From:	Bradley, Chris
To:	Sheplak, Scott
Cc:	Read, David; Bradley, Chris; McGraw, Rachel Lynn; Osbourn, Scott; Hamilton, Suzanne
Subject:	Anclote - Comments on Draft AC/PSD Permit Nos. 1010017-014-AC/PSD-FL-419A
Date:	Wednesday, August 27, 2014 12:59:22 PM

Mr. Scott Sheplak, P.E., Professional Engineer II
Office of Permitting & Compliance
Division of Air Resource Management
Florida Department of Environmental Protection
2600 Blair Stone Road, M.S. 5500
Tallahassee, Florida 32399-2400

RE: Comments on Draft Anclote AC/PSD Revision Permit
Permit No: 1010017-014-AC/PSD-FL-419A
Anclote Power Plant
Facility ID No: 1010017
Pasco County

Good afternoon Scott:

Duke Energy Florida, Inc. (DEF) has completed the review of the above referenced Air Construction/Prevention of Significant Deterioration (AC/PSD) permit. Overall the changes are either representative of the changes requested in the application or related to minor corrections required for accuracy.

The following comments are applicable to the *Technical Evaluation & Preliminary Determination (TE&PD)* and the Project and Facility Description sections of draft Permit Nos. 1010017-014-AC/PSD-FL-419A.

COMMENT: In Section 1.2 Facility Description and Location of the *Technical Evaluation & Preliminary Determination (TE&PD)* the latitude and longitude required minor corrections. Please make the following substitutions:

1.2. Facility Description and Location

This facility is an existing electrical generation plant categorized under Standard Industrial Classification No. 4911. This existing plant is located in Pasco County at 1729 Baillies Bluff Road, Holiday, Florida; UTM Coordinates are: Zone 17, 324.4 km East and 3118.7 km North; and, Latitude: 28°-~~48' 17"~~ 11' 04" North and Longitude: 82° 47' ~~08"~~ 19" West.

COMMENT: In Paragraphs 4 and 5 of Section 2.1 of the *Technical Evaluation & Preliminary Determination (TE&PD)* the name Suwanee appears several times. Please make the following substitutions:

2.1. General PSD Applicability

The list given in the citation includes the category of "fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input". This category applies to the

~~Suwanee~~ Anclote Plant before and after the proposed project. The ~~Suwanee~~ Anclote Plant is a major stationary source based on actual emissions of and potential to emit 100 TPY or more of several individual PSD pollutants.

For major stationary sources such as the ~~Suwanee~~ Anclote Plant, PSD applicability for modification projects is based on thresholds known as the significant emission rates (SER) as defined in Rule 62-210.200(274), F.A.C. Any "net emissions increase" as defined in Rule 62-210.200(204), F.A.C. of a PSD pollutant from the project that equals or exceeds the respective SER is considered "significant". SER also means any emissions rate or any net emissions increase of a PSD pollutant associated with a major stationary source or major modification which would construct within 10 km of a Class I area and have an impact on such area equal to or greater than 1 gram per cubic meter, 24-hour average.

COMMENT: In Condition No. 2 of Se*ction II - Administrative Requirements* of the draft Permit Nos. 1010017-014-AC/PSD-FL-419A the listed contact phone and fax numbers for the Compliance Authority (FDEP's Southwest District Office (SWD)) are incorrect. The correct main and fax numbers are 813-470-5700 and (813) 470-5995, respectively. By mutual agreement in addition to submitting reports U.S. Mail or courier the Southwest District Compliance Authority also accepts reports submitted electronically at the following email address - SWD_AIR@dep.state.fl.us. As a result, DEF request the addition of this method of report submission to the FDEP/SWD as an option.

2. Compliance Authority: All documents related to compliance activities, such as reports, tests, and notifications, shall be submitted to the Department's Southwest District Office at: 13051 North Telecom Parkway, Temple Terrace, Florida 33637-0926, Telephone: (813) ~~632-7600~~ 470-5700, Fax: (813) ~~632-7665~~ 470-5994 or electronically at SWD_AIR@dep.state.fl.us.

COMMENT: In the *Project* Section of the draft Permit Nos. 1010017-014-AC/PSD-FL-419A the latitude and longitude require minor revisions. The correct values have been inserted and the incorrect values have been marked with a strike-through. Please make the following corrections:

PROJECT

This is the final air construction permit, which authorizes revisions to the previously issued air construction (AC)/Prevention of Significant Deterioration (PSD) permits, Permit Nos. 1010017-013-AC/PSD-FL-419 (Project). This facility is an existing electrical generation plant categorized under Standard Industrial Classification No. 4911. This existing plant is located in Pasco County at 1729 Baillies Bluff Road, Holiday, Florida; UTM Coordinates are: Zone 17, 324.4 km East and 3118.7 km North; and, Latitude: 28°-~~48' 17"~~ 11' 04" North and Longitude: 82° 47' ~~08"~~ 19" West.

COMMENT: In the *Facility Description* Section of the draft Permit Nos. 1010017-014-AC/PSD-FL-419A the emergency diesel fire pump has been omitted as an emissions unit. Please make the following insertion:

FACILITY DESCRIPTION

This existing facility consists of two fossil fuel fired steam generators, designated as Unit Nos. 1 and 2. These two units share a common stack. The facility also includes two 12-cell mechanical draft helper cooling towers, two natural gas-fired process heaters, emergency

diesel fire pump and an emergency diesel generator. Also located at the facility are miscellaneous unregulated/insignificant emissions units and/or activities.

If you have any questions, please contact me by telephone at 727/82.5962 or via email at Chris.Bradley@duke-energy.com.

Respectfully,

Chris Bradley
Air Permitting & Compliance
Environmental Services Section
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