site: <http://appprod.dep.state.fl.us/air/emission/apds/default.asp>.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air construction permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting 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 below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mall Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall 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 (in a proceeding initiated by another party) 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 Permitting Authority'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 rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the 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 Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. 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.

Mediation: Mediation is not available for this proceeding.

Published in Citrus County Chronicle, April 28, 2011.



Progress Energy

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

May 10, 2011

RECEIVED

MAY 13 2011

**BUREAU OF
AIR REGULATION**

Mr. Jeff Koerner, P.E.
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
Air Construction Permit Revision (Project No. 0170004-26-AV / PSD-FL-383D)
Comments on the Draft Permit Revision

Dear Mr. Koerner:

Progress Energy Florida (PEF) is in receipt of the draft Air Construction Permit Revision issued on April 26, 2011 and published for comment on April 28, 2011. PEF has the following comments:

Comment 1:

Section 3.A. Condition 25 – The term “AAM” is used twice in this condition. The term should be “AMM”.

Comment 2:

Section 3.C. Process Description – The Term “AAM” should be replaced with the term “AMM”.

Comment 3:

Section 3.F. Condition 1 - The Term “AAM” should be replaced with the term “AMM”.

Comment 4:

Section 3.G. Condition 3 – As a point of clarification, the anti-fouling (Breen) probes may only be installed on one unit (either Unit 4 or 5) as a means of evaluating the alternative sorbents and establishing an operating protocol that will be used to operate both Units 4 and 5. Clarifying language, such as “on at least one of the units” may need to be added to the end of the first sentence in this condition (or other clarifying language elsewhere in the conditions).

Progress Energy Florida – Crystal River Energy Complex
Comments on the Draft Air Construction Permit Revision
May 10, 2011 Letter

Comment 5:

Section 3.G. Condition 16 – Please clarify as necessary, the intent that this condition applies to both Unit 4's and Unit 5's ability to request temporary continued use of an alternative sorbent under an established operating protocol that demonstrates compliance (based on the evaluation of either Unit 4 or Unit 5).

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

Sincerely,



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

Attachments

xc: Tammy McWade, FDEP Tallahassee (via email only)
Ana Oquendo, EPA Region 4 (via email only)