



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

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JONATHAN P. STEVERSON
SECRETARY

January 14, 2015

Sent by Electronic Mail – Received Receipt Requested

brian.powers@duke-energy.com

Mr. Brian V. Powers, Station Manager
Crystal River Units 4 and 5 & Fuel Operations
Duke Energy Florida, Inc. (DEF)
299 First Avenue, North
St. Petersburg, Florida 33701

Re: Crystal River Units 4 and 5
MATS Compliance Extension Request
Request for Additional Information

Dear Mr. Powers:

On December 15, 2014 and January 13, 2015 we received your letter request¹ and Title V application, respectively, for a one-year extension of the Mercury and Air Toxics Standards (MATS)² compliance deadline for the coal-fueled Units 4 and 5 at the Crystal River Energy Complex (CREC) until April 16, 2016. Additional information is required to consider your request. Please provide the information requested below (as well as any other information you wish to provide) within 30 calendar days of this notification.

According to the information submitted and based on historical experience, DEF believes the existing air pollution control equipment including selective catalytic reduction (SCR), electrostatic precipitators (ESPs) and wet scrubbers removes mercury (Hg), but that it is re-emitted from the scrubber liquor. DEF is expediting the installation of a re-emissions chemical additive system. Operational testing and analysis will be performed after the projects are completed to ensure consistent and reasonably efficient mitigation of mercury re-emissions. DEF is requesting a one year extension (to April 16, 2016) for compliance with the MATS rule for Units 4 and 5.

The MATS contains emission standards and monitoring requirements for several hazardous air pollutants (HAP) regulated at coal-fueled units. DEF has identified additional monitoring, chemical addition and testing of mercury control and emissions to support a one-year extension. However, the request is for a compliance extension for all requirements under the MATS rule for CREC Units 4 and 5. The Department believes this request is too broad in scope. Please indicate the specific sections and conditions in the MATS rule to which your extension request applies. With regard to the Operation Testing and Analysis for both the trial and installation phases of the proposed schedule, please provide additional details of the work that justifies the durations.

If you have any questions regarding this request, please contact David Read at 850-717-9075 or me at 850-717-9083.

¹ [Link to DEF Letter Request and Title V Application.](#)

² 40 Code of Federal Regulations, Part 63, Subpart UUUUU - National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units. [Link to 40 CFR 63, Subpart UUUUU](#)

Mr. Brian V. Powers
Crystal River Energy Complex
Units 4 and 5 MATS Compliance Date
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Sincerely,

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

cc: Michael Ballenger, P.E., Trinity Consultants: MBallenger@trinityconsultants.com
Jamie Hunter, DEF: Jamie.Hunter@duke-energy.com