

Svec, Ed

From: Gary Robbins [grobbins@co.pinellas.fl.us]
Sent: Tuesday, November 25, 2003 2:00 PM
To: Svec, Ed
Subject: Re: Fwd: DRAFT Permit Revision #1030011-008-AV - PROGRESSENERGY FLORIDA - P.L. BARTOW PLANT

I have reviewed the draft permit, and my comments follow. An edited version of the draft permit is attached.

1. I revised the language in the facility description, regarding the proposed changes to the ESP (authorized under 103011-007-AC), to present tense. (See edited permit)
2. Condition A.9 limits sulfur dioxide emissions to 2.75 pounds per million BTU, when burning liquid fuel. Condition A.10. only limits new No. 6 and on-specification used oil to 2.5 percent by weight sulfur. What about the other fuel oils?
3. Modify condition A.37 to read: "**A.37. Not Federally Enforceable.** Submit to the Air Section of PCDEM each calendar year on or before March 1, a completed "Annual Operating Report for Air Pollutant Emitting Facility" form for the preceding calendar year. "

I suggest removing the emission factors. Emissions factors and methodologies change from time to time, and Pinellas will work with Florida Power on proper calculation methods.

4. Modified condition A.40. to comply with the most current County Code for O&M Plans. (See edited permit)

"
A.40. E.U. ID No. -001 Operation and Maintenance Plan. The rebuilt General Electric Services, Inc. Model 1-BAB1.2X37(9)36.0-434-4.3P electrostatic precipitator shall be operated and maintained in accordance with the PROGRESS ENERGY FLORIDA BARTOW PLANT UNIT #1 ELECTROSTATIC PRECIPITATOR OPERATION AND MAINTENANCE PLAN dated August 2003 and on file with the Department. The O&M Plan documentation logs shall be maintained for a minimum of five years and made available for inspection upon request. At a minimum, the O&M Plan shall include:

1. The operating parameters of the control device.
2. Time table for the routine maintenance of the pollution control device as specified by the manufacturer.
3. A list of the type and quantity of the required spare parts which are stored on

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the premises for the pollution control device.

4. A record log which shows at a minimum when maintenance and observations were performed, what maintenance and observations were performed, by whom, and acceptable parameter ranges for each operational check.

[Rule 62-296.700(6), F.A.C.; and, Pinellas County Code, Section 58-128]"

5. In condition A.20., the permit mentions the use of Method 19 for PM emission determinations. While this is a direct quote from 62-296 F.A.C., I don't believe this is an appropriate Method for this source. This test method is found in Appendix A-7 to Part 60 of the CFR. The CFR states that "Specific uses of these test methods are described in the standards of performance contained in the subparts, beginning with Subpart D." These utility boilers are not subject to these subparts, so Method 19 is not appropriate. Do you agree? In a recent test, the test results came in approximately 25-30% lower using Method 19.

6. Shouldn't the permit be specific on what continuous emission monitors are required to be operated, the calibration and maintenance of the monitors, and reporting requirements of the monitors?